Most Diversified Portfolio SICAV

Société d'Investissement à Capital Variable

Prospectus

May 2023

Most Diversified Portfolio SICAV (the "**Company**") is registered under part I of the Luxembourg law of 17 December 2010 concerning undertakings for collective investment, as may be amended from time to time (the "**Law**"). The Company qualifies as an Undertaking for Collective Investment in Transferable Securities under the Directive 2009/65/EC of the European Parliament and of the Council of 13 July 2009 on the coordination of laws, regulations and administrative provisions relating to undertakings for collective investment in transferable securities. The Company is managed by TOBAM on the basis of freedom of services pursuant to chapter 15 of the Law.

The Shares (as such term is defined below) have not been registered under the United States Securities Act of 1933 and may not be offered directly or indirectly in the United States of America (including its territories and possessions) to nationals or residents thereof or to persons normally resident therein, or to any partnership or persons connected thereto unless pursuant to any applicable statute, rule or interpretation available under United States law.

The distribution of this Prospectus in other jurisdictions may also be restricted; persons into whose possession this Prospectus comes are required to inform themselves about and to observe any such restrictions. This document does not constitute an offer by anyone in any jurisdiction in which such offer is not authorised or to any person to whom it is unlawful to make such offer.

Any information or representation given or made by any person which is not contained herein or in any other document which may be available for inspection by the public should be regarded as unauthorised and should accordingly not be relied upon. Neither the delivery of this Prospectus nor the offer, issue or sale of Shares in the Company shall under any circumstances constitute a representation that the information given in this Prospectus is correct as at any time subsequent to the date of this Prospectus.

All references herein to times and hours are to Luxembourg local time.

In accordance with the EU Regulation 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data and repealing Directive 95/46/EC accompanied with any implementing legislation applicable to them (together, the “Data Protection Regulation”), personal data of investors (including prospective investors) and of other individuals (including, but not limited to, directors, managers, agents and other representatives or employees of the investors) (“Data Subject”) whose personal information collected and provided to the Company and the Management Company in the context of the investor's investments in the Company may be stored on computer systems by electronic means or other means and processed by the Company and the Management Company as data controller, and may be processed in certain circumstances by third party service providers acting as their delegates such as the central administration, as a data processor of the Company and the Management Company.

In certain circumstances, delegates of the Company acting as data processor may however also act as data controller if and when processing personal data for the purposes of complying with their own legal and regulatory obligations (in particular in the context of their own AML and KYC related processes). The Company and the Management Company are committed to protecting the personal data of the Data Subjects, and have taken all necessary steps, to ensure compliance with the Data Protection Regulation in respect of personal data processed by them in connection with investments made into the Company.

This includes (non-exclusively) actions required in relation to: information about processing of your personal data and, as the case may be, consent mechanisms; procedures for responding to requests to exercise individual rights; contractual arrangements with suppliers and other third parties; security measures; arrangements for overseas data transfers and record keeping and reporting policies and procedures.

Personal data shall have the meaning given in the Data Protection Regulation and includes (non-exclusively) any information relating to an identified or identifiable individual, such as the investor’s name, address, invested amount, the investor’s individual representatives ' names as well as the name of the ultimate beneficial owner, where applicable, and such investor’s bank account details.

Personal data will be processed to facilitate the investments in the Company and its ongoing management and administration such processing of subscriptions, redemptions and conversions, and will also be processed in compliance with the legal obligations under Luxembourg law (such as applicable fund law and commercial company law, prevention of terrorism financing and anti-money laundering legislation, prevention and detection of crime, tax law) and all other laws and regulations as may be issued by the European competent authorities, where necessary for the purposes of the Company’s or their delegates’ legitimate interests.

Personal data provided directly by Data Subjects in the course of their relationship with the Company, in particular their correspondence and conversation with the Company, or their delegates may be recorded, and processed in compliance with Data Protection Regulation.

The Company or their delegates may share the personal data to their affiliates and to other entities which may be located outside the EEA. In such case they will ensure that the personal data are protected by appropriate safeguards.

In compliance with the Data Protection Regulation, Data Subjects have certain rights including the right to access their personal data, the right to have incomplete or inaccurate personal data corrected, the right to object to and to restrict the use of the personal data, the right to require the deletion of their personal data, the right to receive their personal data in a structured, commonly used and machine-readable formatted and to transmit those data to another controller. Data Subjects may address any request to the registered office of the Company, or to the Data Protection Officer (“DPO”).

Data Subjects have the right to raise any question or lodge a complaint about the processing of their personal data with the relevant data protection authority.

The personal data are not kept for longer than is necessary for the purposes for which they are processed.

When subscribing to the Shares, each investor will be informed of the processing of his/her personal data (or, when the investor is a legal person, of the processing of such investor’s individual representatives and/or ultimate beneficial owners’ personal data) via a data protection notice which will be made available in the application form issued by the Company to the investors or on the website of the Management Company. This data protection notice will inform the investors about the processing activities undertaken by the Company, the Management Company and their delegates in more details.

DIRECTORY

Most Diversified Portfolio SICAV

Société d'Investissement à Capital Variable

Registered office: 5, allée Scheffer, L-2520 Luxembourg, Grand-Duchy of Luxembourg

RCS: B186947

Board of Directors

Mr. David BELLAICHE, Chief Operating Officer, TOBAM

Mr. Yves CHOUEIFATY, CEO & President, TOBAM

Mr. François MARION, Senior Adviser, BAIN & Company

Mr. Bertrand GIBEAU, Independent Director.

Management Company

TOBAM
49-53, Avenue des Champs Elysées, 75008 Paris, France

Depositary

CACEIS Bank, Luxembourg Branch

5, allée Scheffer, L-2520 Luxembourg, Grand Duchy of Luxembourg

Administration Agent

CACEIS Bank, Luxembourg Branch

5, allée Scheffer, L-2520 Luxembourg, Grand Duchy of Luxembourg

Global Distributor

TOBAM
49-53, Avenue des Champs Elysées, 75008 Paris, France

Auditors

PricewaterhouseCoopers
2, rue Gerhard Mercator, L-1014 Luxembourg, Grand Duchy of Luxembourg

C O N T E N T S

1. PRINCIPAL FEATURES

The following summary is qualified in its entirety by reference to the more detailed information included elsewhere in this Prospectus.

Administration Agent	CACEIS Bank, Luxembourg Branch, acting as registrar and transfer agent, paying agent and administration as further described below
Articles	the articles of association of the Company, as amended from time to time
AML Regulations	the Luxembourg law of 27 October 2010 relating to the fight against money-laundering and the financing of terrorism, the law of 19 February 1973 on the sale of medicinal substances and the fight against drug addiction (as amended), the law of 12 November 2004 on the fight against money laundering and terrorist financing (as amended), and associated Grand Ducal, Ministerial and CSSF Regulations and the circulars of the CSSF applicable as amended from time to time
Appendix	an appendix to this Prospectus
Board of Directors	the board of directors of the Company
Business Day	a full business day on which banks and Eligible Markets are opened in Luxembourg and France
Class(es)	within each Compartment, separate classes of Shares whose assets will be commonly invested but where a specific sales or redemption charge structure, fee structure, minimum investment amount, taxation, distribution policy or other feature may be applied
Compartment(s)	A specific portfolio of assets and liabilities within the Company having its own net asset value and represented by a separate Class or Classes of Shares, which are distinguished mainly by their specific investment policy and objective and/or by the currency in which they are denominated. The specifications of each Compartment are described in the relevant Appendix to this Prospectus
CSSF	the *Commission de Surveillance du Secteur Financier*, the Luxembourg authority supervising the financial sector
Cut-off Time	a deadline (as further specified in the Appendices) before which applications for subscription, redemption, or conversion of Shares of any Class in any Compartment must be received by the Administration Agent in relation to a Valuation Day. For the avoidance of doubt, cut-off times are stated in the Luxembourg time zone (UTC + 1)
Depositary	CACEIS Bank, Luxembourg Branch, 5, allée Scheffer, L-2520 Luxembourg acting as depositary bank in the meaning of the Law
Directive	the Directive 2009/65/EC of 13 July 2009 on the coordination of laws, regulations and administrative provisions relating to undertakings for collective investment in transferable securities as

	amended from time to time including by means of Directive 2014/91/EU
Diversification Ratio©	TOBAM's Diversification Ratio® (DR) measures to what extent a portfolio is diversified. The DR^2 (square of the diversification ratio) measures the number of effective degrees of freedom to which a portfolio is exposed.
Directive 2014/91/EU	The Directive 2014/91/EU of the European Parliament and of the Council dated 23rd July 2014 amending the Directive as regards depository functions, remuneration policies and sanctions
Eligible Market	a Regulated Market in an Eligible State
Eligible State	any Member State or any other state in (Eastern and Western) Europe, Asia, Africa, Australia, North and South America and Oceania, as determined by the Board of Directors
ESG	environmental, social and governance
ESG factors	also known as sustainability factors, are, among others, environmental, social and employee matters, respect for human rights, anti-corruption and anti-bribery matters
EU	the European Union
EUR	the lawful currency of the member states of the European Union that have adopted the single currency in accordance with the Treaty establishing the European Community (signed in Rome on 25 March 1957) as the same may be amended from time to time
FATCA Rules	the regulations relating to Information Reporting by Foreign Financial Institutions and Other Foreign Entities released by the IRS on 28th January 2013 (the "FATCA Regulations"), all subsequently published Fatca announcements and as the case may be, the provisions of the intergovernmental agreement (IGA) entered between Luxembourg and the United States and/or between the country of each investor and the US
FATF	Financial Action Task Force (also referred to as *Groupe d'Action Financière*)
Feeder Compartment	a Compartment of the Company which investment policy consists in investing at least 85 % of its assets in units/shares in a Master Fund according to article 77 of the Law, by way of derogation from Article 2(2) first indent, Articles 41, 43 and 46, and Article 48(2) third indent of the Law, as further described in the relevant Appendix
Investment Manager	the investment manager appointed by the Management Company (as the case may be) for a specific Compartment as further detailed in the Appendix
Issue Price	the net asset value per relevant Share/ Share Class of a Compartment as determined on the applicable Valuation Day plus the applicable sales commission (if any)
KIID	the key investor information document as defined by the Law and applicable laws and regulations

Law	the law of 17 December 2010 concerning undertakings for collective investments, as may be amended from time to time
Management Company	TOBAM, a "*société par actions simplifiée*" appointed to act as the management company of the Company pursuant to Chapter 15 of the Law
Master Fund	A UCITS, or a sub-fund thereof or a Compartment of the Company, as further described in the relevant Appendix into which a Feeder Compartment invests at least 85 % of its assets and which: (a) has among its unit-holders, at least one feeder UCITS; (b) is not itself a feeder UCITS; and (c) does not hold units of a feeder UCITS
Member State	a member state as defined in the Law
Reference Currency	the currency specified as such in the relevant Appendix to the Prospectus
Regulated Market	a market within the meaning of Article 4(1)14 of Directive 2004/39/EC of the European Parliament and of the Council of 21 April 2004 on markets in financial instruments amending Council Directives 85/611/EEC and 93/6/EEC and Directive 2000/12/EC of the European Parliament and of the Council and repealing Council Directive 93/22/EEC and any other market which is regulated, operates regularly and is recognised and open to the public
Science Based Target Initiative	also known as "SBTI", provides a clearly-defined pathway for companies and financial institutions to reduce greenhouse gas (GHG) emissions, helping to prevent the worst impacts of climate change and future-proof business growth
Securities Financing Transaction	("**SFTs**") (i) a repurchase transaction; (ii) securities lending and securities borrowing; (iii) a buy-sell back transaction or a sell-buy back transaction as defined under the SFTR
SFDR	Regulation (EU) 2019/2088 of the European Parliament and of the Council of 27 November 2019 on sustainability-related disclosures in the financial services sector as amended by Regulation (EU) 2020/842 of the European Parliament and of the Council of 18 June 2020 on the establishment of a framework to facilitate sustainable investment, and amending Regulation (EU) 2019/2088
SFDR Level II	Commission Delegated Regulation (EU) 2022/1288 of 6 April 2022 supplementing SFDR with regard to the regulatory technical standards ("RTS") providing guidance on the sustainability-related disclosures imposed on financial market participants and financial advisers
SFT Agent	any person involved in SFTs as agent, broker, collateral agent or service provider and that is paid fees, commissions, costs or expenses out of the Company's assets or any Compartment's assets
SFTR	Regulation (EU) 2015/2365 of the European Parliament and of the Council of 25 November 2015 on transparency of securities financing

	transactions and of reuse and amending Regulation (EU) No 648/2012
Shares	a share of any Class of any Compartment in the capital of the Company, the details of which being specified in the Appendices
Shareholders	holders of Shares
Subscription / Redemption Settlement Day	the day on which the consideration for subscription, or redemption is fully paid, which is to occur on a day as further specified in each Appendix
Taxonomy Regulation	Regulation (EU) 2020/852 of the European Parliament and of the Council of 18 June 2020 on the establishment of a framework to facilitate sustainable investment, and amending Regulation (EU) 2019/2088
Total Return Swap/TRS	A derivative contract as defined in Regulation (EU) 648/2012, as it may be amended and supplemented from time to time, in which one counterparty transfers the total economic performance, including income from interest and fees, gains and losses from price movements, and credit losses, of a reference obligation to another counterparty.
UCI	undertaking for collective investment within the meaning of the first and second indent of Article 1 (2) of the Directive, whether situated in a Member State or not
UCITS	undertaking for collective investment in transferable securities as defined in the Directive and the Law
UCITS Rules	the set of rules formed by the Directive and any derived or connected EU or national act, statute, regulation, circular or binding guidelines
Underlying Asset	asset(s) to which Compartment may invest in accordance with its investment policy as described in the relevant Compartment's Appendix
Valuation Day	Business Day on which the net asset value per Share is calculated as detailed in the relevant Appendix of each Compartment The Board of Directors may in its absolute discretion amend the Valuation Day for some or all of the Compartments. In such case the Shareholders of the relevant Compartment will be duly informed and the Appendix will be updated accordingly

2. THE COMPANY

Most Diversified Portfolio SICAV is an open-ended collective investment company ("*société d'investissement à capital variable*") established under the laws of the Grand-Duchy of Luxembourg, with an "umbrella" structure comprising different Compartments each may be divided in separate Classes. In accordance with the Law, a subscription of Shares constitutes acceptance of all terms and provisions of the Prospectus and the Articles.

The Company offers investors, within the same investment vehicle, a choice between several Compartments which are distinguished mainly by their specific investment policy and/or by the currency in which they are denominated. The specifications of each Compartment are described in the Appendix.

The assets and liabilities of each Compartment, as further described under 13.5. "Allocation of Assets and Liabilities among the Compartments", shall be segregated from the assets and liabilities of those of the other Compartments, with creditors having recourse only to the assets of the Compartment concerned and where the liabilities cannot be satisfied out of the assets of another Compartment. As between the Shareholders and creditors, each Compartment will be deemed to be a separate entity.

The Board of Directors may, at any time, decide on the creation of further Compartments and in such case, the Appendix will be updated. Each Compartment may have one or more classes of Shares.

3. THE MANAGEMENT COMPANY

The Company has appointed TOBAM to serve as its designated Management Company in accordance with the Law pursuant to a management company services agreement dated 30 April 2014. Under this agreement, the Management Company provides investment management services, administrative agency, registrar and transfer agency services and marketing, principal distribution and sales services to the Company, subject to the overall supervision and control of the Board of Directors of the Company.

The Management Company was incorporated as a French Simplified Limited Company (*société par actions simplifiée)* under the laws of France on 13/06/2006. The Management Company is registered with the Registre de Commerce et des Sociétés de Paris under number 490 505 989. The Management Company is authorised and supervised by the Autorité des Marchés Financiers since June, 14 2006 under the number GP06 0000 19.

The management company services agreement is concluded for an indefinite period of time and may be terminated by either party upon three months' prior written notice or forthwith by notice in writing in the specific circumstances provided in such agreement.

In consideration of its services, the Management Company is entitled to receive fees as indicated in the relevant Appendix to the Prospectus. These fees shall be calculated based on the net asset value of the Compartment and shall be paid quarterly in arrears.

The Management Company may delegate certain of its duties to third parties. Third parties to whom such functions have been delegated by the Management Company will be remunerated directly by the Company (out of the assets of the relevant Compartment), except as otherwise provided in the relevant Appendix.

These remunerations shall be detailed in the relevant Appendix.

4. INVESTMENT POLICIES AND RESTRICTIONS

4.1 General Investment Policies for all Compartments

The Board of Directors determines the specific investment policy and investment objectives of each Compartment, which are described in more detail in the respective Appendix. The investment objectives of the Compartments will be carried out in compliance with the investment restrictions set forth in section 4.3.

Each Compartment seeks an above-average total investment return, comprised principally of long-term capital appreciation, by investing in a diversified portfolio of transferable securities or in financial derivative instruments as described in respect of the investment objective and policies in the relevant Appendix. There can be no assurance that the investment objectives of any Compartment will be achieved.

In the general pursuit of obtaining an above-average total investment return as may be consistent with the preservation of capital, efficient portfolio management techniques may be employed to the extent permitted by the investment and borrowing restrictions stipulated by the Board of Directors.

The Compartments may also hold, for an equivalent amount of up to up to 20% of its assets, ancillary liquid assets which consists of bank deposits at sight such as cash held in current accounts with a bank accessible at any time. The aim of holding ancillary liquid assets is to cover current or exceptional payments, for the time necessary to reinvest in eligible assets provided under article 41(1) of the Law or for a period of time strictly necessary in case of unfavourable market conditions.

The above mentioned 20% limit shall only be temporarily breached for a period of time strictly necessary when, because of exceptionally unfavourable market conditions, circumstances so require and where such breach is justified having regard to the interests of the Shareholders.

The use of cash equivalents such as other deposits, money market instruments and money market funds may only be used if duly described for each Compartment's Appendix.

Investors are invited to refer to the description of the investment policy of each Compartment in the Appendix for details.

The historical performance of the Compartments will be published in the KIID for each Compartment. Past performance is not necessarily indicative of future results.

Responsible and Sustainable Approach

Unless otherwise indicated in the relevant Appendix, the Compartments of the Company are either classified as article 8 or 9 products in accordance with SFDR.

As part of its fiduciary duty, TOBAM is committed to protecting its clients' interests by taking into account all factors that could impact the financial performance and/or risk profile of investee companies. We believe that incorporating ESG within our investment process is not meant to deliver a moral or ethical point of view, nor provide additional performance, but rather is instrumental in managing the risks and makes absolute sense in the context of long-term investments.

Information about the environmental or social characteristics or sustainable objectives for each Compartment of the Company as well as the principal adverse impacts of investment decisions on sustainability factors are specified in the sub-appendix of the relevant Appendix.

Sustainability Risks

1. Integration of Sustainability risks in the investment decisions

The Management Company acknowledges, in reference to article 6 of the Sustainable Finance Disclosure Regulation (the "SFDR") that the investments of the Company are exposed to sustainability risks which represent a potential or actual material risk to maximizing the long-term risk-adjusted returns.

The Management Company has consequently identified and integrated the main features of the sustainability risks into its investment decisions and risk management processes through:

1) Qualitative Criteria: Exclusion Policy;
2) Quantitative Criteria: ESG integration;
3) Quantitative Criteria: Carbon reduction.

1.1) **Exclusion Policy** – The Management Company offers a quantitative management approach which integrates socially responsible investment criteria via an exclusion list.

This exclusion list involves controversial products (Tobacco, Coal, Weapons) and other controversial behaviours (Human rights, Environment and International Laws, severe damages or breaches).

Fossil-fuel focus on five Compartments :
The Management Company also applies a specific fossil-fuel approach to five of its Compartments: TOBAM Anti-Benchmark® Emerging Markets Equity, TOBAM Anti-Benchmark® Global High Yield, TOBAM Maximum Diversification World Equity Protected Fund, TOBAM Anti-Benchmark® High Yield Maturity 2027 and TOBAM Anti-Benchmark® Civil Liberty and Democracy – Emerging Market.
Companies with significant involvement in the production, sales or extraction of fossil fuels (including coal, coal power generation, oil and gas) are excluded from the investment universes.

1.2) **ESG integration** – The Management Company's Research team has built a proprietary methodology to construct the ESG Footprint of each individual security in relevant Compartment, thus deriving the ESG footprint of each sub-fund.

In particular, official data published from Bloomberg are used, in order to monitor the E, S and G criteria for all listed companies of our investment universe, as at least the following indicators are used for the purpose of ESG integration:

E: existence of climate change / biodiversity / energy efficiency policies; green building, water and waste usage;
S: Ethics/Equal opportunity/training/ consumer data protection/whistleblowing policies, CSR committee in place, supply chain management;
G : Number of board meetings per year, % independent directors, chairman tenure, % non-executive directors in board.

As usual, the Management Company's integration efforts is built in parallel to significant research efforts to ensure that these new additions did not significantly impact the characteristics of the relevant sub-fund portfolio in terms of risk/return profile, as well as diversification structure.

1.3) **Carbon Reduction** – The Management Company's research team carried out extensive research on the reduction of the carbon footprint of our portfolios via the implementation of a carbon footprint constraint compared to the market cap weighted benchmark of the investment universe.

Based on the findings of TOBAM's research, it was demonstrated that the integration of the sustainability risks of all of The Management Company's portfolios versus their respective benchmark had no significant impact on average on the Compartment's risk/return profile, nor on its diversification benefits.

More detailed information including TOBAM's Responsible Investment Policy are available at www.tobam.fr/key-documents-policies/.

4.2 Specific Investment Policies for each Compartment

In accordance with the provisions of the Regulation (EU) 2016/1011 of the European Parliament and of the Council of 8 June 2016 on indices used as benchmarks in financial instruments and financial contracts or to measure the performance of investment funds (the “Benchmark Regulation”), the following benchmarks are used to measure the performance and/or to define the asset allocation of the Compartments:

Compartment	Benchmark	Administrator	Included in the Register held by the ESMA
TOBAM Anti-Benchmark World Equity Fund	Bloomberg Developed Markets Large & Mid Cap Net Return Index	Bloomberg Limited	No
TOBAM Anti-Benchmark Global Investment Grade Fund	ICE BofAML Global Corporate Index	ICE Benchmark Administration Limited	No
TOBAM Anti-Benchmark Global High Yield Fund	ICE BofA Global High Yield Index	ICE Benchmark Administration Limited	No
TOBAM Anti-Benchmark Emerging Markets Equity Fund	Bloomberg Emerging Markets Large & Mid Cap Net Return Index	Bloomberg Limited	No
TOBAM Anti-Benchmark Euro Equity Fund	Bloomberg Eurozone Developed Markets Large & Mid Cap Net Return Index	Bloomberg Limited	No
TOBAM Anti-Benchmark Global Equity Fund	Bloomberg Developed Markets Large & Mid Cap Net Return Index	Bloomberg Limited	No
TOBAM Anti-Benchmark Japan Equity Fund	Bloomberg Japan Large & Mid Cap Net Return Index	Bloomberg Limited	No
TOBAM Anti-Benchmark Pacific Ex-Japan Markets Equity Fund	Bloomberg APAC ex Japan Large & Mid Cap Net Return Index	Bloomberg Limited	No
TOBAM Anti-Benchmark US Equity Fund	Bloomberg United States Large & Mid Cap Net Return Index	Bloomberg Limited	No
TOBAM Anti-Benchmark All Countries Equity Fund	Bloomberg World Large & Mid Cap Net Return Index	Bloomberg Limited	No
TOBAM Anti-Benchmark World Ex-USA Equity Fund	Bloomberg World Large & Mid Cap Net Return Index Bloomberg Developed Markets ex US Large & Mid Cap Net Return Index	Bloomberg Limited	No
TOBAM Anti-Benchmark Multi-Asset Fund	Bloomberg Developed Markets Large & Mid Cap Net Return Index and the Bloomberg Emerging Markets Large & Mid Cap Net Return Index	Bloomberg Limited	No
TOBAM Anti-Benchmark SERENITE 90 Fund	Daily-capitalized Euro Short-Term Rate (€STR)	European Central Bank	Yes

TOBAM Maximum Diversification World Equity Protected Fund	TOBAM Maximum Diversification World Developed USD NTR Index	TOBAM	Yes
TOBAM Anti-Benchmark Canada Equity Fund	S&P/TSX Composite Total return Index	S&P DJI Netherlands B.V.	Yes
Most Diversified Portfolio SICAV - TOBAM Anti-Benchmark Civil Liberty and Democracy - All Countries World Equity Fund	Bloomberg World Large & Mid Cap Net Return Index.	Bloomberg Limited	No
Most Diversified Portfolio SICAV - TOBAM Anti-Benchmark Civil Liberty and Democracy – All Countries World Equity Fund Ex-USA	Bloomberg World ex US Large & Mid Cap Net Return Index.	Bloomberg Limited	No
Most Diversified Portfolio SICAV - TOBAM Anti-Benchmark Civil Liberty and Democracy – Emerging Market	Bloomberg Emerging Markets Large & Mid Cap Net Return Index	Bloomberg Limited	No

Certain administrators mentioned above are benefitting from the third country transitional period provided for by article 51(5) of the Benchmark Regulation and have until the end of the Benchmark Regulation transitional period of 31 December 2023 to apply for recognition or endorsement in the European Union in order to be included in the ESMA register. Once the administrators are included in the Register, the Prospectus will be amended accordingly.

In accordance with the provisions of article 28-2 of the Benchmark Regulation, the Management Company has produced and maintains a robust written plan setting out the actions that they would take in the event that a benchmark materially changes or ceases to be provided. The plan is available free of charge at the Management Company office: TOBAM – Client Service - 49/53 Avenue des Champs Elysées – 75008 Paris – France.

The specific investment policy of each Compartment is described in the Appendix.

4.3 Investment and Borrowing Restrictions

The Articles provide that the Board of Directors shall, based upon the principle of spreading of risks, determine the corporate and investment policy of the Company and the investment and borrowing restrictions applicable, from time to time, to the investments of the Company.

The Board of Directors has decided that the following restrictions shall apply to the investments of the Company and, as the case may be and unless otherwise specified for a Compartment in the Appendix, to the investments of each of the Compartments:

I.

(1) The Company, for each Compartment, may invest in:

(a) transferable securities and money market instruments admitted to or dealt in on an Eligible Market;

(b) recently issued transferable securities and money market instruments, provided that the terms of issue include an undertaking that application will be made for admission to official listing on an Eligible Market and such admission is secured within one year of the issue;

(c) units of UCITS and/or other UCI, whether situated in a Member State or not, provided that:

(i) such other UCIs have been authorised under laws which provide that they are subject to supervision considered by the CSSF to be equivalent to that laid down in EU law, and that cooperation between authorities is sufficiently ensured,

(ii) the level of protection for unit holders in such other UCIs is equivalent to that provided for unit holders in a UCITS, and in particular that the rules on assets segregation, borrowing, lending, and uncovered sales of transferable securities and money market instruments are equivalent to the requirements of the Directive,

(iii) the business of such other UCIs is reported in half-yearly and annual reports to enable an assessment of the assets and liabilities, income and operations over the reporting period,

(iv) no more than 10% of the assets of the UCITS or of the other UCIs, whose acquisition is contemplated, can, according to their constitutional documents, in aggregate be invested in units of other UCITS or other UCIs;

(d) deposits with credit institutions which are repayable on demand or have the right to be withdrawn, and maturing in no more than 12 months, provided that the credit institution has its registered office in a Member State or, if the registered office of the credit institution is situated in a third country, provided that it is subject to prudential rules considered by the Luxembourg regulatory authority as equivalent to those laid down in EU law;

(e) financial derivative instruments, including equivalent cash-settled instruments, dealt in on an Eligible Market and/or financial derivative instruments dealt in over-the-counter ("**OTC derivatives**"), provided that:

(i) the underlying consists of instruments covered by this section I. (1), financial indices, interest rates, foreign exchange rates or currencies, in which the Compartments may invest according to their investment objective;

(ii) the counterparties to OTC derivative transactions are institutions subject to prudential supervision, and belonging to the categories approved by the CSSF;

(iii) the OTC derivatives are subject to reliable and verifiable valuation on a daily basis and can be sold, liquidated or closed by an offsetting transaction at any time at their fair value at the Company's initiative;

(f) money market instruments other than those dealt in on an Eligible Market, if the issue or the issuer of such instruments are themselves regulated for the purpose of protecting investors and savings, and provided that such instruments are:

(i) issued or guaranteed by a central, regional or local authority or by a central bank of a Member State, the European Central Bank, the EU or the European Investment Bank, a third country or, in case of a Federal State, by one of the members making up the federation, or by a public international body to which one or more Member States belong, or

(ii) issued by an undertaking any securities of which are dealt in on Eligible Markets, or

(iii) issued or guaranteed by an establishment subject to prudential supervision, in accordance with criteria defined by EU law, or by an establishment which is subject to and complies with prudential rules considered by the CSSF to be at least as stringent as those laid down by EU law, such as, but not limited to, a credit institution which has its registered office in a country which is an OECD member state and a FATF State.

(iv) issued by other bodies belonging to the categories approved by the CSSF provided that investments in such instruments are subject to investor protection equivalent to that laid down in the first, the second or the third indent and provided that the issuer is a company whose capital and reserves amount to

(v) at least ten million Euro (10,000,000 EUR) and which presents and publishes its annual accounts in accordance with the fourth directive 78/660/EEC, is an entity which, within a group of companies which includes one or several listed companies, is dedicated to the financing of the group or is an entity which is dedicated to the financing of securitisation vehicles which benefit from a banking liquidity line.

(2) In addition, the Company may invest a maximum of 10% of the net assets of any Compartment in transferable securities and money market instruments other than those referred to under (1) above.

(3) Under the conditions and within the limits laid down by the Law, the Company may, to the widest extent permitted by the Regulations (i) create a Compartment qualifying either as a Feeder Compartment or as a master Fund, (ii) convert any existing Compartment into a Feeder Compartment, or (iii) change the Master Fund of any of its Feeder Compartment.

(a) A Feeder Compartment shall invest at least 85% of its assets in the units of another Master Fund.

(b) A Feeder Compartment may hold up to 15% of its assets in one or more of the following:

(i) ancillary liquid assets in accordance with paragraph II below;

(ii) financial derivative instruments, which may be used only for hedging purposes.

(c) For the purposes of compliance with paragraph II (1) (c) below, the Feeder Compartment shall calculate its global exposure related to financial derivative instruments by combining its own direct exposure under the second indent of under (b) with either:

(i) the Master Fund actual exposure to financial derivative instruments in proportion to the Feeder Compartment investment into the Master Fund; or

(ii) the Master Fund potential maximum global exposure to financial derivative instruments provided for in the Master UCITS management regulations or instruments of incorporation in proportion to the Feeder UCITS investment into the Master UCITS.

A Master Fund may not invest in a Feeder Fund.

Similarly, if a new Compartment is created, while ensuring observance of the principle of risk-spreading, the limits set forth do not have to be complied with by the newly authorised Compartment for a period of six months after the date of its launch in accordance with article 49(1) of the 2010 Law.

If these limits are exceeded for reasons beyond the control of the Company or as a result of the exercise of subscription rights, it must adopt as a priority objective for its sales transactions the remedying of that situation, taking due account the interests of its shareholders.

The Company reserves the right to introduce other investment restrictions at any time, provided that they are compatible with Part I of the 2010 Law and essential to compliance with laws and regulations in force in certain non-Member States where the shares of the Company may be offered or sold.

(4) The Company may hold, for an equivalent amount of up to up to 20% of its assets, ancillary liquid assets which consists of bank deposits at sight such as cash held in current accounts with a bank accessible at any time. The aim of holding ancillary liquid assets is to cover current or exceptional payments, for the time necessary to reinvest in eligible assets provided under article 41(1) of the Law or for a period of time strictly necessary in case of unfavourable market conditions. The above mentioned 20% limit shall only be temporarily breached for a period of time strictly necessary when, because of exceptionally unfavourable market conditions, circumstances so require and where such breach is justified having regard to the interests of the Shareholders.

II.

(a) The Company may invest no more than 10% of the net assets of any Compartment in transferable securities and money market instruments issued by the same issuing body.

(b) The Company may not invest more than 20% of the net assets of any Compartment in deposits made with the same body.

(c) The risk exposure of a Compartment to a counterparty in an OTC derivative transaction may not exceed 10% of its net assets when the counterparty is a credit institution referred to in I. (1) d) above or 5% of its net assets in other cases.

(5) Moreover, where the Company holds on behalf of a Compartment investment in transferable securities and money market instruments of issuing bodies which individually exceed 5% of the net assets of such Compartment, the total of all such investments must not account for more than 40% of the total net assets of such Compartment.

This limitation does not apply to deposits and OTC derivative transactions made with financial institutions subject to prudential supervision.

Notwithstanding the individual limits laid down in paragraph (1), the Company may not combine for each Compartment:

(a) investments in transferable securities or money market instruments issued by a single body,

(b) deposits made with a single body, and/or

(c) exposures arising from OTC derivative transactions undertaken with a single body

(d) in excess of 20% of the net assets of each Compartment.

(6) The limit of 10% laid down in sub-paragraph II. (1) (a) above is increased to a maximum of 35% in respect of transferable securities or money market instruments which are issued or guaranteed by a Member State, its local authorities, or by another Eligible State, including the federal agencies of the United States of America, Federal National Mortgage Association and Federal Home Loan Mortgage Corporation, or by public international bodies of which one or more Member States are members.

(7) The limit of 10% laid down in sub-paragraph II. (1) (a) is increased to 25% for covered bonds as defined in Article 3(1) of Directive (EU) 2019/2162 of the European Parliament and of the Council of 27 November 2019 on the issue of covered bonds and covered bond public supervision and amending Directives 2009/65/EC and 2014/59/EU (the "Directive (EU) 2019/2162"), and for certain bonds when they are issued before 8 July 2022 by a credit institution which has its registered office in a Member State and is subject by law, to special public supervision designed to protect bondholders. In particular, sums deriving from the issue of these bonds issued before 8 July 2022 must be invested in conformity with the law in assets which, during the whole period of validity of the bonds, are capable of covering claims attaching to the bonds and which, in case of bankruptcy of the issuer, would be used on a priority basis for the repayment of principal and payment of the accrued interest.

If a Compartment invests more than 5% of its net assets in the bonds referred to in this sub-paragraph and issued by one issuer, the total value of such investments may not exceed 80% of the value of the assets of the Compartment.

(8) The transferable securities and money market instruments referred to in paragraphs (3) and (4) shall not be included in the calculation of the limit of 40% in paragraph (2).

The limits set out in sub-paragraphs (1), (2), (3) and (4) may not be aggregated and, accordingly, investments in transferable securities or money market instruments issued by the same issuing body, in deposits or in derivative instruments effected with the same issuing body may not, in any event, exceed a total of 35% of any Compartment's net assets;

Companies which are part of the same group for the purposes of the establishment of consolidated accounts, as defined in accordance with the seventh Council Directive 83/349/EEC of 13 June 1983 based on the Article 54 (3) (g) of the Treaty on consolidated accounts, as amended, or in accordance with recognised international accounting rules, are regarded as a single body for the purpose of calculating the limits contained in this paragraph II. (1) to (5).

The Company may cumulatively invest up to 20% of the net assets of a Compartment in transferable securities and money market instruments within the same group.

(9) Notwithstanding the above provisions, the Company is authorised to invest up to 100% of the net assets of any Compartment, in accordance with the principle of risk spreading,

in transferable securities and money market instruments issued or guaranteed by a Member State, by its local authorities or agencies, or by another member State of the OECD, the G20 or Singapore or by public international bodies of which one or more member states of the EU, provided that such Compartment must hold securities from at least six different issues and securities from one issue do not account for more than 30% of the net assets of such Compartment.

III.

(1) Without prejudice to the limits laid down in paragraph IV., the limits provided in paragraph II. (1) to (5) are raised to a maximum of 20% for investments in shares and/or bonds issued by the same issuing body if the aim of the investment policy of a Compartment is to replicate the composition of a certain stock or bond index which is sufficiently diversified, represents an adequate benchmark for the market to which it refers, is published in an appropriate manner and disclosed in the relevant Compartment's investment policy.

(2) The limit laid down in paragraph (1) is raised to 35% where this proves to be justified by exceptional market conditions, in particular on Regulated Markets where certain transferable securities or money market instruments are highly dominant. The investment up to this limit is only permitted for a single issuer.

IV.

(1) The Company may not acquire shares carrying voting rights which should enable it to exercise significant influence over the management of an issuing body.

(2) The Company may acquire no more than:

(e) 10% of the non-voting shares of the same issuer;

(f) 10% of the debt securities of the same issuer;

(g) 10% of the money market instruments of the same issuer;

These limits under second and third indents may be disregarded at the time of acquisition, if at that time the gross amount of debt securities or of the money market instruments or the net amount of the instruments in issue cannot be calculated.

The provisions of paragraph IV. shall not be applicable to transferable securities and money market instruments issued or guaranteed by a Member State or its local authorities or by any other Eligible State, or issued by public international bodies of which one or more member states of the EU are members.

These provisions are also waived as regards shares held by the Company in the capital of a company incorporated in a non-member state of the EU which invests its assets mainly in the securities of issuing bodies having their registered office in that State, where under the legislation of that State, such a holding represents the only way in which the Company can invest in the securities of issuing bodies of that State provided that the investment policy of the company from the non-member state of the EU complies with the limits laid down in paragraph II. (1) to (5), IV. (1) and (2) and V.

V.

(1) Unless otherwise provided for in the Appendix to the Prospectus for a Compartment, no more than 10% of a Compartment's net assets may be invested in aggregate in the units of UCITS and/or other UCIs referred to in paragraph I. (1) (c).

In the case the restriction of the above paragraph is not applicable to a specific Compartment as provided in its investment policy, (i) such Compartment may acquire units of UCITS and/or other UCIs referred to in paragraph I. (1) (c) provided that no more than 20% of the Compartment's net assets be invested in the units of a single UCITS or other UCI, and (ii) investments made in units of UCIs other than UCITS may not in aggregate exceed 30% of the net asset of a Compartment.

For the purpose of the application of this investment limit, each Compartment of a UCITS and UCI with multiple Compartments is to be considered as a separate issuer provided that the principle of segregation of the obligations of the various Compartments vis-à-vis third parties is ensured.

(2) The underlying investments held by the UCITS or other UCIs in which the Company invests do not have to be considered for the purpose of the investment and borrowing restrictions set forth under II. (1) to (5) above.

(3) When the Company invests in the units of UCITS and/or other UCIs linked to the Company by common management or control, no subscription or redemption fees may be charged to the Company on account of its investment in the units of such other UCITS and/or UCIs, except for any applicable dealing charge payable to the UCITS and/or UCIs.

In the case where a substantial proportion of the net assets are invested in investment funds the Appendix of the relevant Compartment will specify the maximum management fee (excluding any performance fee, if any) charged to the Compartment and each of the UCITS or other UCIs concerned.

(4) The Company may acquire no more than 25% of the units of the same UCITS or other UCI. This limit may be disregarded at the time of acquisition if at that time the net amount of the units in issue cannot be calculated. In case of a UCITS or other UCI with multiple Compartments, this restriction is applicable by reference to all units issued by the UCITS or other UCI concerned, all Compartments combined.

VI.

(1) The Company may not borrow for the account of any Compartment amounts in excess of 10% of the net assets of that Compartment, any such borrowings to be from banks and to be effected only on a temporary basis, provided that the Company may acquire foreign currencies by means of back to back loans;

(2) The Company may not grant loans to or act as guarantor on behalf of third parties.

This restriction shall not prevent the Company from acquiring transferable securities, money market instruments or other financial instruments referred to in I. (1) (c), (e) and (f) which are not fully paid.

(3) The Company may not carry out uncovered sales of transferable securities, money market instruments or other financial instruments.

(4) The Company may acquire movable or immovable property which is essential for the direct pursuit of its business.

(5) The Company may not acquire either precious metals or certificates representing them.

VII.

(1) The Company needs not comply with the limits laid down in this chapter when exercising subscription rights attaching to transferable securities or money market instruments which form part of its assets. While ensuring observance of the principle

of risk spreading, recently created Compartments may derogate from paragraphs II. (1) to (5), III. and V. (1) and (2) for a period of six months following the date of their creation.

(2) If the limits referred to in paragraph (2) are exceeded for reasons beyond the control of the Company or as a result of the exercise of subscription rights, it must adopt as a priority objective for its sales transactions the remedying of that situation, taking due account of the interest of its Shareholders.

(3) To the extent that an issuer is a legal entity with multiple Compartments where the assets of the Compartment are exclusively reserved to the investors in such Compartment and to those creditors whose claim has arisen in connection with the creation, operation or liquidation of that Compartment, each Compartment is to be considered as a separate issuer for the purpose of the application of the risk spreading rules set out in paragraphs II. (1) to (5), III. and V.

VIII. Cross-investment: Each Compartment may, subject to the conditions provided for in the Articles as well as this Prospectus, subscribe, acquire and/or hold up to 100% of the securities to be issued or issued by one or more Compartments of the Company without the Company being subject to the requirements of the Law of 10 August 1915 on commercial companies, as amended, with respect to the subscription, acquisition and/or the holding by a company of its own Shares, under the condition however that:

(1) the target Compartment does not, in turn, invest in the Compartment invested in this target Compartment;

(2) no more than 10% of the assets of the target Compartment whose acquisition is contemplated may, pursuant to the Articles be invested in aggregate in units of other target Compartments of the same Company;

(3) voting rights, if any, attaching to the relevant securities are suspended for as long as they are held by the Compartment concerned and without prejudice to the appropriate processing in the accounts and the periodic reports; and

(4) in any event, for as long as these securities are held by the Company, their value will not be taken into consideration of the calculation of the net assets of the Company for the purposes of verifying the minimum threshold of the net assets imposed by the Law;

(5) there is no duplication of management/subscription or repurchase fees between those at the level of the Compartment of the Company having invested in the target Compartment, and this target Compartment.

4.4 Financial Derivative Instruments

As specified in I. (1) (e) above, the Company may in respect of each Compartment invest in financial derivative instruments.

The Company shall ensure that its global exposure relating to derivative instruments does not exceed the total net value of its net assets. The exposure is calculated taking into account the current value of the Underlying Assets, the counterparty risk, future market movements and the time available to liquidate the positions.

Each Compartment may invest in financial derivative instruments within the limits laid down in I. (1) (e), provided that the exposure to the underlying assets does not exceed in aggregate the investment limits laid down in clause II. (1) to (5). When a Compartment invests in index-based financial derivative instruments, these investments do not have to be combined to the limits laid down in III. When a transferable security or money market instrument embeds a derivative, the latter must be taken into account when complying with the requirements of this restriction. When a Compartment qualifies as a

Feeder Compartment, that Feeder Compartment shall calculate its global exposure related to financial derivative instruments in accordance with Section 3 I. (3) above.

The Compartments may use financial derivative instruments for investment purposes and for hedging purposes, within the limits of the Law. Under no circumstances shall the use of these instruments cause a Compartment to diverge from its investment policy.

4.5 SFTs

The Company and any of its Compartments will employ SFTs for reducing risks (hedging), generating additional capital or income or for cost reduction purposes on a continuous basis where provided for in the relevant Appendix. Any use of SFTs for investment purposes will be in line with the risk profile and risk diversification rules applicable to the Company and any of its Compartments. The Company and any of its Compartments will engage in the following transactions:

(i) "Securities lending" or "securities borrowing", means a transaction by which a counterparty transfers securities subject to a commitment that the borrower will return equivalent securities on a future date or when requested to do so by the transferor, that transaction being considered as securities lending for the counterparty transferring the securities and being considered as securities borrowing for the counterparty to which they are transferred.

(ii) "repurchase transaction" means a transaction governed by an agreement by which a counterparty transfers securities or guaranteed rights relating to title to securities where that guarantee is issued by a recognised exchange which holds the rights to the securities and the agreement does not allow a counterparty to transfer or pledge a particular security to more than one counterparty at a time, subject to a commitment to repurchase them, or substituted securities of the same description at a specified price on a future date specified, or to be specified, by the transferor, being a repurchase agreement for the counterparty selling the securities and a reverse repurchase agreement for the counterparty buying them;

(iii) "buy-sell back transaction" or "sell-buy back transaction" means a transaction by which a counterparty buys or sells securities, commodities, or guaranteed rights relating to title to securities, agreeing, respectively, to sell or to buy back securities or such guaranteed rights of the same description at a specified price on a future date, that transaction being a buy-sell back transaction for the counterparty buying the securities or guaranteed rights, and a sell-buy back transaction for the counterparty selling them, such buy- sell back transaction or sell-buy back transaction not being governed by a repurchase agreement or by a reverse- repurchase agreement within the meaning of item (ii) above;

The Company’s lending agent is CACEIS Bank, Luxembourg Branch or Securities Finance Trust Company.

The remuneration of the security lending activity will be distributed as follows:
Lending agent ≤ 15%
Management Company = 15%
Compartments ≥ 70%

The Company and any of its Compartments may further enter into swap contracts relating to any financial instruments or indices, including TRSs. Total Return Swaps involve the exchange of the right to receive the total return, coupons plus capital gains or losses, of a specified reference asset, index or basket of assets against the right to make fixed or floating payments. As such, the use of TRS or other derivatives with similar characteristics allows gaining synthetic exposure to certain markets or underlying assets without investing directly (and/or fully) in these underlying assets.

The Company or any of its delegates will report the details of any SFT and TRS concluded to a trade repository or ESMA, as the case may be in accordance with the SFTR. SFTs and TRS will be used only in respect of any instrument that is eligible under article 50 of the Directive.

The assets that may be subject to SFTs and TRS are limited to: Equity and equity linked instruments and bonds, or any other underlying assets described in the investment policy of each Compartment.

The maximum and expected proportion of assets that will be subject to SFTs and TRS for each Compartment of the Company are specified in the relevant Appendix.

The Company enters into Total Return Swap ("TRS") and complies with the applicable requirements. For the time being, only the following Compartments enter into TRS:
- TOBAM Anti-Benchmark Global Investment Grade Fund
- TOBAM Anti-Benchmark Global High Yield Fund
- TOBAM Anti-Benchmark Multi-Asset Fund
- TOBAM Anti-Benchmark SERENITE 90 Fund

Should any other Compartment enter into TRS in the future, the Company will comply with the applicable requirements and the Prospectus will be updated prior to the use of any TRS.

The counterparties to the SFTs and TRS are selected on the basis of very specific criteria taking into account notably their legal status, country of origin, and minimum credit rating. These financial counterparties in any case comply with article 3 of the SFTR.

The Company collateralizes its SFTs and TRS pursuant to the provisions set forth hereunder in section 4.7 "*Management of collateral for OTC Derivative transactions and efficient portfolio management techniques*" of the Prospectus.

Collateral posted in favour of the Company or any of its Compartments under a title transfer arrangement and assets subject to SFTs and TRS should be held by the Depositary. Such collateral may be held by one of the Depositary's correspondents or sub-custodians provided that the Depositary has delegated the custody of the collateral to such correspondent or sub-custodian and the Depositary remains liable subject to the provisions of the Law, if the collateral is lost by the sub-custodian. Collateral posted in favour of the Company or any of its Compartments under a security interest arrangement (e.g., a pledge) can be held by the Depositary or a third-party custodian which is subject to prudential supervision, and which is unrelated to the provider of the collateral. Collateral received by the Company can be re-used in line with the provisions of the ESMA Guidelines on ETFs and other UCITS issues (ESMA/2012/832), as revised from time to time, released by the CSSF under CSSF Circulars 08/356, 13/559 and 14/592.

The Company only uses cash and bonds of excellent quality and applies the haircut policy described here below. In any case, eligible collateral consist of assets of excellent quality (with a rating as described in section 4.7), diversified, expected to be uncorrelated with the performance of the counterparty and liquid (traded in a Regulated Market or multilateral trading facility having a transparent pricing and that can be sold quickly). Collateral will be valued on a daily basis on the basis of market prices, taking into account the haircuts determined by the Company and may be subject to daily variation margin requirements. The haircut policy takes into account a variety of factors depending on the nature of received collateral, such as the credit quality of the issuer, the maturity, the currency, the price volatility as well as, if applicable, the results of stress-tests in normal and exceptional liquidity conditions."

The expected and maximum levels of SFTs are indicators and not regulatory limits, depending on market demand. The Compartments will lend securities depending on the market demand to borrow securities. This demand varies per counterparty, per asset class and per market and is influenced by factors such as liquidity, hedging strategies and settlement efficiency. These factors change over time led by the overall market dynamics (e.g. monetary policy) and changes in investment and trading strategies from counterparties or the Compartments. As such, the securities lending income and the utilization may vary per asset class and per Compartment as specified in the relevant Appendix where applicable.

Policy on sharing of return generated by SFTs and TRS

The net revenues achieved from SFTs and TRS remain with the relevant Compartment.

Direct and indirect operational costs and fees may be deducted from the revenues delivered to the Compartment. These costs will not exceed the below percentages of the gross revenues:

Securities lending or securities borrowing	30 %
Repurchase transactions	30%
Buy-sell back transactions or sell-buy back transactions	30%
Total Return Swaps	<1%

These fees may be paid to counterparties of the Company such as agents or other intermediaries as defined under article 3 of the SFTR and providing services in connection with SFTs and TRS as normal compensation of their services. Details of such amounts and counterparties will be disclosed in the annual report of the Company.

4.6 Use of Techniques and Instruments relating to Transferable Securities and Money Market Instruments

The Company, in order to generate additional revenue for Shareholders, may engage in securities lending transactions subject to complying with the provisions set forth in CSSF Circular 08/356 and the provisions on efficient management portfolio techniques set-forth in CSSF Circular 13/559.

In accordance with the CSSF Circular 13/559, all revenues arising from efficient portfolio management techniques, net of any direct and indirect operational costs/fees, will be returned to the Fund. In particular, fees and cost may be paid to intermediaries providing services in connection with efficient portfolio management techniques as normal compensation of their services. Such fees may be calculated as a percentage of gross revenues earned by the Fund through the use of efficient portfolio management techniques. Information on direct and indirect operational costs and fees that may be incurred in this respect as well as the identity of the entities to which such costs and fees are paid – as well as any relationship they have with the Depositary Bank or Management Company - will be available in the annual report of the Fund. The Company may enter into repurchase agreements which consist in the purchase and sale of securities whereby the terms of the agreement entitle the seller to repurchase from the purchaser the securities at a price and at a time agreed amongst the two parties at the conclusion of the agreement.

The Company may act either as purchaser or as seller in repurchase transactions. Its entering in such agreements is however subject to the following rules:

The Company may purchase or sell securities in the context of a repurchase agreement only if its counterpart is a highly rated financial institution which are experts in this type of transactions and which are subject to prudential supervision rules considered by the Luxembourg regulatory authority as equivalent to those prescribed by EU law.

During the lifetime of a repurchase agreement, the Company may not sell the securities which are the object of the agreement either before the repurchase of the securities by the counterparty has been carried out or the repurchase period has expired.

The Company must ensure to maintain the value of purchased securities subject to a repurchase obligation at a level such that it is able, at any time, to meet its obligations to redeem its own Shares.

The Company must ensure that it is able at any time to recall any security that has been lent out or terminate any securities lending agreement into which it has entered.

When the Company enters into a reverse repurchase agreement, it must ensure that it is able at any time to recall the full amount of cash or to terminate the reverse repurchase agreement on either an accrued basis or a mark-to-market basis. When the cash is recallable at any time on a mark-to-market basis, the mark-to-market value of the reverse repurchase agreement should be used for the calculation of the net asset value of the Company.

When the Company enters into a repurchase agreement, it should ensure that it is able at any time to recall any securities subject to the repurchase agreement or to terminate the repurchase agreement into which it has entered.

4.7 Management of collateral for OTC Derivative transactions and efficient portfolio management techniques

Where the Company enters into OTC Derivative transactions and efficient portfolio management techniques, all collateral used to reduce counterparty risk exposure should comply with the following criteria at all times:

(a) Liquidity – any collateral received other than cash should be highly liquid and traded on a regulated market or multilateral trading facility with transparent pricing in order that it can be sold quickly at a price that is close to pre-sale valuation. Collateral received should also comply with the provisions of paragraph V above.

(b) Valuation – collateral received should be valued on at least a daily basis and assets that exhibit high price volatility should not be accepted as collateral unless suitably conservative haircuts are in place.

(c) Issuer credit quality – collateral received should be of high quality.

(d) Correlation – the collateral received by the Company must be issued by an entity that is independent from the counterparty and is expected not to display a high correlation with the performance of the counterparty.

(e) Collateral diversification (asset concentration) – collateral should be sufficiently diversified in terms of country, markets and issuers. The criterion of sufficient diversification with respect to issuer concentration is considered to be respected if the Company receives from a counterparty of efficient portfolio management and OTC Derivative transactions a basket of collateral with a maximum exposure to a given issuer of 20% of its net asset value. When the Company is exposed to different counterparties, the different baskets of collateral should be aggregated to calculate the 20% limit of exposure to a single issuer.

(f) Risks linked to the management of collateral, such as operational and legal risks, should be identified, managed and mitigated by the risk management process.

(g) Where there is a title transfer, the collateral received should be held by the Depositary. For other types of collateral arrangement, the collateral can be held by a third party custodian which is subject to prudential supervision, and which is unrelated to the provider of the collateral.

(h) Collateral received should be capable of being fully enforced by the Company at any time without reference to or approval from the counterparty.

(i) Non-cash collateral received should not be sold, re-invested or pledged.

(j) Cash collateral received should only be:

(k) placed on deposit with entities prescribed in paragraph I. (1) (d) above;

(l) invested in high-quality Sovereign, Supranational and Agency Bonds (minimum rating of A- by at least one of the three most reputable rating agencies (S&P, Moody's and Fitch)), and high quality corporate bonds (minimum rating of BBB by at least one of the three most reputable rating agencies (S&P, Moody's and Fitch) with a maximum maturity of 10 years;

(m) used for the purpose of reverse repo transactions provided the transactions are with credit institutions subject to prudential supervision and the Company is able to recall at any time the full amount of cash on accrued basis;

(n) invested in short-term money market funds.

Re-invested cash collateral should be diversified in accordance with the diversification requirements applicable to non-cash collateral.

Haircut policy

Collateral requirements are valued by the Management Company on a daily basis. The collateral received for securities lending transactions will be 105% of the market value of the securities lent.

4.8 Exercise of Voting Rights

The Company will exercise its voting rights in respect of instruments held by the Company in each Compartment in accordance with the voting policy of the Management Company or as the case may be the Investment Manager.

5. RISK-MANAGEMENT PROCESS

The Management Company must employ a risk-management process which enables it to monitor and measure at any time the risk of the positions in its portfolios and their contribution to the overall risk profile of its portfolios.

In accordance with the Law and the applicable regulations, in particular Circular CSSF 11/512, the Management Company uses for each Compartment a risk-management process which enables it to assess the exposure of each Compartment to market, liquidity and counterparty risks, and to all other risks, including operational risks, which are material to that Compartment. The Management Company may use the Value-at-Risk (VaR) or commitment approach to monitor and measure the global exposure as further specified for each Compartment, in the Appendix.

The Management Company's quantitative investment process is supported by extensive proprietary computer code. The Management Company's researchers, software developers, and IT teams follow a structured design, development, testing, change control, and review processes during the development of its systems and the implementation within our investment process. These controls and their effectiveness are subject to regular internal reviews. However, despite these extensive controls it is possible that errors may occur in coding and within the investment process, as is the case with any complex software or data-driven model, and no guarantee or warranty can be provided that any quantitative investment model is completely free of errors. Any such errors could have a negative impact on investment results.

RISK WARNINGS

The following is a general description of a number of risks which may affect the value of Shares. See also the section of the relevant Appendix to the Prospectus (if any) for a discussion of additional risks particular to a specific issue of Shares. The description of the risks made below is not, nor is it intended to be, exhaustive. Not all risks listed necessarily apply to each issue of Shares, and there may be other considerations that should be taken into account in relation to a particular issue. What factors will be of relevance to a particular Compartment will depend upon a number of interrelated matters including, but not limited to, the nature of the Shares and the Compartment's Investment Policy.

No investment should be made in the Shares until careful consideration of all these factors has been made.

5.1 Introduction

The value of investments and the income from them, and therefore the value of and income from Shares relating to a Compartment can go down as well as up and an investor may not get back the amount the investor invests. Due to the various commissions and fees which may be payable on the Shares, an investment in Shares should be viewed as medium to long term. Short or leveraged funds are associated with higher risks and may better be considered as short to medium term investments. An investment in a Compartment should not constitute a substantial proportion of an investment portfolio and may not be appropriate for all investors. Investors should only reach an investment decision after careful consideration with their legal, tax, accounting, financial and other advisers. The legal, regulatory, tax and accounting treatment of the Shares can vary in different jurisdictions. Any descriptions of the Shares set out in the Prospectus, including any Appendix, are for general information purposes only. Investors should recognise that the Shares may decline in value and should be prepared to sustain a total loss of their investment. Risk factors may occur simultaneously and/or may compound each other resulting in an unpredictable effect on the value of the Shares.

5.2 General risks

Valuation of the Shares: the value of a Share will fluctuate as a result of changes in the value of, amongst other things, the Compartment's assets, the Underlying Asset and, where applicable, the financial derivative instruments used to expose the Compartment to the Underlying Asset synthetically.

Valuation of the Underlying Asset and the Compartment's assets: the Compartment's assets, the Underlying Asset or the financial derivative instruments used to expose the Compartment to the Underlying Asset synthetically may be complex and specialist in nature. Valuations for such assets or financial derivative instruments will usually only be available from a limited number of market professionals which frequently act as counterparties to the transactions to be valued. Such valuations are often subjective and there may be substantial differences between any available valuations.

Risks associated with discretionary management: TOBAM has implemented its investment strategies to create well-diversified funds. The securities to which the Compartments are exposed are selected based on the quantitative and systematic models developed by TOBAM, which help to optimise the level of diversification achieved in relation with the benchmark. It can therefore not be excluded that the Management Company does not choose the most profitable assets.

Exchange rates: an investment in the Shares may directly or indirectly involve exchange rate risk. Because the net asset value of the Compartment will be calculated in its Reference Currency, the performance of an Underlying Asset or of its constituents denominated in a currency other than the Reference Currency will also depend on the exchange rate of such currency. Equally, the currency denomination of any Compartment asset in a currency other than the Reference Currency will involve exchange rate risk for the Compartment.

Interest rates: fluctuations in interest rates of the currency or currencies in which the Shares, the Compartment's assets and/or the Underlying Asset are denominated may affect financing costs and the real value of the Shares.

Inflation: the rate of inflation will affect the actual rate of return on the Shares. An Underlying Asset may reference the rate of inflation.

Yield: returns on Shares may not be directly comparable to the yields which could be earned if any investment were instead made in any Compartment's assets and/or Underlying Asset.

Correlation: the Shares may not correlate perfectly, nor highly, with movements in the value of Compartment's assets and/or the Underlying Asset.

Volatility: the value of the Shares may be affected by market volatility and/or the volatility of the Compartment's assets and/or the Underlying Asset.

Credit Risk: Credit risk involves the risk that an issuer of a bond (or similar money-market instruments) held by the Compartment may default on its obligations to pay interest and repay principal and the Compartment will not recover their investment.

Counterparty risk: Compartment that invests in OTC Derivative may find itself exposed to risk arising from the solvency of its counterparties and from their ability to respect the conditions of these contracts. The Compartment may enter into futures, options and swap contracts including CDS and TRS or use derivative techniques, each of which involves the risk that the counterparty will fail to respect its commitments under the terms of each contract.

Liquidity risk: certain types of securities may be difficult to buy or sell, particularly during adverse market conditions, which may affect their value. The fact that the Shares may be listed on a stock exchange is not an assurance of liquidity in the Shares.

Repurchase and Reverse Repurchase Agreement Risk: The use of repurchase and reverse repurchase agreements, if any, by certain Compartments involves certain risks. For example, if the seller of securities to the relevant Compartment under a reverse repurchase agreement defaults on its obligation to repurchase the underlying securities, as a result of its bankruptcy or otherwise, the said Compartment will seek to dispose of such securities, which action could involve costs or delays. If the seller becomes insolvent and subject to liquidation or reorganisation under applicable bankruptcy or other laws, the ability of the relevant Compartment to dispose of the underlying securities may be restricted. Finally, if a seller defaults on its obligation to repurchase securities under a reverse repurchase agreement, the Compartment may suffer a loss to the extent that it is forced to liquidate its position in the market, and proceeds from the sale of the underlying securities are less than the repurchase price agreed to by the defaulting seller.

Leverage: the Compartment's assets, Underlying Asset and the derivative techniques used to expose the Compartment to the Underlying Assets may comprise elements of leverage (or borrowings) which may potentially magnify losses and may result in losses greater than the amount borrowed or invested by the Compartment.

Political factors, emerging market and non-OECD member country assets: the performance of the Shares and/or the possibility to purchase, sell, or repurchase the Shares may be affected by changes in general economic conditions and uncertainties such as political developments, changes in government policies, the imposition of restrictions on the transfer of capital and changes in regulatory requirements. Such risks can be heightened in investments in, or relating to, emerging markets or non-OECD member countries. In addition, local custody services remain underdeveloped in many non-OECD and emerging market countries and there is a heightened transaction and custody risk involved in dealing in such markets. In certain circumstances, a Compartment may not be able to recover or may encounter delays in the recovery of some of its assets. Furthermore, the legal infrastructure and accounting, auditing and reporting standards in emerging markets or non-OECD member countries, may not provide the same degree of investor information or protection as would generally apply to major markets.

Share subscriptions and repurchases: provisions relating to the subscription and repurchase of Shares grant the Company discretion to limit the amount of Shares available for subscription or repurchase on any Business Day and, in conjunction with such limitations, to defer or pro rata such subscription or repurchase. In addition, where requests for subscription or repurchase are received after the cut-off deadline, the said requests will be processed on the following cut-off. Such deferrals or delays may operate to decrease the number of Shares or the repurchase amount to be received.

Listing: there can be no certainty that a listing on any stock exchange applied for by the Company will be achieved and/or maintained or that the conditions of listing will not change. Further, trading in Shares on a stock exchange may be halted pursuant to that stock exchange's rules due to market conditions and investors may not be able to sell their Shares until trading resumes.

Legal and regulatory: the Company must comply with regulatory constraints or changes in the laws affecting it, the Shares, or the investment restrictions, which might require a change in the investment policy and objectives followed by a Compartment. The Compartment's assets, the Underlying Asset and the derivative techniques used to expose the Compartment to the Underlying Assets may also be subject to change in laws or regulations and/or regulatory action which may affect the value of the Shares.

Nominee arrangements: where an investor invests in Shares via the Principal Placement and Distribution Agent, its sub-distribution or private placement agents and/or a nominee or holds interests in Shares through a clearing agent, such Shareholder will typically not appear on the register of Shareholders of the Company and may not therefore be able to exercise voting or other rights available to those persons appearing on the register.

Use of derivatives: as a Compartment whose performance is linked to an Underlying Asset will often invest in derivative instruments or securities which differ from the Underlying Asset, derivative techniques will be used to link the value of the Shares to the performance of the Underlying Asset. While the prudent use of such derivatives techniques can be beneficial, derivatives instruments also involve risks which, in certain cases, can be greater than the risks presented by more traditional investments. There may be transaction costs associated with the use of any such derivatives instruments.

Duplication of costs - The Compartment incurs costs of its own management and administration comprising the fees paid to the Management Company, the Investment Manager (if any), the Depositary, unless otherwise provided hereinafter and other service providers. It should be noted that, in addition, the Compartment incurs similar costs in its capacity as an investor in the funds in which a Compartment invests, which in turn pay similar fees to their manager and other service providers. It is endeavoured to reduce duplication of management charges by negotiating rebates where applicable in favour of the Company with such funds or their managers. Further, the investment strategies and techniques employed by certain funds may involve frequent changes in positions and a consequent portfolio turnover. This may result in brokerage commission expenses which exceed significantly those of the funds of comparable size. The funds may be required to pay performance fees to their manager. Under these arrangements the managers will benefit from the appreciation, including unrealised appreciation of the investments of such funds, but they are not similarly penalised for realised or unrealised losses. As a consequence, the direct and indirect costs borne by the Compartment are likely to represent a higher percentage of the net asset value per Share than would typically be the case with UCITS which invest directly in equity and bond markets (and not through other UCITS/UCI/funds).

5.3 Risks relating to the use of SFTs and TRS

(i) Counterparty risk

The Company and any of its Compartment may enter into repurchase agreements and reverse repurchase agreements as a buyer or as a seller subject to the conditions and limits set out in section 4.5 "SFTs". If the other party to a repurchase agreement or reverse repurchase agreement should default, the Company or the relevant Compartment might suffer a loss to the extent that the proceeds from the sale of the underlying securities and/or other collateral held by the Company or the relevant Compartment in connection with the repurchase agreement or reverse repurchase agreement are less than the repurchase price or, as the case may be, the value of the underlying securities. In addition, in the event of bankruptcy or similar proceedings of the other party to the repurchase agreement or reverse repurchase agreement or its failure otherwise to perform its obligations on the repurchase date, the Company or the relevant Compartment could suffer losses, including loss of interest on or principal of the security and costs associated with delay and enforcement of the repurchase agreement or reverse repurchase agreement.

The Company and any of its Compartments may enter into securities lending transactions subject to the conditions and limits set out in section 4.7 "*Management of collateral for OTC Derivative transactions* *and efficient portfolio management techniques*". If the other party to a securities lending transaction should default, the Company or the relevant Compartment might suffer a loss to the extent that the proceeds from the sale of the collateral held by the Company or the relevant Compartment in connection with the securities lending transaction are less than the value of the securities lent. In addition, in the event of the bankruptcy or similar proceedings of the other party to the securities lending transaction or its failure to return the securities as agreed, the Company or the relevant Compartment could suffer losses, including loss of interest on or principal of the securities and costs associated with delay and enforcement of the securities lending agreement.

The Company and any of its Compartments may enter into TRS subject to the conditions and limits set out in section 4.7 "*Management of collateral for OTC Derivative transactions and efficient portfolio management techniques*". If the other party to a TRS should default, the Company or the relevant Compartment might suffer a loss to the extent that the proceeds from the sale of the underlying securities and/or other collateral held by the Company or the relevant Compartment in connection with the TRS are less than the value of the underlying securities.

(ii) Operational risk

The risks arising from the use of repurchase agreements, reverse repurchase agreements, securities lending transactions and TRS will be closely monitored and techniques (including collateral management) will be employed to seek to mitigate those risks. Although it is expected that the use of repurchase agreements, reverse repurchase agreements and securities lending transactions will generally not have a material impact on the Company′ or the relevant Compartment's performance.

(iii) Liquidity risk

The use of such techniques may have a significant effect, either negative or positive, on the Company′ or the relevant Compartment 's NAV. The use of such techniques may although have an impact on the ability of the Company to meet redemption requests, security purchases or, more generally, reinvestment.

In respect of margin lending transactions, the Company and any of its Compartment cannot extend credit and may only receive credit subject to the restrictions in the Directive and the Prospectus.

(iv) Legal risk

The use of SFT's and TRS as well as their consequences for the Company, are substantially affected by legal requirements. No assurance can be given that future legislation, administrative rulings or court decisions will not adversely affect the Company. Furthermore, certain transactions are entered into on the basis of complex legal documents. Such documents may be difficult to enforce or may be the subject of a dispute as to interpretation in certain circumstances. Whilst the rights and obligations of the parties to a legal document may be governed by Luxembourg law, in certain circumstances (for example insolvency proceedings) other legal systems may take priority which may affect the enforceability of existing transactions.

(v) Custody risk

The Company's assets are held in custody by the Depositary which exposes the Company to custodian risk. This means that the Company is exposed to the risk of loss of assets placed in custody as a result of insolvency, negligence or fraudulent trading by the Depositary.

5.4 Underlying Asset risks

(a) General

Underlying Asset calculation and substitution: in certain circumstances described in the relevant Appendix, the Underlying Asset may cease to be calculated or published on the basis described or such basis may be altered or the Underlying Asset may be substituted. In certain circumstances such as the discontinuance in the calculation or publication of the Underlying Asset or suspension in the trading of any constituents of the Underlying Asset, it could result in the suspension of trading of the Shares or the requirement for market makers to provide two way prices on the relevant stock exchanges.

Corporate actions: securities comprising an Underlying Asset may be subject to change in the event of corporate actions in respect of those securities.

Tracking error: the following are some of the factors which may result in the value of the Shares varying from the value of the Underlying Asset: investments in assets other than the Underlying Asset may give rise to delays or additional costs and taxes compared to an investment in the Underlying Asset; investment or regulatory constraints may affect the Company but not the Underlying Asset; the fluctuation in value of a Compartment's assets; where applicable, any differences between the maturity date of the Shares and the Maturity Date of the relevant Compartment's assets; and the existence of a cash position held by a Compartment.

No investigation or review of the Underlying Asset(s): none of the Management Company, the Investment Manager (if any) or any of their delegates (if any) or affiliates has performed or will perform any investigation or review of the Underlying Asset on behalf of any prospective investor in the Shares. Any investigation or review made by or on behalf of the Company, the Management Company, the Investment Manager (if any) or any of their delegates (if any) or any of their affiliates is or shall be for their own proprietary investment purposes only.

(b) Certain risks associated with particular Underlying Assets

Certain risks associated with investment in particular Underlying Assets or any securities comprised therein are set out below.

Shares: the value of an investment in Shares will depend on a number of factors including, but not limited to, market and economic conditions, sector, geographical region and political events.

Pooled investment vehicles: alternative investment funds, mutual funds and similar investment vehicles operate through the pooling of investors' assets. Investments are then invested either directly into assets or are invested using a variety of hedging strategies and/or mathematical modelling techniques, alone or in combination, any of which may change over time. Such strategies and/or techniques can be speculative, may not be an effective hedge and may involve substantial risk of loss and limit the opportunity for gain. It may be difficult to obtain valuations of products where such strategies and/or techniques are used and the value of such products may depreciate at a greater rate than other investments. Pooled investment vehicles are often unregulated, make available only limited information about their operations, may incur extensive costs, commissions and brokerage charges, involve substantial fees for investors (which may include fees based on unrealised gains), have no minimum credit standards, employ high risk strategies such as short selling and high levels of leverage and may post collateral in unsegregated third party accounts.

Indices: the compilation and calculation of an index or portfolio will generally be rules based, account for fees and include discretions exercisable by the index provider or investment manager. Methodologies used for certain proprietary indices are designed to ensure that the level of the index reaches a pre-determined level at a specified time. However, this mechanism may have the effect of limiting any gains above that level. Continuous protection or lock-in features designed to provide protection in a falling market may also result in a lower overall performance in a rising market.

Real estate: the risks associated with an indirect investment in real estate include, but are not limited to: the cyclical nature of real estate values, changes in environmental, planning, landlord and tenant, tax or other laws or regulations affecting real property, demographic trends, variations in rental income and increases in interest rates.

Commodities: prices of commodities are influenced by, among other things, various micro and macro economic factors such as changing supply and demand relationships, weather conditions and other natural phenomena, agricultural, trade, fiscal, monetary, and exchange control programmes and policies of governments (including government intervention in certain markets) and other events.

Structured finance securities: structured finance securities include, without limitation, asset-backed securities and credit-linked securities, which may entail a higher liquidity risk than exposure to sovereign or corporate bonds. Certain specified events and/or the performance of assets referenced by such securities, may affect the value of, or amounts paid on, such securities (which may in each case be zero).

Master-Feeder Structure: Using a "feeder-master" fund structure, in particular the existence of multiple feeder funds investing in a Master fund, presents certain risks to the investors. Smaller feeder funds may be materially affected by the actions of larger feeder funds. For example, it is expected that a feeder fund may initially, and perhaps for the life of the Master Fund, hold a larger portion of the net asset value of the outstanding interests of the Master Fund. Consequently, if such feeder fund were to redeem from the Master Fund, the remaining feeder funds, including the Feeder Compartment, may experience higher pro rata operating expenses, thereby producing lower returns, and the Master Fund may become less diverse due to redemption by a larger feeder fund, resulting in increased portfolio risk.

A Feeder Compartment may hold only a minority of the net asset value of the outstanding voting interests of the Master Fund and, consequently, will not be able to control matters that require a vote of the investors of the Master Fund.

Emerging Markets: Underlying investments in emerging markets involve additional risks and special considerations not typically associated with investing in other more established economies or markets. Such risks may include (i) increased risk of nationalisation or expropriation of assets or confiscatory taxation; (ii) greater social, economic and political uncertainty, including war; (iii) higher dependence on exports and the corresponding importance of international trade; (iv) greater volatility, less liquidity and smaller capitalisation of markets; (v) greater volatility in currency exchange rates; (vi) greater risk of inflation; (vii) greater controls on foreign investment and limitations on realisation of investments, repatriation of invested capital and on the ability to exchange local currencies for the Reference Currency; (viii) increased likelihood of governmental involvement in and control over the economy; (ix) governmental decisions to cease support of economic reform programs or to impose centrally planned economies; (x) differences in auditing and financial reporting standards which may result in the unavailability of material information about issuers; (xi) less extensive regulation of the markets; (xii) longer settlement periods for transactions and less reliable clearance and custody arrangements; (xiii) less developed corporate laws regarding fiduciary duties of officers and directors and the protection of investors; and (xiv) certain considerations regarding the maintenance of the Compartment's financial instruments with brokers and securities depositories. Repatriation of investment income, assets and the proceeds of sales by foreign investors may require governmental registration and/or approval in some emerging countries. A Compartment may be adversely affected by delays in or a refusal to grant any required governmental registration or approval for such repatriation or by withholding taxes imposed by emerging market countries on interest or dividends paid on financial instruments held by the Company or gains from the disposition of such financial instruments.

In emerging markets, there is often less government supervision and regulation of business and industry practices, stock exchanges, over-the-counter markets, brokers, dealers, counterparties and issuers than in other more established markets. Any regulatory supervision which is in place may be subject to manipulation or control. Some emerging market countries do not have mature legal systems comparable to those of more developed countries. Moreover, the process of legal and regulatory reform may not be proceeding at the same pace as market developments, which could result in investment risk. Legislation to safeguard the rights of private ownership may not yet be in place in certain areas, and there may be the risk of conflict among local, regional and national requirements. In certain cases, the laws and regulations governing investments in securities may not exist or may be subject to inconsistent or arbitrary appreciation or interpretation. Both the independence of judicial systems and their immunity from economic, political or nationalistic influences remain largely untested in many countries. The Compartments may also encounter difficulties in pursuing legal remedies or in obtaining and enforcing judgments in local courts.

Investments in securities of issuers in emerging markets may be subject to greater risks than investments in securities of issuers from member states of the OECD due to a variety of factors including currency controls and currency exchange rates fluctuations, changes in governmental administration or economic or monetary policy or changed circumstances in dealings between nations, expropriation, confiscatory taxation and potential difficulties in enforcing contractual obligations. There may be less publicly available information about issuers in certain countries and such issuers may not be subject to uniform accounting, auditing and financial reporting standards and requirements comparable to those of most OECD issuers. In certain countries, securities of local issuers are less liquid and more volatile than securities of comparable issuers of more mature economies and subject to lower levels of government supervision than those on the OECD. The investments in such markets may be considered speculative and subject to significant custody and clearance risks and delay in settlement.

Others: underlying Asset(s) may include other assets which involve substantial financial risk such as distressed debt, low quality credit securities, forward contracts and deposits with commodity trading advisors (in connection with their activities).

5.5 Sustainability risks

As the Management Company integrates ESG factors in its investment decision process, the Company is exposed to sustainability risks. Sustainability risks mean an environmental, social or governance event or condition that, if it occurs, could cause an actual or a potential material negative impact on the value of the investment.

The Management Company has identified the following specific sustainability risks related to ESG factors:

Sustainability risks mean an environmental, social or governance event or condition that, if it occurs, could cause an actual or a potential material negative impact on the value of the investment.

Specific sustainability risks related to ESG factors could notably include:

Climate change, resource scarcity, and reputational and legal risks related to breaches of international laws, standards in links with Environmental, Social or Governance challenges.

The Management Company has put in place as assessment of the ESG factors to mitigate sustainability risks as identified.

5.6 Other risks

Potential conflicts of interest: The Management Company, the Investment Manager (if any), their delegates (if any), the sales agents, the Administration Agent, and the Depositary may from time to time act as management company, investment manager or adviser, sales agent, administration agent, registrar or custodian in relation to, or be otherwise involved in, other funds or collective investment schemes which have similar investment objectives to those of any Compartment.

The Management Company, the Investment Manager (if any) and their delegates (if any) will enter into all transactions on an arm’s length basis. The directors of the Management Company, the directors of the Investment Manager (if any), their delegates (if any) and any affiliate thereof, members, and staff may engage in various business activities other than their business, including providing consulting and other services (including, without limitation, serving as director) to a variety of partnerships, corporations and other entities, not excluding those in which the Company invests.

In the due course of their business, the above persons and entities may have potential conflicts of interest with the Company or Compartment.

Any kind of conflict of interest is to be fully disclosed to the Board of Directors.

In such event, each person and entities will at all times endeavour to comply with its obligations under any agreements to which it is party or by which it is bound in relation to the Company or any Compartment.

The directors of the Management Company, the directors of the Investment Manager (if any), the directors of their delegates (if any) and their members will devote the time and effort necessary and appropriate to the business of the Company.

Although it is aimed to avoid such conflicts of interest, the Management Company, the Investment Manager (if any), their delegates (if any) and their members will attempt to resolve all nonetheless arising conflicts in a manner that is deemed equitable to all parties under the given circumstances so as to serve the best interests of the Company and its Shareholders.

Allocation of shortfalls among Classes of a Compartment: the right of holders of any Class of Shares to participate in the assets of the Company is limited to the assets (if any) of the relevant Compartment and all the assets comprising a Compartment will be available to meet all of the liabilities of the Compartment, regardless of the different amounts stated to be payable on the separate Classes (as set out in the relevant Appendix). For example, if on a winding-up of the Company, the amounts received by the Company under the relevant Compartment's assets (after payment of all fees, expenses and other liabilities which are to be borne by the relevant Compartment) are insufficient to pay the full redemption amount payable in respect of all Classes of Shares of the relevant Compartment, each Class of Shares of the Compartment will rank pari passu with each other Class of Shares of the relevant Compartment and the proceeds of the relevant Compartment will be distributed equally amongst the Shareholders of that Compartment pro rata to the amount paid up on the Shares held by each Shareholder. The relevant Shareholders will have no further right of payment in respect of their Shares or any claim against any other Compartment or any other assets of the Company. This may mean that the overall return (taking account of any dividends already paid) to Shareholders who hold Shares paying dividends quarterly or more frequently may be higher than the overall return to Shareholders who hold Shares paying dividends annually and that the overall return to Shareholders who hold Shares paying dividends may be higher than the overall return to Shareholders who hold Shares paying no dividends. In practice, cross liability between Classes is only likely to arise where the aggregate amounts payable in respect of any Class exceed the assets of the Compartment notionally allocated to that Class, that is, those amounts (if any) received by the Company under the relevant Compartment's assets (after payment of all fees, expenses and other liabilities which are to be borne by such Compartment) that are intended to Company payments in respect of such Class or are otherwise attributable to that Class. In these circumstances, the remaining assets of the Compartment notionally allocated to any other Class of the same Compartment may be available to meet such payments and may accordingly not be available to meet any amounts that otherwise would have been payable on such other Class.

Consequences of winding-up proceedings: If the Company fails for any reason to meet its obligations or liabilities, or is unable to pay its debts, a creditor may be entitled to make an application for the winding-up of the Company. The commencement of such proceedings may entitle creditors (including the Swap Counterparty) to terminate contracts with the Company and claim damages for any loss arising from such early termination. The commencement of such proceedings may result in the Company being dissolved at a time and its assets (including the assets of all Compartments) being realised and applied to pay the fees and expenses of the appointed liquidator or other insolvency officer, then in satisfaction of debts preferred by law and then in payment of the Company's liabilities, before any surplus is distributed to the Shareholders of the Company. In the event of proceedings being commenced, the Company may not be able to pay the full amounts anticipated by the relevant Appendix in respect of any Class or Compartments.

5.7 U.S. Foreign account Tax Compliance Requirements

FATCA Rules being particularly complex, the Company cannot accurately assess the extent of the requirements that FATCA Rules will place upon it.

Although the Company will attempt to satisfy any obligations imposed on it to avoid the imposition of the 30% withholding tax, no assurance can be given that the Company will be able to satisfy these obligations. If the Company becomes subject to a withholding tax as a result of FATCA Rules, the value of Shares held by all Shareholders may be materially affected.

The Company and/or its Shareholders may also be indirectly affected by the fact that a non U.S. financial entity does not comply with FATCA Rules even if the Company satisfies with its own obligations deriving from FATCA Rules.

6. ISSUE, REDEMPTION AND CONVERSION OF SHARES

Shares in the Company will be issued in the registered form.

As further described in each relevant Appendix, the Company may create within each Compartment issue different Classes of Shares whose assets will be commonly invested pursuant to the specific investment policy of the relevant Compartment.

A distinct fee structure, currency of denomination, dividend policy minimum holding amount, eligibility requirements or other specific feature may apply. The Company may notably issue Shares reserved to retail investors and Shares reserved to institutional investors. The range of available Classes and their features are described in the relevant Appendices.

Shares of a Compartment may be listed on the Luxembourg Stock Exchange or any other Regulated Market at the discretion of the Board of Directors and may be cleared through Clearstream Banking or Euroclear or other central depositories.

6.1 Subscription Redemption and Conversion Requests

Unless otherwise provided for a specific Compartment in the relevant Appendix, requests for subscription, redemption and conversion of Shares should be sent to one of the sub-distribution and private placement agents or to the Company at its registered address in Luxembourg. Requests may also be accepted by facsimile transmission, or at the discretion of the Company by other means of telecommunication. An application form can be obtained from the Company.

Unless otherwise specified in the Appendix to the Prospectus for any Compartment, requests for subscriptions, redemptions and conversions from or to any Compartment will be dealt with on the relevant Valuation Day on which they are received, provided they are received prior to the cut-off time specified in the relevant Appendix.

Requests received after such time will be accepted on the next Valuation Day. As a result, requests for the subscription, redemption and conversion of Shares shall be dealt with on an unknown net asset value basis before the determination of the net asset value for that day.

The Company does not permit market timing (as set out in CSSF circular 04/146) or related excessive, short-term trading practices. The Company has the right to reject any request for the subscription or conversion of Shares from any investor engaging in such practices or suspected of engaging in such practices and to take such further action as it may deem appropriate or necessary.

Subscription, redemption and conversion of Shares of a given Compartment shall be suspended whenever the determination of the net asset value per Share of such Compartment is suspended by the Company.

The Company may enter into an agreement with the distribution agent giving the distribution agent the power to sub delegate the distribution pursuant to which they agree to act as or appoint nominees for investors subscribing for Shares through their facilities. In such capacity the distributor or sales agent may effect subscriptions, conversion and redemptions of Shares in the nominee name on behalf of individual investors and request the registration of such transactions on the register of Shareholders of the Company in the nominee name.

Different technical cut-off times may be imposed by a distributor in the frame of requests for subscriptions, redemptions and conversions from or to any Compartment provided that the principle of equal treatment between the shareholders is respected. This may be the case in certain countries being in different time zones from the Transfer Agent. Shareholders are invited to check with the respective distributor, the cut-off times applicable.

The appointed nominee maintains its own records and provides the investor with individualised information as to its holdings of Shares in the Company. Except where local law or custom prohibits the practice, investors may invest directly in the Company and not avail themselves of a nominee service.

Unless otherwise provided by local law, any Shareholder holding Shares in a nominee account with a distributor has the right to claim, at any time, direct title to such Shares.

6.2 Deferral of Redemptions and Conversion

If the total requests for redemption and conversion out of a Compartment on any Valuation Day exceed 10% of the total value of Shares in issue of that Compartment, the Company may decide that redemption and conversion requests in excess of 10% shall be deferred until the next Valuation Day. On the next Valuation Day, or Valuation Days until completion of the original requests, deferred requests will be dealt with in priority to later requests.

6.3 Settlements

If, on the Settlement Day as determined in the Appendix, banks are not open for business, or an interbank settlement system is not operational, in the country of the currency of the relevant Class, then settlement will be on the next day on which those banks and settlement systems are open as further specified in each Appendix

Confirmation of completed subscriptions, redemptions and conversions will normally be dispatched on the Business Day following the execution of the transaction.

No redemption payments will be made until the original application form and relevant subscription monies have been received from the Shareholder and all the necessary anti-money laundering checks have been completed. Redemption proceeds will be paid on receipt of faxed instructions where such payment is made into the account specified by the Shareholder in the original application form submitted. However, any amendments to the Shareholder’s registration details and payment instructions can only be effected upon receipt of original documentation.

6.4 Minimum Subscription and Holding Amounts and Eligibility for Shares

A minimum initial and subsequent subscription amount and minimum holding amounts for each Class may be set forth, as further detailed in the Appendices to the Prospectus. The Company has the discretion, from time to time, to waive or reduce any applicable minimum subscription amounts.

The right to transfer, redeem or convert Shares is subject to compliance with any conditions (including any minimum subscription or holding amounts and eligibility requirements) applicable to the Class from which the redemption or conversion is being made, and also the Class into which the conversion is to be effected.

The Board of Directors may also, at any time, decide to compulsorily redeem all Shares from Shareholders whose holding is less than the minimum holding amount specified in the relevant Appendix to the Prospectus or who fail to satisfy any other applicable eligibility requirements set out above. In such case the Shareholder concerned will receive one month's prior notice so as to be able to increase its holding above such amount or otherwise satisfy the eligibility requirements.

If a redemption or conversion request would result in the amount remaining invested by a Shareholder falling below the minimum holding amount of that Class, such request will be treated as a request to redeem or convert, as appropriate, the Shareholder’s total holding in that Class. If the request is to transfer Shares, then that request may be refused by the Company.

The Company may restrict or prevent the ownership of Shares in the Company by any person, firm or corporate body, if in the opinion of the Company such holding (i) may be detrimental to the Company, (ii) if it may result in a breach of any law or regulation, whether Luxembourg or foreign, (iii) if as a result thereof the Company may become exposed to tax disadvantages or other financial disadvantages that it would not have otherwise incurred or (iv) if such person, firm or corporate body would not comply with the eligibility criteria of a given Class of Shares. Such persons, firms or corporate bodies to be determined by the Board of Directors.

If the Company becomes aware that a Shareholder is holding Shares in breach of any law or regulation or otherwise in circumstances having, or which may have, adverse regulatory, tax or fiscal consequences for the Company or the Shareholders or would otherwise be detrimental to the interests of the Company or that the Shareholder has become or is a US Person, the Company may, in its sole discretion, redeem the Shares of the Shareholder. "US Person" shall have the meaning given in Regulation S under the U.S. Securities Act of 1933, as amended, and shall mean any national, citizen or resident of the United States of America or of any of its territories or possessions or areas subject to its jurisdiction or any person who is normally resident therein (including the estate of any such person or corporations or partnerships created or organised therein).

Shareholders of the Company with Solvency II calculation requirements may request to receive the holdings information of the concerned Compartment of the SICAV on a T+3 basis.

Shareholders are required to notify the Company immediately in the event that they are or become US Persons or hold Shares for the account or benefit of US Persons or hold Shares in breach of any law or regulation or otherwise in circumstances having, or which may have, adverse regulatory, tax or fiscal consequences for the Company or the Shareholders or otherwise be detrimental to the interests of the Company.

Where it appears that a person who should be precluded from holding Shares, either alone or in conjunction with any other person, is a beneficial owner of Shares, the Company may compulsorily redeem all Shares so owned in accordance with the provisions of the Articles.

6.5 Issue of Shares

Subscriptions for Shares can be made in relation to any day that is a Valuation Day for the relevant Compartment. Shares will be allotted at the subscription price of the relevant Class i.e. the net asset value per Share of such Class determined on the applicable Valuation Day for which the request has been accepted plus the applicable sales commission, if any. Any subscription request shall be irrevocable.

If any sale commissions applied in relation to any particular Compartment, it will be disclosed in the relevant Appendix to the Prospectus. The Company might be entitled to receive the sale commission (if any).

Failure to make good settlement by the Settlement Day as determined in the Appendix, may result in the Management Company bringing an action against the defaulting investor or its financial intermediary or deducting any costs or losses incurred by the Company against any existing holding of the applicant in the Company. In all cases any money returnable to the investor will be held by the Company without payment of interest pending receipt of the remittance.

Payment for Shares must be received by the Company in the reference currency of the relevant Class. Requests for subscriptions in any other major freely convertible currency will be accepted.

Investors are advised to refer to the terms and conditions applicable to subscriptions, which may be obtained by contacting the Company.

The Company may also limit the distribution of a given Class or Compartment to specific countries. In particular, the Company may issue Class F Shares within one or more Compartment which shall be reserved for the founders of the Company. The Company may also restrict the distribution of the Company's Shares by distributors or agents who have not been approved.

The Company may, in its absolute discretion, delay the acceptance of any subscription for Shares of a Class restricted to institutional investors until such date as it has received sufficient evidence of the qualification of the investor as an institutional investor.

6.6 Anti-Money Laundering Procedures

Pursuant to international rules and Luxembourg laws and regulations comprising, but not limited to, the Law of 12 November 2004 on the fight against money laundering and financing of terrorism, as amended, CSSF Regulation 12-02 and circulars of the supervising authority, obligations have been imposed on all professionals of the financial sector to prevent the use of undertakings for collective investment for money laundering and financing of terrorism purposes. As a result of such provisions, the registrar agent of a Luxembourg undertaking for collective investment must in principle ascertain the identity of the subscriber in accordance with Luxembourg laws and regulations. The registrar agent may require subscribers to provide any document it deems necessary to effect such identification.

Namely, the requests for subscription must be accompanied, in the case of individuals, by a certified copy of the investor's passport or identification card and, in the case of legal entities, by a certified copy of the investor's articles of incorporation and, where applicable, an extract from the commercial register or a copy of such other documents as may be requested as verification of the identity and address of the individual or legal entity.

This identification procedure must be complied with by CACEIS Bank, Luxembourg Branch, acting as registrar and transfer agent (or the relevant competent agent of registrar and transfer agent) in the case of direct subscriptions to the Company, and in the case of subscriptions received by the Company from any intermediary resident in a country that does not impose on such intermediary an obligation to identify investors equivalent to that required under AML Regulations.

In case of delay or failure by a subscriber to provide the documents required, the application for subscription (or, if applicable, for redemption) will not be accepted. Neither the undertakings for collective investment nor the registrar agent have any liability for delays or failure to process deals as a result of the subscriber providing no or only incomplete documentation.

6.7 Redemption of Shares

Requests for the redemption of Shares can be made on any day that is a Valuation Day for the relevant Compartment. Redemptions will be carried out at the redemption price of the relevant Class i.e. the net asset value per Share of such Class determined on the applicable Valuation Day on which the request has been accepted less the applicable redemption commission, if any. Any redemption request shall be irrevocable.

The Company may carry out any authentication procedures that it considers appropriate relating to a redemption request. This aims to mitigate the risk of error and fraud for the Company, its agents or Shareholders. Where it has not been possible to complete any authentication procedures to its satisfaction, the Company may delay the processing of payment instructions until authentication procedures have been satisfied.

This will not affect the Valuation Day on which the redemption request is accepted and the redemption to be applied. The Company shall not be held responsible to the Shareholder or anyone if it delays execution or declines to execute redemption instructions in these circumstances.

Redemption payments will normally be paid in the Reference Currency of the Class by bank transfer according to the Subscription/Redemption Settlement Day of each Compartment as detailed in the Appendices. Neither the Company are responsible for any delays or charges incurred at any receiving bank or settlement system. A Shareholder may request, at its own cost and subject to agreement by the Company that their redemption proceeds be paid in a currency other than the Reference Currency of the relevant Class.

If, in exceptional circumstances, redemption proceeds cannot be paid within the period specified above, payment will be made as soon as reasonably practicable thereafter (not exceeding, however, 10 Business Days) at the redemption price calculated on the relevant Valuation Day, it being understood that the Board of Directors will always ensure the overall liquidity of the Company.

If any redemption charge is applied in relation to any particular Compartment, it will be disclosed in the relevant Appendix to the Prospectus. The Company is entitled to receive the redemption charge (if any).

Shares redeemed by the Company become null and void.

6.8 Conversion of Shares

Subject to any provision under this Prospectus and its Appendix, Shareholders have the right to convert all or part of their Shares of any Class of a Compartment into Shares of another Class of that or another Compartment, by applying for conversion in the same manner as for the subscription and redemption of Shares. Conversions within the Company are permitted provided that the Shareholder satisfies the eligibility requirements and minimum holding amounts set out in the Appendix to the Prospectus and such other conditions applicable to the contemplated Classes.

Procedure for conversion within the Company

Conversion may be requested on a common Valuation Day for the original Class and the contemplated Class. The number of Shares issued upon conversion will be based upon the redemption price of the original Class and the net asset value of the contemplated Class, plus a conversion charge (if any), as disclosed in the relevant Appendix to the Prospectus. The Company is entitled to any charges arising from conversions and any rounding adjustment. Any conversion request shall be irrevocable.

6.9 Transfer of Shares

Subject to the restrictions described herein, Shares are freely transferable and are each entitled to participate equally in the profits and liquidation proceeds attributable to the relevant Class.

The transfer of Shares may normally be carried out by delivery to the relevant distributor, sales agent or the Company of an instrument of transfer in appropriate form. On the receipt of the transfer request, and after reviewing the endorsement(s), signature(s) may be required to be certified by an approved bank, stock broker or public notary.

The right to transfer Shares is subject to the minimum investment and holding requirements as detailed above and in the Appendix.

Shareholders are advised to contact the relevant distributor, sales agent or the Company prior to requesting a transfer to ensure that they have the correct documentation for the transaction.

6.10 Swing Pricing

Under certain circumstances (for example, large volumes of deals) investment and/or disinvestment costs may have an adverse effect on the Shareholders' interests in a Compartment. This effect is called "dilution".
Therefore, in order to reduce the dilution impact and to protect existing Shareholders 'interests against dilution a swing pricing mechanism may be adopted by the Company as part of the general valuation policy.

The net asset value per Share of a Compartment may be adjusted on any Valuation Day and taking into account the prevailing market conditions and the level of subscriptions, redemptions and conversions requested by Shareholders in relation to the size of the respective Compartment.

The maximum Company's swing factor is 2%.
The Board of Directors may change from time to time the effective Swing Factor to be applied in the interest of the Shareholders.

Such adjustment, as determined by the Board of Directors at its discretion, may reflect both the estimated fiscal charges and dealing costs (brokerage and transaction costs) that may be incurred by the Compartment and the estimated bid/offer spread of the assets in which the respective Compartment invests. The adjustment will be an addition when the net movement results in an increase of the net asset value of the respective Compartment and a deduction when it results in a decrease of the net asset value.

The volatility of the Compartment's net asset value might not reflect the true portfolio performance and therefore might deviate from Compartment's benchmark as a consequence of the application of swing pricing.

This dilution adjustment will be excluded for the purposes of calculating performance fees paid to the Management Company.

7. DISTRIBUTION POLICY

The general policy regarding the appropriation of net income and capital gains is as follows:

With respect to capital appreciation Classes of Shares, the Board of Directors does intend to recommend at the annual general meeting the reinvestment of their net assets.

With respect to distributing Classes of Shares, the Board of Directors may decide to distribute interim dividends in the form of cash in the relevant currency of the Class.

No dividend will be distributed if the amount of the capital of the Company falls below the amount of 1,250,000 EUR and the dividend will be capitalised.

Dividends may in any case result from a decision of the Shareholders in general meeting, subject to a majority vote of those present or represented and within limits provided by law, and a concurring decision at the same majority in the relevant Compartment.

Dividends unclaimed after five years from the date of declaration will lapse and revert to the Company in the relevant Compartment.

8. MANAGEMENT AND ADMINISTRATION

The Directors of the Company and the Management Company are responsible for its management and supervision including the determination of investment policies.

8.1 Management Company

The Management Company shall at all times act in the best interests of the Shareholders and according to the provisions set forth by the Law, the Prospectus and the Articles.

In fulfilling its responsibilities set forth by the Law and the management company services agreement, the Management Company is permitted to delegate all or a part of its functions and duties to third parties, provided that it retains responsibility and oversight over such delegates. The appointment of third parties is subject to the approval of the Company and the CSSF. The Management Company's liability shall not be affected by the fact that it has delegated its functions and duties to third parties.

The Management Company shall also ensure compliance of the Company with the investment restrictions and oversee the implementation of the investment policy of each Compartment.

The Management Company will receive periodic reports from the Company's service providers in relation to the services which they provide. The Management Company shall also submit its own report to the Board of Directors on a periodic basis and inform the Board of Directors without delay of any non-compliance of the Company with the investment restrictions.

The Management Company may act as the management company of other open-ended collective investment schemes. The names of these other collective investment schemes are available upon request.

For its services, the Management Company shall receive remuneration as further described in the relevant Appendix to the Prospectus.

(a) Conflicts of Interest

For the purpose of identifying the types of conflict of interest that arise in the course of providing services and activities and whose existence may damage the interest of the Company, the Management Company will take into account, by way of minimum criteria, the question of whether the Management Company or a relevant person, or a person directly or indirectly linked by way of control to the Management Company, is in any of the following situations, whether as a result of providing collective portfolio management activities or otherwise:

(1) the Management Company or that person is likely to make a financial gain, or avoid a financial loss, at the expense of the Company;

(2) the Management Company or that person has an interest in the outcome of a service or an activity provided to the Company or another client or of a transaction carried out on behalf of the Company or another client or, which is distinct from the Company interest in that outcome;

(3) the Management Company or that person has a financial or other incentive to favour the interest of another client or group of clients over the interests of the Company;

(4) the Management Company or that person carries on the same activities for the Company and for another client or clients which are not UCITS; and

(5) the Management Company or that person receives or will receive from a person other than the Company an inducement in relation to collective portfolio management activities provided to the Company, in the form of monies, goods or services, other than the standard commission or fee for that service.

When identifying any potential types of conflict of interests, the Management Company will take into account

(1) the interests of the Management Company, including those deriving from its belonging to a group or from the performance of services and activities, the interests of the clients and the duty of the Management Company towards the Company as well as

(2) the interests of two or more managed UCITS.

The summary description of the strategies referred to in that paragraph will be made available to the investors on request

(b) Best Execution

The Management Company will act in the best interests of the Company when executing decision to deal on behalf of the Company in the context of the management of the Compartment. For that purpose the Management Company will take all reasonable steps to obtain the best possible results for the Company, taking into account price, costs, speed, likelihood of execution and settlement, order size and nature, or any other consideration relevant to the execution of the order (best execution).

The relative importance of such factors will be determined by reference to the following criteria:

(a) the objectives, investment policy and risks specific to the Company,

(b) the characteristics of the order.

8.2 Administration Agent

With the Company's consent, the Management Company has concluded an agreement (the "**Services Agreement**") appointing CACEIS Bank, Luxembourg Branch as Administration Agent (which mainly comprises the services of the Administrative Agent, Domiciliary Agent, Transfer Agent and Registrar).

This agreement has been concluded for an indefinite duration and may be terminated by either party in writing with three months' notice.

In its capacity as Administration Agent, CACEIS Bank, Luxembourg Branch shall notably perform the calculation of the net asset value of units for each existing Class or Compartment of the Company, management of accounts, the preparation of the annual and semi-annual financial statements and execute all tasks required as central administration.

In its capacity as the transfer and registration agent, CACEIS Bank, Luxembourg Branch shall in particular execute subscription, redemption and conversion applications and keep and maintain the register of Shareholders of the Company. In such capacity it is also responsible for supervising anti-money laundering measures under the AML Regulations. CACEIS Bank, Luxembourg Branch may request documents necessary for identification of investors.

For its services under the Services Agreement CACEIS Bank, Luxembourg Branch shall receive remuneration as further described in the relevant Appendix to the Prospectus.

8.3 Depositary

CACEIS Bank, Luxembourg Branch, established at 5, allée Scheffer, L-2520 Luxembourg and registered with the Luxembourg Register of Commerce and Companies under number B 209.310 is acting as depositary of the Company (the "**Depositary**") in accordance with a depositary agreement dated as of 31 October 2016 as amended from time to time (the "**Depositary Agreement**") and the relevant provisions of the Law and UCITS Rules.

CACEIS Bank, Luxembourg Branch is acting as a branch of CACEIS Bank, a public limited liability company (société anonyme) incorporated under the laws of France, having its registered office located at 1-3, place Valhubert, 75013 Paris, France, registered with the French Register of Trade and Companies under number 692 024 722 RCS Paris.

CACEIS Bank is an authorised credit institution supervised by the European Central Bank ("ECB") and the Autorité de contrôle prudentiel et de résolution ("ACPR"). It is further authorised to exercise through its Luxembourg branch banking and central administration activities in Luxembourg.

Investors may consult upon request at the registered office of the Company, the Depositary Agreement to have a better understanding and knowledge of the limited duties and liabilities of the Depositary.

The Depositary has been entrusted with the custody and/or, as the case may be, recordkeeping and ownership verification of the Compartments' assets, and it shall fulfil the obligations and duties provided for by Part I of the Law. In particular, the Depositary shall ensure an effective and proper monitoring of the Company' cash flows.

In due compliance with the UCITS Rules the Depositary shall:

(i) ensure that the sale, issue, re-purchase, redemption and cancellation of units of the Company are carried out in accordance with the applicable national law and the UCITS Rules or the Articles;

(ii) ensure that the value of the Units is calculated in accordance with the UCITS Rules, the Articles and the procedures laid down in the Directive;

(iii) carry out the instructions of the Company, unless they conflict with the UCITS Rules, or the Articles;

(iv) ensure that in transactions involving the Company's assets any consideration is remitted to the Company within the usual time limits; and

(v) ensure that an Company's income is applied in accordance with the UCITS Rules and the Articles.

The Depositary may not delegate any of the obligations and duties set out in (i) to (v) of this clause.

In compliance with the provisions of the Directive, the Depositary may, under certain conditions, entrust part or all of the assets which are placed under its custody and/or recordkeeping to correspondents/ third party custodians as appointed from time to time. The Depositary's liability shall not be affected by any such delegation, unless otherwise specified, but only within the limits as permitted by the Law.

A list of these correspondents/third party custodians is available on the website of the Depositary (www.caceis.com, section "veille règlementaire"). Such list may be updated from time to time. A complete list of all correspondents/third party custodians may be obtained, free of charge and upon request, from the Depositary. Up-to-date information regarding the identity of the Depositary, the description of its duties and of conflicts of interest that may arise, the safekeeping functions delegated by the Depositary and any conflicts of interest that may arise from such a delegation are also made available to investors on the website of the Depositary, as mentioned above, and upon request. There are many situations in which a conflict of interest may arise, notably when the Depositary delegates its safekeeping functions or when the Depositary also performs other tasks on behalf of the Company, such as administrative agency and registrar agency services. These situations and the conflicts of interest thereto related have been identified by the Depositary. In order to protect the Company's and its Shareholders' interests and comply with applicable regulations, a policy and procedures designed to prevent situations of conflicts of interest and monitor them when they arise have been set in place within the Depositary, aiming namely at:

(i) identifying and analysing potential situations of conflicts of interest;

(ii) recording, managing and monitoring the conflict of interest situations either in:

(iii) relying on the permanent measures in place to address conflicts of interest such as maintaining separate legal entities, segregation of duties, separation of reporting lines, insider lists for staff members; or

(iv) implementing a case-by-case management to (i) take the appropriate preventive measures such as drawing up a new watch list, implementing a new Chinese wall, making sure that operations are carried out at arm's length and/or informing the concerned Shareholders of the Company, or (ii) refuse to carry out the activity giving rise to the conflict of interest.

The Depositary has established a functional, hierarchical and/or contractual separation between the performance of its UCITS depositary functions and the performance of other tasks on behalf of the Company, notably, administrative agency and registrar agency services.

The Company and the Depositary may terminate the Depositary Agreement at any time by giving ninety (90) days' notice in writing. The Company may, however, dismiss the Depositary only if a new depositary bank is appointed within two months to take over the functions and responsibilities of the Depositary. After its dismissal, the Depositary must continue to carry out its functions and responsibilities until such time as the entire assets of the Compartments have been transferred to the new depositary bank.

The Depositary has no decision-making discretion nor any advice duty relating to the Company's investments. The Depositary is a service provider to the Company and is not responsible for the preparation of this Prospectus and therefore accepts no responsibility for the accuracy of any information contained in this Prospectus or the validity of the structure and investments of the Company.

9. CHARGES & EXPENSES

The Company shall bear the following expenses:

- all taxes which may be payable on the assets, income and expenses chargeable to the Company;
- standard brokerage fees and bank charges originating from the Company's business transactions;
- all fees due to the Board of Directors of the Company;
- all reasonable expenses of the Board of Directors of the Company, the Management Company, the Administration Agent and the Depositary;

Any costs incurred by the Company, which are not attributable to a specific Compartment, will be charged to all Compartments in proportion to their net assets. Each Compartment will be charged with all costs or expenses directly attributable to it.

Management Company Fees

The Management Company is entitled to receive from the Fund the Management Company Fees as further described in the appendices to the Prospectus.

Such Management Company Fees, remunerating the Management Company for its activities of asset management may be composed of following elements calculated on following basis:

- a percentage based on the net asset value of the Compartment;
- a fee based on the performance of each Compartment. It has to be noted that this performance fee will be charged on the basis of the unswung net asset value.

These fees are calculated and accrued on each day and are payable quarterly in arrears.

The exact percentage of the relevant fees as well as their characteristics will be detailed, if any, in the relevant Appendix.

Administration Fee

The Administration Fee is a fee expressed as a percentage of the net asset value of the Compartments and Classes of Shares, including all the administrative expenses of the Fund.

The Administration Fee is payable quarterly in arrears to the Management Company and is calculated each day for each Compartment and each Class of Shares.

The Administration Fee is mainly composed of:

- The remuneration of the Administrative Agent, Domiciliary Agent, Transfer Agent and Registrar, including transaction fees for the issue/redemption/conversion of Shares in accordance with the provisions of the Services Agreement;
- The remuneration of the Depositary and the fees due to the correspondent banks;
- all expenses connected with publications and the supply of information to Shareholders, in particular the cost of printing global certificates and proxy forms for general meetings for the Shareholders, the cost of publishing the issue and redemption prices, and also the cost of printing, the distribution of the annual and semi-annual reports, the Prospectus as well as the KIID, including translation costs;
- all expenses involved in registering and maintaining the registration of the Company with all governmental agencies and stock exchanges;
- all fees due to any sub-paying agent, to representatives in foreign countries and any other agents,
- The costs related to extraordinary measures, in particular any expertise or trial aiming at the protection of the Shareholders' interests;
- all fees due to the Auditor;
- all fees due to the legal advisors or similar administrative charges, incurred by the Company, the Management Company and the Depositary for acting on behalf of the Shareholders;

From such fee, the Management Company will pay the fees of the Depositary, the Administrative Agent, the Domiciliary Agent, the Transfer Agent and the Registrar and the administrative expenses of the Fund.

The Management Company will absorb any difference between the actual operating costs and the applicable fixed fees due to the Management Company (i.e. meaning the Management Company Fees and the Administration Fees) the amount of which is disclosed for each Compartment in the relevant appendices to this Prospectus (the "Fixed Fees"). To the extent that the actual operating costs are lower that the Fixed Fees, the excess will be retained to the Management Company. To the extent that the actual operating costs exceed the Fixed Fees, the difference will be supported by the Management Company.

10. TAXATION

The Company is qualified for a special Luxembourg tax regime applicable to SICAVs.

The following is a summary of certain material Luxembourg tax consequences of purchasing/subscribing, owning and disposing of the Shares. It does not purport to be a complete analysis of all possible tax situations that may be relevant to a decision to purchase, own or sell the Shares. It is included herein solely for preliminary information purposes. It is not intended to be, nor should it construed to be, legal or tax advice.

Prospective purchasers/subscribers of the Shares should consult their own tax advisers as to the applicable tax consequences of the ownership of the Shares, based on their particular circumstances.

This summary does not allow any conclusions to be drawn with respect to issues not specifically addressed. The following description of Luxembourg tax law is based upon the Luxembourg law and regulations as in effect and as interpreted by the Luxembourg tax authorities on the date of the Prospectus and is subject to any amendments in law (or in interpretation) later introduced, whether or not on a retroactive basis.

Any reference in the present section to a tax, duty, levy impost or other charge or withholding of a similar nature refers to Luxembourg tax law and/or concepts only.

10.1 Luxembourg tax residency of the Shareholders

A Shareholder will not become a resident, nor be deemed to be a resident, in Luxembourg, by reason only of the holding of the Shares, or the execution, performance, delivery and/or enforcement of the Shares.

10.2 Luxembourg taxation of the Company

In accordance with the current Luxembourg legislation applying to open-ended collective investment company ("société d'investissement à capital variable") established under the laws of the Grand-Duchy of Luxembourg, the Company is exempt from corporate income tax (impôt sur le revenu des collectivités), municipal business tax (impôt commercial communal) and net worth tax (impôt sur la fortune) in Luxembourg, and dividends declared/paid by the Company are not subject to withholding tax in Luxembourg.

The Company is subject to a subscription tax (taxe d'abonnement) at the rate of 0.05% p.a. on the Company's net asset value calculated on the last Valuation Day of each quarter and is payable in quarterly instalments. Such a rate is reduced to 0.01% p.a. for the Company's net asset value which is exclusively related to Compartments whose exclusive policy is the investment in money market instruments and Compartments reserved to institutional investors. Under certain circumstances, the above mentioned subscription tax rates are not applicable which leads de facto to a subscription tax exemption.

No stamp duty or other tax is payable in Luxembourg on the issue of Shares by the Company.
Luxembourg value added tax (taxe sur la valeur ajoutée) at a rate of 17% might be due by the Company on fees paid to remunerate service providers.

Feeder Funds
The investment into a Master Fund has no specific Luxembourg tax impact.

10.3 Luxembourg taxation of the Shareholders

10.3.1 Luxembourg taxation of Luxembourg tax resident Shareholders

10.3.1.1 Luxembourg taxation of Luxembourg tax resident individual Shareholders

Income such as dividends, liquidation bonus or capital gains derived from the Shares are generally subject to Luxembourg income tax at the progressive ordinary rates. For the year 2016, the top effective marginal rate (without considering the solidarity surcharge) is 40% for a taxable income ranging from EUR 100,00 to EUR 150,000 for 'class 1 and 1a' taxpayers and ranging from EUR 200,000 to EUR 300,000 for 'class 2' taxpayers. The maximum aggregate income tax rate is thus of 42.80% (including the solidarity surcharge of 7%) for a taxable income ranging from EUR 100,000 to EUR 150,000 for 'class 1 and 1a' taxpayers (or ranging from EUR 200,000 to EUR 300,000 for 'class 2' taxpayers) and 43.60% (including the solidarity surcharge of 9%) for a taxable income exceeding EUR 150,000 for 'class 1 and 1a' taxpayers (or exceeding EUR 300,000 for 'class 2' taxpayers).

However, capital gains realized upon disposal of the Shares by individual tax resident Shareholders who act in the course of the management of their private wealth, are not subject to income tax, unless said capital gains qualify either as speculative gains or as gains on a substantial participation.
Capital gains are deemed to be speculative gains and are subject to Luxembourg income tax at ordinary rates if the Shares are disposed within a period of 6 months after their acquisition or the disposal precedes the acquisition.

A participation will be deemed to be substantial where an individual tax resident Shareholder holds, either alone or together with his spouse/partner and/or minor children, directly or indirectly at any time within the 5 years preceding the disposal, more than 10% in the share capital of the Company. Capital gains realized on a substantial participation more than 6 months after the acquisition thereof are subject to income tax according to the half-global rate method (i.e., the average rate applicable to the total income is calculated according to the progressive income tax rates and half of the average rates is applied to the capital gains realized on the substantial participation). A shareholder is also deemed to alienate a substantial participation if he acquired free of charge, within 5 years preceding the disposal, a participation that was constituting a substantial participation in the hands of the alienator (or the alienators in case of successive transfers free of charge within the same 5-year period). For the avoidance of any doubt, a disposal may include a sale, an exchange, a contribution or any other kind of alienation of the Shares.

Capital gains realized on the disposal of the Shares by resident individual Shareholders, who act in the course of their professional / business activity, are subject to Luxembourg income tax at the progressive ordinary rates.

Under Luxembourg tax law, where an individual Shareholder is a resident of Luxembourg for inheritance tax purposes at the time of his/her death, the Shares are included in his or her Luxembourg taxable basis for inheritance tax purposes. On the contrary, the Shares are not included in his or her Luxembourg taxable basis in cases where the deceased was not a resident of Luxembourg for inheritance purposes.

10.3.1.2 Luxembourg taxation of Luxembourg tax resident corporate Shareholders

Income such as dividends, liquidation bonus or capital gains derived from the Shares by a Luxembourg fully-taxable resident company are subject to corporate income tax (impôt sur le revenu des collectivités) and municipal business tax (impôt commercial communal) in Luxembourg.

10.3.1.3 Luxembourg tax exempt Shareholders

A Shareholder who is either (i) an undertaking for collective investment subject to the amended law of 20 December 2002 or the Law, (ii) a specialised investment fund governed by the law of 13 February 2007, or (iii) a family wealth management company governed by the law of 11 May 2007, is exempt from corporate income tax (impôt sur le revenu des collectivités), municipal business tax (impôt commercial communal) and net worth tax (impôt sur la fortune) in Luxembourg. Dividends, liquidation bonus and capital gains derived from the Shares are therefore not subject to corporate income tax (impôt sur le revenu des collectivités), municipal business tax (impôt commercial communal) and net worth tax (impôt sur la fortune) in Luxembourg. However, subscription tax might be due in Luxembourg under certain circumstances.

10.3.2 Luxembourg taxation of non-Luxembourg tax resident Shareholders

Shareholders (either individuals or corporations) who are not resident in Luxembourg for tax purposes and who have neither a permanent establishment nor a permanent representative in Luxembourg to which or whom the Shares are attributable are not liable to taxes in Luxembourg withholding taxes on dividends paid by the Company or to Luxembourg capital gains taxes realized on its shares of the Company by reason only of the holding or disposing of the Shares, or the execution, performance, delivery and/or enforcement of the Shares (for the avoidance of any doubt, including but not limited to taxes on capital gain(s) and dividend distribution(s)).

10.4 Foreign Account Tax Compliance Act

Legislation commonly known as the Foreign Account Tax Compliance Act (FATCA) substantially changes the information reporting requirements imposed on many non-U.S. entities. The IRS and US Treasury Department have recently issued final Treasury Regulations for implementing the provisions of FATCA. FATCA imposes withholding at a rate of 30% with respect to US-source interest, dividends and certain other payments to certain non-US entities, effective 1 July 2014, and withholding at a rate of 30% on the gross proceeds realized by certain non-US entities from the sale of any property of a type which can produce these types of income, effective 1 January 2017. The non-US entities on which FATCA withholding is imposed include "foreign financial institutions" unless they collect and disclose information regarding their direct and indirect US owners, either under an agreement entered into by the "foreign financial institution" with the IRS or pursuant to an "intergovernmental agreement" for FATCA compliance entered into between the United States and the jurisdiction in which such "foreign financial institution" is established.

Investment funds such as the Company will likely be treated as "foreign financial institutions" under FATCA. Although the Company is unlikely to receive any US-source payments or gross proceeds, under FATCA, "foreign financial institutions" that do not comply with the reporting and disclosure requirements imposed by FATCA (including failure to comply with an applicable "intergovernmental agreement"), or that otherwise do not cooperate with certain documentation requests, may still be subject to a 30% US withholding tax on their receipt of certain "pass-through payments" from a "foreign financial institution" that is compliant with FATCA, effective 1 January 2017.

The Company may be required to disclose information regarding their investors to the IRS or other tax or governmental authorities. The Board of Directors may request from investors information, representations, certificates and duly completed forms as the Board of Directors may deem necessary to eliminate withholding under, or otherwise comply with, FATCA or any similar regime. Investors will be required to provide information and documentation that the Board of Directors determines is required for FATCA compliance by the Company and will be subject to certain adverse consequences for failure to so comply. The operating agreements of the Company will provide that any investors that fail to provide documentation or other information for purposes of FATCA, any "intergovernmental agreement" under FATCA or any similar regime will indemnify the Company for any costs or expenses arising out of such failure, including any withholding tax imposed under FATCA, and will economically bear such costs and expenses to any other investors.

Shareholders should consult their own advisers as to the applicable tax and other consequences regarding FATCA.

10.5 Common Reporting Standard

Under Directive 2015/2060/EC repealing Directive 2003/48/EC on the taxation of savings income in the form of interest payments of 3 June 2003 (EUSD), as amended by Directive 2014/48/EU, the EUSD has been repealed and will no longer apply once all the reporting obligations concerning financial year 2015 will have been complied with (normally 1 June 2016). Under the EUSD, EU Member States are required to provide the tax authorities of another EU Member State with information on payments of interest or other similar income (within the meaning of the EUSD) paid by a paying agent (within the meaning of the EUSD) to an individual beneficial owner who is a resident, or to certain residual entities (within the meaning of the EUSD) established, in that other EU Member State.

Under the Luxembourg law of 21 June 2005 implementing the EUSD, as amended by the law of 25 November 2014, and several agreements concluded between Luxembourg and certain dependent or associated territories of the EU (Territories) (EUSD Law), Luxembourg-based paying agents are required as since 1 January 2015 to report to the Luxembourg tax authorities the payment of interest and other similar income paid by it to (or under certain circumstances, to the benefit of) an individual or certain residual entities resident or established in another EU Member State or in the Territories, and certain personal detail on the beneficial owner. These details are provided by the Luxembourg tax authorities to the competent foreign tax authorities of the state of residence of the beneficial owner (within the meaning of the EUSD).

Following the development by the OECD of a common reporting standard (CRS) to achieve a comprehensive and multilateral automatic exchange of information in the future on a global basis, Directive 2014/107/EU amending Directive 2011/16/EU as regards mandatory automatic exchange of information in the field of taxation ("Euro-CRS Directive") was adopted on 9 December 2014 in order to implement the CRS among the EU Member States.

EU Member States will be required to implement an automatic exchange of information as provided for by the Euro-CRS Directive effective as from 1 January 2016 (and in the case of Austria as from 1 January 2017). The Euro-CRS Directive was implemented into Luxembourg legislation by the law of 18 December 2015 on the automatic exchange of financial account information in the field of taxation (CRS Law).

The CRS Law requires Luxembourg financial institutions to identify financial assets holders and establish if they are fiscally resident in countries with which Luxembourg has a tax information sharing agreement. Luxembourg financial institutions will then report financial account information of the asset holder to the Luxembourg tax authorities, which will thereafter automatically transfer this information to the competent foreign tax authorities on a yearly basis.

Accordingly, the Company will require its investors to provide information in relation to the identity and fiscal residence of financial account holders (including certain entities and their controlling persons), account details, reporting entity, account balance/value and income/sale or redemption proceeds to the local tax authorities of the country of fiscal residency of the foreign investors to the extent that they are fiscally resident in a jurisdiction participating in the automatic exchange of information.

Under the CRS Law, the first exchange of information will be applied by 30 September 2017 for information related to the calendar year 2016.

In addition, Luxembourg signed the OECD's multilateral competent authority agreement ("Multilateral Agreement") to automatically exchange information under the CRS. The Multilateral Agreement aims to implement the CRS among non-Member States; it requires agreements on a country-by-country basis.

Shareholders in the Company may therefore be reported to the Luxembourg and other relevant tax authorities in accordance with applicable rules and regulations.

Shareholders should consult their own advisers as to the applicable tax and other consequences regarding CRS”.

11. GENERAL INFORMATION

11.1 Organisation

The Company is an investment company organised as a *société anonyme* under the laws of the Grand-Duchy of Luxembourg and qualifies as a *société d'investissement à capital variable* (SICAV) subject to Part I of the Law. The Company was initially incorporated on 30 April 2014. The Company is registered with the *Registre de Commerce et des Sociétés*, Luxembourg, under number B186947. The articles of incorporation will be published in the *Mémorial* on 19 May 2014. The articles of incorporation have been filed with the *Registre de Commerce et des Sociétés* of Luxembourg.

The minimum capital of the Company required by Luxembourg law shall be 1,250,000 EUR.

11.2 The Shares

Shares will be issued in registered form. Fractional entitlements to Shares will be rounded to 4 decimal places. Subject to the restrictions described herein, Shares in each Compartment are freely transferable and are each entitled to participate equally in the profits and liquidation proceeds attributable to each Class of the relevant Compartment. The rules governing such allocation are set forth under 5. "Allocation of Assets and Liabilities among the Compartments".

The Shares, which are of no par value and which must be fully paid upon issue, carry no preferential or pre-emptive rights and each one is entitled to one vote at all meetings of Shareholders. Shares redeemed by the Company become null and void.

Should the Shareholders, at an annual general meeting, decide any distributions in respect of distribution Shares (if issued) these will be paid within one month of the date of the annual general meeting. Under Luxembourg law, no distribution may be decided as a result of which the net assets of the Company would become less than the minimum provided for under Luxembourg law.

11.3 Meetings

The annual general meeting of Shareholders will be held at the registered office of the Company in Luxembourg on the second Thursday of April of each year at 11 am or, to the extent required by Luxembourg law, and notices will be sent to the holders of registered Shares recorded by the transfer agent in the Share register of the Company by post at least 8 calendar days prior to the meeting at their addresses shown on the register of Shareholders. Such notices will include the agenda and will specify the time and place of the meeting and the conditions of admission. They will also refer to the rules of quorum and majorities required in the Articles of the Company.

Each Share confers the right to one vote. The vote on the payment of a dividend on a particular Class requires a separate majority vote from the meeting of Shareholders of the Class concerned. Any change in the Articles affecting the rights of a Compartment must be approved by a resolution of both the general meeting of the Company and the Shareholders of the Compartment concerned.

The Management Company draws the investors' attention to the fact that any investor will only be able to fully exercise his investor rights directly against the Company, notably the right to participate in general shareholders' meetings if the investor is registered himself and in his own name in the shareholders' register of the Company. In cases where an investor invests in the Company through an intermediary investing into the Company in his own name but on behalf of the investor, it may not always be possible for the investor to exercise certain shareholder rights directly against the Company. Investors are advised to take advice on their rights.

11.4 Reports and Accounts

Audited annual reports shall be published within 4 months following the end of the accounting year and unaudited semi-annual reports shall be published within 2 months following the period to which they refer. The annual and semi-annual reports shall be made available at the registered offices of the Company, the Depositary, the representatives and paying agents during ordinary office hours. The Company's accounting year ends on the thirty-first of December each year. The first accounting year will end in 31 December 2014. The first audited report shall be published as of 31 December 2014 and the first unaudited semi-annual report shall be published as of 30 June 2015.

The Reference Currency of the Company is the EUR. The aforesaid reports will comprise consolidated accounts of the Company expressed in EUR as well as individual information on each Compartment expressed in the Reference Currency of each Compartment.

11.5 Allocation of assets and liabilities among the Compartments

For the purpose of allocating the assets and liabilities between the Compartments, the Board of Directors has established a pool of assets for each Compartment in the following manner:

(1) the proceeds from the issue of each Share of each Compartment are to be applied in the books of the Company to the pool of assets established for that Compartment and the assets and liabilities and income and expenditure attributable thereto are applied to such pool subject to the provisions set forth hereafter;

(2) Where any asset is derived from another asset, such derivative asset is applied in the books of the Company to the same pool as the asset from which it was derived and on each revaluation of an asset, the increase or diminution in value is applied to the relevant pool;

(3) Where the Company incurs a liability which relates to any asset of a particular pool or to any action taken in connection with an asset of a particular pool, such liability is allocated to the relevant pool;

(4) in the case where any asset or liability of the Company cannot be considered as being attributable to a particular pool, such asset or liability is allocated to all the pools in equal parts or, if the amounts so justify, pro rata to the net asset values of the relevant Compartments;

(5) upon the payment of dividends to the holders of Shares in any Compartment, the net asset value of such Compartment shall be reduced by the amount of such dividends.

If there have been created within each Compartment different classes of Shares, the rules shall mutatis mutandis apply for the allocation of assets and liabilities amongst Classes.

11.6 Determination of the net asset value of Shares

The net asset value of Shares of each Compartment shall be expressed in the Reference Currency of the relevant Compartment. The net asset value shall be determined by the Administration Agent on each Valuation Day and on any such day that the Board may decide from time to time by dividing the net assets of the Company attributable to each Compartment by the number of outstanding Shares of that Compartment.

The Administration Agent calculates the net asset value per Share in each Compartment on the Valuation Day as defined in the Appendix. In order to avoid market timing in their units, and prevent arbitrage opportunities, where the Compartment is a Feeder Compartment, the Valuation Day shall be the same day as the valuation day of the Master Fund.

The calculation of the net asset value of the Shares of any Compartment and the issue, redemption, and conversion of the Shares of any Compartment may be suspended in the following circumstances, in addition to any circumstances provided for by law:

- during any period (other than ordinary holidays or customary weekend closings) when any market or stock exchange is closed which is the principal market or stock exchange for a significant part of the Compartment's investments, or in which trading is restricted or suspended,
- during any period when an emergency exists as a result of which it is impossible to dispose of investments which constitute a substantial portion of the assets of the Compartment, or it is impossible to transfer money involved in the acquisition or disposal of investments at normal rates of exchange, or it is impossible to fairly determine the value of any assets in the Compartment,
- during any breakdown in the means of communication normally employed in determining the price of any of the Compartment's investments or the current prices on any stock exchange,
- when for any reason beyond the control of the Board of Directors, the prices of any investment held by the Compartment cannot be reasonably, promptly or accurately ascertained, or,

- during any period when remittance of money which will or may be involved in the purchase or sale of any of the Compartment's investments cannot, in the opinion of the and/or the Board of Directors, be effected at normal rates of exchange;
- when calculating the net asset value of a UCITS/UCIs in which the Company has invested a substantial portion of the assets of one or more Compartments or one or more classes is suspended or unavailable, or where the issue, redemption or conversion of shares or units of such UCITS or other UCI is suspended or restricted;
- in the event of the publication of the convening notice to a general meeting of Shareholders at which a resolution to wind up or merge the Company or one or more Compartment(s) is to be proposed or;
- during any period when in the opinion of the Directors of the Company there exist circumstances outside the control of the Company where it would be impracticable or unfair towards the Shareholders to continue dealing in Shares of any Compartment of the Company

Furthermore, a Feeder Compartment may temporarily suspend the redemption, reimbursement or subscription of its Shares, when its master UCITS temporarily suspends the redemption, reimbursement or subscription of its shares/units, whether this be at its own initiative or at the request of its competent authorities, for a period identical to the period of suspension imposed on the master UCITS.

The suspension of the calculation of the net asset value and of the issue, redemption, and conversion of shares shall be published in a daily newspaper in Luxembourg and in another newspaper generally available in jurisdictions in which the Company is registered.

The value of the assets of each Class of Shares of each Compartment is determined as follows:

I. The assets of the Company contain the following:

(1) all fixed-term deposits, money market instruments, cash in hand or cash expected to be received or cash contributions including interest accrued;

(2) all debts which are payable upon presentation as well as all other money claims including claims for purchase price payment not yet fulfilled that arise from the sale of investment fund Shares or other assets;

(3) all investment fund Shares;

(4) all dividends and distributions due in favour of the Company, as far as they are known to the Company;

(5) all interest accrued on interest-bearing securities that the Company holds, as far as such interest is not contained in the principal claim;

(6) all financial rights which arise from the use of derivative instruments;

(7) the provisional expenses of the Company, as far as these are not deducted, under the condition that such provisional expenses may be amortised directly from the capital of the Company;

(8) all other assets of what type or composition, including prepaid expenses.

II. The value of such assets is fixed as follows:

(1) Investment funds are valued at their net asset value.

(2) Liquid assets are valued at their nominal value plus accrued interest.

(3) Fixed term deposits are valued at their nominal value plus accrued interest. Fixed term deposits with an original term of more than 30 calendar days can be valued at their yield adjusted price if an arrangement between the Company and the bank, with which the fixed term deposit is invested has been concluded including that the fixed term deposits are terminable at any time and the yield adjusted price corresponds to the realisation value.

(4) Commercial papers are valued at their nominal value plus accrued interest. Commercial papers with an original term of more than 90 calendar days can be valued at their yield adjusted price if an arrangement between the Company and the bank, with which the commercial paper is invested has been concluded including that the commercial papers are terminable at any time and the yield adjusted price corresponds to the realisation value.

(5) Securities or financial instruments admitted for official listing on a Regulated Market are valued on the basis of the last available closing price at the time when the valuation is carried out. If the same security is quoted on a Regulated Markets, the quotation on the principal market for this security will be used. If there is no relevant quotation or if the quotations are not representative of the fair value, the evaluation will be made in good faith by the Board of Directors or their delegate.

(6) Unlisted securities or financial instruments are valued on the basis of their probable value realisation as determined by the Board of Directors or their delegate using valuation principles which can be examined by the auditor of the Company, in order to reach a proper and fair valuation of the total assets of each Compartment.

(7) Any other assets are valued on the basis of their probable value realisation as determined by the Board of Directors or their delegate using valuation principles which can be examined by the auditor of the Company, in order to reach a proper and fair valuation of the total assets of each Compartment.

(8) OTC derivative financial instruments must be value at their «fair value» in accordance with CSSF Circular 08/356.

(9) Units or shares of the Master Fund will be valued at their last determined and available net asset value.

In the event that it is impossible or incorrect to carry out a valuation in accordance with the above rules owing to particular circumstances, the Board of Directors or their delegate shall be entitled to use other generally recognised valuation principles which can be examined by an auditor, in order to reach a proper valuation of the total assets of each Compartment.

III. The liabilities of the Company contain the following:

(1) all loans, bills of exchange and other sums due, including deposits of security such as margin accounts, etc. In connection with the use of derivative instruments; and

(2) all administrative expenses that are due or have been incurred, including the costs of formation and registration at the registration offices as well as legal fees, auditing fees, all fees of the Management Company, the Administration Agent, the Investment Manager (if any), the Depositary and all other representatives and agents of the Company, the costs of mandatory publications, the Prospectus and the KIID,

conclusions of transactions and other documents which are made available to the Shareholders. If the fee rates agreed between the Company and the employed service providers (such as the Management Company, the Administration Agent, Depositary or Investment Manager (if any)) for such services deviate with regard to individual Classes, the corresponding varying fees shall be charged exclusively to the respective Class; and

(3) all known liabilities, whether due or not, including dividends that have been declared but not yet been paid; and

(4) a reasonable sum provided for taxes, calculated as of the day of the valuation as well as other provisions and reserves approved by the Board of Directors; and

(5) all other liabilities of the Company, of whatever nature, vis-à-vis third parties; however, each Compartment shall be exclusively responsible for all debts, liabilities and obligations attributable to it.

For the purpose of valuing its liabilities, the Company may include all administrative and other expenses of a regular or periodic nature by valuing these for the entire year or any other period and apportioning the resulting amount proportionally to the respective expired period of time. The method of valuation may only apply to administrative or other expenses which concern all of Shares equally.

IV. For the purpose of valuation within the scope of this chapter, the following applies:

(1) Shares that are redeemed in accordance with the provisions under "ISSUE, REDEMPTION AND CONVERSION OF SHARES" above shall be treated as existing Shares and shall be posted until immediately after the point in time set by the Board of Directors for carry out the valuation; from this point in time until the price is paid, they shall be treated as a liability of the Company; and

(2) All investments, cash in hand and other assets of any fixed assets that are not in the denomination of the Share Class concerned shall be converted at the exchange rate applicable on the day of the calculation of net asset value, taking into consideration their market value; and

(3) On every Valuation Day, all purchases and sales of securities which were contracted by the Company on this very Valuation Day must be included in the valuation to the extent possible.

11.7 Merger or Liquidation of Compartments

The Board of Directors may decide to liquidate any Compartment if in the case of a Feeder Compartment, the Master Fund of a Feeder Compartment has been liquidated or closed (without prejudice to the below provisions) or if more generally, a change in the economic or political situation relating to the Compartment concerned would justify such liquidation or if required by the interests of the Shareholders of any of the Compartments concerned. The decision of the liquidation will be notified to the Shareholders concerned prior to the effective date of the liquidation and the notification will indicate the reasons for, and the procedures of, the liquidation operations. Unless the Board of Directors otherwise decides in the interests of the Shareholders of the Compartment concerned, they may continue to request redemption or conversion of their Shares on the basis of the applicable net asset value, taking into account the estimated liquidation expenses. Assets which could not be distributed to their beneficiaries upon the close of the liquidation of the Compartment will be deposited with the *Caisse de Consignation* on behalf of their beneficiaries.

Termination of a Compartment for other than those mentioned in the preceding paragraph, may be effected only upon prior approval by the Shareholders of the Compartment to be terminated, at a duly convened Compartment's Shareholders meeting which may be validly held without quorum and may decide by a simple majority of the Shareholders of the relevant Compartment present or represented.

The Board of Directors may decide to merge any Compartment into another Compartment or into another UCITS or a Compartment within such UCITS (whether established in Luxembourg or another Member State or whether such UCITS is incorporated as a company or is a contractual type fund) (the "**new Compartment**"), in compliance with the procedures laid down in Chapter 8 of the law of 17 December 2010. Such decision will be notified to Shareholders in the same manner as described in the preceding paragraph and, in addition, the notification will contain information in relation to the new Compartment in accordance with the Law and related regulations. Such notification will be made at least 30 calendar days before the last day for requesting the redemption or conversion of the Shares, free of charge.

In accordance with the provisions of the Law applying to a Compartment qualifying as Feeder Compartment, the Feeder Compartment shall be liquidated upon the Master Fund being either liquidated, divided into two or more UCITS or merged with another UCITS, unless the CSSF approves either (a) the investment of at least 85 % of the assets of the Feeder Compartment into units of another master Fund, or (b) the Feeder Compartment's conversion into a UCITS which is not a feeder UCITS within the meaning of the Law.

11.8 Liquidation of the Company

The Company is incorporated for an unlimited period and liquidation shall normally be decided upon by an extraordinary general meeting of Shareholders. Such a meeting must be convened by the Board of Directors within 40 calendar days if the net assets of the Company become less than two thirds of the minimum capital required by law. The meeting, for which no quorum shall be required, shall decide on the dissolution by a simple majority of Shares represented at the meeting. If the net assets fall below one fourth of the minimum capital, the dissolution may be resolved by Shareholders holding one fourth of the Shares at the meeting.

Should the Company be liquidated, such liquidation shall be carried out in accordance with the provisions of the Law and which specifies the steps to be taken to enable Shareholders to participate in the liquidation distributions and in this connection provides for deposit in escrow at the Caisse de Consignation in Luxembourg of any such amounts which it has not been possible to distribute to the Shareholders at the close of liquidation. Amounts not claimed within the prescribed period are liable to be forfeited in accordance with the provisions of Luxembourg law. The net liquidation proceeds of each Compartment shall be distributed to the Shareholders of the relevant Compartment in proportion to their respective holdings.

11.9 Material Contracts

The following material contracts have been entered into:

(1) An agreement between the Company and TOBAM, pursuant to which the latter acts as Management Company of the Company. This Agreement is entered into for an unlimited period and may be terminated by either party upon three months written notice.

(2) An agreement between the Company and CACEIS Bank, Luxembourg Branch pursuant to which the latter was appointed as Depositary of the Company. The Agreement is entered into for an unlimited period and may be terminated by either party upon three months' written notice.

(3) An agreement between the Company, TOBAM and CACEIS Bank, Luxembourg Branch pursuant to which the latter acts as registrar and transfer agent - paying and

administration agent of the Company. The Agreement is entered into for an unlimited period and may be terminated by either party upon three months written notice.

(4) An information sharing agreement between TOBAM and CACEIS Bank, Luxembourg Branch, acting as Depositary of the Company regulating the flows of information that are necessary to allow CACEIS Bank, Luxembourg Branch to perform its functions.

11.10 Documents

Copies of the contracts mentioned above are available for inspection, and copies of the Articles, the current Prospectus, the KIID for the Compartments and the latest financial reports may be obtained free of charge during normal office hours at the registered office of the Company in Luxembourg.

11.11 Complaints Handling

Shareholders of each Compartment of the Company may file complaints free of charge with the Management Company in an official language of their home country.

Shareholders can access the complaints handling procedure upon request at the registered office of the Management Company.

APPENDICES TO THE PROSPECTUS - COMPARTMENTS

1. Most Diversified Portfolio SICAV - TOBAM Anti-Benchmark Emerging Markets Equity Fund
2. Most Diversified Portfolio SICAV - TOBAM Anti-Benchmark Euro Equity Fund
3. Most Diversified Portfolio SICAV - TOBAM Anti-Benchmark Global Equity Fund
4. Most Diversified Portfolio SICAV - TOBAM Anti-Benchmark Japan Equity Fund
5. Most Diversified Portfolio SICAV - TOBAM Anti-Benchmark Pacific Ex-Japan Markets Equity Fund
6. Most Diversified Portfolio SICAV - TOBAM Anti-Benchmark US Equity Fund
7. Most Diversified Portfolio SICAV - TOBAM Anti-Benchmark World Equity Fund
8. Most Diversified Portfolio SICAV - TOBAM Anti-Benchmark Canada Equity Fund
9. Most Diversified Portfolio SICAV - TOBAM Anti-Benchmark All Countries World Equity Fund
10. Most Diversified Portfolio SICAV - TOBAM Anti-Benchmark Global Investment Grade Fund
11. Most Diversified Portfolio SICAV - TOBAM Anti-Benchmark Global High Yield Fund
12. Most Diversified Portfolio SICAV - TOBAM Anti-Benchmark Ex - USA Equity Fund
13. Most Diversified Portfolio SICAV - TOBAM Anti-Benchmark Multi-Asset Fund
14. Most Diversified Portfolio SICAV - TOBAM CIH CAPITAL Anti-Benchmark Multi-Asset Fund
15. Most Diversified Portfolio SICAV – TOBAM Anti-Benchmark SERENITE 90 Fund
16. Most Diversified Portfolio SICAV - TOBAM Maximum Diversification World Equity Protected Fund
17. Most Diversified Portfolio SICAV - TOBAM Anti-Benchmark High Yield Maturity 2027
18. Most Diversified Portfolio SICAV - TOBAM Anti-Benchmark Civil Liberty and Democracy - All Countries World Equity Fund
19. Most Diversified Portfolio SICAV - TOBAM Anti-Benchmark Civil Liberty and Democracy – All Countries World Equity Fund Ex-USA
20. Most Diversified Portfolio SICAV - TOBAM Anti-Benchmark Civil Liberty and Democracy – Emerging Market

APPENDIX 1. Most Diversified Portfolio SICAV - TOBAM Anti-Benchmark Emerging Markets Equity Fund

Investment Objective, Benchmark of the Compartment

The Compartment's primary investment objective is to be exposed to global emerging market equities, by systematically applying the investment process developed by the Management Company. This process aims the outperformance of the reference index by minimizing risk factor concentration via a maximally diversified portfolio.

Changes in the net asset value can be compared to the Bloomberg Emerging Markets Large & Mid Cap Net Return Index.

The Bloomberg Emerging Markets Large & Mid Cap Net Return Index is a free float-adjusted market capitalization index that is designed to measure equity market performance of emerging markets. The shares that make up the index are selected on the basis of size, liquidity and free-float capital freely available for trading on a regulated market. Index levels include the minimum possible reinvestments linked to dividends paid out on the shares in the index. A dividend is considered to be reinvested after deduction of withholding taxes by applying the maximum rate of the company's country of incorporation applicable to institutional investors.

The Bloomberg Emerging Markets Large & Mid Cap Net Return Index is published on www.bloomberg.com/indices.

The Compartment does not use an index-based management strategy, it is actively managed. As a consequence, its performance may differ substantially from the benchmark, which is used to define the investment universe and determine the global risk profile of the Compartment. A majority of the Compartment's equity securities will be components of the benchmark. The weightings of the Compartment's portfolio holdings may diverge significantly from their equivalent weighting in the index.

Investment strategy of the Compartment

In order to achieve its investment objective, at least 90% of the Compartment's portfolio is exposed to emerging equity markets, including small, mid and large-cap emerging markets stocks.

If justified by extreme market conditions and in order to curb the cost of trading on the various markets, the Compartment reserves the right to invest up to 100% of its assets in mono- underlying Contracts for Differences (CFDs). CFDs are futures contracts entered into with a counterparty settled through cash payments rather than through physical delivery of financial instruments. The Compartment may thus take advantage of the (liquidity and pricing) characteristics of these instruments compared with the financial instruments in which it invests directly.

For the purpose of diversification, the Compartment may invest up to 20% of its assets in closed-ended Real Estate Investment Trusts (REIT).

The equities in which the Compartment invests are selected on the basis of quantitative models developed by the Management Company, which enable it to optimize the level of diversification on offer in relation to the benchmark. The resulting Compartment, combined with other "long only" investments, is expected to improve the results of the asset allocation by, among other things, improving the Sharpe ratio and reducing volatility. The aim of the management models used is to increase diversification in relation to the benchmark index. The sector breakdown may be taken into account to limit concentration into a particular sector.

To maintain exposure as close as possible to the results of the model, the Compartment may build or add to its exposure through American Depository Receipt (ADR) and Global Depository Receipt (GDR), for up to 100% of its net assets, and/or though other OTC contracts in order to enhance risk control and minimize transaction costs. Investments in American Depository Receipt (ADR), Global

Depository Receipt (GDR), and Real Estate Investment Trusts (REIT) are made in compliance with the restrictions laid down in Article 41 of the Law.

It may also invest up to 100% of its assets in forward financial instruments (such as futures contracts) in order to make occasional adjustments to allow for subscriptions and redemptions and/or to hedge currency. The Compartment may also build up or supplement its exposure by investing in OTC contracts in order to improve risk management and reduce trading costs. The Compartment will be able to benefit from the flexibility these instruments may offer (particularly in terms of liquidity and price) relative to the financial instruments in which it invests directly.

In order to achieve an optimal return on its residual cash exposure, the Compartment may invest up to 10% of its assets in money market instruments.

The Compartment may also use deposits for up to 100% of its assets, and may borrow cash in the event that it becomes overdrawn.

The Compartment qualifies under article 8 of SFDR. The investment strategy does not have a sustainable investment objective but promotes environmental and social characteristics. The strategy notably follows the 4 pillars of TOBAM's SRI policy: exclusion, carbon reduction, ESG integration and responsible stewardship via voting and engagement.

The Management Company considers ESG factors and applies a sustainability approach in its investment process for the Compartment as further detailed in the Appendix 1.1 Environmental and/or Social Characteristics - Pre-contractual disclosures in compliance with SFDR Level II.

1) Description of the asset classes used to achieve the investment objective

The asset classes included in the portfolio are the following:

a) Equities

In pursuit of the strategy presented above, the Compartment will invest in the emerging equities market that is depending on the outlook as seen by the Management Company, the Compartment may invest in shares of companies listed in the emerging countries, irrespective of the companies' size and the sector of the economy to which they belong. This exposure may be gained either through CFDs or direct securities, depending on market conditions. This exposure will not fall below 90% of the Compartment's assets. The Compartment may build or add to its exposure through American Depository Receipts (ADRs) and Global

Depository Receipts (GDRs), for up to 100% of its net assets.

The Compartment may invest up to 20% of its assets in closed-ended Real Estate Investment Trust (REIT).

b) Money market instruments

For treasury purposes, the Compartment may trade, up to 10% of its assets, in money-market instruments (government bonds for OECD states, money-market funds).

In order to achieve its investment objective, if execution of the investment strategy leads the Management Company to opt for CFDs, the portfolio may comprise a significant proportion of instruments (notably certificates of deposit, European commercial paper, treasury bills) with a minimum rating of AA- (S&P) or Aa3 (Moody's). In case of separation between the two ratings, the Management Company will select the lowest rating.

c) Shares or units of investment funds:

The Compartment may invest maximum 10% of its assets in shares or units of UCITS which themselves invest maximum 10% of their assets in shares or units of UCITS or investment funds.

These funds may be managed by the Management Company or an affiliated company. The investment strategies of these funds are compatible with that of the Compartment.

The Compartment may invest maximum 10% of its assets in one or more Compartments of the Company.

2) Derivatives used to achieve the investment objective

The Compartment may use financial futures up to a maximum of one time its assets. The Compartment's leveraged exposure may not exceed 110%.

The Compartment will invest in regulated, organized markets and over-the-counter.

The Compartment will use derivatives instrument for hedging and exposure purposes, and to achieve the investment objective (including replication of synthetic exposure to baskets of equities or indices).

The hedging derivatives transaction shall aim to cover equity risk and currency risk of the Compartment.

The types of instruments used by the Management Company will mainly be futures on equities or stock market indices, swaps on currencies or equities and CFDs.

3) Deposits and cash

The Compartment may hold, up to 20% of its net assets, ancillary liquid assets which consists of bank deposits at sight such as cash held in current accounts with a bank accessible at any time.

The Compartment may make limited use of other deposits in order to achieve its investment objective, for treasury purposes and/or in in case of unfavourable market conditions.

4) Cash borrowing

The Compartment may borrow up to the equivalent of 10% of its net assets in cash on a temporary basis and for technical needs only.

5) Temporary purchases and sales of securities

The attention of the Shareholders is drawn to the fact that the below wording, reporting the increased use of securities lending, applies as of 29 May 2023.

In addition, the Compartment may engage in security lending for up to 75% of its assets.
The Compartment may also, as ancillary, make temporary deposits and borrow cash in the event that a debit balance was to appear.

The Compartment will enter into securities lending transactions opportunistically in circumstances where the Management Company believes that the objective described below could be achieved.

In the context of investments in specials and general collateral the Compartment will use securities lending in order to increase the return of the portfolio.

The expected proportion of the Compartment's assets which may be subject to securities lending depends on the demand of market participants for the securities forming part of the Compartment's portfolio at any time.

This demand depends notably on the interest of such securities, the size of the lendable positions, the presence of specials or securities used as general collateral, the potential duration of the loan (the securities being subject to portfolio adjustments or rebalancing, and thus sell trades), and the type of collateral accepted by the Compartment.

The Compartment's use of, or investment in, securities lending transactions will be as follows:

Type of transaction	Expected proportion	Maximum proportion
Securities lending	0% to 30%	75%

Reference Currency

The reference currency of the Compartment is USD.

Profile of the Typical Investor

The Compartment is a high-risk vehicle. The Compartment is intended for investors seeking to gain exposure to emerging markets. To determine their level of investment, investors should consider their personal assets, the regulations applicable to them, their current financial needs over a recommended minimum investment horizon of more than five years, and also their willingness to take risks or their preference for a more prudent investment. The recommended minimum investment horizon is more than 5 years.

Form of Shares and Classes

The Share Classes of the Compartment will be issued in registered form

Share Classes	A Isin Code: LU1067853769	A1 Isin Code: LU1067853843	A2 Isin Code: LU1162503731	A3 Isin Code: LU1185970016	A4 Isin Code: LU1245553703	A5 Isin Code: LU1444496654	B Isin Code: LU1067854064	B1 Isin Code: LU1543552514	R Isin Code: LU1067854148	R1 Isin Code: LU1543552605	R2 Isin Code: LU1067854221	F Isin Code: LU1067854494	Z Isin Code: LU1666142879
Currency	USD	EUR	GBP	USD	EUR	USD	USD	EUR	GBP	EUR	USD	EUR	USD
Type of Shares	Accumulation				Distribution	Accumulation							
Target Investors	Institutional investors		Institutional investors	Dedicated/ Institutional investors	Institutional investors	Dedicated/ Institutional investors	All investors	All investors	All investors	All investors	All investors	Management Company	Institutional investors
Minimum initial Subscription	10 Shares	10 Shares	10 Shares	1,500 Shares	10 Shares	10 Shares	1 Share	1 Share	1 Share	1 Share	1 Share	1 Share	10 Shares
Minimum holding amount	1 Share	1 Share	1 Share	1 Share	1 Share	1 Share	1 Share	1 Share	1 Share	1 Share	1 Share	1 Share	1 Share
Valuation Day	Every Business Day, with the exception of days on which the American markets are closed (based on the official NYSE Euronext calendar)												
Management Company Fee	1.50 %	1.50%	1.50%	0.70%	1.50%	1%	2.5%	2.5%	0.70%	0.70%	0.70%	None	None
Administration Fee & Depositary Fee	0.25 %	0.25%	0.25%	0.25%	0.25%	0.25%	0.25%	0.25%	0.25%	0.25%	0.25%	0.25%	0.25%
Subscription Fee paid to the Management Company	none	none	none	Up to 0.5%	Up to 3%	Up to 3%	Up to 3%	Up to 3%	Up to 5%	Up to 5%	Up to 5%	None	Up to 5%
Redemption Fee paid to the Management Company	Up to 1%	Up to 1%	Up to 1%	Up to 1%	Up to 1%	Up to 1%	Up to 1%	Up to 1%	Up to 1%	Up to 1%	Up to 1%	None	Up to 5%
Cut-off	12.00 p.m. CET the Business Day before the relevant Valuation Day												
Subscription/ Redemption Settlement Day	2 days, according to the official NYSE Euronext calendar, following the Valuation Day												

R units: these units are intended for "all investors" seeking a low initial investment and a "clean fee" structure. The R "clean fee" share class will not carry any fees payable to distributors.

Investors subscribing for shares denomminated in EUR/GBP are subject to EUR/ GBP currency risk given the conversion of the net asset value.

Launch date

This Compartment has been launched by way of a cross-border operation with the French UCITS FCP TOBAM Anti-Benchmark Emerging Markets Equity Fund. The launch date of this Compartment was 9 October 2014.

The initial subscription prices of the Share Classes of this Compartment corresponded to the NAV of their equivalent Share Classes in the French UCITS FCP TOBAM Anti-Benchmark Emerging Markets Equity Fund with the exception of Shares Class F which has been created at the incorporation of the Company.

The following Share Classes of this Compartment will be created with the following initial subscription prices:

Class:	Initial subscription prices:
Class A2	GBP 10,000
Class A3	USD 150,000
Class A4	EUR 10,000
Class A5	USD 100
Class B	USD 100
Class B1	EUR 100
Class R1	EUR 100
Class R2	USD 100
Class Z	USD 10,000

Total Expense Ratio

The latest calculated total expense ratio rate can be found in the Company's latest financial report.

Risk Management

The method used to calculate overall exposure is commitment method.

Compartments Specific Risk Factors

The funds will be invested primarily in financial instruments selected by the Management Company. These instruments will be subject to market movements and fluctuations. The Management Company invests according to a systematic, fundamentals-based model: there is a risk that the equities selected may not be the best performing stocks.

1) Equity risk

If the equities or indices to which the portfolio is exposed fall, the net asset value of the Compartment may also fall.

Since the volume of small and mid-cap stocks listed on the stock exchange is relatively low, market downturns are more pronounced and more rapid than for large caps. The net asset value of the Compartment may therefore decline more quickly and more significantly.

Investors' attention is drawn to the fact that the small-cap markets and emerging markets are intended to accommodate businesses that, due to their specific characteristics, may pose a risk for investors.

2) Risk associated with the Management Company's investment process

Investors should note that portfolio construction and the selection and weighting of assets are based on a process developed by the Management Company. The Compartment's investment process is based on a systematic model designed to identify signals based on past statistical results.

There is a risk that the model may not be efficient, as there is no guarantee that past market situations will be repeated in the future. Since the aim of the processes developed by the Management Company is to achieve good diversification of the Compartment's portfolio, using these processes may lead the Management Company to not select the top-performing assets.

3) Risk associated with emerging markets equities

The equities of emerging countries may be less liquid than equities of developed countries. Consequently, holding these securities may increase the level of portfolio risk. For example, market declines may be greater and faster than in developed countries, so the Compartment's net asset value may decline more sharply and quickly.

4) Risk associated with the use of financial futures

The Compartment may use some financial futures. The Compartment may thus be exposed for up to 110% of its assets to the market, assets, index and economic and/or financial instrument or parameter, which can imply a risk of reduction in the net asset value of the Compartment that might be more significant and quicker that the one observed on the markets where the Compartment is invested.

5) Currency risk

Currency risk is the risk of depreciation in the currencies in which the Compartment invests relative to the reference currency. This currency risk will be managed according to market opportunities and may thus account for a significant proportion of the risk. In the event of depreciation in foreign currencies, investors are thus exposed to a decline in the value of their units.

6) Counterparty risk

The Compartment may incur a loss in the event of default by a counterparty with which certain transactions were conducted, leading to a decline in the Compartment's net asset value.

7) Interest rate risk

This refers to the risk of a fall in the value of fixed income instruments resulting from changes in interest rates. If interest rates rise, the Compartment's net asset value may fall. The Compartment has limited exposure to fixed income products.

8) Credit risk

This is the risk of a decline in bonds or debt securities issued by a private or public issuer or default by the latter. The value of the debt securities in which the Compartment is invested may decline, leading to a fall in net asset value.

Template pre-contractual disclosure for the financial products referred to in Article 8, paragraphs 1, 2 and 2a, of Regulation (EU) 2019/2088 and Article 6, first paragraph, of Regulation (EU) 2020/852

Product name: Most Diversified Portfolio SICAV - TOBAM Anti-Benchmark Emerging Markets Equity Fund

Legal entity identifier: 5493001GNX2Q1V5VRS59

Sustainable investment means an investment in an economic activity that contributes to an environmental or social objective, provided that the investment does not significantly harm any environmental or social objective and that the investee companies follow good governance practices.

The **EU Taxonomy** is a classification system laid down in Regulation (EU) 2020/852, establishing a list of **environmentally sustainable economic activities**. That Regulation does not lay down a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

Environmental and/or social characteristics

Does this financial product have a sustainable investment objective?

☐ **Yes**

☐ It will make a minimum of **sustainable investments with an environmental objective:** ___%

- ☐ in economic activities that qualify as environmentally sustainable under the EU Taxonomy
- ☐ in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy

☐ It will make a minimum of **sustainable investments with a social objective:** ___%

☒ **No**

☒ It **promotes Environmental/Social (E/S) characteristics** and while it does not have as its objective a sustainable investment, it will have a minimum proportion of 40% of sustainable investments

- ☐ with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy
- ☒ with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy
- ☐ with a social objective

☐ It promotes E/S characteristics, but **will not make any sustainable investments**

What environmental and/or social characteristics are promoted by this financial product?

The Compartment's primary investment objective is to be exposed to global emerging market equities, by systematically applying the Management Company's investment process, which aims to outperform the reference index by minimizing risk factor concentration via a maximally diversified portfolio.

This process integrates environmental, social and governance (ESG) risks and opportunities to the sustainability of long-term company returns. The Compartment aims to promote low carbon approaches, commitment to climate action and companies with good governance. In particular, the Compartment aims to promote the following E/S characteristics:

- Low carbon approach by applying a systematic carbon footprint reduction of at least 50% versus the reference investment universe's carbon footprint,

- Commitment to climate action and climate change mitigation by optimizing constraint of temperature contribution of each holding to reach a 1.5°C portfolio,
- Promotion of companies with good governance using raw data and their ESG footprint.

The Compartment has designated Bloomberg Emerging Markets Large & Mid Cap Net Return Index as a reference index to compare its ESG characteristics, such as carbon emissions or ESG footprint.

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

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

In order to achieve the above characteristics promoted by the Compartment, the Management Company has put in place an ambitious ESG policy made of key pillars and sustainability indicators. The Compartment uses the following sustainability indicators to attain each of the environmental and social characteristics promoted by the Compartment:

- **Carbon Emissions Reduction:** The Management Company applies a systematic carbon footprint reduction of at least 50% versus the reference index Bloomberg Emerging Markets Large & Mid Cap Net Return Index's carbon footprint. The calculation of the carbon footprint is based on the greenhouse gas emissions scope 1 (i.e. direct emission from owned or controlled sources), scope 2 (i.e. indirect emissions from the generation of purchased energy) and scope 3 (i.e. indirect emission resulting from value chain activities) when possible, according to GHG Protocol Corporate Standard. Data on emissions used is obtained from a number of sources including company reports, CDP questionnaire (Carbon Disclosure Project) or an estimation model.

- **ESG Footprint:** The Management Company has put in place a strict E, S and G integration process for all listed companies in its investment universe; using officially published data from Bloomberg.

✓ E: For example: existence of climate change / biodiversity / energy efficiency policies; green building, water and waste usage
✓ S: For example: Ethics/Equal opportunity/training/ consumer data protection/whistleblowing policies, CSR committee in place, supply chain management
✓ G: For example: Number of board meetings per year, ratio of independent directors, chairman tenure, ratio of nonexecutive directors in boards

From that raw data, the Management Company has built a proprietary methodology to compute the "E,S,G footprints" of each individual holding in the portfolio and as such determine the overall E,S,G Footprints of the portfolio.

The Management Company has constrained its investment decision-making process to reach E,S,G footprints of the Compartment, at minima at the same level as the E,S,G footprints of the reference index Bloomberg Emerging Markets Large & Mid Cap Net Return Index.

- **Optimization constraint of temperature contribution** of each holding to reach a 1.5° C portfolio in line with the latest Intergovernmental Panel on Climate Change (IPCC) climate scenarios.

What are the objectives of the sustainable investments that the financial product partially intends to make and how does the sustainable investment contribute to such objectives?

The sustainable investments within this Compartment contribute to Environmental objectives including climate change mitigation and adaptation (however not in the meaning of the Taxonomy Regulation) or commitment to science-based emissions reduction targets ("SBTI").

To determine the share of sustainable investments, the Management Company consider the environmental objective for companies that:

- Have a carbon intensity (carbon emissions normalized by the Enterprise Value including Cash) below 80% of the average carbon intensity of the reference index the Bloomberg Emerging Markets Large & Mid Cap Net Return Index

Or

Made a commitment to the SBTI initiative (This engagement is followed by the Management Company's research team on an annual basis).

- Are not involved in severe breaches or controversies in regard to the labor rights, human rights, environmental or corruption, and that are not part of the following sectors: tobacco, controversial weapons, coal mining and fossil fuels

And

Have not been targeted by any significant environmental fines over the past years.

- Have a G score for Good Governance practices (as defined by the Management Company ESG Footprint proprietary methodology) in the top 80% of the reference index the Bloomberg Emerging Markets Large & Mid Cap Net Return Index.

How do the sustainable investments that the financial product partially intends to make, not cause significant harm to any environmental or social sustainable investment objective?

Companies the Compartment invests in contribute to achieve the Compartments' carbon reduction objective, ESG footprint commitment while not significantly harming any environmental or social sustainable investment objectives. Before any investment is made by the Compartment (not only sustainable investments but all investments), the investment has to pass a negative screening, further including the consideration of the principal adverse impacts described in the below section. Hence no companies involved in controversial sectors or activities not aligned with TOBAM's policy, can be eligible for investments for the Compartment.

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

The following Principal Adverse Impacts ("PAI") indicators as defined in SFDR Level II have been considered:

- PAI #4 : Exposure to companies active in the fossil fuel sector
- PAI #7 : Activities negatively affecting biodiversity
- PAI #10 : Violations of UN Global Compact principles and OECD guidelines
- PAI #14 : Exposure to Controversial Weapons

The principal adverse impacts on sustainability indicators have been taken into account through an exclusionary investment policy.

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

The Management Company will not invest in any company that has been classified as failing to comply with key international norms (ISS Ethix Norm-based screening) such as for example the UN Global Compact Principles, OECD Guidelines for Multinational Enterprises, Guiding Principles on Business and Human rights.

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

The "do no significant harm" principle applies only to those investments underlying the financial product that take into account the EU criteria for environmentally sustainable economic activities. The investments underlying the remaining portion of this financial product do not take into account the EU criteria for environmentally sustainable economic activities.

Any other sustainable investments must also not significantly harm any environmental or social objectives.

Principal adverse impacts are the most significant negative impacts of investment decisions on sustainability factors relating to environmental, social and employee matters, respect for human rights, anti-corruption and anti-bribery matters.

Does this financial product consider principal adverse impacts on sustainability factors?

✖ Yes, the Management Company has committed to monitor the 14 mandatory and 2 optional environmental and social indicators to show the impact of the Compartment's investments against these PAI indicators.

Furthermore, this Compartment considers principal adverse impacts on sustainability factors and only the following PAI have been taken into account into the investment process:

- PAI #1: GHG (Greenhouse Gas) emissions - Scope 1 & 2
- PAI #2: Carbon footprint
- PAI #3: GHG intensity of investee companies

The Compartment by targeting an overall carbon reduction of at least 50% compared to the the reference index Bloomberg Emerging Markets Large & Mid Cap Net

Return's carbon footprint, is looking to invest in a combination of stocks that achieve this overall carbon reduction, by considering carbon emissions scope 1 and 2.

• PAI #4: Exposure to companies active in the fossil fuel sector (Share of investments in companies active in the fossil)
The sector is excluded from the investment universe of this Compartment.

• PAI #7: Activities negatively affecting biodiversity
The Management Company proprietary ESG footprint methodology considers raw data published by companies in order to compute an ESG footprint, by notably looking for example at the existence or not of key policies relevant to the biodiversity (for example: biodiversity policy, water usage policy, waste reduction policy, climate change policy…).

In addition to the previous PAI, the following social sustainability indicators have been considered:
• PAI #10: Violations of UN Global Compact principles and (OECD) Guidelines
• PAI #13: Board Gender Diversity
• PAI #14: Exposure to controversial weapons

PAI reports are available on the Compartment's annual report.

☐ No

What investment strategy does this financial product follow?

The investment strategy of the Compartment is to be exposed to global emerging market equities, by systematically applying the investment process developed by the Management Company. This process aims the outperformance of the reference index by minimizing risk factor concentration via a maximally diversified portfolio.

The Compartment aims to promote low carbon approaches, commitment to climate action and companies with good governance.

The Management Company applies systematically its ESG methodology in the investment decision-making process.

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

What are the binding elements of the investment strategy used to select the investments to attain each of the environmental or social characteristics promoted by this financial product?

The Compartment applies the following binding elements to select investments and to attain the environmental and social characteristics described above:

• **Restrictive Exclusion Policy:** the Management Company applies a general exclusion policy, restricting the investment universe and excluding companies based either on their involvement in certain activities (sector or product based) or based on controversies or breaches to key international norms. The key exclusions used by the Management Company are reflected in the below table:

Sector /Product	**Criteria**
Producer and distributors of tobacco	Limit (5% of the revenues)

Coal and coal-based producers and distributors	Limit (10% of the revenues)
Development, production, maintenance or distribution of controversial and prohibited weapons	Exclusion
Breach or violation of International Treaties, Conventions & Standards such as OECD Guidelines for Multinational Enterprises, ILO Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy, UN Global Compact, Guiding Principles on Business and Human Rights	Exclusion

In addition, the Compartment excludes companies with significant involvement in the production, sales or extraction of fossil fuels (including coal, coal power generation, oil and gas) from the investment universe of the Compartment.

Further details on the exclusion policy can be found in the following link: https://www.tobam.fr/our-beliefs/exclusion-policy/

- **ESG Integration:** The Management Company has put in place a strict E, S and G integration process for all listed companies in its investment universe; using officially published data from Bloomberg.

✓ E: For example: existence of climate change / biodiversity / energy efficiency policies; green building, water and waste usage

✓ S: For example: Ethics/Equal opportunity/training/ consumer data protection/whistleblowing policies, CSR committee in place, supply chain management

✓ G: For example: Number of board meetings per year, ratio of independent directors, chairman tenure, ratio of nonexecutive directors in boards.

From that raw data, the Management Company has built a proprietary methodology to compute the "E,S,G footprints" of each individual holding in the portfolio and as such determine the overall E,S,G Footprints of the portfolio. The E, S and G footprint aggregates and normalizes (for industry, size and regional biases) the information contained in each of the above mentioned items by E, S and G pillar. The normalization also corrects differences in scale of the different pieces of raw data. The final footprint is an equal weighted measure of the three pillars. The Management Company then adds a constraint into its quantitative portfolio optimization process, to ensure that the E, S and G footprints of the respective portfolio (computed based on the holdings' individual E, S and G footprints) are respectively at least at the same level as the E, S and G footprints of the reference index Bloomberg Emerging Markets Large & Mid Cap Net Return Index.

- **Carbon Emissions Reduction & Commitment to SBTI:** In addition, the Management Company analyses the carbon emissions of each holding in its investment universe, computes the carbon footprint of the portfolio and applies a systematic portfolio carbon footprint reduction of at least 50% versus the reference index the Bloomberg Emerging Markets Large & Mid Cap Net Return Index's carbon footprint. The calculation of the carbon footprint is based on the greenhouse gas emissions scope 1, scope 2 and scope 3 when available. Data on emissions used is obtained from a number of sources including company reports, CDP questionnaire (Carbon Disclosure Project) or an estimation model.

The Management Company is also monitoring the companies' commitment to the SBTI as a way to monitor best effort toward more incorporation of best practices. This feature is monitored on a yearly basis.

- **Optimization constraint of temperature contribution** of each holding to reach a 1.5° C portfolio in line with the latest Intergovernmental Panel on Climate Change (IPCC) climate scenarios.

- **Responsible Ownership:** The Management Company applies a responsible voting policy and has built an ambitious engagement policy to support its commitment to sustainability and address via engagement and dialogues, issues relative to ESG and sustainability.

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

Not applicable.

Good governance practices include sound management structures, employee relations, remuneration of staff and tax compliance.

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

In order to assess good governance practices, the Management Company consider the G scoring of its proprietary ESG footprint methodology, and ensure that the G scoring of the Compartment is matching the reference index Bloomberg Emerging Markets Large & Mid Cap Net Return Index's G scoring.

Asset allocation describes the share of investments in specific assets.

What is the asset allocation planned for this financial product?

#1: 90% of the assets of this Compartment are aligned (promote) E/S characteristics.

#1A: at least 40% of those assets fall under the sustainable share of investment with non EU Taxonomy-aligned environmental objectives.

These sustainable investments contribute to environmental objectives, including climate change mitigation and adaptation (however not in the meaning of the Taxonomy Regulation) or commitment to SBTI.

The model used by TOBAM for the determination of the sustainable investments combines the pass or fail approach and the weighted-revenue approach with threshold for the carbon emissions and governance.
To determine the share of sustainable investments, the Management Company considers the environmental objective for companies that have:

Environmental objective determined as:
o Companies that have carbon emission intensity (carbon emissions normalized by the Enterprise Value Including Cash) below 80% of the average emissions carbon intensity of the reference index the Bloomberg Emerging Markets Large & Mid Cap Net Return Index
Or
o Companies that have made a commitment to the SBTI initiative (this engagement is followed by the Management Company's research team on an annual basis).

Do Not Significantly Harm characteristics:

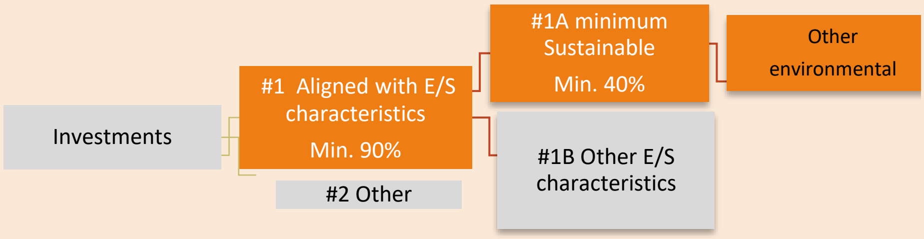
○ Companies that are not involved in severe breaches or controversies in regard to the labor rights, human rights, environmental or corruption, and that are not part of the following sectors: tobacco, controversial weapons, coal mining and fossil fuels

And

○ Companies that have not been targeted by any significant environmental fines over the past years.

Good Governance practices are defined as companies that have a G score (as defined by the Management Company ESG Footprint proprietary methodology) in the top 80% of the reference index the Bloomberg Emerging Markets Large & Mid Cap Net Return Index.

Please note that investments falling under section #1B on the below diagram 'non sustainable investment share of the Compartment', still comply with all of the Compartment ESG policy (exclusions, carbon reduction, ESG footprint, voting & engagement), but did not qualify as a sustainable investment.



#1 Aligned with E/S characteristics includes the investments of the financial product used to attain the environmental or social characteristics promoted by the financial product.

#2Other includes the remaining investments of the financial product which are neither aligned with the environmental or social characteristics, nor are qualified as sustainable investments.

The category **#1 Aligned with E/S characteristics** covers:
- The sub-category **#1A Sustainable** covers sustainable investments with environmental or social objectives.
- The sub-category **#1B Other E/S characteristics** covers investments aligned with the environmental or social characteristics that do not qualify as sustainable investments.

- ***How does the use of derivatives attain the environmental or social characteristics promoted by the financial product*?**

The Compartment may use financial derivative instruments for investment, efficient portfolio management and/or hedging purposes, and this will not impact in any way the exposure to sustainable assets, or the ESG characteristics of the Compartment.

Taxonomy-aligned activities are expressed as a share of:
- **turnover** reflecting the share of revenue from green activities of investee companies
- **capital expenditure** (CapEx) showing the green investments made by investee companies, e.g. for a transition to a green economy.
- **operational expenditure** (OpEx) reflecting green operational activities of investee companies.

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

The Compartment commits to a 0% alignment with the EU Taxonomy.

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

Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy[1]?

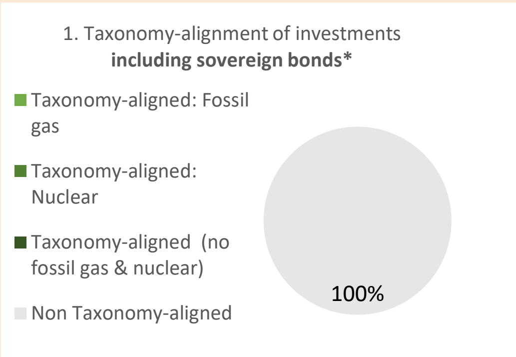
☐ Yes :

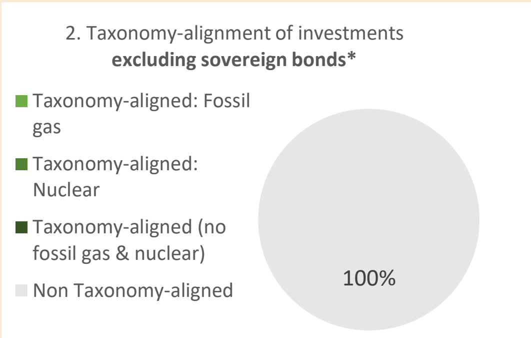
☐ In fossil gas ☐ In nuclear energy

☒ No

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

The two graphs below show in green the minimum percentage of investments that are aligned with the EU Taxonomy. As there is no appropriate methodology to determine the Taxonomy-alignment of sovereign bonds*, the first graph shows the Taxonomy alignment in relation to all the investments of the financial product including sovereign bonds, while the second graph shows the Taxonomy alignment only in relation to the investments of the financial product other than sovereign bonds.





This graph represents 100% of the total investments.

*** For the purpose of these graphs, 'sovereign bonds' consist of all sovereign exposures**

Enabling activities directly enable other activities to make a substantial contribution to an environmental objective.

Transitional activities are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.

What is the minimum share of investments in transitional and enabling activities?

As the Compartment does not have a minimum Taxonomy alignement, there is no minimum share in transitional and enabling activities.

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

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

The minimum share of sustainable investments with an environmental objective that is not aligned with the EU Taxonomy is 40%.

What is the minimum share of socially sustainable investments?

Not applicable

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

Investments falling under category "#2 Other", are investments such as derivatives, cash or cash equivalent, not integrating E/S characteristics, where ESG key features and analysis have not been performed, and E/S characteristics not considered.

No minimum environmental or social safeguards apply to the above elements.

Is a specific index designated as a reference benchmark to determine whether this financial product is aligned with the environmental and/or social characteristics that it promotes?

No, but the Compartment has designated a reference benchmark (Bloomberg Emerging Markets Large & Mid Cap Net Return Index). This index is used as a reference to compare the Compartment ESG characteristics, such as carbon emissions or ESG footprint, with the reference benchmark.

- ***How is the reference benchmark continuously aligned with each of the environmental or social characteristics promoted by the financial product?***

  The reference index used by the Compartment is not an ESG benchmark and is not consistent with the ESG characteristics promoted by the Compartment. All ESG calculations or comparisons are computed using Bloomberg Emerging Markets Large

& Mid Cap Net Return Index, as a good proxy of the Compartment investment universe.

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

- ***How is the alignment of the investment strategy with the methodology of the index ensured on a continuous basis?***

The reference index the Bloomberg Emerging Markets Large & Mid Cap Net Return Index is a broad market index, capturing global emerging market equities, which is in line with the Compartment investment universe.

The investment universe of the reference index is regularly monitored by the Management Company research team to ensure the consistency with the Compartment's investment universe, in order to ensure relevance of ESG and performance comparisons.

- ***How does the designated index differ from a relevant broad market index?***

The reference index the Bloomberg Emerging Markets Large & Mid Cap Net Return Index is a broad market index, capturing global emerging market equities, which is in line with the Compartment investment universe.

- ***Where can the methodology used for the calculation of the designated index be found?***

https://assets.bbhub.io/professional/sites/27/Global-Equity-Index-Methodology.pdf

Where can I find more product specific information online?

More product-specific information can be found on the website:
https://www.tobam.fr/key-documents-policies/

APPENDIX 2. Most Diversified Portfolio SICAV - TOBAM Anti-Benchmark Euro Equity Fund

Investment Objective, Benchmark of the Compartment

The Compartment's primary investment objective is to be exposed to Eurozone equities, by systematically applying the Management Company's investment process, which aims to outperform the reference index by minimizing risk factor concentration via a maximally diversified portfolio.

Changes in the net asset value can be compared to the Bloomberg Eurozone Developed Markets Large & Mid Cap Net Return Index.

The Bloomberg Eurozone Developed Markets Large & Mid Cap Net Return Index is a free float-adjusted market capitalization weighted index maintained by Bloomberg. The Bloomberg Eurozone Developed Markets Large & Mid Cap Net Return Index is designed to measure equity market performance of countries within European Economic and Monetary Union ("EMU") classified as Developed Market by Bloomberg.

The Bloomberg Eurozone Developed Markets Large & Mid Cap Net Return Index is published on www.bloomberg.com/indices.

The Compartment does not use an index-based management strategy, it is actively managed. As a consequence, its performance may differ substantially from the benchmark, which is used to define the investment universe and determine the global risk profile of the Compartment. A majority of the Compartment's equity securities will be components of the benchmark. The weightings of the Compartment's portfolio holdings may diverge significantly from their equivalent weighting in the index.

Investment strategy of the Compartment

In order to achieve its investment objective, at least 90% of the Compartment's assets are exposed to Eurozone equity markets, of which at least 75% are invested in securities eligible for the French equity savings plan (PEA).

In addition to the portfolio's 90% exposure to small, mid and large-cap Eurozone equities, the Compartment may also be exposed to different markets or asset classes in order to meet its investment objective.

The equities in which the Compartment invests are selected on the basis of quantitative models developed by the Management Company, which enable it to maximize the level of diversification provided compared to the benchmark. The resulting Compartment is expected to improve the results of the asset allocation by, among other things, improving the Sharpe ratio and reducing volatility. The aim of the management models used is to increase diversification in relation to the benchmark index.

The sector breakdown may be taken into account to limit concentration into a particular sector. For the purpose of diversification, the Compartment may invest up to 20% of its assets in closed-ended Real Estate Investment Trusts (REIT). Investments in Real Estate Investment Trusts (REIT) are made in compliance with the restrictions laid down in Article 41 of the Law.

It may also invest up to 100% of its assets in forward financial instruments (such as futures contracts) in order to make occasional adjustments to allow for subscriptions and redemptions and/or to hedge currency risk. The Compartment may also build up or supplement its exposure by investing in OTC contracts in order to improve risk management and reduce trading costs.

The Compartment will be able to benefit from the flexibility these instruments may offer (particularly in terms of liquidity and price) relative to the financial instruments in which it invests directly.

In order to achieve an optimal return on its residual cash exposure, the Compartment may invest up to 10% of its assets in money market instruments.

The Compartment may also use deposits for up to 100% of its assets and may borrow cash in the event that it becomes overdrawn.

The Compartment qualifies under article 8 of SFDR. The investment strategy does not have a sustainable investment objective but promotes environmental and social characteristics. The strategy notably follows the 4 pillars of TOBAM’s SRI policy: exclusion, carbon reduction, ESG integration and responsible stewardship via voting and engagement.

The Management Company considers ESG factors and applies a sustainability approach in its investment process for the Compartment as further detailed in the Appendix 2.1 Environmental and/or Social Characteristics - Pre-contractual disclosures in compliance with SFDR Level II.

1) Description of the asset classes used to achieve the investment objective

The asset classes included in the portfolio are the following:

a) Equities

At least 90% of the Compartment's net assets will be exposed to Eurozone equities. Subject to the above-mentioned limits, the Compartment will invest in equities of small, mid and large caps. In terms of geographical allocation, the Compartment will invest predominantly in Eurozone equities, in accordance with its classification. The Compartment is eligible for the French equity savings plan (PEA). Accordingly, it invests at least 75% of its assets in securities eligible for the PEA.

The Compartment may invest up to 20% of its assets in closed-ended Real Estate Investment Trusts (REIT).

b) Money market instruments

For treasury purposes, the Compartment may trade, up to 10% of its assets, in money-market instruments (government bonds for OECD states, money-market funds) with a minimum rating of AA- (S&P) or Aa3 (Moody’s). In case of separation between the two ratings, the Management Company will select the lowest rating.

c) Shares or units of investment funds

The Compartment may invest maximum 10% of its assets in shares or units of UCITS which themselves invest maximum 10% of their assets in shares or units of UCITS or investment funds.

These funds may be managed by the Management Company or an affiliated company. The investment strategies of these funds are compatible with that of the Compartment.

The Compartment may invest maximum 10% of its assets in one or more Compartments of the Company.

2) Derivatives used to achieve the investment objective

The Compartment may invest up to 100% of its net assets in financial derivatives. The Compartment’s leveraged exposure may not exceed 110%.

The Compartment may invest in regulated, organized markets and over-the-counter.

The Compartment will use derivatives instrument for hedging and exposure purposes and to achieve the investment objective (including replication of synthetic exposure to baskets of equities or indices).

The hedging derivatives transaction shall aim to cover equity risk and currency risk of the Compartment.

The types of instruments used by the Management Company will mainly be futures on equities or stock market indices, swaps on currencies, equities or indices on a temporary basis for technical needs.

3) Deposits and cash

The Compartment may hold, up to 20% of its net assets, ancillary liquid assets which consists of bank deposits at sight such as cash held in current accounts with a bank accessible at any time.

The Compartment may make limited use of other deposits in order to achieve its investment objective, for treasury purposes and/or in in case of unfavourable market conditions.

4) Cash borrowing

The Compartment may borrow up to the equivalent of 10% of its net assets in cash on a temporary basis and for technical needs only.

5) Temporary purchases and sales of securities

The attention of the Shareholders is drawn to the fact that the below wording, reporting the increased use of securities lending, applies as of 29 May 2023.

In addition, the Compartment may engage in security lending for up to 75% of its assets.
The Compartment may also, as ancillary, make temporary deposits and borrow cash in the event that a debit balance was to appear.

The Compartment will enter into securities lending transactions opportunistically in circumstances where the Management Company believes that the objective described below could be achieved.

In the context of investments in specials and general collateral the Compartment will use securities lending in order to increase the return of the portfolio.

The expected proportion of the Compartment's assets which may be subject to securities lending depends on the demand of market participants for the securities forming part of the Compartment's portfolio at any time.

This demand depends notably on the interest of such securities, the size of the lendable positions, the presence of specials or securities used as general collateral, the potential duration of the loan (the securities being subject to portfolio adjustments or rebalancing, and thus sell trades), and the type of collateral accepted by the Compartment.

The Compartment's use of, or investment in, securities lending transactions will be as follows:

Type of transaction	Expected proportion	Maximum proportion
Securities lending	0% to 30%	75%

Reference currency

The reference currency of the Compartment is EUR.

Profile of the Typical Investor

The Compartment is a high risk vehicle. To determine their level of investment, investors should consider their personal assets, the regulations applicable to them, their current financial needs over a recommended minimum investment horizon of more than five years, and also their willingness to take risks or their preference for a more prudent investment. The recommended minimum investment horizon is more than 5 years.

Form of Shares and Classes

The Share Classes of the Compartment will be issued in registered form.

Share Classes	A Isin Code: LU1067854650	B Isin Code: LU1067854734	R1 Isin Code: LU1067854817	Z Isin Code: LU1666142952
Currency	EUR			
Type of Shares	Accumulation			
Target Investors	Institutional investors	All investors	All investors	Institutional investors
Minimum initial subscription	10 Shares	1 Share	1 Share	10 Shares
Minimum holding amount	1 Share	1 Share	1 Share	1 Share
Valuation Day	Every Business Day			
Management Company Fee	1%	2%	0.55%	0%
Administration Fee & Depositary Fee	0.20%	0.20%	0.20%	0.20%
Subscription Fee paid to the Management Company	None	Up to 3%	Up to 5%	Up to 5%
Redemption Fee paid to the Management Company	Up to 1%	Up to 1%	Up to 1%	Up to 5%
Cut-off	12.00 p.m. CET on the relevant Valuation Day			
Subscription/Redemption Settlement Day	2 days, according to the official French and Luxembourg market calendars, following the Valuation Day			

R units: these units are intended for "all investors" seeking a low initial investment and a "clean fee" structure. The R "clean fee" share class will not carry any fees payable to distributors.

Launch date

This Compartment has been launched by way of a cross-border operation with the French UCITS FCP TOBAM Anti-Benchmark Euro Equity Fund. The launch date of this Compartment was 2 October 2014.

The initial subscription prices of the Share Classes of this Compartment corresponded to the NAV of their equivalent Share Classes in the French UCITS FCP TOBAM Anti-Benchmark Euro Equity Fund.

The Share Classes R1 and Z of this Compartment will be created with the following initial subscription prices:

Class:	Initial subscription price:
Class R1	EUR 100

Class Z	EUR 10,000

Total Expense Ratio

The latest calculated total expense ratio rate can be found in the Company’s latest financial report.

Risk Management

The method used to calculate overall exposure is the commitment method.

Compartments Specific Risk Factors

The funds will be invested primarily in financial instruments selected by the Management Company. These instruments will be subject to market movements and fluctuations. The Management Company invests according to a systematic, fundamentals-based model: there is a risk that the equities selected may not be the best performing stocks.

1) Equity risk

If the equities or indices to which the portfolio is exposed fall, the net asset value of the Compartment may also fall.

Since the volume of small and mid-cap stocks listed on the stock exchange is relatively low, market downturns are more pronounced and more rapid than for large caps. The net asset value of the Compartment may therefore decline more quickly and more significantly.

Investors' attention is drawn to the fact that the small-cap markets are intended to accommodate businesses that, due to their specific caracteristics, may pose a risk for investors.

2) Risk associated with the Management Company’s investment process

Investors should note that portfolio construction and the selection and weighting of assets are based on a process developed by the Management Company. The Compartment's investment process is based on a systematic model designed to identify signals based on past statistical results.

There is a risk that the model may not be efficient, as there is no guarantee that past market situations will be repeated in the future. Since the aim of the processes developed by the Management Company is to achieve good diversification of the Compartment’s portfolio, using these processes may lead the Management Company to not select the top-performing assets.

3) Interest rate risk

This refers to the risk of a fall in the value of fixed income instruments resulting from changes in interest rates. The Compartment has limited exposure to fixed income products.

4) Currency risk (limited to less than 10%)

Currency risk is the risk of depreciation in the currencies in which the Compartment invests relative to the reference currency. This currency risk will be managed according to market opportunities and may thus account for a significant proportion of the risk. In the event of depreciation in foreign currencies, investors are thus exposed to a decline in the value of their units.

Template pre-contractual disclosure for the financial products referred to in Article 8, paragraphs 1, 2 and 2a, of Regulation (EU) 2019/2088 and Article 6, first paragraph, of Regulation (EU) 2020/852

Product name: Most Diversified Portfolio SICAV - TOBAM Anti-Benchmark Euro Equity Fund

Legal entity identifier: 549300YIN7MHMLIWW809

Environmental and/or social characteristics

Does this financial product have a sustainable investment objective?

☐ Yes	☒ No
☐ It will make a minimum of **sustainable investments with an environmental objective:** ___%	☒ It **promotes Environmental/Social (E/S) characteristics** and while it does not have as its objective a sustainable investment, it will have a minimum proportion of 40% of sustainable investments
☐ in economic activities that qualify as environmentally sustainable under the EU Taxonomy	☐ with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy
☐ in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy	☒ with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy
	☐ with a social objective
☐ It will make a minimum of **sustainable investments with a social objective:** ___%	☐ It promotes E/S characteristics, but **will not make any sustainable investments**

Sustainable investment means an investment in an economic activity that contributes to an environmental or social objective, provided that the investment does not significantly harm any environmental or social objective and that the investee companies follow good governance practices.

The **EU Taxonomy** is a classification system laid down in Regulation (EU) 2020/852, establishing a list of **environmentally sustainable economic activities**. That Regulation does not lay down a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

What environmental and/or social characteristics are promoted by this financial product?

The Compartment's primary investment objective is to be exposed to Eurozone equities, by systematically applying the Management Company's investment process, which aims to outperform the reference index by minimizing risk factor concentration via a maximally diversified portfolio.

This process integrates environmental, social and governance (ESG) risks and opportunities to the sustainability of long-term company returns. The Compartment aims to promote low carbon approaches, commitment to climate action and companies with good governance.

In particular, the Compartment aims to promote the following E/S characteristics:

- Low carbon approach by applying a systematic carbon footprint reduction of at least 20% versus the reference investment universe's carbon footprint,
- Promotion of companies with good governance using raw data and their ESG footprint.

The Compartment has designated Bloomberg Eurozone Developed Markets Large & Mid Cap Net Return Index as a reference index to compare its ESG characteristics, such as carbon emissions or ESG footprint.

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

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

In order to achieve the above characteristics promoted by the Compartment, the Management Company has put in place an ambitious ESG policy made of key pillars and sustainability indicators. The Compartment uses the following sustainability indicators to attain each of the environmental and social characteristics promoted by the Compartment:

- **Carbon Emissions Reduction:** The Management Company applies a systematic carbon footprint reduction of at least 20% versus the reference index Bloomberg Eurozone Developed Markets Large & Mid Cap Net Return Index. The calculation of the carbon footprint is based on the greenhouse gas emissions scope 1 (i.e. direct emissions from owned or controlled sources) and scope 2 (i.e. indirect emissions from the generation of purchased energy) according to GHG Protocol Corporate Standard. Data on emissions used is obtained from a number of sources including company reports, CDP questionnaire (Carbon Disclosure Project) or an estimation model.

- **ESG Footprint:** The Management Company has put in place a strict E, S and G integration process for all listed companies in its investment universe, using officially published data from Bloomberg:

✓ E: For example: existence of climate change / biodiversity / energy efficiency policies; green building, water and waste usage
✓ S: For example: Ethics/Equal opportunity/training/ consumer data protection/whistleblowing policies, CSR committee in place, supply chain management
✓ G: For example: Number of board meetings per year, ratio of independent directors, chairman tenure, ratio of nonexecutive directors in boards

From that raw data, the Management Company has built a proprietary methodology to compute the "E,S,G footprints" of each individual holding in the portfolio and as such determine the overall E,S,G Footprints of the portfolio.

The Management Company has constrained its investment decision-making process to reach E,S,G footprints of the Compartment, at minima at the same level as the E,S,G footprints of the reference index Bloomberg Eurozone Developed Markets Large & Mid Cap Net Return Index.

- ***What are the objectives of the sustainable investments that the financial product partially intends to make and how does the sustainable investment contribute to such objectives?***

The sustainable investments within this Compartment contribute to Environmental objectives including climate change mitigation and adaptation (however not in the meaning of the Taxonomy Regulation) or commitment to science-based emissions reduction targets (“SBTI”).

To determine the share of sustainable investments, the Management Company considers the environmental objective for companies that:

- Have a carbon intensity (carbon emissions normalized by the Enterprise Value including Cash) below 80% of the average carbon intensity of the reference index Bloomberg Eurozone Developed Markets Large & Mid Cap Net Return Index

Or

Made a commitment to the SBTI initiative (This engagement is followed by the Management Company's research team on an annual basis).

- Are not involved in severe breaches or controversies in regard to the labor rights, human rights, environmental or corruption, and that are not part of the following sectors: tobacco, controversial weapons, coal mining and fossil fuels

And

Have not been targeted by any significant environmental fines over the past years.

- Have a G score for Good Governance practices (as defined by the Management Company ESG Footprint proprietary methodology) in the top 80% of the reference index the Bloomberg Eurozone Developed Markets Large & Mid Cap Net Return Index.

How do the sustainable investments that the financial product partially intends to make, not cause significant harm to any environmental or social sustainable investment objective?

Companies the Compartment invests in contribute to achieve the Compartments' carbon reduction objective, ESG footprint commitment while not significantly harming any environmental or social sustainable investment objectives. Before any investment is made by the Compartment (not only sustainable investments but all investments), the investment has to pass a negative screening further including the consideration of the principal adverse impacts described in the below section. Hence no companies involved in controversial sectors or activities not aligned with TOBAM's policy, can be eligible for investments for the Compartment.

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

The following Principal Adverse Impacts ("PAI") indicators as defined in SFDR Level II have been considered:

- PAI #7 : Activities negatively affecting biodiversity
- PAI #10 : Violations of UN Global Compact principles and OECD guidelines
- PAI #14 : Exposure to Controversial Weapons

The principal adverse impacts on sustainability indicators have been taken into account through an exclusionary investment policy.

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

The Management Company will not invest in any company that has been classified as failing to comply with key international norms (ISS Ethix Norm-based screening)) such as for example the UN Global Compact Principles, OECD Guidelines for Multinational Enterprises, Guiding Principles on Business and Human rights.

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

The "do no significant harm" principle applies only to those investments underlying the financial product that take into account the EU criteria for environmentally sustainable economic activities. The investments underlying the remaining portion of this financial product do not take into account the EU criteria for environmentally sustainable economic activities.

Any other sustainable investments must also not significantly harm any environmental or social objectives.

Does this financial product consider principal adverse impacts on sustainability factors?

Principal adverse impacts are the most significant negative impacts of investment decisions on sustainability factors relating to environmental, social and employee matters, respect for human rights, anti-corruption and anti-bribery matters.

☒ Yes, the Management Company has committed to monitor the 14 mandatory and 2 optional environmental and social indicators to show the impact of the Compartment's investments against these PAI indicators.

Furthermore, this Compartment considers principal adverse impacts on sustainability factors and only the following PAI have been taken into account into the investment process:

- PAI #1: GHG (Greenhouse Gas) emissions - Scope 1 & 2
- PAI #2: Carbon footprint
- PAI #3: GHG intensity of investee companies

The Compartment by targeting an overall carbon reduction of at least 20% compared to the reference index Bloomberg Eurozone Developed Markets Large & Mid Cap Net Return Index for carbon footprint, is looking to invest in a combination of stocks that achieve this overall carbon reduction, by considering carbon emissions scope 1 and 2.

- PAI #7: Activities negatively affecting biodiversity

The Management Company proprietary ESG footprint methodology considers raw data published by companies in order to compute an ESG footprint, by notably looking for example at the existence or not of key policies relevant to the biodiversity (for example: biodiversity policy, water usage policy, waste reduction policy, climate change policy…).

In addition to the previous PAI, the following social sustainability indicators have been considered:

- PAI #10: Violations of UN Global Compact principles and (OECD) Guidelines
- PAI #13: Board Gender Diversity
- PAI #14: Exposure to controversial weapons

PAI reports are available on the Compartment annual report.

☐ No

What investment strategy does this financial product follow?

The Compartment's primary investment objective is to be exposed to Eurozone equities, by systematically applying the Management Company's investment process, which aims to outperform the reference index by minimizing risk factor concentration via a maximally diversified portfolio.

In order to achieve its investment objective, at least 90% of the Compartment's assets are exposed to Eurozone equity markets, of which at least 75% are invested in securities eligible for the French equity savings plan (PEA).

The Management Company applies systematically its ESG methodology in the investment decision-making process.

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

- ***What are the binding elements of the investment strategy used to select the investments to attain each of the environmental or social characteristics promoted by this financial product?***

The Compartment applies the following binding elements to select investments and attain the environmental and social characteristics described above:

- **Exclusion policy:** the Management Company applies a general exclusion policy, restricting the investment universe and excluding companies based either on their involvement in certain activities (sector or product based) or based on controversies or breaches to key international norms. The key exclusions used by the Management Company are reflected in the below table:

Sector /Product	**Criteria**
Producer and distributors of tobacco	Limit (5% of the revenues)
Coal and coal-based producers and distributors	Limit (10% of the revenues)
Development, production, maintenance or distribution of controversial and prohibited weapons	Exclusion
Breach or violation of International Treaties, Conventions & Standards such as OECD Guidelines for Multinational Enterprises, ILO Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy, UN Global Compact, Guiding Principles on Business and Human Rights	Exclusion

Further details on the exclusion policy can be found in the following link: https://www.tobam.fr/our-beliefs/exclusion-policy/.

- **ESG Integration:** The Management Company has put in place a strict E, S and G integration process for all listed companies in its investment universe; using officially published data from Bloomberg.

✓ E: For example: existence of climate change / biodiversity / energy efficiency policies; green building, water and waste usage

✓ S: For example: Ethics/Equal opportunity/training/ consumer data protection/whistleblowing policies, CSR committee in place, supply chain management

✓ G: For example: Number of board meetings per year, ratio of independent directors, chairman tenure, ratio of nonexecutive directors in boards

From that raw data, the Management Company has built a proprietary methodology to compute the "E,S,G footprints" of each individual holding in the portfolio and as such determine the overall E,S,G Footprints of the portfolio. The E, S and G footprint aggregates and normalizes (for industry, size and regional biases) the information contained in each of the above mentioned items by E, S and G pillar. The normalization also corrects differences in scale of the different pieces of raw data. The final footprint is an equal weighted measure of the three pillars. The Management Company then adds a constraint into its quantitative portfolio optimization process, to ensure that the E, S and G footprints of the respective portfolio (computed based on the holdings' individual E, S and G footprints) are respectively at least at the same level as the E, S and G footprints of the reference index Bloomberg Eurozone Developed Markets Large & Mid Cap Net Return Index.

- **Carbon Emissions Reduction & Commitment to SBTI:** In addition, the Management Company analyses the carbon emissions of each holding in its investment universe, computes the carbon footprint of the portfolio and applies a systematic portfolio carbon footprint reduction of at least 20% versus the reference index the Bloomberg Eurozone Developed Markets Large & Mid Cap Net Return Index's carbon footprint. The calculation of the carbon footprint is based on the greenhouse gas emissions scope 1 and scope 2. Data on emissions used is obtained from a number of sources including company reports, CDP questionnaire (Carbon Disclosure Project) or an estimation model.

The Management Company is also monitoring the companies' commitment to the SBTI as a way to monitor best effort toward more incorporation of best practices. This feature is monitored on a yearly basis.

- **Responsible Ownership:** The Management Company applies a responsible voting policy and has built an ambitious engagement policy to support its commitment to sustainability and address via engagement and dialogues, issues relative to ESG and sustainability.

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

Not applicable.

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

In order to assess good governance practices, the Management Company consider the G scoring of its proprietary ESG footprint methodology, and ensure that the G scoring of the Compartment is matching the reference index Bloomberg Eurozone Developed Markets Large & Mid Cap Net Return Index's G scoring.

Good governance practices include sound management structures, employee relations, remuneration of staff and tax compliance.

What is the asset allocation planned for this financial product?

Asset allocation describes the share of investments in specific assets.

#1: 90% of the assets of this Compartment are aligned (promote) E/S characteristics.

#1A: at least 40% of those assets fall under the sustainable share of investment with non EU Taxonomy aligned environmental objectives.

These sustainable investments contribute to environmental objectives, including climate change mitigation and adaptation (however not in the meaning of the Taxonomy Regulation) or commitment to SBTI.

The model used by TOBAM for the determination of the sustainable investments combines the pass or fail approach and the weighted-revenue approach with threshold for the carbon emissions and governance.
To determine the share of sustainable investments, the Management Company considers the environmental objective for companies that have:

Environmental objective determined as:

- Companies that have carbon emission intensity (carbon emissions normalized by the Enterprise Value Including Cash) below 80% of the average emissions carbon intensity of the reference index the Bloomberg Eurozone Developed Markets Large & Mid Cap Net Return Index

Or

- Companies that have made a commitment to the SBTI initiative (this engagement is followed by the Management Company's research team on an annual basis).

Do Not Significantly Harm characteristics:

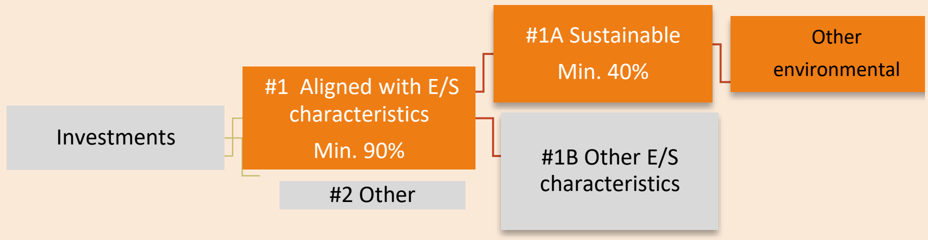
- Companies that are not involved in severe breaches or controversies in regard to the labor rights, human rights, environmental or corruption, and that are not part of the following sectors: tobacco, controversial weapons, coal mining and fossil fuels

And

- Companies that have not been targeted by any significant environmental fines over the past years.

Good Governance practices are defined as companies that have a G score (as defined by the Management Company ESG Footprint proprietary methodology) in the top 80% of the reference index the Bloomberg Eurozone Developed Markets Large & Mid Cap Net Return Index.

Please note that investments falling under section #1B on the below diagram 'non sustainable investment share of the Compartment', still comply with all of the Compartment ESG policy (exclusions, carbon reduction, ESG footprint, voting & engagement), but did not qualify as a sustainable investment.



#1 Aligned with E/S characteristics includes the investments of the financial product used to attain the environmental or social characteristics promoted by the financial product.

#2Other includes the remaining investments of the financial product which are neither aligned with the environmental or social characteristics, nor are qualified as sustainable investments.

The category **#1 Aligned with E/S characteristics** covers:
- The sub-category **#1A Sustainable** covers sustainable investments with environmental or social objectives.
- The sub-category **#1B Other E/S characteristics** covers investments aligned with the environmental or social characteristics that do not qualify as sustainable investments.

How does the use of derivatives attain the environmental or social characteristics promoted by the financial product?

The Compartment may use financial derivative instruments, for investment, efficient portfolio management and/or hedging purposes, and this will not impact in any way the exposure to sustainable assets, or the ESG characteristics of the Compartment.

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

The Compartment commits to a 0% alignment with the EU Taxonomy.

Taxonomy-aligned activities are expressed as a share of:
- **turnover** reflecting the share of revenue from green activities of investee companies
- **capital expenditure** (CapEx) showing the green investments made by investee companies, e.g. for a transition to a green economy.
- **operational expenditure** (OpEx) reflecting green operational activities of investee companies.

- ***Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy[1]?***

☐ Yes :

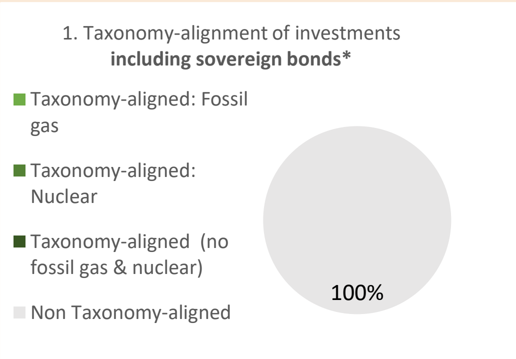
☐ In fossil gas ☐ In nuclear energy

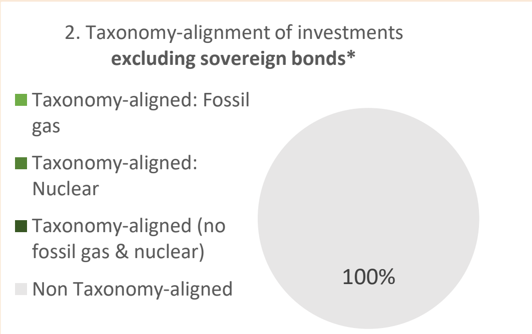
☒ No

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

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

The two graphs below show in green the minimum percentage of investments that are aligned with the EU Taxonomy. As there is no appropriate methodology to determine the Taxonomy-alignment of sovereign bonds*, the first graph shows the Taxonomy alignment in relation to all the investments of the financial product including sovereign bonds, while the second graph shows the Taxonomy alignment only in relation to the investments of the financial product other than sovereign bonds.





This graph represents 100% of the total investments.

*** For the purpose of these graphs, 'sovereign bonds' consist of all sovereign exposures**

Enabling activities directly enable other activities to make a substantial contribution to an environmental objective.

Transitional activities are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.

- ***What is the minimum share of investments in transitional and enabling activities?***

As the Compartment does not have a minimum Taxonomy alignement, there is no minimum share in transitional and enabling activities.

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

The minimum share of sustainable investments with an environmental objective that is not aligned with the EU Taxonomy is 40%.

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

What is the minimum share of socially sustainable investments?

Not applicable.

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

Investments falling under category "#2 Other", are investments such as derivatives, cash or cash equivalent, not integrating E/S characteristics, where ESG key features and analysis have not been performed, and E/S characteristics not considered.

No minimum environmental or social safeguards apply to the above elements.

Is a specific index designated as a reference benchmark to determine whether this financial product is aligned with the environmental and/or social characteristics that it promotes?

No, but the Compartment has designated a reference benchmark (Bloomberg Eurozone Developed Markets Large & Mid Cap Net Return Index). This index is used as a reference to compare the Compartment ESG characteristics, such as carbon emissions or ESG footprint, with the reference benchmark.

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

- ***How is the reference benchmark continuously aligned with each of the environmental or social characteristics promoted by the financial product?***

  The reference index used by the Compartment is not an ESG benchmark and is not consistent with the ESG characteristics promoted by the Compartment. All ESG calculations or comparisons are computed using Bloomberg Eurozone Developed Markets Large & Mid Cap Net Return Index, as a good proxy of the Compartment investment universe.

- ***How is the alignment of the investment strategy with the methodology of the index ensured on a continuous basis?***

  The reference index the Bloomberg Eurozone Developed Markets Large & Mid Cap Net Return Index is designed to measure equity market performance of countries within European Economic and Monetary Union ("EMU") classified as Developed Market by Bloomberg, which is in line with the Compartment investment universe.

  The investment universe of the reference index is regularly monitored by the Management Company research team to ensure the consistency with the Compartment's investment universe, in order to ensure relevance of ESG and performance comparisons.

- ***How does the designated index differ from a relevant broad market index?***

  The reference index Bloomberg Eurozone Developed Markets Large & Mid Cap Net Return Index is a broad market index, capturing developed and emerging markets equities, which is in line with the Compartment investment universe.

- ***Where can the methodology used for the calculation of the designated index be found?***

  https://assets.bbhub.io/professional/sites/27/Global-Equity-Index-Methodology.pdf

Where can I find more product specific information online?

More product-specific information can be found on the website:
https://www.tobam.fr/key-documents-policies/

APPENDIX 3. Most Diversified Portfolio SICAV - TOBAM Anti-Benchmark Global Equity Fund

Investment Objective, Benchmark of the Compartment

The Compartment's investment objective is to seek performance correlated primarily to the international equity markets by using the Management Company's investment process to select financial instruments.

Changes in the net asset value can be compared to the Bloomberg Developed Markets Large & Mid Cap Net Return Index.

The Bloomberg Developed Markets Large & Mid Cap Net Return Index includes large-cap equities of OECD countries chosen based on an allocation by region and then by sector.

This series approximates the minimum possible dividend reinvestment. The dividend is reinvested after deduction of withholding tax by applying the maximum rate of the company's country of incorporation applicable to institutional investors.

The performance of the benchmark index includes dividends paid by stocks comprising the indicator on www.bloomberg.com/indices.

The Compartment does not use an index-based management strategy, it is actively managed. As a consequence, its performance may differ substantially from the benchmark, which is used to define the investment universe and determine the global risk profile of the Compartment. A majority of the Compartment's equity securities will be components of the benchmark. The weightings of the Compartment's portfolio holdings may diverge significantly from their equivalent weighting in the index.

Investment strategy of the Compartment

At least 90% of the Compartment's assets are exposed at all times to small, mid and large-cap international equity markets. If justified by extreme market conditions and to limit the cost of trading on the various stock exchanges, including in particular the London Stock Exchange, the Compartment reserves the option to invest up to 100% of its assets in mono underlying contracts for difference ("CFDs"). CFDs are futures contracts entered into with a counterparty and settled through cash payments rather than through physical delivery of financial instruments. The Compartment will thus be able to benefit from the flexibility these instruments may offer (particularly in terms of liquidity and price) relative to the financial instruments in which it invests directly.

For the purpose of diversification, the Compartment may invest up to 20% of its net assets in closed-ended real estate investment trusts (REIT). Investments in Real Estate Investment Trusts (REIT) are made in compliance with the restrictions laid down in Article 41 of the Law.

The equities in which the Compartment invests are selected on the basis of quantitative models developed by the management company, which enable it to maximize the level of diversification provided compared to the BLOOMBERG World index. The resulting Compartment, combined with other "long only" investments, is expected to improve the results of the asset allocation by, among other things, improving the Sharpe ratio and reducing volatility. These models determine the choice of eligible equities and their weighting in the portfolio. The sector breakdown may be taken into account to limit concentration into a particular sector.

The Compartment may hold up to 100% of its assets in shares or units of UCITS.

Up to 10% of the Compartment may be exposed, either directly or through UCITS, to different markets or asset classes (money market instruments, listed index funds) in order to achieve its investment objective (optimum return on its cash).

In order to be continually exposed as closely as possible to the model portfolio, it may build or supplement its exposure by investing in other OTC contracts to improve risk management and reduce trading costs. It may also invest up to 100% of its assets in forward financial instruments (such as futures contracts) in order to make occasional adjustments to allow for subscriptions and redemptions and/or to occasionally hedge a portion of currency risk.

The Compartment may also use deposits for up to 100% of its assets, and may borrow cash in the event that it becomes overdrawn.

The Compartment qualifies under article 8 of SFDR. The investment strategy does not have a sustainable investment objective but promotes environmental and social characteristics. The strategy notably follows the 4 pillars of TOBAM's SRI policy: exclusion, carbon reduction, ESG integration and responsible stewardship via voting and engagement.

The Management Company considers ESG factors and applies a sustainability approach in its investment process for the Compartment as further detailed in the Appendix 3.1 Environmental and/or Social Characteristics - Pre-contractual disclosures in compliance with SFDR Level II.

1) Description of the asset classes used to achieve the investment objective

The asset classes included in the portfolio are the following:

a) Equities

In pursuit of the strategy described above, the Compartment will be exposed to the international equities market based on the outlook perceived by the Management Company, the Compartment may invest in equities of listed companies in developed countries as defined by BLOOMBERG of all sizes and from all economic sectors either via CFDs or via paper securities depending on market conditions. At least 90% of the Compartment's net assets will be exposed to these equities. The Compartment may invest up to 20% of its assets in closed-ended real estate investment trusts (REIT).

b) Money market instruments

For treasury purposes, the Compartment may trade, up to 10% of its assets, in money-market instruments (government bonds for OECD states, money-market funds).

In order to achieve its investment objective, if execution of the investment strategy leads the Management Company to opt for CFDs, the portfolio may comprise a significant proportion of instruments (notably certificates of deposit, European commercial paper, treasury bills) with a minimum rating of AA- (S&P) or Aa3 (Moody's). In case of separation between the two ratings, the Management Company will select the lowest rating.

c) Shares or units of UCITS

The Compartment may hold up to 100% of its assets in shares or units of UCITS of any classification, whether or not they comply with the European directive and/or are authorized to be issued in France.

The Compartment will invest exclusively in funds investing no more than 10% of their assets in UCITS or investment funds.

These funds may be managed by the Management Company or an affiliated company. The investment strategies of these funds are compatible with that of the Compartment.

The Compartment may invest maximum 20% of its assets in each Compartment of the Company.

2) Derivatives used to achieve the investment objective

The Compartment may use financial futures up to a maximum of one time its assets. The Compartment's leveraged exposure may not exceed 110%.

The Compartment will invest in regulated, organized markets and over-the-counter.

The Compartment will use derivatives instrument for hedging and exposure purposes, and to achieve the investment objective (including replication of synthetic exposure to baskets of equities or indices).

The hedging derivatives transaction shall aim to cover equity risk, foreign exchange risk of the Compartment.

The types of instruments used by the Management Company will mainly be futures on equities or stock market indices, swaps on currencies, equities or indices and CFDs.

3) Deposits and cash

The Compartment may hold, up to 20% of its net assets, ancillary liquid assets which consists of bank deposits at sight such as cash held in current accounts with a bank accessible at any time.

The Compartment may make limited use of other deposits in order to achieve its investment objective, for treasury purposes and/or in in case of unfavourable market conditions

4) Cash borrowing

The Compartment may borrow up to the equivalent of 10% of its net assets in cash on a temporary basis and for technical needs only.

5) Temporary purchases and sales of securities

The attention of the Shareholders is drawn to the fact that the below wording, reporting the increased use of securities lending, applies as of 29 May 2023.

In addition, the Compartment may engage in security lending for up to 75% of its assets.
The Compartment may also, as ancillary, make temporary deposits and borrow cash in the event that a debit balance was to appear.

The Compartment will enter into securities lending transactions opportunistically in circumstances where the Management Company believes that the objective described below could be achieved.

In the context of investments in specials and general collateral the Compartment will use securities lending in order to increase the return of the portfolio.

The expected proportion of the Compartment's assets which may be subject to securities lending depends on the demand of market participants for the securities forming part of the Compartment's portfolio at any time.

This demand depends notably on the interest of such securities, the size of the lendable positions, the presence of specials or securities used as general collateral, the potential duration of the loan (the securities being subject to portfolio adjustments or rebalancing, and thus sell trades), and the type of collateral accepted by the Compartment.

The Compartment's use of, or investment in, securities lending transactions will be as follows:

Type of transaction	Expected proportion	Maximum proportion
Securities lending	0% to 30%	75%

Reference Currency

The reference currency of the Compartment is EUR.

Profile of the Typical Investor

The Compartment is a significant risk vehicle.

To determine their level of investment, investors should consider their personal assets, the regulations applicable to them, their current financial needs over a recommended minimum investment horizon of more than five years, and also their willingness to take risks or their preference for a more prudent investment. The recommended minimum investment horizon is more than 5 years.

Form of Shares and Classes

The Share Classes of the Compartment will be issued in registered form

Share Classes	**A** **Isin Code:** **LU1067855038**	**A1** **Isin Code:** **LU1067855111**	**B** **Isin Code:** **LU1067855202**	**B1** **Isin Code:** **LU1067855384**	**Z** **Isin Code:** **LU1666143091**
Currency	EUR	USD	EUR	USD	EUR
Type of Shares	Accumulation				
Target Investors	Institutional investors	Institutional investors	All investors	All investors	Institutional investors
Minimum initial subscription	10 Shares	10 Shares	1 Share	1 Share	10 Shares
Minimum holding amount	1 Share	1 Share	1 Share	1 Share	1 Share
Valuation Day	Every Business Day, with the exception of days on which the American markets are closed (based on the official NYSE Euronext calendar)				
Management Company Fee	1.20%*	1.20%*	2%**	2%**	0%
Administration Fee & Depositary Fee	0.20% ***	0.20% ***	0.20%***	0.20% ***	0.20%
Subscription Fee paid to the Management Company	None	None	Up to 3%	Up to 3%	Up to 5%
Redemption Fee paid to the Management Company	Up to 1%	Up to 1%	Up to 1%	Up to 1%	Up to 5%
Cut-off	11.00 a.m. CET the Business Day before the relevant Valuation Day				
Subscription/Redemption Settlement Day	2 days, according to the official NYSE Euronext calendar, following the Valuation Day				

**maximum 0.20% for investments in other Compartments of the Company*

***maximum 1.00% for investments in other Compartments of the Company*

****0.00% for investments in other Compartments of the Company*

Investors subscribing for Shares denomminated in USD are subject to USD currency risk given the conversion of the net asset value.

Launch date

This Compartment has been launched by way of a cross-border operation with the French UCITS FCP TOBAM Anti-Benchmark Global Equity Fund. The launch date of this Compartment was 9 October 2014.

The initial subscription prices of the Share Classes of this Compartment corresponded to the NAV of their equivalent Share Classes in the French UCITS FCP TOBAM Anti-Benchmark Global Equity Fund.

The following Share Classes B, B1 and Z of this Compartment will be created with the following initial subscription prices:

Class:	Initial subscription prices:
Class B	EUR 100

Class B1	USD 100
Class Z	EUR 10,000

Total Expense Ratio

The latest calculated total expense ratio rate can be found in the Company's latest financial report.

Risk Management

The method used to calculate overall exposure is commitment method.

Compartments Specific Risk Factors

The funds will be invested primarily in financial instruments selected by the Management Company. These instruments will be subject to market movements and fluctuations. The Management Company invests according to a systematic, fundamentals-based model: there is a risk that the equities selected may not be the best performing stocks.

1) Equity risk

If the equities or indices to which the portfolio is exposed fall, the net asset value of the Compartment may also fall.

Since the volume of small and mid-cap stocks listed on the stock exchange is relatively low, market downturns are more pronounced and more rapid than for large caps. The net asset value of the Compartment may therefore decline more quickly and more significantly.

Investors' attention is drawn to the fact that the small-cap markets are intended to accommodate businesses that, due to their specific characteristics, may pose a risk for investors.

2) Risk associated with the Management Company's investment process

Investors should note that portfolio construction and the selection and weighting of assets are based on a process developed by the Management Company. The Compartment's investment process is based on a systematic model designed to identify signals based on past statistical results.

There is a risk that the model may not be efficient, as there is no guarantee that past market situations will be repeated in the future. Since the aim of the processes developed by the Management Company is to achieve good diversification of the Compartment's portfolio, using these processes may lead the Management Company to not select the top-performing assets.

3) Currency risk

Currency risk is the risk of depreciation in the currencies in which the Compartment invests relative to the reference currency. This currency risk will be managed according to market opportunities and may thus account for a significant proportion of the risk. In the event of depreciation in foreign currencies, investors are thus exposed to a decline in the value of their units.

4) Counterparty risk

The Compartment may incur a loss in the event of default by a counterparty with which certain transactions were carried out which would result in a decline in the Compartment's net asset value.

5) Interest rate risk

This refers to the risk of a fall in the value of fixed income instruments resulting from changes in interest rates. If interest rates rise, the Compartment's net asset value may fall. The Compartment has limited exposure to fixed income products.

6) Credit risk

This is the risk of a decline in shares issued by a private or public issuer or default by the latter. The value of the debt securities in which the Compartment is invested may decline, leading to a fall in net asset value.

Pre-contractual disclosure for the financial products referred to in Article 8, paragraphs 1, 2 and 2a, of Regulation (EU) 2019/2088 and Article 6, first paragraph of Regulation (EU) 2020/852

Product name: Most Diversified Portfolio SICAV - TOBAM Anti-Benchmark Global Equity Fund

Legal entity identifier: 54930001O21CHRMH0731

Sustainable investment means an investment in an economic activity that contributes to an environmental or social objective, provided that the investment does not significantly harm any environmental or social objective and that the investee companies follow good governance practices.

The **EU Taxonomy** is a classification system laid down in Regulation (EU) 2020/852, establishing a list of **environmentally sustainable economic activities**. That Regulation does not lay down a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

Environmental and/or social characteristics

Does this financial product have a sustainable investment objective?

☐ **Yes**

☒ **No**

☐ It will make a minimum of **sustainable investments with an environmental objective:** ___%

- ☐ in economic activities that qualify as environmentally sustainable under the EU Taxonomy
- ☐ in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy

☐ It will make a minimum of **sustainable investments with a social objective:** ___%

☒ It **promotes Environmental/Social (E/S) characteristics** and while it does not have as its objective a sustainable investment, it will have a minimum proportion of 32% of sustainable investments

- ☐ with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy
- ☒ with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy
- ☐ with a social objective

☐ It promotes E/S characteristics, but **will not make any sustainable investments**

What environmental and/or social characteristics are promoted by this financial product?

The Compartment's investment objective is to seek performance correlated primarily to the international equity markets by using the Management Company's investment process to select financial instruments.
The Compartment will primarily be invested in shares of Anti-Benchmark funds managed by TOBAM, classified Article 8 according the SFDR regulation, with a minimum of 36% of sustainable investment, applying TOBAM's Sustainable and Responsible policy.

The Compartment hence integrates environmental, social and governance (ESG) risks and opportunities to the sustainability of long-term company returns. The Compartment aims to promote low carbon approaches, commitment to climate action and companies with good governance.

In particular, the Compartment aims to promote the following E/S characteristics:

- Low carbon approach by applying a systematic carbon footprint reduction of at least 20% versus the reference investment universe's carbon footprint,
- Promotion of companies with good governance using raw data and their ESG footprint.

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

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

In order to achieve the above characteristics promoted by this Compartment, the Management Company invests in Compartments managed by TOBAM, classified Article 8 as per the SFDR regulation, applying the Management Company's ambitious ESG policy made of key pillars and sustainability indicators. The Compartments invested by the Compartment use the following sustainability indicators to attain each of the environmental and social characteristics promoted by the Compartment:

- **Carbon Emissions Reduction:** The underlying Compartments invested by the Compartment, each apply a systematic carbon footprint reduction of at least 20% versus their respective reference investment's carbon footprint. The calculation of the carbon footprint is based on the greenhouse gas emissions scope 1(i.e. direct emissions from owned or controlled sources) and scope 2 (i.e. indirect emissions from the generation of purchased energy) according to GHG Protocol Corporate Standard. Data on emissions used is obtained from a number of sources including company reports, CDP questionnaire (Carbon Disclosure Project) or an estimation model.

- **ESG Footprint:** The Management Company has put in place a strict E, S and G integration process for all listed companies in its investment universe; using officially published data from Bloomberg.

✓ E: For example: existence of climate change / biodiversity / energy efficiency policies; green building, water and waste usage

✓ S: For example: Ethics/Equal opportunity/training/ consumer data protection/whistleblowing policies, CSR committee in place, supply chain management

✓ G: For example: Number of board meetings per year, ratio of independent directors, chairman tenure, ratio of nonexecutive directors in boards

From that raw data, the Management Company has built a proprietary methodology to compute the "E,S,G footprints" of each individual holding in the portfolio and as such determine the overall E,S,G Footprints of the unerlying Compartments invested by the Compartment.

The Management Company has constrained its investment decision-making process to ensure that the E,S,G footprints of each of the underlying Compartments, are at minima, at the same level than their respective investment universe's E,S,G footprints.

What are the objectives of the sustainable investments that the financial product partially intends to make and how does the sustainable investment contribute to such objectives?

The sustainable investments within this Compartment contribute to Environmental objectives including climate change mitigation and adaptation (however not in the meaning of the Taxonomy Regulation) or commitment to science-based emissions reduction targets ("SBTI").

To determine the share of sustainable investments, the Management Company consider its investments in TOBAM's underlying Compartments, classified as Article 8 per the SFDR regulation, with a minimum of 36% of sustainable investment.

How do the sustainable investments that the financial product partially intends to make, not cause significant harm to any environmental or social sustainable investment objective?

The sustainable investments the Compartment invests in contribute to achieve the Compartments' carbon reduction objective, ESG footprint commitment while not significantly harming any environmental or social sustainable investment objectives. Before any investment is made by the Compartment (not only sustainable investments but all investments), the investment must pass a negative screening, further including the consideration of the principal adverse impacts described in the below section. Hence no companies involved in controversial sectors or activities not aligned with TOBAM's policy, can be eligible for investments by the Compartment.

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

The following Principal Adverse Impacts ("PAI") indicators as defined in the Taxonomy Regulation have been considered:

- PAI #7 : Activities negatively affecting biodiversity
- PAI #10 : Violations of UN Global Compact principles and OECD guidelines
- PAI #14 : Exposure to Controversial Weapons

The principal adverse impacts on sustainability indicators have been taken into account through an exclusionary investment policy.

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

The Management Company will not invest in any company that has been classified as failing to comply with key international norms (ISS Ethix Norm-based screening) such as for example the UN Global Compact Principles, OECD Guidelines for Multinational Enterprises, Guiding Principles on Business and Human rights.

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

The "do no significant harm" principle applies only to those investments underlying the financial product that take into account the EU criteria for environmentally sustainable economic activities. The investments underlying the remaining portion of this financial product do not take into account the EU criteria for environmentally sustainable economic activities.

Any other sustainable investments must also not significantly harm any environmental or social objectives.

Does this financial product consider principal adverse impacts on sustainability factors?

Principal adverse impacts are the most significant negative impacts of investment decisions on sustainability factors relating to environmental, social and employee matters, respect for human rights, anti-corruption and anti-bribery matters.

✖ Yes, the Management Company has committed to monitor the 14 mandatory and 2 optional environmental and social indicators to show the impact of the Compartment 's investments against these PAI indicators.

Furthermore, theCompartments the Compartment invests in consider principal adverse impacts on sustainability factors and only the following PAI have been taken into account into the investment process:

- PAI #1: GHG (Greenhouse Gas) emissions - Scope 1 & 2
- PAI #2: Carbon footprint
- PAI #3: GHG intensity of investee companies

By investing in underlying funds, managed by TOBAM, that have a systematic carbon reduction policy.

- PAI #7: Activities negatively affecting biodiversity

By investing in underlying funds, managed by TOBAM, that have a systematic ESG footprint integration policy. The Management Company proprietary ESG footprint methodology considers raw data published by companies in order to compute an ESG footprint, by notably looking for example at the existence or not of key policies relevant to the biodiversity (for example: biodiversity policy, water usage policy, waste reduction policy, climate change policy…).

In addition to the previous PAI, the following social Sustainability indicators have been considered:

- PAI #10: Violations of UN Global Compact principles and (OECD) Guidelines
- PAI #13: Board Gender Diversity
- PAI #14: Exposure to controversial weapons

PAI reports are available on the Compartment's annual report.

☐ No

What investment strategy does this financial product follow?

The Compartment's investment objective is to seek performance correlated primarily to the international equity markets by using the Management Company's investment process to select financial instruments.

The Compartment will primarily be invested in shares of Anti-Benchmark funds managed by TOBAM, classified Article 8 according the SFDR regulation, with a minimum of 36% of sustainable investment, applying TOBAM's Sustainable and Responsible policy.
This Compartment aims to promote low carbon approaches, commitment to climate action and companies with good governance.

The Management Company applies systematically its ESG methodology in the investment decision-making process.

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

What are the binding elements of the investment strategy used to select the investments to attain each of the environmental or social characteristics promoted by this financial product?

The Compartment invests in strategies applying the following binding ESG elements:

- **Exclusion Policy:** The Management Company applies a general exclusion policy, restricting the investment universe and excluding companies based either on their involvement in certain activities (sector or product based) or based on controversies or breaches to key international norms. The key exclusions used by the Management Company are reflected in the below table:

Sector /Product	Criteria
Producer and distributors of tobacco	Limit (5% of the revenues)
Coal and coal-based producers and distributors	Limit (10% of the revenues)
Development, production, maintenance or distribution of controversial and prohibited weapons	Exclusion
Breach or violation of International Treaties, Conventions & Standards such as OECD Guidelines for Multinational Enterprises, ILO Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy, UN Global Compact, Guiding Principles on Business and Human Rights	Exclusion

Further details on the exclusion policy can be found in the following link: https://www.tobam.fr/our-beliefs/exclusion-policy/

- **ESG Integration:** The Management Company has put in place a strict E, S and G integration process for all listed companies in its investment universe; using officially published data from Bloomberg.

  ✓ E: For example: existence of climate change / biodiversity / energy efficiency policies; green building, water and waste usage

  ✓ S: For example: Ethics/Equal opportunity/training/ consumer data protection/whistleblowing policies, CSR committee in place, supply chain management

  ✓ G: For example: Number of board meetings per year, ratio of independent directors, chairman tenure, ratio of nonexecutive directors in boards.

From that raw data, the Management Company has built a proprietary methodology to compute the "E,S,G footprints" of each individual holding in the portfolio and as such determine the overall E,S,G Footprints of the portfolios. The Management Company has constrained its investment decision-making process to ensure that the E,S,G footprints of the underlying Compartments invested by this Compartment, are at minima, at the same level as the E,S,G footprints of their respective investment universes.

Carbon Emissions Reduction: In addition, the Management Company analyses the carbon emissions of each holding in its investment universe, computes the carbon footprint of the portfolio and applies a systematic portfolio carbon footprint reduction to all the underlying Compartments invested by the Compartment, of at least 20% versus their respective investment universes' carbon footprint.

- **Responsible Ownership:** The Management Company applies a responsible voting policy and has built an ambitious engagement policy to support its commitment to sustainability and address via engagement and dialogues, issues relative to ESG and sustainability.

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

Not applicable.

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

Good governance practices include sound management structures, employee relations, remuneration of staff and tax compliance.

In order to assess good governance practices, the Management Company invests in Compartments classified as article 8 under the SFDR regulation and applying the proprietary ESG footprint methodology, to ensure that the G scoring of the respective Compartments is at minimum matching their reference investment universe's G scoring.

What is the asset allocation planned for this financial product?

#1: 90% of the assets of this Compartment are aligned (promote) with E/S characteristics.

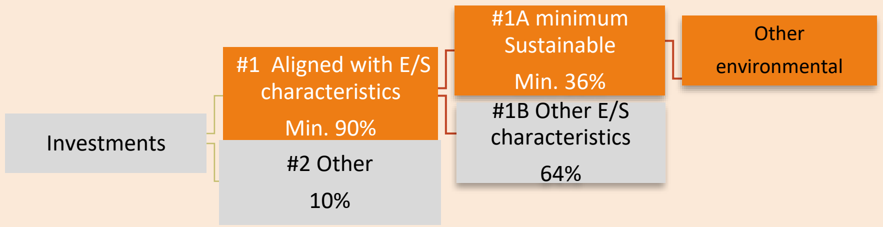
#1A: at least 36% of those assets fall under the sustainable share of investment with non EU Taxonomy-aligned environmental objectives.

These sustainable investments contribute to environmental objectives, including climate change mitigation and adaptation (however not in the meaning of the Taxonomy Regulation) or commitment to science-based emissions reduction targets (“SBTI”).

The model used by TOBAM for the determination of the sustainable investments combines the pass or fail approach and the weighted-revenue approach with threshold for the carbon emissions and governance.
Please note that investments falling under section #1B on the below diagram “non sustainable investment share of the Compartment”, still comply with all of the Compartment ESG policy (exclusions, carbon reduction, ESG footprint, voting & engagement), but did not qualify as a sustainable investment.

#2Other includes the cash and cash equivalents holdings that may be used by the Compartment for liquidity purposes and that are not aligned with E/S characteristics.

Asset allocation describes the share of investments in specific assets.



#1 Aligned with E/S characteristics includes the investments of the financial product used to attain the environmental or social characteristics promoted by the financial product.

#2Other includes the remaining investments of the financial product which are neither aligned with the environmental or social characteristics, nor are qualified as sustainable investments.

The category **#1 Aligned with E/S characteristics** covers:
- The sub-category **#1A Sustainable** covers sustainable investments with environmental or social objectives.
- The sub-category **#1B Other E/S characteristics** covers investments aligned with the environmental or social characteristics that do not qualify as sustainable investments.

How does the use of derivatives attain the environmental or social characteristics promoted by the financial product?

The Compartment may use financial derivative instruments for investment, efficient portfolio management and/or hedging purposes, and this will not impact in any way the exposure to sustainable assets, or the ESG characteristics of the Compartment.

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

The Compartment commits to a 0% alignment with the EU Taxonomy.

Taxonomy-aligned activities are expressed as a share of:
- **turnover** reflecting the share of revenue from green activities of investee companies
- **capital expenditure** (CapEx) showing the green investments made by investee companies, e.g. for a transition to a green economy.
- **operational expenditure** (OpEx) reflecting green operational activities of investee companies.

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

- ***Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy[1]?***

☐ Yes :

☐ In fossil gas ☐ In nuclear energy

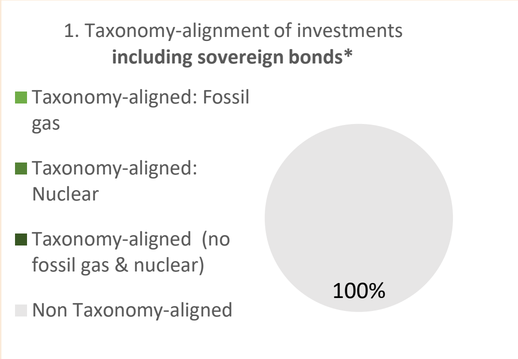
☒ No

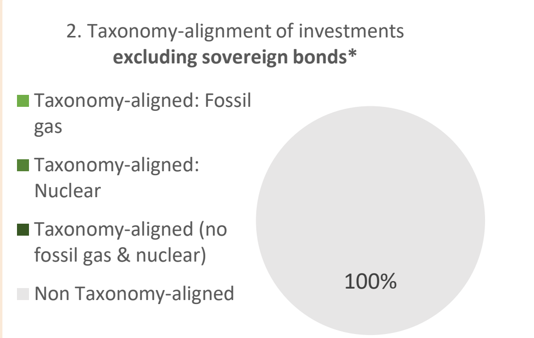
[1]Fossil gas and/or nuclear related activities will only comply with the EU Taxonomy where they contribute to limiting climate change ("climate change mitigation") and do not significantly harm any EU Taxonomy objective - see explanatory note in the left hand margin. The full criteria for fossil gas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

Enabling activities directly enable other activities to make a substantial contribution to an environmental objective.

Transitional activities are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.

The two graphs below show in green the minimum percentage of investments that are aligned with the EU Taxonomy. As there is no appropriate methodology to determine the Taxonomy-alignment of sovereign bonds*, the first graph shows the Taxonomy alignment in relation to all the investments of the financial product including sovereign bonds, while the second graph shows the Taxonomy alignment only in relation to the investments of the financial product other than sovereign bonds.





This graph represents 100% of the total investments.

*** For the purpose of these graphs, 'sovereign bonds' consist of all sovereign exposures**

What is the minimum share of investments in transitional and enabling activities?

As the Compartment does not have a minimum Taxonomy alignement, there is no minimum share in transitional and enabling activities.

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

The minimum share of sustainable investments with an environmental objective that is not aligned with the EU Taxonomy is 32%.

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

What is the minimum share of socially sustainable investments?

Not applicable.

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

Investments falling under category "#2 Other", are investments such as derivatives, cash or cash equivalent, not integrating E/S characteristics, where ESG key features and analysis have not been performed, and E/S characteristics not considered.

No minimum environmental or social safeguards apply to the above elements.

Is a specific index designated as a reference benchmark to determine whether this financial product is aligned with the environmental and/or social characteristics that it promotes?

No, but the Compartment invests in underlying Compartments, managed by TOBAM, that for ESG comparisons purposes have designated references indices for each of their relevant investment universes.

- ***How is the reference benchmark continuously aligned with each of the environmental or social characteristics promoted by the financial product?***

The reference index used by the Compartment, or the reference indices used by the underlying Compartments invested by this Compartment, are not ESG benchmarks and are not consistent with the ESG characteristics promoted by the Compartment. All ESG calculations or comparisons are computed using the underlying funds, reference indexes, as a good proxy of the respective Compartment's investment universes.

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

- ***How is the alignment of the investment strategy with the methodology of the index ensured on a continuous basis?***

The reference index of the Compartment is not used for the ESG integration purposes of this Compartment. ESG features in place in the underlying Compartments invested by this Compartment, when made in comparison to a reference index, are using the underlying Compartments' reference index, which are in line and representative of the Compartment investment universe.

These indices are regularly monitored by the Management Company research team to ensure the consistency with their respective Compartment's investment universes, in order to ensure relevance of ESG and performance comparisons.

- ***How does the designated index differ from a relevant broad market index?***

Neither the reference index of the Compartment nor the reference indices used by the underlying Compartments invested by this Compartment differ from a relevant broad market index.

- ***Where can the methodology used for the calculation of the designated index be found?***

https://assets.bbhub.io/professional/sites/27/Global-Equity-Index-Methodology.pdf

Where can I find more product specific information online?

More product-specific information can be found on the website:
https://www.tobam.fr/key-documents-policies/

APPENDIX 4. Most Diversified Portfolio SICAV - TOBAM Anti-Benchmark Japan Equity Fund

Investment Objective, Benchmark of the Compartment

The Compartment's investment objective is to be exposed to Japanese equity markets by systematically applying the Management Company's investment process, which aims to outperform the reference index by minimizing risk factor concentration via a maximally diversified portfolio.

Changes in the net asset value can be compared to the Bloomberg Japan Large & Mid Cap Net Return Index.

The Bloomberg Japan Large & Mid Cap Net Return Index is a free float-adjusted market capitalization index that is designed to measure equity market performance of Japanese markets. The shares that make up the index are selected on the basis of size, liquidity and free-float capital freely available for trading on a regulated market. index levels include the minimum possible reinvestments linked to dividends paid out on the shares in the index. A dividend is considered to be reinvested after deduction of withholding taxes by applying the maximum rate of the company's country of incorporation applicable to institutional investors.

The index is available at www.bloomberg.com/indices

The Compartment does not use an index-based management strategy, it is actively managed. As a consequence, its performance may differ substantially from the benchmark, which is used to define the investment universe and determine the global risk profile of the Compartment. A majority of the Compartment's equity securities will be components of the benchmark. The weightings of the Compartment's portfolio holdings may diverge significantly from their equivalent weighting in the index.

Investment strategy of the Compartment

In order to achieve its investment objective, at least 90% of the Compartment's portfolio is exposed to small, mid and large-cap Japanese equity markets.

In addition to the portfolio's 90% exposure to Japanese equities, the Compartment may also be exposed to different markets or asset classes in order to meet its investment objective.

The equities in which the Compartment invests are selected on the basis of quantitative models developed by the Management Company, which enable it to optimize the level of diversification on offer in relation to the benchmark. The resulting Compartment, combined with other "long only" investments, is expected to improve the results of the asset allocation by, among other things, improving the Sharpe ratio and reducing volatility. The aim of the management models used is to increase diversification in relation to the benchmark index. The sector breakdown may be taken into account to limit concentration into a particular sector.

For the purpose of diversification, the Compartment may invest up to 20% of its net assets in closed-ended real estate investment trusts (REIT). Investments in Real Estate Investment Trusts (REIT) are made in compliance with the restrictions laid down in Article 41 of the Law.

It may invest up to 100% of its assets in forward financial instruments (such as futures contracts) in order to make occasional adjustments to allow for subscriptions and redemptions and/or to hedge currency risk. The Compartment may also build up or supplement its exposure by investing in OTC contracts in order to improve risk management and reduce trading costs.

The Compartment will thus be able to benefit from the flexibility these instruments may offer (particularly in terms of liquidity and price) relative to the financial instruments in which it invests directly.

In order to achieve an optimal return on its cash, the Compartment may invest up to 10% of its assets in money market instruments.

The Compartment may also use deposits for up to 100% of its assets, and may borrow cash in the event that it becomes overdrawn.

The Compartment qualifies under article 8 of SFDR. The investment strategy does not have a sustainable investment objective but promotes environmental and social characteristics. The strategy notably follows the 4 pillars of TOBAM's SRI policy: exclusion, carbon reduction, ESG integration and responsible stewardship via voting and engagement.

The Management Company considers ESG factors and applies a sustainability approach in its investment process for the Compartment as further detailed in the Appendix 4.1 Environmental and/or Social Characteristics - Pre-contractual disclosures in compliance with SFDR Level II. Description of the asset classes used to achieve the investment objective

The asset classes included in the portfolio are the following:

a) Equities

At least 90% of the Compartment's net assets will be exposed to Japanese equities.

Subject to the above-mentioned limits, the Compartment will be exposed to small, mid and large-cap equities.

The Compartment may invest up to 20% of its assets in closed-ended real estate investment trusts (REIT).

b) Money market instruments

For treasury purposes, the Compartment may trade, up to 10% of its assets, in money-market instruments (government bonds for OECD states, money-market funds).

In order to achieve its investment objective, if execution of the investment strategy leads the Management Company to opt for CFDs, the portfolio may comprise a significant proportion of instruments (notably certificates of deposit, European commercial paper, treasury bills) with a minimum rating of AA- (S&P) or Aa3 (Moody's). In case of separation between the two ratings, the Management Company will select the lowest rating.

c) Shares or units of UCITS:

The Compartment may invest up to 10% of its asset in share or units of other UCITS which themselves invest maximum 10% of their assets in UCITS or investment funds.

These funds may be managed by the Management Company or an affiliated company. The investment strategies of these funds are compatible with that of the Compartment.

The Compartment may invest maximum 10% of its assets in one or more Compartments of the Company.

1) Derivatives used to achieve the investment objective

The Compartment may use financial futures up to a maximum of one time its assets. The Compartment's leveraged exposure may not exceed 110%.

The Compartment will invest in regulated, organized markets and over-the-counter.

The Compartment will use derivatives instrument for hedging and exposure purposes, and to achieve the investment objective (including replication of synthetic exposure to baskets of equities or indices).

The hedging derivatives transaction shall aim to cover equity risk and currency risk of the Compartment.

The types of instruments used by the Management Company will mainly be futures on equities or stock market indices and swaps on currencies, equities or indices.

2) Deposits and cash

The Compartment may hold, up to 20% of its net assets, ancillary liquid assets which consists of bank deposits at sight such as cash held in current accounts with a bank accessible at any time.

The Compartment may make limited use of other deposits in order to achieve its investment objective, for treasury purposes and/or in in case of unfavourable market conditions.

3) Cash borrowing

The Compartment may borrow up to the equivalent of 10% of its net assets in cash in order to cover its technical needs.

4) Temporary purchases and sales of securities

The attention of the Shareholders is drawn to the fact that the below wording, reporting the increased use of securities lending, applies as of 29 May 2023.

In addition, the Compartment may engage in security lending for up to 75% of its assets.
The Compartment may also, as ancillary, make temporary deposits and borrow cash in the event that a debit balance was to appear.

The Compartment will enter into securities lending transactions opportunistically in circumstances where the Management Company believes that the objective described below could be achieved.

In the context of investments in specials and general collateral the Compartment will use securities lending in order to increase the return of the portfolio.

The expected proportion of the Compartment's assets which may be subject to securities lending depends on the demand of market participants for the securities forming part of the Compartment's portfolio at any time.

This demand depends notably on the interest of such securities, the size of the lendable positions, the presence of specials or securities used as general collateral, the potential duration of the loan (the securities being subject to portfolio adjustments or rebalancing, and thus sell trades), and the type of collateral accepted by the Compartment.
The Compartment's use of, or investment in, securities lending transactions will be as follows:

Type of transaction	Expected proportion	Maximum proportion
Securities lending	0% to 30%	75%

Reference currency

The reference currency of the Compartment is JPY.

Profile of the typical investor

The Compartment is a high risk vehicle. To determine their level of investment, investors should consider their personal assets, the regulations applicable to them, their current financial needs over a recommended minimum investment horizon of more than five years, and also their willingness to take risks or their preference for a more prudent investment. The recommended minimum investment horizon is more than 5 years.

Form of Shares and Classes

The Share Classes of the Compartment will be issued in registered form

Share Classes	**A** **Isin Code:** **LU1067855467**	**A1** **Isin Code:** **LU1067855541**	**A2** **Isin Code:** **LU1234739495**	**B** **Isin Code:** **LU1067855624**	**R** **Isin Code:** **LU1444496738**	**RD1*** **Isin Code:** **LU1444496811**	**RD2** **Isin Code:** **LU1666143257**	**Z** **Isin Code:** **LU1666143174**
Currency	JPY	EUR	GBP	EUR	GBP	EUR	JPY	JPY
Type of Shares	Accumulation					Distribution	Accumulation	
Target Investors	Institutional investors	Institutional investors	Institutional investors	All investors	All investors	All investors	All investors	Institutional investors

Minimum initial subscription	10 Shares	10 Shares	10 Shares	1 Share	1 Share	1 Share	1 Share	10 Shares
Minimum holding amount	1 Share	1 Share	1 Share	1 Share	1 Share	1 Share	1 Share	1 Share
Valuation Day	Every Business Day, with the exception of days on which the Japanese markets are closed (based on the official Tokyo Stock Exchange calendar)							
Hedge						100% systematic hedging against foreign exchange risk		
Management Company Fee	1%	1%	1%	2%	0.55%	0.55%	0.55%	0%
Administration Fee & Depositary Fee	0.20%	0.20%	0.20%	0.20%	0.20%	0.20%	0.20%	0.20%
Subscription Fee paid to the Management Company	None	None	None	Up to 3%	Up to 5%	Up to 5%	Up to 5%	Up to 5%
Redemption Fee paid to the Management Company	Up to 1%	Up to 1%	Up to 1%	Up to 1%	Up to 1%	Up to 1%	Up to 1%	Up to 5%
Cut-off	12.00 p.m. CET the Business Day before the relevant Valuation Day							
Subscription /Redemption Settlement Day	2 days, according to the official Tokyo Stock Exchange calendar following the Valuation Day							

R units: these units are intended for "all investors” seeking a low initial investment and a “clean fee” structure. The R “clean fee” share class will not carry any fees payable to distributors. *Investors subscribing for Shares denomminated in EUR are subject to EUR currency risk given the conversion of the net asset value.*

** Share Class RD1 offers 100% systematic hedging against foreign exchange risk with a 10% tolerance. The Share Class RD1 does not hedge currency risk against the reference currency of the Compartment (*JPY*) but against the foreign exchange risk of all currency exposures held in the portfolio against the currency of the concerned Share Class (EUR). The reference benchmark for the share Class RD1 will be the Bloomberg Japan Large & Mid Cap Net Return Indexindex hedged against the share class currency (EUR).*

Launch date

This Compartment has been launched by way of a cross-border operation with the French UCITS FCP TOBAM Anti-Benchmark Japan Equity Fund. The launch date of this Compartment was 3 October 2014.

The initial subscription prices of the Share Classes of this Compartment corresponded to the NAV of their equivalent Share Classes in the French UCITS FCP TOBAM Anti-Benchmark Japan Equity Fund.

Share Classes of this Compartment will be created with the following initial subscription prices:

Class:	Initial subscription prices:
Class A2	GBP 10 000
Class B	EUR 100
Class R	GBP 100
Class RD1	EUR 100
Class RD2	JPY 100
Class Z	JPY 1 000 000

Total Expense Ratio

The latest calculated total expense ratio rate can be found in the Company's latest financial report.

Risk Management

The method used to calculate overall exposure is commitment method.

Compartments Specific Risk Factors

The funds will be invested primarily in financial instruments selected by the Management Company. These instruments will be subject to market movements and fluctuations. The Management Company invests according to a systematic, fundamentals-based model: there is a risk that the equities selected may not be the best performing stocks.

1) Equity risk

If the equities or indices to which the portfolio is exposed fall, the net asset value of the Compartment may also fall.

Since the volume of small and mid-cap stocks is relatively low, market downturns are more pronounced and more rapid than for large caps. The net asset value of the Compartment may therefore decline more quickly and more significantly.

Investors' attention is drawn to the fact that the small-cap markets are intended to accommodate businesses that, due to their specific characteristics, may pose a risk for investors.

2) Risk associated with the Management Company's investment process

Investors should note that portfolio construction and the selection and weighting of assets are based on a process developed by the Management Company. The Compartment's investment process is based on a systematic model designed to identify signals based on past statistical results.

There is a risk that the model may not be efficient, as there is no guarantee that past market situations will be repeated in the future. Since the aim of the processes developed by the Management Company is to achieve good diversification of the Compartment's portfolio, using these processes may lead the Management Company to not select the top-performing assets.

3) Currency risk

Currency risk is the risk of depreciation in the currencies in which the Compartment invests relative to the reference currency. This currency risk will be managed according to market opportunities and may thus account for a significant proportion of the risk. In the event of depreciation in foreign currencies, investors are thus exposed to a decline in the value of their units.

4) Interest rate risk

This refers to the risk of a fall in the value of fixed income instruments resulting from changes in interest rates. If interest rates rise, the Compartment's net asset value may fall. The Compartment has limited exposure to fixed income products.

5) Credit risk

This is the risk of a decline in bonds or debt securities issued by a private or public issuer or default by the latter. The value of the debt securities in which the Compartment is invested may decline, leading to a fall in net asset value.

Template pre-contractual disclosure for the financial products referred to in Article 8, paragraphs 1, 2 and 2a, of Regulation (EU) 2019/2088 and Article 6, first paragraph, of Regulation (EU) 2020/852

Product name: Most Diversified Portfolio SICAV - TOBAM Anti-Benchmark Japan Equity Fund

Legal entity identifier: 549300Q4Q64WR7RCPQ79

Sustainable investment means an investment in an economic activity that contributes to an environmental or social objective, provided that the investment does not significantly harm any environmental or social objective and that the investee companies follow good governance practices.

The **EU Taxonomy** is a classification system laid down in Regulation (EU) 2020/852, establishing a list of **environmentally sustainable economic activities**. That Regulation does not lay down a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

Environmental and/or social characteristics

Does this financial product have a sustainable investment objective?

☐ **Yes**	☒ **No**
☐ It will make a minimum of **sustainable investments with an environmental objective:** ___% ☐ in economic activities that qualify as environmentally sustainable under the EU Taxonomy ☐ in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy	☒ It **promotes Environmental/Social (E/S) characteristics** and while it does not have as its objective a sustainable investment, it will have a minimum proportion of 40% of sustainable investments ☐ with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy ☒ with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy ☐ with a social objective
☐ It will make a minimum of **sustainable investments with a social objective:** ___%	☐ It promotes E/S characteristics, but **will not make any sustainable investments**

What environmental and/or social characteristics are promoted by this financial product?

The Compartment’s investment objective is to be exposed to Japanese equity markets by systematically applying the Management Company’s investment process, which aims to outperform the reference index by minimizing risk factor concentration via a maximally diversified portfolio.

This process integrates environmental, social and governance (ESG) risks and opportunities to the sustainability of long-term company returns. This Compartment aims to promote low carbon approaches, commitment to climate action and companies with good governance.

In particular, the Compartment aims to promote the following E/S characteristics:

- Low carbon approach by applying a systematic carbon footprint reduction of at least 20% versus the reference investment universe’s carbon footprint.
- Promotion of companies with good governance using raw data and their ESG footprint.

The Compartment has designated Bloomberg Japan Large & Mid Cap Net Return Index as a reference index to compare its ESG characteristics, such as carbon emissions and ESG footprint.

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

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

In order to achieve the above characteristics promoted by this Compartment, the Management Company has put in place an ambitious ESG policy made of key pillars and sustainability indicators. This Compartment uses the following sustainability indicators to attain each of the environmental and social characteristics promoted by the Compartment:

- **Carbon Emissions Reduction:** The Management Company applies a systematic carbon footprint reduction of at least 20% versus the reference index the Bloomberg Japan Large & Mid Cap Net Return Index’s carbon footprint. The calculation of the carbon footprint is based on the greenhouse gas emissions scope 1 (i.e. direct emissions from owned or controlled sources) and scope 2 (i.e. indirect emissions from the generation of purchased energy) according to GHG Protocol Corporate Standard. Data on emissions used is obtained from a number of sources including company reports, CDP questionnaire (Carbon Disclosure Project) or an estimation model.

- **ESG Footprint:** The Management Company has put in place a strict E, S and G integration process for all listed companies in its investment universe; using officially published data from Bloomberg.

✓ E: For example: existence of climate change / biodiversity / energy efficiency policies; green building, water and waste usage
✓ S: For example: Ethics/Equal opportunity/training/ consumer data protection/whistleblowing policies, CSR committee in place, supply chain management
✓ G: For example: Number of board meetings per year, ratio of independent directors, chairman tenure, ratio of nonexecutive directors in boards

From that raw data, the Management Company has built a proprietary methodology to compute the "E,S,G footprints" of each individual holding in the portfolio and as such determine the overall E,S,G Footprints of the portfolio.

The Management Company has constrained its investment decision-making process to reach E,S,G footprints of the Compartment, at minima at the same level as the E,S,G footprints of the reference index the Bloomberg Japan Large & Mid Cap Net Return Index.

What are the objectives of the sustainable investments that the financial product partially intends to make and how does the sustainable investment contribute to such objectives?

The sustainable investments within this Compartment contribute to Environmental objectives including climate change mitigation and adaptation (however not in the meaning of the Taxonomy regulation) or commitment to science-based emissions reduction targets (“SBTI”).

To determine the share of sustainable investments, the Management Company consider the environmental objective for companies that:

- Have a carbon intensity (carbon emissions normalized by the Enterprise Value including Cash) below 80% of the average carbon intensity of the reference index the Bloomberg Japan Large & Mid Cap Net Return Index

Or

Made a commitment to the SBTI initiative. (This engagement is followed by the Management Company's research team on an annual basis).

- Are not involved in severe breaches or controversies in regard to the labor rights, human rights, environmental or corruption, and that are not part of the following sectors: tobacco, controversial weapons, coal mining and fossil fuels

And

Have not been targeted by any significant environmental fines over the past years.

- Have a G score for Good Governance practices (as defined by the Management Company ESG Footprint proprietary methodology) in the top 80% of the reference index the Bloomberg Japan Large & Mid Cap Net Return Index.

How do the sustainable investments that the financial product partially intends to make, not cause significant harm to any environmental or social sustainable investment objective?

Companies the Compartment invests in contribute to achieve the Compartments' carbon reduction objective, ESG footprint commitment while not significantly harming any environmental or social sustainable investment objectives. Before any investment is made by the Compartment (not only sustainable investments but all investments), the investment has to pass a negative screening, further including the consideration of the principal adverse impacts described in the below section. Hence no companies involved in controversial sectors or activities not aligned with TOBAM's policy, can be eligible for investments for the Compartment.

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

The following Principal Adverse Impacts ("PAI") indicators as defined in SFDR Level II have been considered:

- PAI #7 : Activities negatively affecting biodiversity
- PAI #10 : Violations of UN Global Compact principles and OECD guidelines
- PAI #14 : Exposure to Controversial Weapons

The principal adverse impacts on sustainability indicators have been taken into account through an exclusionary policy.

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

The Management Company will not invest in any company that has been classified as failing to comply with key international norms (ISS Ethix Norm-based screening) such as for example the UN Global Compact Principles, OECD Guidelines for Multinational Enterprises, Guiding Principles on Business and Human rights.

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

The "do no significant harm" principle applies only to those investments underlying the financial product that take into account the EU criteria for environmentally sustainable economic activities. The investments underlying the remaining portion of this financial product do not take into account the EU criteria for environmentally sustainable economic activities.

Any other sustainable investments must also not significantly harm any environmental or social objectives.

Does this financial product consider principal adverse impacts on sustainability factors?

Principal adverse impacts are the most significant negative impacts of investment decisions on sustainability factors relating to environmental, social and employee matters, respect for human rights, anti-corruption and anti-bribery matters.

✖ Yes, the Management Company has committeed to monitor the 14 mandatory and 2 optional environmental and social indicators to show the impact of the Compartment's investments against these PAI indicators.

Furthermore, this Compartment considers principal adverse impacts on sustainability factors and only the following PAI have been taken into account into the investment process:

- PAI #1: GHG (Greenhouse Gas) emissions - Scope 1 & 2
- PAI #2: Carbon footprint
- PAI #3: GHG intensity of investee companies

The Compartment by targeting an overall carbon reduction of at least 20% compared to the reference index Bloomberg Japan Large & Mid Cap Net Return Index's carbon footprint, is looking to invest in a combination of stocks that achieve this overall carbon reduction, by considering carbon emissions scope 1 and 2.

- PAI #7: Activities negatively affecting biodiversity

The Management Company proprietary ESG footprint methodology considers raw data published by companies in order to compute an ESG footprint, by notably looking for example at the existence or not of key policies relevant to the biodiversity (for example: biodiversity policy, water usage policy, waste reduction policy, climate change policy…).

In addition to the previous PAI, the following social sustainability indicators have been considered:

- PAI #10: Violations of UN Global Compact principles and (OECD) Guidelines
- PAI #13: Board Gender Diversity
- PAI #14: Exposure to controversial weapons

PAI reports are available on the Compartment annual report.

☐ No

What investment strategy does this financial product follow?

The investment strategy of the Compartment is a Japanese market equities strategy by systematically applying the Management Company's investment process, which aims to outperform the reference index by minimizing risk factor concentration via a maximally diversified portfolio.

This Compartment aims to promote low carbon approaches, commitment to climate action and companies with good governance.

The Management Company applies systematically its ESG methodology in the investment decision-making process.

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

What are the binding elements of the investment strategy used to select the investments to attain each of the environmental or social characteristics promoted by this financial product?

The Compartment applies the following binding elements to select investments and attain the environmental and social characteristics described above:

- **Exclusion policy:** the Management Company applies a general exclusion policy, restricting the investment universe and excluding companies based either on their involvement in certain activities (sector or product based) or based on controversies or breaches to key international norms. The key exclusions used by the Management Company are reflected in the below table:

Sector /Product	**Criteria**
Producer and distributors of tobacco	Limit (5% of the revenues)
Coal and coal-based producers and distributors	Limit (10% of the revenues)
Development, production, maintenance or distribution of controversial and prohibited weapons	Exclusion
Breach or violation of International Treaties, Conventions & Standards such as OECD Guidelines for Multinational Enterprises, ILO Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy, UN Global Compact, Guiding Principles on Business and Human Rights	Exclusion

Further details on the exclusion policy can be found in the following link: https://www.tobam.fr/our-beliefs/exclusion-policy/.

- **ESG Integration:** The Management Company has put in place a strict E, S and G integration process for all listed companies in its investment universe; using officially published data from Bloomberg.

✓ E: For example: existence of climate change / biodiversity / energy efficiency policies; green building, water and waste usage

✓ S: For example: Ethics/Equal opportunity/training/ consumer data protection/whistleblowing policies, CSR committee in place, supply chain management

✓ G: For example: Number of board meetings per year, ratio of independent directors, chairman tenure, ratio of nonexecutive directors in boards

From that raw data, the Management Company has built a proprietary methodology to compute the "E,S,G footprints" of each individual holding in the portfolio and as such determine the overall E,S,G Footprints of the portfolio. The E, S and G footprint aggregates and normalizes (for industry, size and regional biases) the information contained in each of the above mentioned items by E, S and G pillar. The normalization also corrects differences in scale of the different pieces of raw data. The final footprint is an equal weighted measure of the three pillars. The Management Company then adds a constraint into its quantitative portfolio optimization process, to ensure that the E, S and G footprints of the respective portfolio (computed based on the holdings' individual E, S and G footprints) are respectively at least at the same level as the E, S and G footprints of the reference index Bloomberg Japan Large & Mid Cap Net Return Index.

- **Carbon Emissions Reduction & Commitment to SBTI:** In addition, the Management Company analyses the carbon emissions of each holding in its investment universe, computes the carbon footprint of the portfolio and applies a systematic portfolio carbon footprint reduction of at least 20% versus the reference index the Bloomberg Japan Large & Mid Cap Net Return Index's carbon footprint. The calculation of the carbon footprint is based on the greenhouse gas emissions scope 1 and scope 2. Data on emissions used is obtained from a number of sources including company reports, CDP questionnaire (Carbon Disclosure Project) or an estimation model.

The Management Company is also monitoring the companies' commitment to the SBTI as a way to monitor best effort toward more incorporation of best practices. This feature is monitored on a yearly basis.

- **Responsible Ownership:** The Management Company applies a responsible voting policy and has built an ambitious engagement policy to support its commitment to sustainability and address via engagement and dialogues, issues relative to ESG and sustainability.

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

Not applicable.

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

Good governance practices include sound management structures, employee relations, remuneration of staff and tax compliance.

In order to assess good governance practices, the Management Company consider the G scoring of its proprietary ESG footprint methodology, and ensure that the G scoring of the Compartment is matching the reference index Bloomberg Japan Large & Mid Cap Net Return Index's G scoring.

Asset allocation describes the share of investments in specific assets.

What is the asset allocation planned for this financial product?

#1: 90% of the assets of the Compartment are aligned (promote) E/S characteristics.

#1A: at least 40% of those assets fall under the sustainable share of investment with non EU Taxonomy aligned environmental objectives.

These sustainable investments contribute to environmental objectives, including climate change mitigation and adaptation (however not in the meaning of the Taxonomy Regulation) or commitment to SBTI.

The model used by TOBAM for the determination of the sustainable investments combines the pass or fail approach and the weighted-revenue approach with threshold for the carbon emissions and governance.
To determine the share of sustainable investments, the Management Company considers the environmental objective for companies that have:

Environmental objective determined as:

o Companies that have carbon emission intensity (carbon emissions normalized by the Enterprise Value Including Cash) below 80% of the average emissions carbon intensity of the reference index the Bloomberg Japan Large & Mid Cap Net Return Index

Or

o Companies that have made a commitment to the SBTI initiative (this engagement is followed by the Management Company's research team on an annual basis).

Do Not Significantly Harm characteristics:

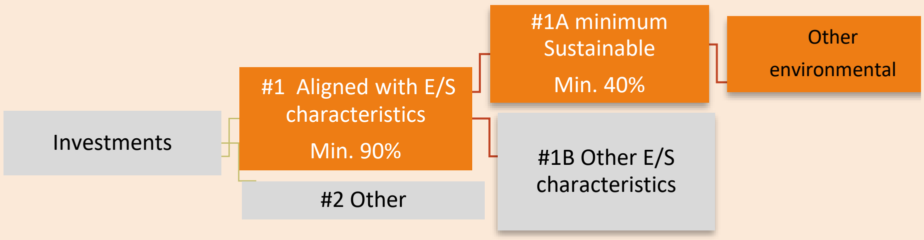
o Companies that are not involved in severe breaches or controversies in regard to the labor rights, human rights, environmental or corruption, and that are not part of the following sectors: tobacco, controversial weapons, coal mining and fossil fuels

And

o Companies that have not been targeted by any significant environmental fines over the past years.

Good Governance practices are defined as companies that have a G score (as defined by the Management Company ESG Footprint proprietary methodology) in the top 80% of the reference index the Bloomberg Japan Large & Mid Cap Net Return Index.

Please note that investments falling under section #1B on the below diagram 'non sustainable investment share of the Compartment', still comply with all of the Compartment ESG policy (exclusions, carbon reduction, ESG footprint, voting & engagement), but did not qualify as a sustainable investment.



#1 Aligned with E/S characteristics includes the investments of the financial product used to attain the environmental or social characteristics promoted by the financial product.

#2Other includes the remaining investments of the financial product which are neither aligned with the environmental or social characteristics, nor are qualified as sustainable investments.

The category **#1 Aligned with E/S characteristics** covers:
- The sub-category **#1A Sustainable** covers sustainable investments with environmental or social objectives.
- The sub-category **#1B Other E/S characteristics** covers investments aligned with the environmental or social characteristics that do not qualify as sustainable investments.

***How does the use of derivatives attain the environmental or social characteristics promoted by the financial product*?**

The Compartment may use financial derivative for investment, efficient portfolio management and/or hedging purposes, and this will not impact in any way the exposure to sustainable assets, or the ESG characteristics of the Compartment.

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

Taxonomy-aligned activities are expressed as a share of:
- **turnover** reflecting the share of revenue from green activities of investee companies
- **capital expenditure** (CapEx) showing the green investments made by investee companies, e.g. for a transition to a green economy.
- **operational expenditure** (OpEx) reflecting green operational activities of investee companies.

This Compartment commits to a 0% alignment with the EU Taxonomy.

Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy[1]?

☐ Yes :

☐ In fossil gas ☐ In nuclear energy

☒ No

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

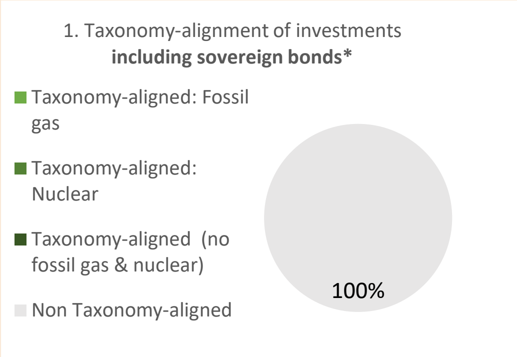
To comply with the EU Taxonomy, the criteria for **fossil gas** include limitations on emissions and switching to renewable power or low-carbon fuels by the end of 2035. For **nuclear energy**, the criteria include comprehensive safety and waste management rules.

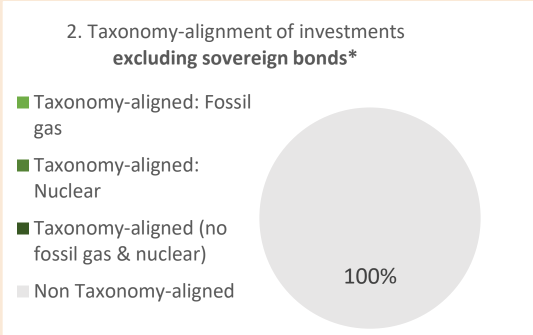
Enabling activities directly enable other activities to make a substantial contribution to an environmental objective.

Transitional activities are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.

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

The two graphs below show in green the minimum percentage of investments that are aligned with the EU Taxonomy. As there is no appropriate methodology to determine the Taxonomy-alignment of sovereign bonds*, the first graph shows the Taxonomy alignment in relation to all the investments of the financial product including sovereign bonds, while the second graph shows the Taxonomy alignment only in relation to the investments of the financial product other than sovereign bonds.





This graph represents 100% of the total investments.

*** For the purpose of these graphs, 'sovereign bonds' consist of all sovereign exposures**

What is the minimum share of investments in transitional and enabling activities?

As the Compartment does not have a minimum Taxonomy alignement, there is no minimum share in transitional and enabling activities.

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

The minimum share of sustainable investments with an environmental objective that is not aligned with the EU Taxonomy is 40%.

What is the minimum share of socially sustainable investments?

Not applicable

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

Investments falling under category "#2 Other", are investments such as derivatives, cash or cash equivalent, not integrating E/S characteristics, where ESG key features and analysis have not been performed, and E/S characteristics not considered.

No minimum environmental or social safeguards apply to the above elements.

Is a specific index designated as a reference benchmark to determine whether this financial product is aligned with the environmental and/or social characteristics that it promotes?

No, but the Compartment has designated a reference benchmark (Bloomberg Japan Large & Mid Cap Net Return Index). This index is used as a reference to compare the Compartment ESG characteristics, such as carbon emissions or ESG footprint, with the reference benchmark.

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

- ***How is the reference benchmark continuously aligned with each of the environmental or social characteristics promoted by the financial product?***

  The reference index used by the Compartment is not an ESG benchmark and is not consistent with the ESG characteristics promoted by the Compartment. All ESG calculations or comparisons are computed using the Compartment's benchmark, as a good proxy of the Compartment investment universe.

- ***How is the alignment of the investment strategy with the methodology of the index ensured on a continuous basis?***

  The reference index the Bloomberg Japan Large & Mid Cap Net Return Index is a free float-adjusted market capitalization index is designed to measure equity market performance of Japanese markets which is in line with the Compartment investment universe.

  The investment universe of the reference index is regularly monitored by the Management Company research team to ensure the consistency with the Compartment's investment universe, in order to ensure relevance of ESG and performance comparisons.

- ***How does the designated index differ from a relevant broad market index?***

  The reference index the Bloomberg Japan Large & Mid Cap Net Return Index is a free float-adjusted market capitalization index is designed to measure equity market performance of Japanese markets which is in line with the Compartment investment universe.

- ***Where can the methodology used for the calculation of the designated index be found?***

  https://assets.bbhub.io/professional/sites/27/Global-Equity-Index-Methodology.pdf

Where can I find more product specific information online?

More product-specific information can be found on the website:
https://www.tobam.fr/key-documents-policies/

APPENDIX 5. Most Diversified Portfolio SICAV - TOBAM Anti-Benchmark Pacific Ex-Japan Markets Equity Fund

Investment Objective, Benchmark of the Compartment

The Compartment's investment objective is to be exposed to Pacific ex-Japan market equities, by systematically applying the Management Company's investment process, which aims to outperform the reference index by minimizing risk factor concentration via a maximally diversified portfolio.

Changes in the net asset value can be compared to the Bloomberg APAC ex Japan Large & Mid Cap Net Return Index(closing price).

Bloomberg APAC ex Japan Large & Mid Cap Net Return Index is a free float-adjusted market capitalization index that is designed to measure equity market performance of pacific ex-Japan area developed markets. This series approximates the minimum possible dividend reinvestment. The dividend is reinvested after deduction of withholding tax by applying the maximum rate of the company's country of incorporation applicable to institutional investors.

The Bloomberg APAC ex Japan Large & Mid Cap Net Return Index is published on www.bloomberg.com/indices

The Compartment does not use an index-based management strategy, it is actively managed. As a consequence, its performance may differ substantially from the benchmark, which is used to define the investment universe and determine the global risk profile of the Compartment. A majority of the Compartment's equity securities will be components of the benchmark. The weightings of the Compartment's portfolio holdings may diverge significantly from their equivalent weighting in the index.

Investment strategy of the Compartment

In order to achieve its investment objective, at least 90% of the Compartment's assets are exposed to Pacific ex-Japan area equity markets, including small, medium and large capitalizations.

For the purpose of diversification, the Compartment may invest up to 20% of its assets in closed-ended Real Estate Investment Trusts (REIT).

If justified by extreme market conditions and in order to curb the cost of trading on the various markets, the Compartment reserves the right to invest up to 100% of its assets in mono-underlying Contracts for Differences (CFDs). CFDs are futures contracts entered into with a counterparty settled through cash payments rather than through physical delivery of financial instruments. The Compartment may thus take advantage of the (liquidity and pricing) characteristics of these instruments compared with the financial instruments in which it invests directly.

The equities in which the Compartment invests are selected on the basis of quantitative models developed by the management company, which enable it to maximize the level of diversification provided compared to the benchmark. The resulting Compartment is expected to improve the results of the asset allocation by, among other things, improving the Sharpe ratio and reducing volatility. The aim of the management models used is to increase diversification in relation to the benchmark index. The sector breakdown may be taken into account to limit concentration into a particular sector.

To maintain exposure as close as possible to the results of the model, the Compartment may build or add to its exposure through listed index funds, American Depository Receipt (ADR) and Global Depository Receipt (GDR), for up to 100% of its net assets, and/or though other OTC contracts in order to enhance risk control and minimise transaction costs. Investments in American Depository Receipt (ADR), Global Depository Receipt (GDR), and Real Estate Investment Trusts (REIT) are made in compliance with the restrictions laid down in Article 41 of the Law.

It may also use forward financial instruments (notably including futures contracts) up to a maximum of one times the assets (maximum leverage of 110%) with a view to making adjustments from time to time owing to movements in subscriptions and redemptions and/or to hedge currency risk.

The Compartment will thus be able to benefit from the flexibility these instruments may offer, (particularly in terms of liquidity and price) relative to the financial instruments in which it invests directly.

In order to achieve an optimal return on its cash, the Compartment may invest in money market instruments for up to 10% of its assets.

The Compartment may also use deposits for up to 100% of its assets, and may borrow cash in the event that it becomes overdrawn.

The Compartment qualifies under article 8 of SFDR. The investment strategy does not have a sustainable investment objective but promotes environmental and social characteristics. The strategy notably follows the 4 pillars of TOBAM's SRI policy: exclusion, carbon reduction, ESG integration and responsible stewardship via voting and engagement.

The Management Company considers ESG factors and applies a sustainability approach in its investment process for the Compartment as further detailed in the Appendix 5.1 Environmental and/or Social Characteristics - Pre-contractual disclosures in compliance with SFDR Level II.

1) Description of the asset classes used to achieve the investment objective

The asset classes included in the portfolio are the following:

a) Equities

To implement the above strategy, the Compartment will invest in the Pacific ex-Japan area equities market based on the outlook as seen by the Management Company, the Compartment may invest in shares of companies listed in the countries of the pacific ex-Japan area, irrespective of the companies' size and the sector of the economy to which they belong.

At least 90% of the Compartment's net assets will be exposed to Pacific ex-Japan equities. This exposure may be gained either through CFDs or direct securities, depending on market conditions. This exposure will not fall below 90% of the Compartment's assets. The securities could include American Depository Receipt (ADR) and Global Depository Receipt (GDR), for up to 100% of its net assets.

b) The Compartment may invest up to 20% of its assets in closed-ended Real Estate Investment Trust (REIT).Money market instruments

For treasury purposes, the Compartment may trade, up to 10% of its assets, in money-market instruments (government bonds for OECD states, money-market funds).

In order to achieve its investment objective, if execution of the investment strategy leads the Management Company to opt for CFDs, the portfolio may comprise a significant proportion of instruments (notably certificates of deposit, European commercial paper, treasury bills) with a minimum rating of AA- (S&P) or Aa3 (Moody's). In case of separation between the two ratings, the Management Company will select the lowest rating.

c) Shares or units of investment funds:

The Compartment may invest maximum 10% of its assets in shares or units of UCITS which themselves invest maximum 10% of their assets in shares or units of UCITS or investment funds.

These funds may be managed by the Management Company or an affiliated company. The investment strategies of these funds are compatible with that of the Compartment

The Compartment may invest maximum 10% of its assets in one or more Compartments of the Company.

2) Derivatives used to achieve the investment objective

The Compartment may invest up to 100% of its net assets in financial derivative instruments. The Compartment's leveraged exposure may not exceed 110%.

The Compartment will invest in regulated, organized markets and over-the-counter.

The Compartment will use derivatives instrument for hedging and exposure purposes, and to achieve the investment objective (including replication of synthetic exposure to baskets of equities or indices).

The hedging derivatives transaction shall aim to cover equity risk, foreign exchange risk of the Compartment.

The types of instruments used by the Management Company will mainly be futures on equities or stock market indices and swaps on currencies, equities or indices.

3) Deposits and cash

The Compartment may hold, up to 20% of its net assets, ancillary liquid assets which consists of bank deposits at sight such as cash held in current accounts with a bank accessible at any time.

The Compartment may make limited use of other deposits in order to achieve its investment objective, for treasury purposes and/or in in case of unfavourable market conditions.

4) Cash borrowing

The purpose of the Compartment is not to borrow cash. However, the Compartment may borrow up to the equivalent of 10% of its net assets in cash for temporary technical needs.

5) Temporary purchases and sales of securities

The attention of the Shareholders is drawn to the fact that the below wording, reporting the increased use of securities lending, applies as of 29 May 2023.

In addition, the Compartment may engage in security lending for up to 75% of its assets.
The Compartment may also, as ancillary, make temporary deposits and borrow cash in the event that a debit balance was to appear.

The Compartment will enter into securities lending transactions opportunistically in circumstances where the Management Company believes that the objective described below could be achieved.

In the context of investments in specials and general collateral the Compartment will use securities lending in order to increase the return of the portfolio.

The expected proportion of the Compartment's assets which may be subject to securities lending depends on the demand of market participants for the securities forming part of the Compartment's portfolio at any time.

This demand depends notably on the interest of such securities, the size of the lendable positions, the presence of specials or securities used as general collateral, the potential duration of the loan (the securities being subject to portfolio adjustments or rebalancing, and thus sell trades), and the type of collateral accepted by the Compartment.

The Compartment's use of, or investment in, securities lending transactions will be as follows:

Type of transaction	Expected proportion	Maximum proportion
Securities lending	0% to 30%	75%

Reference Currency

The reference currency of the Compartment is USD.

Profile of the Typical Investor

The Compartment is a high risk vehicle. To determine their level of investment, investors should consider their personal assets, the regulations applicable to them, their current financial needs over a recommended minimum investment horizon of more than five years, and also their willingness to take risks or their preference for a more prudent investment. The recommended minimum investment horizon is more than 5 years.

Form of Shares and Classes

The Share Classes of the Compartment will be issued in registered form.

Share Classes	A Isin Code: LU1067855897	A1 Isin Code: LU1234739735	A2 Isin Code: LU1502352781	B Isin Code: LU1067855970	R Isin Code: LU1230136464	RD1 Isin Code: LU1303502592	Z Isin Code: LU1666143331
Currency	USD	GBP	USD	USD	GBP	GBP	USD
Type of Shares	Accumulation					Distribution	Accumulation
Target Investors	Institutional investors	Institutional investors	Dedicated/ Institutional investors	All investors	All investors	All investors	Institutional investors
Minimum initial subscription	10 Shares	10 Shares	10 Shares	1 Share	1 Share	1 Share	10 Shares
Minimum holding amount	1 Share	1 Share	1 Share	1 Share	1 Share	1 Share	1 Share
Valuation Day	Every Business Day, with the exception of days on which the Australian and Hong Kong markets are closed (based on the official Stock Exchange of Hong Kong and Australian Securities Exchange Limited calendars)						
Management Company Fee	1%	1%	1.00%	2%	0.40%	0.40%	0%
Administration Fee & Depositary Fee	0.20%	0.20%	0.20%	0.20%	0.20%	0.20%	0.20%
Subscription Fee paid to the Management Company	None	None	Up to 3%	Up to 3%	Up to 5%	Up to 5%	Up to 5%
Redemption Fee paid to the Management Company	Up to 1%	Up to 1%	Up to 1%	Up to 1%	Up to 1%	Up to 1%	Up to 5%
Cut-off	12.00 p.m. CET the Business Day before the relevant Valuation Day						
Subscription/Redemption Settlement Day	2 days, according to the official Stock Exchange of Hong Kong and Australian Securities Exchange Limited calendars, following the Valuation Day						

R units: these units are intended for "all investors" seeking a low initial investment and a "clean fee" structure. The R "clean fee" share class will not carry any fees payable to distributors.

Launch date

This Compartment has been launched by way of a cross-border operation with the French UCITS FCP TOBAM Anti-Benchmark Pacific Ex-Japan Markets Equity Fund. The launch date of this Compartment was 2 October 2014.

The initial subscription prices of the Share Classes of this Compartment corresponded to the NAV of their equivalent Share Classes in the French UCITS FCP TOBAM Anti-Benchmark Pacific Ex-Japan Markets Equity Fund.

The Share Classes A1, A2, B, R, RD1 and Z of this Compartment will be created with the following initial subscription prices:

Class:	Initial subscription prices:
Class A1	GBP 10 000
Class A2	USD 100
Class B	USD 100
Class R	GBP 100
Class RD1	GBP 100
Class Z	USD 10 000

Total Expense Ratio

The latest calculated total expense ratio rate can be found in the Company's latest financial report.

Risk Management

The method used to calculate overall exposure is the commitment method.

Compartments Specific Risk Factors

The funds will be invested primarily in financial instruments selected by the Management Company. These instruments will be subject to market movements and fluctuations. The Management Company invests according to a systematic, fundamentals-based model: there is a risk that the equities selected may not be the best performing stocks.

1) Equity risk

If the equities or indices to which the portfolio is exposed fall, the net asset value of the Compartment may also fall.

Since the volume of small and mid-cap stocks listed on the stock exchange is relatively low, market downturns are more pronounced and more rapid than for large caps. The net asset value of the Compartment may therefore decline more quickly and more significantly.

Investors' attention is drawn to the fact that the small-cap markets are intended to accommodate businesses that, due to their specific characteristics, may pose a risk for investors.

2) Risk associated with the Management Company's investment process

Investors should note that portfolio construction and the selection and weighting of assets are based on a process developed by the Management Company. The Compartment's investment process is based on a systematic model designed to identify signals based on past statistical results.

There is a risk that the model may not be efficient, as there is no guarantee that past market situations will be repeated in the future. Since the aim of the processes developed by the Management Company is to achieve good diversification of the Compartment's portfolio, using these processes may lead the Management Company to not select the top-performing assets.

3) Risk associated with the use of financial futures

The Compartment may use some financial futures for up to one times its assets. The Compartment may thus be exposed for up to 110% of its assets to the market, assets, index and economic and/or financial instrument or parameter, which can imply a risk of reduction in the net asset value of the Compartment that might be more significant and quicker that the one observed on the markets where the Compartment is invested.

4) Currency risk

Currency risk is the risk of depreciation in the currencies in which the Compartment invests relative to the reference currency. This currency risk will be managed according to market opportunities and may thus account for a significant proportion of the risk. In the event of depreciation in foreign currencies, investors are thus exposed to a decline in the value of their units.

5) Counterparty risk

The Compartment may incur a loss in the event of default by a counterparty with which certain transactions were conducted, leading to a decline in the Compartment's net asset value.

6) Interest rate risk

This refers to the risk of a fall in the value of fixed income instruments resulting from changes in interest rates. If interest rates rise, the Compartment's net asset value may fall. The Compartment has limited exposure to fixed income products.

7) Credit risk

This is the risk of a decline in shares issued by a private or public issuer or default by the latter. The value of the debt securities in which the Compartment is invested may decline, leading to a fall in net asset value.

Template pre-contractual disclosure for the financial products referred to in Article 8, paragraphs 1, 2 and 2a, of Regulation (EU) 2019/2088 and Article 6, first paragraph, of Regulation (EU) 2020/852

Product name: Most Diversified Portfolio SICAV - TOBAM Anti-Benchmark Pacific Ex-Japan Markets Equity Fund

Legal entity identifier: 549300X2IJW9BR70QU27

Sustainable investment means an investment in an economic activity that contributes to an environmental or social objective, provided that the investment does not significantly harm any environmental or social objective and that the investee companies follow good governance practices.

The **EU Taxonomy** is a classification system laid down in Regulation (EU) 2020/852, establishing a list of **environmentally sustainable economic activities**. That Regulation does not lay down a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

Environmental and/or social characteristics

Does this financial product have a sustainable investment objective?

☐ **Yes**

☒ **No**

☐ It will make a minimum of **sustainable investments with an environmental objective:** ___%

- ☐ in economic activities that qualify as environmentally sustainable under the EU Taxonomy
- ☐ in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy

☐ It will make a minimum of **sustainable investments with a social objective:** ___%

☒ It **promotes Environmental/Social (E/S) characteristics** and while it does not have as its objective a sustainable investment, it will have a minimum proportion of 40% of sustainable investments

- ☐ with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy
- ☒ with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy
- ☐ with a social objective

☐ It promotes E/S characteristics, but **will not make any sustainable investments**

What environmental and/or social characteristics are promoted by this financial product?

The Compartment's investment objective is to be exposed to Pacific ex-Japan market equities, by systematically applying the Management Company's investment process, which aims to outperform the reference index by minimizing risk factor concentration via a maximally diversified portfolio.

This process integrates environmental, social and governance (ESG) risks and opportunities to the sustainability of long-term company returns. The Compartment aims to promote low carbon approaches, commitment to climate action and companies with good governance.
In particular, the Compartment aims to promote the following E/S characteristics:

- Low carbon approach by applying a systematic carbon footprint reduction of at least 20% versus the reference investment universe's carbon footprint,
- Promotion of companies with good governance using raw data and their ESG footprint.

The Compartment has designated Bloomberg APAC ex Japan Large & Mid Cap Net Return Index as a reference index to compare its ESG characteristics, such as carbon emissions or ESG footprint.

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

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

In order to achieve the above characteristics promoted by the Compartment, the Management Company has put in place an ambitious ESG policy made of key pillars and sustainability indicators. The Compartment uses the following sustainability indicators to attain each of the environmental and social characteristics promoted by the Compartment:

- **Carbon Emissions Reduction:** The Management Company applies a systematic carbon footprint reduction of at least 20% versus the reference index the Bloomberg APAC ex Japan Large & Mid Cap Net Return Index. The calculation of the carbon footprint is based on the greenhouse gas emissions scope 1 (i.e. direct emissions from owned or controlled sources) and scope 2 (i.e. indirect emissions from the generation of purchased energy) according to GHG Protocol Corporate Standard. Data on emissions used is obtained from a number of sources including company reports, CDP questionnaire (Carbon Disclosure Project) or an estimation model.

- **ESG Footprint:** The Management Company has put in place a strict E, S and G integration process for all listed companies in its investment universe; using officially published data from Bloomberg.

✓ E: For example: existence of climate change / biodiversity / energy efficiency policies; green building, water and waste usage
✓ S: For example: Ethics/Equal opportunity/training/ consumer data protection/whistleblowing policies, CSR committee in place, supply chain management
✓ G: For example: Number of board meetings per year, ratio of independent directors, chairman tenure, ratio of nonexecutive directors in boards

From that raw data, the Management Company has built a proprietary methodology to compute the "E,S,G footprints" of each individual holding in the portfolio and as such determine the overall E,S,G Footprints of the portfolio.

The Management Company has constrained its investment decision-making process to reach E,S,G footprints of the Compartment, at minima at the same level as the E,S,G footprints of the reference index Bloomberg APAC ex Japan Large & Mid Cap Net Return Index.

- ***What are the objectives of the sustainable investments that the financial product partially intends to make and how does the sustainable investment contribute to such objectives?***

The sustainable investments within the Compartment contribute to Environmental objectives including climate change mitigation and adaptation (however not in the meaning of the Taxonomy Regulation) or commitment to science-based emissions reduction targets (“SBTI”).

To determine the share of sustainable investments, the Management Company consider the environmental objective for companies that have:

- A carbon intensity (carbon emissions normalized by the Enterprise Value including Cash) below 80% of the average carbon intensity of the reference index the Bloomberg APAC ex Japan Large & Mid Cap Net Return Index.

Or

Made a commitment to the SBTI initiative. (This engagement is followed by the Management Company's research team on an annual basis).

- Are not involved in severe breaches or controversies in regard to the labor rights, human rights, environmental or corruption, and that are not part of the following sectors: tobacco, controversial weapons, coal mining and fossil fuels

And

Have not been targeted by any significant environmental fines over the past years.

- Have a G score for Good Governance practices (as defined by the Management Company ESG Footprint proprietary methodology) in the top 80% of the reference index the Bloomberg APAC ex Japan Large & Mid Cap Net Return.

How do the sustainable investments that the financial product partially intends to make, not cause significant harm to any environmental or social sustainable investment objective?

Companies the Compartment invests in, contribute to achieve the Compartments' carbon reduction objective, ESG footprint commitment while not significantly harming any environmental or social sustainable investment objectives. Before any investment is made by the Compartment (not only sustainable investments but all investments), the investment has to pass a negative screening, further including the consideration of the principal adverse impacts described in the below section. Hence no companies involved in controversial sectors or activities not aligned with TOBAM's policy, can be eligible for investments for the Compartment.

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

The following Principal Adverse Impacts ("PAI") indicators as defined in SFDR Level II have been considered:

- PAI #7 : Activities negatively affecting biodiversity
- PAI #10 : Violations of UN Global Compact principles and OECD guidelines
- PAI #14 : Exposure to Controversial Weapons

The principal adverse impacts on sustainability indicators have been taken into account through an exclusionary investment policy.

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

The Management Company will not invest in any company that has been classified as failing to comply with key international norms (ISS Ethix Norm-based screening)) such as for example the UN Global Compact Principles, OECD Guidelines for Multinational Enterprises, Guiding Principles on Business and Human rights.

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

The "do no significant harm" principle applies only to those investments underlying the financial product that take into account the EU criteria for environmentally sustainable economic activities. The investments underlying the remaining portion of this financial product do not take into account the EU criteria for environmentally sustainable economic activities.

Any other sustainable investments must also not significantly harm any environmental or social objectives.

Does this financial product consider principal adverse impacts on sustainability factors?

Principal adverse impacts are the most significant negative impacts of investment decisions on sustainability factors relating to environmental, social and employee matters, respect for human rights, anti-corruption and anti-bribery matters.

✖ Yes, the Management Company has committed to monitor the 14 mandatory and 2 optional environmental and social indicators to show the impact of the Compartment investments against these PAI indicators.
Furthermore, the Compartment considers principal adverse impacts on sustainability factors and only the following PAI have been taken into account into the investment process:

- PAI #1: GHG (Greenhouse Gas) emissions - Scope 1 & 2
- PAI #2: Carbon footprint
- PAI #3: GHG intensity of investee companies

The Compartment by targeting an overall carbon reduction of at least 20% compared to the reference index Bloomberg APAC ex Japan Large & Mid Cap Net Return Index's carbon footprint, is looking to invest in a combination of stocks that achieve this overall carbon reduction, by considering carbon emissions scope 1 and 2.

- PAI #7: Activities negatively affecting biodiversity

The Management Company proprietary ESG footprint methodology considers raw data published by companies in order to compute an ESG footprint, by notably looking for example at the existence or not of key policies relevant to the biodiversity (for example: biodiversity policy, water usage policy, waste reduction policy, climate change policy…).

In addition to the previous PAI, the following social sustainability indicators have been considered:

- PAI #10: Violations of UN Global Compact principles and (OECD) Guidelines
- PAI #13: Board Gender Diversity
- PAI #14: Exposure to controversial weapons

PAI reports are available on the Compartment annual report.

☐ No

What investment strategy does this financial product follow?

The investment strategy of this Compartment is a Pacific Ex-Japan market equities strategy, systematically applying the Management Company's investment process, which aims to outperform the reference index by minimising risk factor concentration via a maximally diversified portfolio.

The Compartment aims to promote low carbon approaches, commitment to climate action and companies with good governance.

The Management Company applies systematically its ESG methodology in the investment decision-making process.

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

What are the binding elements of the investment strategy used to select the investments to attain each of the environmental or social characteristics promoted by this financial product?

The Compartment applies the following binding elements to select investments and attain the environmental and social characteristics described above:

- **Exclusion policy:** the Management Company applies a general exclusion policy, restricting the investment universe and excluding companies based either on their involvement in certain activities (sector or product based) or based on controversies or breaches to key international norms. The key exclusions used by the Management Company are reflected in the below table:

Sector /Product	Criteria
Producer and distributors of tobacco	Limit (5% of the revenues)
Coal and coal-based producers and distributors	Limit (10% of the revenues)
Development, production, maintenance or distribution of controversial and prohibited weapons	Exclusion
Breach or violation of International Treaties, Conventions & Standards such as OECD Guidelines for Multinational Enterprises, ILO Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy, UN Global Compact, Guiding Principles on Business and Human Rights	Exclusion

Further details on the exclusion policy can be found in the following link: https://www.tobam.fr/our-beliefs/exclusion-policy/.

- **ESG Integration:** The Management Company has put in place a strict E, S and G integration process for all listed companies in its investment universe; using officially published data from Bloomberg.

- ✓ E: For example: existence of climate change / biodiversity / energy efficiency policies; green building, water and waste usage

- ✓ S: For example: Ethics/Equal opportunity/training/ consumer data protection/whistleblowing policies, CSR committee in place, supply chain management

- ✓ G: For example: Number of board meetings per year, ratio of independent directors, chairman tenure, ratio of nonexecutive directors in boards

From that raw data, the Management Company has built a proprietary methodology to compute the "E,S,G footprints" of each individual holding in the portfolio and as such determine the overall E,S,G Footprints of the portfolio. The E, S and G footprint aggregates and normalizes (for industry, size and regional biases) the information contained in each of the above mentioned items by E, S and G pillar. The normalization also corrects differences in scale of the different pieces of raw data. The final footprint is an equal weighted measure of the three pillars. The Management Company then adds a constraint into its quantitative portfolio optimization process, to ensure that the E, S and G footprints of the respective portfolio (computed based on the holdings' individual E, S and G footprints) are respectively at least at the same level as the E, S and G footprints of the reference index Bloomberg APAC ex Japan Large & Mid Cap Net Return.

- **Carbon Emissions Reduction & Commitment to SBTI:**

In addition, the Management Company analyses the carbon emissions of each holding in its investment universe, computes the carbon footpring of the portfolio and applies a portfolio systematic carbon footprint reduction of at least 20% versus the reference index the Bloomberg APAC ex Japan Large & Mid Cap Net Return Index's carbon footprint. The calculation of the carbon footprint is based on the greenhouse gas emissions scope 1 and scope 2. Data on emissions used is obtained from a number of sources including company reports, CDP questionnaire (Carbon Disclosure Project) or an estimation model.

The Management Company is also monitoring the companies' commitment to the SBTI as a way to monitor best effort toward more incorporation of best practices. This feature is monitored on a yearly basis.

- **Responsible Ownership:** The Management Company applies a responsible voting policy and has built an ambitious engagement policy to support its commitment to sustainability and address via engagement and dialogues, issues relative to ESG and sustainability.

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

  Not applicable.

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

  In order to assess good governance practices, the Management Company consider the G scoring of its proprietary ESG footprint methodology, and ensure that the G scoring of the Compartment is matching the reference index Bloomberg APAC ex Japan Large & Mid Cap Net Return Index's G scoring.

Good governance practices include sound management structures, employee relations, remuneration of staff and tax compliance.

Asset allocation describes the share of investments in specific assets.

What is the asset allocation planned for this financial product?

#1: 90% of the assets of the Compartment are aligned (promote) E/S characteristics.

#1A: at least 40% of those assets fall under the sustainable share of investment with non EU Taxonomy aligned environmental objectives.

These sustainable investments contribute to environmental objectives, including climate change mitigation and adaptation (however not in the meaning of the Taxonomy Regulation) or commitment to SBTI.

The model used by TOBAM for the determination of the sustainable investments combines the pass or fail approach and the weighted-revenue approach with threshold for the carbon emissions and governance.
To determine the share of sustainable investments, the Management Company considers the environmental objective for companies that have:

Environmental objective determined as:

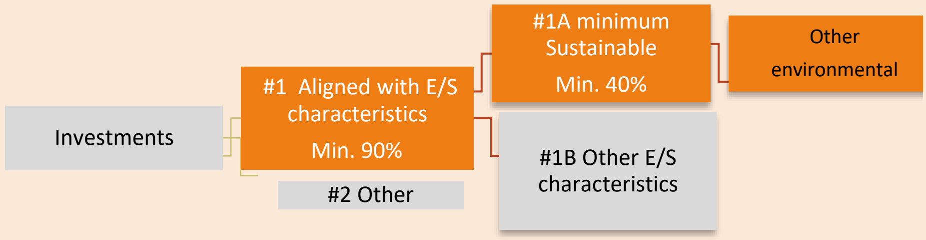
o Companies that have carbon emission intensity (carbon emissions normalized by the Enterprise Value Including Cash) below 80% of the average emissions carbon intensity of the reference index the Bloomberg APAC ex Japan Large & Mid Cap Net Return Index.
Or
o Companies that have made a commitment to the SBTI initiative (this engagement is followed by the research team on an annual basis)

Do Not Significantly Harm characteristics:

o Companies that are not involved in severe breaches or controversies in regard to the labor rights, human rights, environmental or corruption, and that are not part of the following sectors: tobacco, controversial weapons, coal mining and fossil fuels.
And
o Companies that have not been targeted by any significant environmental fines over the past years.

Good Governance practices are defined as companies that have a G score (as defined by the Management Company ESG Footprint proprietary methodology) in the top 80% of the reference index the Bloomberg APAC ex Japan Large & Mid Cap Net Return Index.

Please note that investments falling under section #1B on the below diagram 'non sustainable investment share of the Compartment', still comply with all of the Compartment ESG policy (exclusions, carbon reduction, ESG footprint, voting & engagement), but did not qualify as a sustainable investment.



#1 Aligned with E/S characteristics includes the investments of the financial product used to attain the environmental or social characteristics promoted by the financial product.

#2Other includes the remaining investments of the financial product which are neither aligned with the environmental or social characteristics, nor are qualified as sustainable investments.

The category **#1 Aligned with E/S characteristics** covers:
- The sub-category **#1A Sustainable** covers sustainable investments with environmental or social objectives.
- The sub-category **#1B Other E/S characteristics** covers investments aligned with the environmental or social characteristics that do not qualify as sustainable investments.

How does the use of derivatives attain the environmental or social characteristics promoted by the financial product?

The Compartment may use financial derivative instruments for investment, efficient portfolio management and/or hedging purposes, and this will not impact in any way the exposure to sustainable assets, or the ESG characteristics of the Compartment.

Taxonomy-aligned activities are expressed as a share of:
- **turnover** reflecting the share of revenue from green activities of investee companies
- **capital expenditure** (CapEx) showing the green investments made by investee companies, e.g. for a transition to a green economy.
- **operational expenditure** (OpEx) reflecting green operational activities of investee companies.

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

This Compartment commits to a 0% alignment with the EU Taxonomy.

Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy[1]?

☐ Yes :

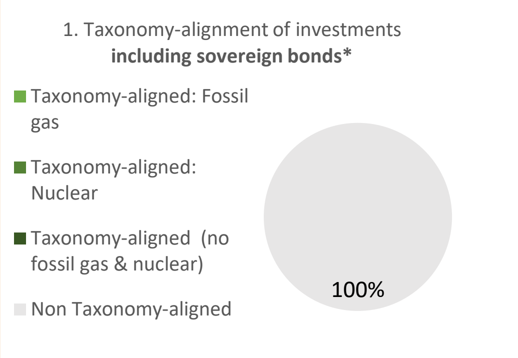
☐ In fossil gas ☐ In nuclear energy

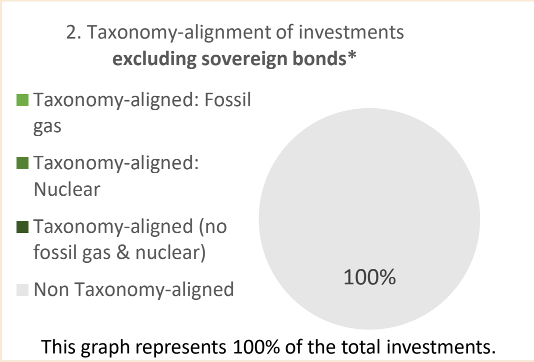
☒ No

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

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

The two graphs below show in green the minimum percentage of investments that are aligned with the EU Taxonomy. As there is no appropriate methodology to determine the Taxonomy-alignment of sovereign bonds*, the first graph shows the Taxonomy alignment in relation to all the investments of the financial product including sovereign bonds, while the second graph shows the Taxonomy alignment only in relation to the investments of the financial product other than sovereign bonds.





*** For the purpose of these graphs, 'sovereign bonds' consist of all sovereign exposures**

Enabling activities directly enable other activities to make a substantial contribution to an environmental objective.

Transitional activities are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.

What is the minimum share of investments in transitional and enabling activities?

As the Compartment does not have a minimum Taxonomy alignement, there is no minimum share in transitional and enabling activities.

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

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

The minimum share of sustainable investments with an environmental objective that is not aligned with the EU Taxonomy is 40%.

What is the minimum share of socially sustainable investments?

Not applicable.

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

Investments falling under category "#2 Other", are investments such as derivatives, cash or cash equivalent, not integrating E/S characteristics, where ESG key features and analysis have not been performed, and E/S characteristics not considered.

No minimum environmental or social safeguards apply to the above elements.

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

Is a specific index designated as a reference benchmark to determine whether this financial product is aligned with the environmental and/or social characteristics that it promotes?

No, but the Compartment has designated a reference benchmark (Bloomberg APAC ex Japan Large & Mid Cap Net Return Index). This index is used as a reference to compare the Compartment ESG characteristics, such as carbon emissions or ESG footprint, with the reference benchmark.

- ***How is the reference benchmark continuously aligned with each of the environmental or social characteristics promoted by the financial product?***

  The reference index used by the Compartment is not an ESG benchmark and is not consistent with the ESG characteristics promoted by the Compartment. All ESG calculations or comparisons are computed using the Compartment's benchmark, as a good proxy of the Compartment investment universe.

- ***How is the alignment of the investment strategy with the methodology of the index ensured on a continuous basis?***

  The reference index the Bloomberg APAC ex Japan Large & Mid Cap Net Return Index is a broad market index, capturing Pacific ex-Japan market equities, which is in line with the Compartment investment universe.

  The investment universe of the reference index is regularly monitored by the Management Company research team to ensure the consistency with the Compartment's investment universe, in order to ensure relevance of ESG and performance comparisons.

- ***How does the designated index differ from a relevant broad market index?***

  The reference index the Bloomberg APAC ex Japan Large & Mid Cap Net Return Index is a broad market index, capturing Pacific ex-Japan market equities, which is in line with the Compartment investment universe.

- ***Where can the methodology used for the calculation of the designated index be found?***

  https://assets.bbhub.io/professional/sites/27/Global-Equity-Index-Methodology.pdf

Where can I find more product specific information online?

More product-specific information can be found on the website:
https://www.tobam.fr/key-documents-policies/

APPENDIX 6. Most Diversified Portfolio SICAV - TOBAM Anti-Benchmark US Equity Fund

Investment Objective, Benchmark of the Compartment

The Compartment's primary investment objective is to be exposed to US equity markets, by systematically applying the Management Company's investment process, which aims to outperform the reference index by minimizing risk factor concentration via a maximally diversified portfolio.

Changes in the net asset value can be compared to the Bloomberg United States Large & Mid Cap Net Return Index

Bloomberg United States Large & Mid Cap Net Return Index is a free float-adjusted market capitalization index that is designed to measure equity market performance of American markets. The shares that make up the index are selected on the basis of size, liquidity and free-float capital freely available for trading on a regulated market. index levels include the minimum possible reinvestments linked to dividends paid out on the shares in the index. A dividend is considered to be reinvested after deduction of withholding taxes by applying the maximum rate of the company's country of incorporation applicable to institutional investors.

The Bloomberg United States Large & Mid Cap Net Return Index is published on www.bloomberg.com/indices

The Compartment does not use an index-based management strategy, it is actively managed. As a consequence, its performance may differ substantially from the benchmark, which is used to define the investment universe and determine the global risk profile of the Compartment. A majority of the Compartment's equity securities will be components of the benchmark. The weightings of the Compartment's portfolio holdings may diverge significantly from their equivalent weighting in the index.

Investment strategy of the Compartment

In order to achieve its investment objective at least 90% of the Compartment's assets will be exposed to shares in companies listed on the US Stock Exchanges including small, mid and large-cap US equity markets.

In addition to the portfolio's 90% exposure to shares in companies listed on US Stock Exchanges, the Compartment may also be exposed to different markets or asset classes in order to meet its investment objective.

For the purpose of diversification, the Compartment may invest up to 20% of its assets in closed-ended Real Estate Investment Trusts (REIT). Investments in Real Estate Investment Trusts (REIT) are made in compliance with the restrictions laid down in Article 41 of the Law.

The equities in which the Compartment invests are selected on the basis of quantitative and systematic models developed by the management company, which enable it to optimize the level of diversification on offer in relation to the benchmark. The resulting Compartment, combined with other "long only" investments, is expected to improve the results of the asset allocation by, among other things, improving the Sharpe ratio and reducing volatility. The aim of the management models used is to increase diversification in relation to the benchmark index. The sector breakdown may be taken into account to limit concentration into a particular sector.

The Compartment may invest up to 100% of its assets in forward financial instruments (such as futures contracts) in order to make occasional adjustments to allow for subscriptions and redemptions and/or to hedge currency risk. The Compartment may also build up or supplement its exposure by investing in OTC contracts in order to improve risk management and reduce trading costs.

The Compartment will thus be able to benefit from the flexibility these instruments may offer (particularly in terms of liquidity and price) relative to the financial instruments in which it invests directly.

In order to achieve an optimum return on its residual cash exposure, the Compartment may invest up to 10% of its assets in money market instruments.

The Compartment may also use deposits and temporary purchases and sales of securities and may borrow cash in the event that it becomes overdrawn.

The Compartment qualifies under article 8 of SFDR. The investment strategy does not have a sustainable investment objective but promotes environmental and social characteristics. The strategy notably follows the 4 pillars of TOBAM's SRI policy: exclusion, carbon reduction, ESG integration and responsible stewardship via voting and engagement.

The Management Company considers ESG factors and applies a sustainability approach in its investment process for the Compartment as further detailed in the Appendix 6.1 Environmental and/or Social Characteristics - Pre-contractual disclosures in compliance with SFDR Level II.

Description of the asset classes used to achieve the investment objective

1) The asset classes included in the portfolio are the following:

   a) Equities

At least 90% of the Compartment's assets will be exposed to shares in companies listed on US stock exchanges.

Subject to the above-mentioned limits, the Compartment will invest in small, mid and large-cap equities.

The Compartment may invest up to 20% of its assets in closed-ended Real Estate Investment Trusts (REIT).

   b) Money market instruments

For treasury purposes, the Compartment may carry out transactions on money market instruments, including money market funds and transferable debt securities, for up to 10% of its assets.

   c) Shares or units of investment funds

The Compartment may invest maximum 10% of its assets in shares or units of UCITS which themselves invest maximum 10% of their assets in shares or units of UCITS or investment funds.

These funds may be managed by the Management Company or an affiliated company. The investment strategies of these funds are compatible with that of the Compartment.

The Compartment may invest maximum 10% of its assets in one or more Compartments of the Company.

1) Derivatives used to achieve the investment objective

The Compartment may invest up to 100% of its assets in financial derivatives.

The Compartment will invest in regulated, organized markets and over-the-counter.

The Compartment will use derivatives instrument for hedging and exposure purposes, and to achieve the investment objective (including replication of synthetic exposure to baskets of equities or indices).

The hedging derivatives transaction shall aim to cover equity risk and currency risk of the Compartment.

The types of instruments used by the Management Company will mainly be futures on equities or stock market indices and swaps on currencies, equities.

2) Deposits and cash

The Compartment may hold, up to 20% of its net assets, ancillary liquid assets which consists of bank deposits at sight such as cash held in current accounts with a bank accessible at any time.

The Compartment may make limited use of other deposits in order to achieve its investment objective, for treasury purposes and/or in in case of unfavourable market conditions

3) Cash borrowing

The Compartment may borrow up to the equivalent of 10% of its net assets in cash on a temporary basis and for technical needs only.

4) Temporary purchases and sales of securities

The attention of the Shareholders is drawn to the fact that the below wording, reporting the increased use of securities lending, applies as of 29 May 2023.

In addition, the Compartment may engage in security lending for up to 75% of its assets.
The Compartment may also, as ancillary, make temporary deposits and borrow cash in the event that a debit balance was to appear.

The Compartment will enter into securities lending transactions opportunistically in circumstances where the Management Company believes that the objective described below could be achieved.

In the context of investments in specials and general collateral the Compartment will use securities lending in order to increase the return of the portfolio.

The expected proportion of the Compartment's assets which may be subject to securities lending depends on the demand of market participants for the securities forming part of the Compartment's portfolio at any time.

This demand depends notably on the interest of such securities, the size of the lendable positions, the presence of specials or securities used as general collateral, the potential duration of the loan (the securities being subject to portfolio adjustments or rebalancing, and thus sell trades), and the type of collateral accepted by the Compartment.

The Compartment's use of, or investment in, securities lending transactions will be as follows:

Type of transaction	**Expected proportion**	**Maximum proportion**
Securities lending	0% to 30%	75%

Form of Shares and Classes

Share Classes	**A** **Isin Code:** **LU1067856606**	**A1** **Isin Code:** **LU1067856788**	**A2** **Isin Code:** **LU1067856861**	**A6** **Isin Code:** **LU1709548074**	**A4*** **Isin Code:** **LU1185970958**	**B** **Isin Code:** **LU1067856945**	**R1** **Isin Code:** **LU1067857083**	**R2** **Isin Code:** **LU1067857166**	**Z** **Isin Code:** **LU1666143505**
Currency	USD	EUR	USD	GBP	EUR	EUR	GBP	USD	USD
Type of Shares	Accumulation								
Target Investors	Institutional investors	Institutional investors	Institutional investors	Institutional investors	Institutional investors	All Investors	All investors	All investors	Institutional investors
Minimum initial subscription	10 Shares	10 Shares	10 Shares	10 Shares	10 Shares	1 Share	1 Share	1 Share	10 Shares
Minimum holding amount	1 Share	1 Share	1 Share	1 Share	1 Share	1 Share	1 Share	1 Share	1 Share
Valuation Day	Every Business Day, with the exception of days on which the American markets are closed (based on the official NYSE Euronext calendar)								
Management	1%	1%	Up to1%	1%	Up to1%	2%	0.55%	0.55%	0%

Company Fee									
Hedge					100% systematic hedging against foreign exchange risk				
Administration Fee & Depositary Fee	0.20%	0.20%	0.20%	0.20%	0,20%	0.20%	0.20%	0.20%	0.20%
Subscription Fee paid to the Management Company	None	None	Up to 5%	None	Up to 5%	Up to 3%	Up to 5%	Up to 5%	Up to 5%
Redemption Fee paid to the Management Company	Up to 1%	Up to 1%	Up to 1%	Up to 1%	Up to 1%	Up to 1%	Up to 1%	Up to 1%	Up to 5%
Cut-off	12.00 p.m. CET on the relevant Valuation Day								
Subscription / Redemption Settlement Day	2 days, according to the official NYSE Euronext calendar, following the Valuation Day								

Reference Currency

The reference currency of the Compartment is USD.

Profile of the Typical Investor

The Compartment is a high risk vehicle. To determine their level of investment, investors should consider their personal assets, the regulations applicable to them, their current financial needs over a recommended minimum investment horizon of more than five years, and also their willingness to take risks or their preference for a more prudent investment. The recommended minimum investment horizon is more than 5 years.

Form of Shares and Classes

The Share Classes of the Compartment will be issued in registered form

R units: these units are intended for "all investors” seeking a low initial investment and a “clean fee” structure. The R “clean fee” share class will not carry any fees payable to distributors.

Investors subscribing for Shares denomminated in EUR are subject to EUR currency risk given the conversion of the net asset value, except for the Share Class A4.

** Share Class A4 offers 100% systematic hedging against foreign exchange risk with a 10% tolerance. The Share Class A4 does not hedge currency risk against the reference currency of the Compartment (USD) but against the foreign exchange risk of all currency exposures held in the portfolio against the currency of the concerned Share Class (EUR). The reference benchmark for the share Class A4 will be the* Bloomberg United States Large & Mid Cap Net Return *index hedged against the share class currency (EUR).*

Launch date

This Compartment has been launched by way of a cross-border operation with the French UCITS FCP TOBAM Anti-Benchmark US Equity Fund. The launch date of this Compartment was 2 October 2014.

The initial subscription prices of the Share Classes of this Compartment corresponded to the NAV of their equivalent Share Classes in the French UCITS FCP TOBAM Anti-Benchmark US Equity Fund.

The following Share Classes of this Compartment will be created with the following initial subscription prices:

Class:	Initial subscription prices:
Class A6	GBP 10,000
Class A4	EUR 10,000
Class R2	USD 100
Class Z	USD 10,000

Total Expense Ratio

The latest calculated total expense ratio rate can be found in the Company's latest financial report.

Risk Management

The method used to calculate overall exposure is the commitment method.

Compartments Specific Risk Factors

The funds will be invested primarily in financial instruments selected by the Management Company. These instruments will be subject to market movements and fluctuations. The Management Company invests according to a systematic, fundamentals-based model: there is a risk that the equities selected may not be the best performing stocks.

1) Equity risk

If the equities or indices to which the portfolio is exposed fall, the net asset value of the Compartment may also fall.

Since the volume of small and mid-cap stocks listed on the stock exchange is relatively low, market downturns are more pronounced and more rapid than for large caps. The net asset value of the Compartment may therefore decline more quickly and more significantly.

Investors' attention is drawn to the fact that the small-cap markets are intended to accommodate businesses that, due to their specific characteristics, may pose a risk for investors.

2) Risk associated with the Management Company's investment process

Investors should note that portfolio construction and the selection and weighting of assets are based on a process developed by the Management Company. The Compartment's investment process is based on a systematic model designed to identify signals based on past statistical results.

There is a risk that the model may not be efficient, as there is no guarantee that past market situations will be repeated in the future. Since the aim of the processes developed by the Management Company is to achieve good diversification of the Compartment's portfolio, using these processes may lead the Management Company to not select the top-performing assets.

3) Currency risk

Currency risk is the risk of depreciation in the currencies in which the Compartment invests relative to the reference currency. This currency risk will be managed according to market opportunities and may thus account for a significant proportion of the risk. In the event of depreciation in foreign currencies, investors are thus exposed to a decline in the value of their units.

4) Interest rate risk

This refers to the risk of a fall in the value of fixed income instruments resulting from changes in interest rates. If interest rates rise, the Compartment's net asset value may fall. The Compartment has limited exposure to fixed income products.

5) Credit risk

This is the risk of a decline in shares issued by a private or public issuer or default by the latter. The value of the debt securities in which the Compartment is invested may decline, leading to a fall in net asset value.

Template pre-contractual disclosure for the financial products referred to in Article 8, paragraphs 1, 2 and 2a, of Regulation (EU) 2019/2088 and Article 6, first paragraph, of Regulation (EU) 2020/852

Product name: Most Diversified Portfolio SICAV - TOBAM Anti-Benchmark US Equity Fund

Legal entity identifier: 54930033JZYCPOUWCO47

Sustainable investment means an investment in an economic activity that contributes to an environmental or social objective, provided that the investment does not significantly harm any environmental or social objective and that the investee companies follow good governance practices.

The **EU Taxonomy** is a classification system laid down in Regulation (EU) 2020/852, establishing a list of **environmentally sustainable economic activities**. That Regulation does not lay down a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

Environmental and/or social characteristics

Does this financial product have a sustainable investment objective?

☐ **Yes**

☐ It will make a minimum of **sustainable investments with an environmental objective:** ___%

- ☐ in economic activities that qualify as environmentally sustainable under the EU Taxonomy
- ☐ in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy

☐ It will make a minimum of **sustainable investments with a social objective:** ___%

☒ **No**

☒ It **promotes Environmental/Social (E/S) characteristics** and while it does not have as its objective a sustainable investment, it will have a minimum proportion of 40% of sustainable investments

- ☐ with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy
- ☒ with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy
- ☐ with a social objective

☐ It promotes E/S characteristics, but **will not make any sustainable investments**

What environmental and/or social characteristics are promoted by this financial product?

The Compartment's primary investment objective is to be exposed to US equity markets, by systematically applying the Management Company's investment process, which aims to outperform the reference index by minimizing risk factor concentration via a maximally diversified portfolio.

This process integrates environmental, social and governance (ESG) risks and opportunities to the sustainability of long-term company returns. The Compartment aims to promote low carbon approaches, commitment to climate action and companies with good governance.

In particular, the Compartment aims to promote the following E/S characteristics:

- Low carbon approach by applying a systematic carbon footprint reduction of at least 20% versus the reference investment universe's carbon footprint,

- Promotion of companies with good governance using raw data and their ESG footprint.

The Compartment has designated Bloomberg United States Large & Mid Cap Net Return Index as a reference index to compare its ESG characteristics, such as carbon emissions or ESG footprint.

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

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

In order to achieve the above characteristics promoted by the Compartment, the Management Company has put in place an ambitious ESG policy made of key pillars and sustainability indicators. The Compartment uses the following sustainability indicators to attain each of the environmental and social characteristics promoted by the Compartment:

- **Carbon Emissions Reduction:** The Management Company applies a systematic carbon footprint reduction of at least 20% versus the reference index the Bloomberg United States Large & Mid Cap Net Return Index's carbon footprint. The calculation of the carbon footprint is based on the greenhouse gas emissions scope 1 (i.e. direct emissions from owned or controlled sources) and scope 2 (i.e. indirect emissions from the generation of purchases energy) according to GHG Protocol Corporate Standard. Data on emissions used is obtained from a number of sources including company reports, CDP questionnaire (Carbon Disclosure Project) or an estimation model.

- **ESG Footprint:** The Management Company has put in place a strict E, S and G integration process for all listed companies in its investment universe; using officially published data from Bloomberg.

✓ E: For example: existence of climate change / biodiversity / energy efficiency policies; green building, water and waste usage
✓ S: For example: Ethics/Equal opportunity/training/ consumer data protection/whistleblowing policies, CSR committee in place, supply chain management
✓ G: For example: Number of board meetings per year, ratio of independent directors, chairman tenure, ratio of nonexecutive directors in boards

From that raw data, the Management Company has built a proprietary methodology to compute the "E,S,G footprints" of each individual holding in the portfolio and as such determine the overall E,S,G Footprints of the portfolio.

The Management Company has constrained its investment decision-making process to reach E,S,G footprints of the Compartment, at minima at the same level as the E,S,G footprints of the reference index the Bloomberg United States Large & Mid Cap Net Return Index.

What are the objectives of the sustainable investments that the financial product partially intends to make and how does the sustainable investment contribute to such objectives?

The sustainable investments within this Compartment contribute to Environmental objectives including climate change mitigation and adaptation (however not in the meaning of the Taxonomy Regulation) or commitment to science-based emissions reduction targets ("SBTI").

To determine the share of sustainable investments, the Management Company consider the environmental objective for companies that have:

- A carbon intensity (carbon emissions normalized by the Enterprise Value including Cash) below 80% of the average carbon intensity of the Bloomberg United States Large & Mid Cap Net Return Index

  Or

  Made a commitment to the SBTI initiative. This engagement is followed by the Management Company's research team on an annual basis.

- Are not involved in severe breaches or controversies in regard to the labor rights, human rights, environmental or corruption, and that are not part of the following sectors: tobacco, controversial weapons, coal mining and fossil fuels

  And

  Have not been targeted by any significant environmental fines over the past years.

- Have a G score for Good Governance practices (as defined by the Management Company ESG Footprint proprietary methodology) in the top 80% of the reference index the Bloomberg United States Large & Mid Cap Net Return Index.

How do the sustainable investments that the financial product partially intends to make, not cause significant harm to any environmental or social sustainable investment objective?

Companies the Compartment invests in, contribute to achieve the Compartments' carbon reduction objective, ESG footprint commitment while not significantly harming any environmental or social sustainable investment objectives. Before any investment is made by the Compartment (not only sustainable investments but all investments), the investment has to pass a negative screening, further including the consideration of the principal adverse impacts described in the below section. Hence no companies involved in controversial sectors or activities not aligned with TOBAM's policy, can be eligible for investments for the Compartment.

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

The following Principal Adverse Impacts ("PAI") indicators as defined in SFDR Level II have been considered:

- PAI #7 : Activities negatively affecting biodiversity
- PAI #10 : Violations of UN Global Compact principles and OECD guidelines
- PAI #14 : Exposure to Controversial Weapons

The principal adverse impact on sustainability indicators have been taken into account through an exclusionary investment policy.

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

The Management Company will not invest in any company that has been classified as failing to comply with key international norms (ISS Ethix Norm-based screening)) such as for example the UN Global Compact Principles, OECD Guidelines for Multinational Enterprises, Guiding Principles on Business and Human rights.

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

The "do no significant harm" principle applies only to those investments underlying the financial product that take into account the EU criteria for environmentally sustainable economic activities. The investments underlying the remaining portion of this financial product do not take into account the EU criteria for environmentally sustainable economic activities.

Any other sustainable investments must also not significantly harm any environmental or social objectives.

Does this financial product consider principal adverse impacts on sustainability factors?

Principal adverse impacts are the most significant negative impacts of investment decisions on sustainability factors relating to environmental, social and employee matters, respect for human rights, anti-corruption and anti-bribery matters.

✖ Yes, the Management Company has committeed to monitor the 14 mandatory and 2 optional environmental and social indicators to show the impact of the Compartment's investments against these PAI indicators.
Furthermore, the Compartment considers principal adverse impacts on sustainability factors and only the following PAI have been taken into account into the investment process:

- PAI #1: GHG (Greenhouse Gas) emissions - Scope 1 & 2
- PAI #2: Carbon footprint
- PAI #3: GHG intensity of investee companies

The Compartment by targeting an overall carbon reduction of at least 20% compared to the reference index Bloomberg United States Large & Mid Cap Net Return Index's carbon footprint, is looking to invest in a combination of stocks that achieve this overall carbon reduction, by considering carbon emissions scope 1 and 2.

- PAI #7: Activities negatively affecting biodiversity

The Management Company proprietary ESG footprint methodology considers raw data published by companies in order to compute an ESG footprint, by notably looking for example at the existence or not of key policies relevant to the biodiversity (for example: biodiversity policy, water usage policy, waste reduction policy, climate change policy…).

In addition to the previous PAI, the following social sustainability indicators have been considered:

- PAI #10: Violations of UN Global Compact principles and (OECD) Guidelines
- PAI #13: Board Gender Diversity

- PAI #14: Exposure to controversial weapons

PAI reports are available on the Compartment annual report.

No

What investment strategy does this financial product follow?

The investment strategy of the Compartment is a US market equities strategy, systematically applying the Management Company's investment process, which aims to outperform the reference index by minimizing risk factor concentration via a maximally diversified portfolio.

The Compartment aims to promote low carbon approaches, commitment to climate action and companies with good governance.

The Management Company applies systematically its ESG methodology in the investment decision-making process.

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

What are the binding elements of the investment strategy used to select the investments to attain each of the environmental or social characteristics promoted by this financial product?

The Compartment applies the following binding elements to select investments and attain the environmental and social characteristics described above:

- **Exclusion policy:** the Management Company applies a general exclusion policy, restricting the investment universe and excluding companies based either on their involvement in certain activities (sector or product based) or based on controversies or breaches to key international norms. The key exclusions used by the Management Company are reflected in the below table:

Sector /Product	**Criteria**
Producer and distributors of tobacco	Limit (5% of the revenues)
Coal and coal-based producers and distributors	Limit (10% of the revenues)
Development, production, maintenance or distribution of controversial and prohibited weapons	Exclusion
Breach or violation of International Treaties, Conventions & Standards such as OECD Guidelines for Multinational Enterprises, ILO Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy, UN Global Compact, Guiding Principles on Business and Human Rights	Exclusion

Further details on the exclusion policy can be found in the following link: https://www.tobam.fr/our-beliefs/exclusion-policy/

- **ESG Integration:** The Management Company has put in place a strict E, S and G integration process for all listed companies in its investment universe; using officially published data from Bloomberg.

✓ E: For example: existence of climate change / biodiversity / energy efficiency policies; green building, water and waste usage

✓ S: For example: Ethics/Equal opportunity/training/ consumer data protection/whistleblowing policies, CSR committee in place, supply chain management

✓ G: For example: Number of board meetings per year, ratio of independent directors, chairman tenure, ratio of nonexecutive directors in boards

From that raw data, the Management Company has built a proprietary methodology to compute the "E,S,G footprints" of each individual holding in the portfolio and as such determine the overall E,S,G Footprints of the portfolio. The E, S and G footprint aggregates and normalizes (for industry, size and regional biases) the information contained in each of the above mentioned items by E, S and G pillar. The normalization also corrects differences in scale of the different pieces of raw data. The final footprint is an equal weighted measure of the three pillars. The Management Company then adds a constraint into its quantitative portfolio optimization process, to ensure that the E, S and G footprints of the respective portfolio (computed based on the holdings' individual E, S and G footprints) are respectively at least at the same level as the E, S and G footprints of the reference index Bloomberg United States Large & Mid Cap Net Return Index.

- **Carbon Emissions Reduction & Commitment to SBTI:**

In addition, the Management Company analyses the carbon emissions of each holding in its investment universe, computes the carbon footprint of the portfolio and applies a systematic portfolio carbon footprint reduction of at least 20% versus the reference index the Bloomberg United States Large & Mid Cap Net Return Index 's carbon footprint. The calculation of the carbon footprint is based on the greenhouse gas emissions scope 1 and scope 2. Data on emissions used is obtained from a number of sources including company reports, CDP questionnaire (Carbon Disclosure Project) or an estimation model.

The Management Company is also monitoring the companies' commitment to the SBTI as a way to monitor best effort toward more incorporation of best practices. This feature is monitored on a yearly basis.

- **Responsible Ownership:** The Management Company applies a responsible voting policy and has built an ambitious engagement policy to support its commitment to sustainability and address via engagement and dialogues, issues relative to ESG and sustainability.

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

Not applicable.

Good governance practices include sound management structures, employee relations, remuneration of staff and tax compliance.

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

In order to assess good governance practices, the Management Company consider the G scoring of its proprietary ESG footprint methodology, and ensure that the G scoring of the portfolio is matching the reference index Bloomberg United States Large & Mid Cap Net Return Index's G scoring.

What is the asset allocation planned for this financial product?

Asset allocation describes the share of investments in specific assets.

#1: 90% of the assets of this Compartment are aligned (promote) E/S characteristics.

#1A: at least 40% of those assets fall under the sustainable share of investment with non EU Taxonomy aligned environmental objectives.

These sustainable investments contribute to environmental objectives, including climate change mitigation and adaptation (however not in the meaning of the Taxonomy Regulation) or commitment to SBTI.

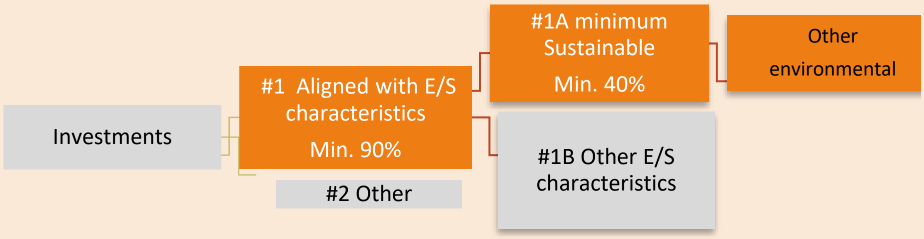
The model used by TOBAM for the determination of the sustainable investments combines the pass or fail approach and the weighted-revenue approach with threshold for the carbon emissions and governance.
To determine the share of sustainable investments, the Management Company considers the environmental objective for companies that have:

Environmental objective determined as:
o Companies that have carbon emission intensity (carbon emissions normalized by the Enterprise Value Including Cash) below 80% of the average emissions carbon intensity of the reference index the Bloomberg United States Large & Mid Cap Net Return Index
Or
o Companies that have made a commitment to the SBTI initiative (this engagement is followed by the Management Company's research team on an annual basis).

Do Not Significantly Harm characteristics:
o Companies that are not involved in severe breaches or controversies in regard to the labor rights, human rights, environmental or corruption, and that are not part of the following sectors: tobacco, controversial weapons, coal mining and fossil fuels
And
o Companies that have not been targeted by any significant environmental fines over the past years.

Good Governance practices are defined as companies that have a G score (as defined by the Management Company ESG Footprint proprietary methodology) in the top 80% of the reference index the Bloomberg United States Large & Mid Cap Net Return Index.

Please note that investments falling under section #1B on the below diagram 'non sustainable investment share of the Compartment', still comply with all of the Compartment ESG policy (exclusions, carbon reduction, ESG footprint, voting & engagement), but did not qualify as a sustainable investment.



#1 Aligned with E/S characteristics includes the investments of the financial product used to attain the environmental or social characteristics promoted by the financial product.

#2Other includes the remaining investments of the financial product which are neither aligned with the environmental or social characteristics, nor are qualified as sustainable investments.

The category **#1 Aligned with E/S characteristics** covers:
- The sub-category **#1A Sustainable** covers sustainable investments with environmental or social objectives.
- The sub-category **#1B Other E/S characteristics** covers investments aligned with the environmental or social characteristics that do not qualify as sustainable investments.

How does the use of derivatives attain the environmental or social characteristics promoted by the financial product?

The Compartment may use financial derivative instruments for investment, efficient portfolio management and/or hedging purposes, and this will not impact in any way the exposure to sustainable assets, or the ESG characteristics of the Compartment.

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

This Compartment commits to a 0% alignment with the EU Taxonomy.

Taxonomy-aligned activities are expressed as a share of:
- **turnover** reflecting the share of revenue from green activities of investee companies
- **capital expenditure** (CapEx) showing the green investments made by investee companies, e.g. for a transition to a green economy.
- **operational expenditure** (OpEx) reflecting green operational activities of investee companies.

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

- ***Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy[1]?***

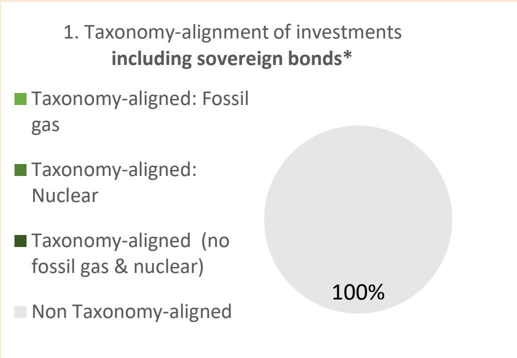
☐ Yes :

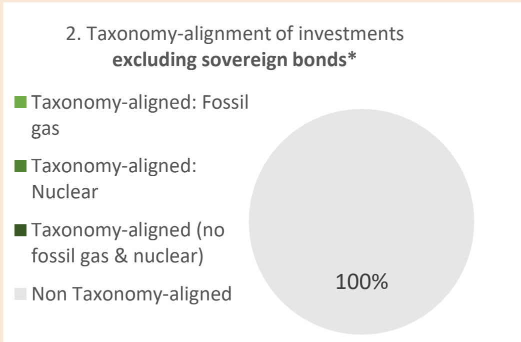
☐ In fossil gas ☐ In nuclear energy

☒ No

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

The two graphs below show in green the minimum percentage of investments that are aligned with the EU Taxonomy. As there is no appropriate methodology to determine the Taxonomy-alignment of sovereign bonds*, the first graph shows the Taxonomy alignment in relation to all the investments of the financial product including sovereign bonds, while the second graph shows the Taxonomy alignment only in relation to the investments of the financial product other than sovereign bonds.





This graph represents 100% of the total investments.

* **For the purpose of these graphs, 'sovereign bonds' consist of all sovereign exposures**

Enabling activities directly enable other activities to make a substantial contribution to an environmental objective.

Transitional activities are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels

- ***What is the minimum share of investments in transitional and enabling activities?***

As the Compartment does not have a minimum Taxonomy alignement, there is no minimum share in transitional and enabling activities.

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

The minimum share of sustainable investments with an environmental objective that is not aligned with the EU Taxonomy is 40%.

What is the minimum share of socially sustainable investments?

Not applicable.

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

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

Investments falling under category "#2 Other", are investments such as derivatives, cash or cash equivalent, not integrating E/S characteristics, where ESG key features and analysis have not been performed, and E/S characteristics not considered.

No minimum environmental or social safeguards apply to the above elements.

Is a specific index designated as a reference benchmark to determine whether this financial product is aligned with the environmental and/or social characteristics that it promotes?

No, but the Compartment has designated a reference benchmark (Bloomberg United States Large & Mid Cap Net Return Index). This index is used as a reference to compare the Compartment ESG characteristics, such as carbon emissions or ESG footprint, with the reference benchmark.

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

- ***How is the reference benchmark continuously aligned with each of the environmental or social characteristics promoted by the financial product?***

The Benchmark used by the Compartment is not an ESG benchmark and is not consistent with the ESG characteristics promoted by the Compartment. All ESG calculations or comparisons are computed using the Compartment's benchmark, as a good proxy of the Compartment investment universe.

- ***How is the alignment of the investment strategy with the methodology of the index ensured on a continuous basis?***

The reference index the Bloomberg United States Large & Mid Cap Net Return Indexis a broad market index, capturing US markets equities, which is in line with the Compartment investment universe.

The investment universe of the reference index is regularly monitored by the Management Company research team to ensure the consistency with the Compartment's investment universe, in order to ensure relevance of ESG and performance comparisons.

- ***How does the designated index differ from a relevant broad market index?***

The reference index the Bloomberg United States Large & Mid Cap Net Return Index is a broad market index, capturing US markets equities, which is in line with the Compartment investment universe.

- ***Where can the methodology used for the calculation of the designated index be found?***

https://assets.bbhub.io/professional/sites/27/Global-Equity-Index-Methodology.pdf

Where can I find more product specific information online?

More product-specific information can be found on the website:
https://www.tobam.fr/key-documents-policies/

APPENDIX 7. Most Diversified Portfolio SICAV - TOBAM Anti-Benchmark World Equity Fund

Investment Objective, Benchmark of the Compartment

The Compartment's primary investment objective is to be exposed to global developed market equities, by systematically applying the Management Company's investment process, which aims to outperform the reference index by minimizing risk factor concentration via a maximally diversified portfolio.

Changes in the net asset value can be compared to the Bloomberg Developed Markets Large & Mid Cap Net Return Index (closing price).

The Bloomberg Developed Markets Large & Mid Cap Net Return Index includes large and mid-cap equity performance across 23 developed markets countries selected firstly on geographical and then on sector criteria. This index, stated in Euros converted from US dollars, is published Bloomberg. The shares that make up the index are selected on the basis of size, liquidity and free-float capital freely available for trading on a regulated market. index levels include the minimum possible reinvestments linked to dividends paid out on the shares in the index. A dividend is considered to be reinvested after deduction of taxes. The rate of tax applied is that for a non-resident investor who does not benefit from double taxation treaties.

The index is available at www.bloomberg.com/indices

The Compartment does not use an index-based management strategy, it is actively managed. As a consequence, its performance may differ substantially from the benchmark, which is used to define the investment universe and determine the global risk profile of the Compartment. A majority of the Compartment's equity securities will be components of the benchmark. The weightings of the Compartment's portfolio holdings may diverge significantly from their equivalent weighting in the index.

Investment strategy of the Compartment

At least 90% of the Compartment's assets are constantly kept exposed to the international small-, mid- and large-cap equity markets.

In addition to the portfolio's minimum 90% exposure to international equities, the Compartment may also be exposed to different markets or asset classes in order to meet its investment objective.

For the purpose of diversification, the Compartment may invest up to 20% of its assets in closed-ended Real Estate Investment Trusts (REIT).

The equities in which the Compartment invests are selected on the basis of quantitative models developed by the management company, which enable it to maximize the level of diversification provided in relation to the benchmark. The resulting Compartment, combined with other "long only" investments, is expected to improve the results of the asset allocation by, among other things, improving the Sharpe ratio and reducing volatility. The aim of the management models used is to increase diversification in relation to the benchmark index. The sector breakdown may be taken into account to limit concentration into a particular sector.

In order to support its investment objective (obtain maximum remuneration of its liquidities), the Compartment can invest directly or via funds on different markets or asset classes (money market instruments or listed index funds) for up to 10% of its assets.

In order to be continually exposed as closely as possible to the results of the model and therefore meet its investment objective, the Compartment may invest in listed index funds. To maintain exposure as close as possible to the results of the model, the Compartment may build or add to its exposure through American Depository Receipt (ADR) and Global Depository Receipt (GDR), for up to 100% of its net assets, and/or through other OTC contracts in order to enhance risk control and minimize transaction costs. Investments in American Depository Receipt (ADR), Global Depository Receipt (GDR), and Real Estate Investment Trusts (REIT) are made in compliance with the restrictions laid down in Article 41 of the Law.

If justified by extreme market conditions and in order to curb the cost of trading on the various markets, the Compartment reserves the right to invest up to 100% of its assets in mono-underlying Contracts for Differences (CFDs), CFDs are futures contracts entered into with a counterparty settled through cash payments rather than through physical delivery of financial instruments. The Compartment may thus take advantage of the (liquidity and pricing) characteristics of these instruments compared with the financial instruments in which it invests directly.

It may also invest up to 100% of its assets in forward financial instruments (such as futures contracts) in order to make occasional adjustments to allow for subscriptions and redemptions and/or to hedge currency risk. The Compartment may also build up or supplement its exposure by investing in OTC contracts in order to improve risk management and reduce trading costs.

The Compartment will thus be able to benefit from the flexibility these instruments may offer (particularly in terms of liquidity and price) relative to the financial instruments in which it invests directly.

The Compartment may also use deposits and temporary purchases and sales of securities, and may borrow cash in the event that it becomes overdrawn.

The Compartment qualifies under article 8 of SFDR. The investment strategy does not have a sustainable investment objective but promotes environmental and social characteristics. The strategy notably follows the 4 pillars of TOBAM's SRI policy: exclusion, carbon reduction, ESG integration and responsible stewardship via voting and engagement.

The Management Company considers ESG factors and applies a sustainability approach in its investment process for the Compartment as further detailed in the Appendix 7.1 Environmental and/or Social Characteristics - Pre-contractual disclosures in compliance with SFDR Level II. Description of the asset classes used to achieve the investment objective

The asset classes included in the portfolio are the following:

a) Equities

To implement the above strategy, the Compartment will invest in the international equities market that is depending on the outlook as seen by the Management Company, the Compartment may invest in shares of companies listed in developed countries as defined by BLOOMBERG, irrespective of the companies' size and the sector of the economy to which they belong. At least 90% of the Compartment's net assets will be exposed to international equities. This exposure may be gained either through CFDs or direct securities, depending on market conditions. This exposure will not fall below 90% of the Compartment's assets. The securities could include American Depository Receipt (ADR) and Global Depository Receipt (GDR), for up to 100% of its net assets.

The Compartment may invest up to 20% of its net assets in closed-ended Real Estate Investment Trusts (REIT).

b) Money market instruments

For treasury purposes, the Compartment may invest up to 10% of its assets in money market instruments, including money market funds and transferable debt securities.

In order to achieve its investment objective, if execution of the investment strategy leads the Management Company to opt for CFDs, the portfolio may comprise a significant proportion of instruments (notably certificates of deposit, European commercial paper, treasury bills) with a minimum rating of AA- (S&P) or Aa3 (Moody's). In case of separation between the two ratings, the Management Company will select the lowest rating.

c) Shares or units of investment funds

The Compartment may invest maximum 10% of its assets in shares or units of UCITS which themselves invest maximum 10% of their assets in shares or units of UCITS or investment funds.

These funds may be managed by the Management Company or an affiliated company. The investment strategies of these funds are compatible with that of the Compartment.

The Compartment may invest maximum 10% of its assets in one or more Compartments of the Company.

1) Derivatives used to achieve the investment objective

The Compartment may use financial futures up to a maximum of one time its assets. The Compartment's leveraged exposure may not exceed 110%.

The Compartment will invest in regulated, organized markets and over-the-counter.

The Compartment will use derivatives instrument for hedging and exposure purposes, and to achieve the investment objective (including replication of synthetic exposure to baskets of equities or indices).

The hedging derivatives transaction shall aim to cover equity risk and foreign exchange risk of the Compartment.

The types of instruments used by the Management Company will mainly be futures on equities or stock market indices, swaps on currencies or equities and CFDs.

2) Deposits and cash

The Compartment may hold, up to 20% of its net assets, ancillary liquid assets which consists of bank deposits at sight such as cash held in current accounts with a bank accessible at any time.

The Compartment may make limited use of other deposits in order to achieve its investment objective, for treasury purposes and/or in in case of unfavourable market conditions.

3) Cash borrowing

The Compartment may borrow up to the equivalent of 10% of its net assets in cash on a temporary basis and for technical needs only.

4) Temporary purchases and sales of securities

The attention of the Shareholders is drawn to the fact that the below wording, reporting the increased use of securities lending, applies as of 29 May 2023.

In addition, the Compartment may engage in security lending for up to 75% of its assets.
The Compartment may also as ancillary, make temporary deposits and borrow cash in the event that a debit balance was to appear.

The Compartment will enter into securities lending transactions opportunistically in circumstances where the Management Company believes that the objective described below could be achieved.

In the context of investments in specials and general collateral the Compartment will use securities lending in order to increase the return of the portfolio.

The expected proportion of the Compartment's assets which may be subject to securities lending depends on the demand of market participants for the securities forming part of the Compartment's portfolio at any time.

This demand depends notably on the interest of such securities, the size of the lendable positions, the presence of specials or securities used as general collateral, the potential duration of the loan (the securities being subject to portfolio adjustments or rebalancing, and thus sell trades), and the type of collateral accepted by the Compartment.

The Compartment's use of, or investment in, securities lending transactions will be as follows:

Type of transaction	Expected proportion	Maximum proportion
Securities lending	0% to 30%	75%

Reference Currency
The reference currency of the Compartment is USD.

Profile of the Typical Investor

The Compartment is a high risk vehicle. To determine their level of investment, investors should consider their personal assets, the regulations applicable to them, their current financial needs over a recommended minimum investment horizon of more than five years, and also their willingness to take risks or their preference for a more prudent investment. The recommended minimum investment horizon is more than 5 years.

Form of Shares and Classes

The Share Classes of the Compartment will be issued in registered form.

Share Classes	A Isin Code: LU1067857240	A1 Isin Code: LU1067857323	A2 Isin Code: LU1067857596	B Isin Code: LU1067857679	B1 Isin Code: LU1067857752	C** Isin Code: LU1067857836	R Isin Code: LU1067857919	R2 Isin Code: LU1067858057	R3** Isin Code: LU1131953470	R4 Isin Code :LU1263145580	Z Isin Code: LU1666143687
Currency	USD	EUR	GBP	USD	EUR	EUR	GBP	USD	EUR	EUR	USD
Type of Shares	Accumulation										
Target Investors	Institutional investors			All investors		Institutional investors	All investors				Institutional investors
Minimum initial subscription	10 Shares	10 Shares	10 Shares	1 Share	1 Share	10 Shares	1 Share	1 Share	1 Share	1 Share	10 Shares
Minimum holding amount	1 Share	1 Share	1 Share	1 Share	1 Share	1 Share	1 Share	1 Share	1 Share	1 Share	1 Share
Valuation Day	Every Business Day, with the exception of days on which the American markets are closed (based on the official NYSE Euronext calendar)										
Management Company Fee	1.2%	1.2%	1.2%	2%	2%	1.2%	0.55%	0.55%	0.55%	0.55%	0%
Hedge						100% systematic hedging against foreign exchange risk**			100% systematic hedging against foreign exchange risk**		
Administration Fee & Depositary Fee	0.20%	0.20%	0.20%	0.20%	0.20%	0.20%	0.20%	0.20%	0.20%	0.20%	0.20%
Subscription Fee paid to the	None	None	None	Up to 3%	Up to 3%	None	Up to 5%	Up to 5%	Up to 5%	Up to 5%	Up to 5%

Management Company											
Redemption Fee paid to the Management Company	Up to 1%	Up to 1%	Up to 1%	Up to 1%	Up to 1%	Up to 1%	Up to 1%	Up to 1%	Up to 1%	Up to 1%	Up to 5%
Cut-off	12.00 p.m. CET the Business Day before the relevant Valuation Day										
Subscription / Redemption Settlement Day	2 days, according to the official NYSE Euronext calendar, following the Valuation Day										

R units: these units are intended for "all investors" seeking a low initial investment and a "clean fee" structure. The R "clean fee" share class will not carry any fees payable to distributors.

Investors subscribing for Shares denomminated in EUR or GBP are subject to EUR/GBP currency risk given the conversion of the net asset value.

In the event that an investor redeems Shares prior to the end of the financial year, any accrued but unpaid performance fee relating to those Shares shall be paid to the Management Company at the last Valuation Day of the relevant quarter.

*** Share Classes C and R3 offer at least 100% systematic hedging against foreign exchange risk with a 10% tolerance.*

The Share Classes C and R3 do not hedge currency risk against the reference currency of the Compartment (USD) but against the foreign exchange risk of all currency exposures held in the portfolio against the currency of the concerned share class (EUR). The reference benchmarks for each of these share classes will be the Bloomberg Developed Markets Large & Mid Cap Net Return Index.

Launch date

This Compartment has been launched by way of a cross-border operation with the French UCITS FCP TOBAM Anti-Benchmark World Equity Fund. The launch date of this Compartment was 9 October 2014.

The initial subscription prices of the Share Classes of this Compartment corresponded to the NAV of their equivalent Share Classes in the French UCITS FCP TOBAM Anti-Benchmark World Equity Fund.

The following Share Classes of this Compartment will be created with the following initial subscription prices:

Class:	Initial subscription prices:
Class B	USD 100
Class R2	USD 100
Class R3	EUR 100
Class R4	EUR 100
Class Z	USD 10,000

Total Expense Ratio

The latest calculated total expense ratio rate can be found in the Company's latest financial report.

Risk Management

The method used to calculate overall exposure is the commitment method.

Compartments Specific Risk Factors

The funds will be invested primarily in financial instruments selected by the Management Company. These instruments will be subject to market movements and fluctuations. The Management Company invests according to a systematic, fundamentals-based model: there is a risk that the equities selected may not be the best performing stocks.

1) Equity risk

If the equities or indices to which the portfolio is exposed fall, the net asset value of the Compartment may also fall.

Since the volume of small and mid-cap stocks listed on the stock exchange is relatively low, market downturns are more pronounced and more rapid than for large caps. The net asset value of the Compartment may therefore decline more quickly and more significantly.

Investors' attention is drawn to the fact that the small-cap markets are intended to accommodate businesses that, due to their specific characteristics, may pose a risk for investors.

2) Risk associated with the Management Company's investment process

Investors should note that portfolio construction and the selection and weighting of assets are based on a process developed by the Management Company. The Compartment's investment process is based on a systematic model designed to identify signals based on past statistical results.

There is a risk that the model may not be efficient, as there is no guarantee that past market situations will be repeated in the future. Since the aim of the processes developed by the Management Company is to achieve good diversification of the Compartment's portfolio, using these processes may lead the Management Company to not select the top-performing assets.

3) Risk associated with the use of financial futures

The Compartment may use some financial futures for up to 110% of its assets. The Compartment may thus be exposed for up to 110% of its assets to the market, assets, index and economic and/or financial instrument or parameter, which can imply a risk of reduction in the net asset value of the Compartment that might be more significant and quicker that the one observed on the markets where the Compartment is invested.

4) Currency risk (up to 100%)

Currency risk is the risk that the investment currencies may weaken in relation to the base currency of the portfolio (US dollar). In the event of depreciation in foreign currencies, investors are thus exposed to a decline in the value of their units. The A, A1, A2, B, B1, R and R2 Shares are exposed to currency risk. C Shares and R3 Shares are hedged with regard to currency risk back in the currency of the share (the Euro), and are thus minimally exposed to the risk of a depreciation of foreign currencies against the Euro.

5) Counterparty risk

The Compartment may incur a loss in the event of default by a counterparty with which certain transactions were conducted, leading to a decline in the Compartment's net asset value.

6) Interest rate risk

This refers to the risk of a fall in the value of fixed income instruments resulting from changes in interest rates. If interest rates rise, the Compartment's net asset value may fall. The Compartment has limited exposure to interest rate products.

7) Credit risk

This is the risk of a decline in shares issued by a private or public issuer or default by the latter. The value of the debt securities in which the Compartment is invested may decline, leading to a fall in net asset value.

Template pre-contractual disclosure for the financial products referred to in Article 8, paragraphs 1, 2 and 2a, of Regulation (EU) 2019/2088 and Article 6, first paragraph, of Regulation (EU) 2020/852

Product name: Most Diversified Portfolio SICAV - TOBAM Anti-Benchmark World Equity Fund

Legal entity identifier: 549300BJ9K8HS74TEX84

Sustainable investment means an investment in an economic activity that contributes to an environmental or social objective, provided that the investment does not significantly harm any environmental or social objective and that the investee companies follow good governance practices.

The **EU Taxonomy** is a classification system laid down in Regulation (EU) 2020/852, establishing a list of **environmentally sustainable economic activities**. That Regulation does not lay down a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

Environmental and/or social characteristics

Does this financial product have a sustainable investment objective?

☐ **Yes**	☒ **No**
☐ It will make a minimum of **sustainable investments with an environmental objective:** ___%	☒ It **promotes Environmental/Social (E/S) characteristics** and while it does not have as its objective a sustainable investment, it will have a minimum proportion of 40% of sustainable investments
☐ in economic activities that qualify as environmentally sustainable under the EU Taxonomy	☐ with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy
☐ in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy	☒ with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy
	☐ with a social objective
☐ It will make a minimum of **sustainable investments with a social objective:** ___%	☐ It promotes E/S characteristics, but **will not make any sustainable investments**

What environmental and/or social characteristics are promoted by this financial product?

The Compartment's primary investment objective is to be exposed to global developed market equities, by systematically applying the Management Company's investment process, which aims to outperform the reference index by minimizing risk factor concentration via a maximally diversified portfolio.

This process integrates environmental, social and governance (ESG) risks and opportunities to the sustainability of long-term company returns. The Compartment aims to promote low carbon approaches, commitment to climate action and companies with good governance.

In particular, the Compartment aims to promote the following E/S characteristics:

- Low carbon approach by applying a systematic carbon footprint reduction of at least 20% versus the reference investment universe's carbon footprint,
- Promotion of companies with good governance using raw data and their ESG footprint.

The Compartment has designated Bloomberg Developed Markets Large & Mid Cap Net Return Index as a reference index to compare its ESG characteristics, such as carbon emissions or ESG footprint.

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

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

In order to achieve the above characteristics promoted by the Compartment, the Management Company has put in place an ambitious ESG policy made of key pillars and sustainability indicators. The Compartment uses the following sustainability indicators to attain each of the environmental and social characteristics promoted by the Compartment:

- **Carbon Emissions Reduction:** The Management Company applies a systematic carbon footprint reduction of at least 20% versus the reference index the Bloomberg Developed Markets Large & Mid Cap Net Return Index's carbon footprint. The calculation of the carbon footprint is based on the greenhouse gas emissions scope 1 (i.e. direct emissions from owned or controlled sources) and scope 2 (i.e. indirect emissions from the generation of purchased energy) according to GHG Protocol Corporate Standard. Data on emissions used is obtained from a number of sources including company reports, CDP questionnaire (Carbon Disclosure Project) or an estimation model.

- **ESG Footprint:** The Management Company has put in place a strict E, S and G integration process for all listed companies in its investment universe; using officially published data from Bloomberg.

✓ E: For example: existence of climate change / biodiversity / energy efficiency policies; green building, water and waste usage
✓ S: For example: Ethics/Equal opportunity/training/ consumer data protection/whistleblowing policies, CSR committee in place, supply chain management
✓ G: For example: Number of board meetings per year, ratio of independent directors, chairman tenure, ratio of nonexecutive directors in boards.

From that raw data, the Management Company has built a proprietary methodology to compute the "E,S,G footprints" of each individual holding in the portfolio and as such determine the overall E,S,G Footprints of the portfolio.

The Management Company has constrained its investment decision-making process to reach E,S,G footprints of the Compartment, at minima at the same level as the E,S,G footprints of the reference index the Bloomberg Developed Markets Large & Mid Cap Net Return Index.

- ***What are the objectives of the sustainable investments that the financial product partially intends to make and how does the sustainable investment contribute to such objectives?***

The sustainable investments within the Compartment contribute to Environmental objectives including climate change mitigation and adaptation (however not in the meaning of the Taxonomy Regulation) or commitment to science-based emissions reduction targets ("SBTI").

To determine the share of sustainable investments, the Management Company consider the environmental objective for companies that have:

- A carbon intensity (carbon emissions normalized by the Enterprise Value including Cash) below 80% of the average carbon intensity of the reference the Bloomberg Developed Markets Large & Mid Cap Net Return Index

Or

Made a commitment to the SBTI initiative. (This engagement is followed by the Management Company's research team on an annual basis).

- Are not involved in severe breaches or controversies in regard to the labor rights, human rights, environmental or corruption, and that are not part of the following sectors: tobacco, controversial weapons, coal mining and fossil fuels

And

Have not been targeted by any significant environmental fines over the past years.

- Have a G score for Good Governance practices (as defined by the Management Company ESG Footprint proprietary methodology) in the top 80% of the reference index the Bloomberg Developed Markets Large & Mid Cap Net Return Index.

How do the sustainable investments that the financial product partially intends to make, not cause significant harm to any environmental or social sustainable investment objective?

Companies the Compartment invests in, contribute to achieve the Compartments' carbon reduction objective, ESG footprint commitment while not significantly harming any environmental or social sustainable investment objectives. Before any investment is made by the Compartment (not only sustainable investments but all investments), the investment has to pass a negative screening, further including the consideration of the principal adverse impacts described in the below section. Hence no companies involved in controversial sectors or activities not aligned with TOBAM's policy, can be eligible for investments for the Compartment.

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

The following Principal Adverse Impacts ("PAI") indicators as defined in SFDR Level II have been considered:

- PAI #7 : Activities negatively affecting biodiversity
- PAI #10 : Violations of UN Global Compact principles and OECD guidelines
- PAI #14 : Exposure to Controversial Weapons

The principal adverse impacts on sustainability indicators have been taken into account through an exclusionary investment policy.

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

The Management Company will not invest in any company that has been classified as failing to comply with key international norms (ISS Ethix Norm-based screening) such as for example the UN Global Compact Principles, OECD Guidelines for Multinational Enterprises, Guiding Principles on Business and Human rights.

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

The "do no significant harm" principle applies only to those investments underlying the financial product that take into account the EU criteria for environmentally sustainable economic activities. The investments underlying the remaining portion of this financial product do not take into account the EU criteria for environmentally sustainable economic activities.

Any other sustainable investments must also not significantly harm any environmental or social objectives.

Does this financial product consider principal adverse impacts on sustainability factors?

Principal adverse impacts are the most significant negative impacts of investment decisions on sustainability factors relating to environmental, social and employee matters, respect for human rights, anti-corruption and anti-bribery matters.

✖ Yes, the Management Company has committed to monitor the 14 mandatory and 2 optional environmental and social indicators to show the impact of the Compartment's investments against these PAI indicators.
Furthermore, the Compartment considers principal adverse impacts on sustainability factors and only the following PAI have been taken into account into the investment process:

- PAI #1: GHG (Greenhouse Gas) emissions - Scope 1 & 2
- PAI #2: Carbon footprint
- PAI #3: GHG intensity of investee companies

The Compartment by targeting an overall carbon reduction of at least 20% compared to the reference index Bloomberg Developed Markets Large & Mid Cap Net Return Index's carbon footprint, is looking to invest in a combination of stocks that achieve this overall carbon reduction, by considering carbon emissions scope 1 and 2.

- PAI #7: Activities negatively affecting biodiversity

The Management Company proprietary ESG footprint methodology considers raw data published by companies in order to compute an ESG footprint, by notably looking for example at the existence or not of key policies relevant to the biodiversity (for example: biodiversity policy, water usage policy, waste reduction policy, climate change policy…).

In addition to the previous PAI, the following social sustainability indicators have been considered:

- PAI #10: Violations of UN Global Compact principles and (OECD) Guidelines
- PAI #13: Board Gender Diversity
- PAI #14: Exposure to controversial weapons

PAI reports are available on the Compartment annual report.

☐ No

What investment strategy does this financial product follow?

The investment strategy of the Compartment is a global developed market equities strategy, systematically applying the Management Company's investment process, which aims to outperform the reference index by minimizing risk factor concentration via a maximally diversified portfolio.

The Compartment aims to promote low carbon approaches, commitment to climate action and companies with good governance.

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

What are the binding elements of the investment strategy used to select the investments to attain each of the environmental or social characteristics promoted by this financial product?

The Compartment applies the following binding elements to select investments and attain the environmental and social characteristics described above:

- **Exclusion policy:** the Management Company applies a general exclusion policy, restricting the investment universe and excluding companies based either on their involvement in certain activities (sector or product based) or based on controversies or breaches to key international norms. The key exclusions used by the Management Company are reflected in the below table:

Sector /Product	**Criteria**
Producer and distributors of tobacco	Limit (5% of the revenues)
Coal and coal-based producers and distributors	Limit (10% of the revenues)
Development, production, maintenance or distribution of controversial and prohibited weapons	Exclusion
Breach or violation of International Treaties, Conventions & Standards such as OECD Guidelines for Multinational Enterprises, ILO Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy, UN Global Compact, Guiding Principles on Business and Human Rights	Exclusion

Further details on the exclusion policy can be found in the following link: https://www.tobam.fr/our-beliefs/exclusion-policy/

- **ESG Integration:** The Management Company has put in place a strict E, S and G integration process for all listed companies in its investment universe; using officially published data from Bloomberg.

✓ E: For example: existence of climate change / biodiversity / energy efficiency policies; green building, water and waste usage

✓ S: For example: Ethics/Equal opportunity/training/ consumer data protection/whistleblowing policies, CSR committee in place, supply chain management

✓ G: For example: Number of board meetings per year, ratio of independent directors, chairman tenure, ratio of nonexecutive directors in boards

From that raw data, the Management Company has built a proprietary methodology to compute the "E,S,G footprints" of each individual holding in the portfolio and as such determine the overall E,S,G Footprints of the portfolio. The E, S and G footprint aggregates and normalizes (for industry, size and regional biases) the information contained in each of the above mentioned items by E, S and G pillar. The normalization also corrects differences in scale of the different pieces of raw data. The final footprint is an equal weighted measure of the three pillars. The Management Company then adds a constraint into its quantitative portfolio optimization process, to ensure that the E, S and G footprints of the respective portfolio (computed based on the holdings' individual E, S and G footprints) are respectively at least at the same level as the E, S and G footprints of the reference index Bloomberg Developed Markets Large & Mid Cap Net Return Index.

- **Carbon Emissions Reduction & Commitment to SBTI:**

In addition, the Management Company analyses the carbon emissions of each holding in its investment universe, computes the carbon footprint of the portfolio and applies a systematic portfolio carbon footprint reduction of at least 20% versus the reference index the Bloomberg Developed Markets Large & Mid Cap Net Return Index's carbon footprint. The calculation of the carbon footprint is based on the greenhouse gas emissions scope 1 and scope 2. Data on emissions used is obtained from a number of sources including company reports, CDP questionnaire (Carbon Disclosure Project) or an estimation model.

The Management Company is also monitoring the companies' commitment to the SBTI as a way to monitor best effort toward more incorporation of best practices. This feature is monitored on a yearly basis.

- **Responsible Ownership:** The Management Company applies a responsible voting policy and has built an ambitious engagement policy to support its commitment to sustainability and address via engagement and dialogues, issues relative to ESG and sustainability.

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

  Not applicable.

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

  In order to assess good governance practices, the Management Company consider the G scoring of its proprietary ESG footprint methodology, and ensure that the G scoring of the Compartment is matching the reference index Bloomberg Developed Markets Large & Mid Cap Net Return Index's G scoring.

Good governance practices include sound management structures, employee relations, remuneration of staff and tax compliance.

What is the asset allocation planned for this financial product?

#1: 90% of the assets of this Compartment are aligned (promote) E/S characteristics.

#1A: at least 40% of those assets fall under the sustainable share of investment with non EU Taxonomy aligned environmental objectives.

Asset allocation describes the share of investments in specific assets.

These sustainable investments contribute to environmental objectives, including climate change mitigation and adaptation (however not in the meaning of the Taxonomy Regulation) or commitment to SBTI.

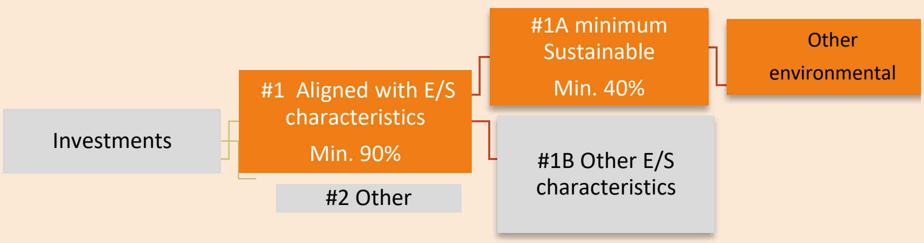
The model used by TOBAM for the determination of the sustainable investments combines the pass or fail approach and the weighted-revenue approach with threshold for the carbon emissions and governance.
To determine the share of sustainable investments, the Management Company considers the environmental objective for companies that have:

Environmental objective determined as:
o Companies that have carbon emission intensity (carbon emissions normalized by the Enterprise Value Including Cash) below 80% of the average emissions carbon intensity of the reference index Bloomberg Developed Markets Large & Mid Cap Net Return Index
Or
o Companies that have made a commitment to the SBTI initiative (this engagement is followed by the Management Company's research team on an annual basis).

Do Not Significantly Harm characteristics:
o Companies that are not involved in severe breaches or controversies in regard to the labor rights, human rights, environmental or corruption, and that are not part of the following sectors: tobacco, controversial weapons, coal mining and fossil fuels
And
o Companies that have not been targeted by any significant environmental fines over the past years.

Good Governance practices are defined as companies that have a G score (as defined by the Management Company ESG Footprint proprietary methodology) in the top 80% of the reference index the Bloomberg Developed Markets Large & Mid Cap Net Return Index.

Please note that investments falling under section #1B on the below diagram 'non sustainable investment share of the Compartment', still comply with all of the Compartment ESG policy (exclusions, carbon reduction, ESG footprint, voting & engagement), but did not qualify as a sustainable investment.



#1 Aligned with E/S characteristics includes the investments of the financial product used to attain the environmental or social characteristics promoted by the financial product.

#2Other includes the remaining investments of the financial product which are neither aligned with the environmental or social characteristics, nor are qualified as sustainable investments.

The category **#1 Aligned with E/S characteristics** covers:
- The sub-category **#1A Sustainable** covers sustainable investments with environmental or social objectives.
- The sub-category **#1B Other E/S characteristics** covers investments aligned with the environmental or social characteristics that do not qualify as sustainable investments.

How does the use of derivatives attain the environmental or social characteristics promoted by the financial product?

The Compartment may use financial derivative instruments for investment, efficient portfolio management and/or hedging purposes, and this will not impact in any way the exposure to sustainable assets, or the ESG characteristics of the Compartment.

Taxonomy-aligned activities are expressed as a share of:
- **turnover** reflecting the share of revenue from green activities of investee companies
- **capital expenditure** (CapEx) showing the green investments made by investee companies, e.g. for a transition to a green economy.
- **operational expenditure** (OpEx) reflecting green operational activities of investee companies.

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

This Compartment commits to a 0% alignment with the EU Taxonomy.

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

Enabling activities directly enable other activities to make a substantial contribution to an environmental objective.

Transitional activities are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.

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

- ***Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy[1]?***

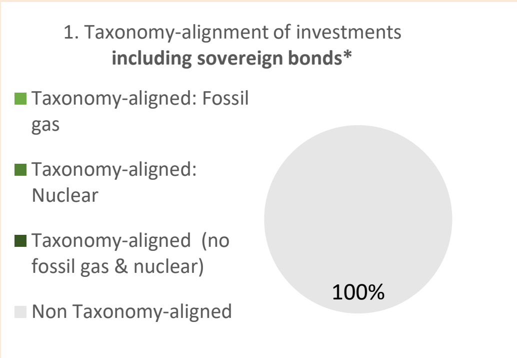
☐ Yes :

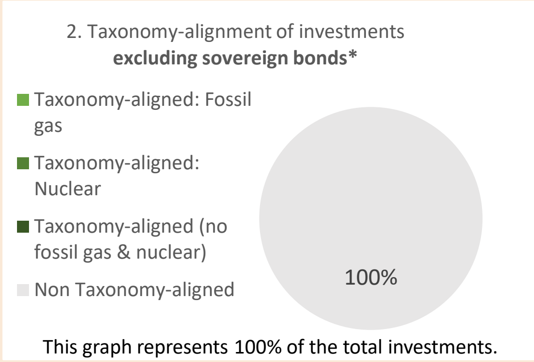
☐ In fossil gas ☐ In nuclear energy

☒ No

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

The two graphs below show in green the minimum percentage of investments that are aligned with the EU Taxonomy. As there is no appropriate methodology to determine the Taxonomy-alignment of sovereign bonds*, the first graph shows the Taxonomy alignment in relation to all the investments of the financial product including sovereign bonds, while the second graph shows the Taxonomy alignment only in relation to the investments of the financial product other than sovereign bonds.





*** For the purpose of these graphs, 'sovereign bonds' consist of all sovereign exposures**

- ***What is the minimum share of investments in transitional and enabling activities?***

As the Compartment does not have a minimum Taxonomy alignement, there is no minimum share in transitional and enabling activities.

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

The minimum share of sustainable investments with an environmental objective that are not aligned with the EU Taxonomy is 40%.

What is the minimum share of socially sustainable investments?

Not applicable.

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

Investments falling under category "#2 Other", are investments such as derivatives, cash or cash equivalent, not integrating E/S characteristics, where ESG key features and analysis have not been performed, and E/S characteristics not considered.

No minimum environmental or social safeguards apply to the above elements.

Is a specific index designated as a reference benchmark to determine whether this financial product is aligned with the environmental and/or social characteristics that it promotes?

No, but the Compartment has designated a reference benchmark (Bloomberg Developed Markets Large & Mid Cap Net Return Index). This index is used as a reference to compare the Compartment ESG characteristics, such as carbon emissions or ESG footprint, with the reference benchmark.

- ***How is the reference benchmark continuously aligned with each of the environmental or social characteristics promoted by the financial product?***

  The reference index used by the Compartment is not an ESG benchmark and is not consistent with the ESG characteristics promoted by the Compartment. All ESG calculations or comparisons are computed using the Compartment's benchmark, as a good proxy of the Compartment investment universe.

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

- ***How is the alignment of the investment strategy with the methodology of the index ensured on a continuous basis?***

  The reference index the Bloomberg Developed Markets Large & Mid Cap Net Return Index is a broad market index, capturing global developed markets equities, which is in line with the Compartment investment universe.

  The investment universe of the reference index is regularly monitored by the Management Company research team to ensure the consistency with the Compartment's investment universe, in order to ensure relevance of ESG and performance comparisons.

- ***How does the designated index differ from a relevant broad market index?***

  The reference index the Bloomberg Developed Markets Large & Mid Cap Net Return Index is a broad market index, capturing global developed markets equities, which is in line with the Compartment investment universe.

- ***Where can the methodology used for the calculation of the designated index be found?***

  https://assets.bbhub.io/professional/sites/27/Global-Equity-Index-Methodology.pdf

Where can I find more product specific information online?

More product-specific information can be found on the website:
https://www.tobam.fr/key-documents-policies/

APPENDIX 8. Most Diversified Portfolio SICAV - TOBAM Anti-Benchmark Canada Equity Fund

Investment Objective, Benchmark of the Compartment

The Compartment's primary investment objective is to be exposed to Canadian equities, by systematically applying the Management Company's investment process, which aims to outperform the reference index by minimising risk factor concentration via a maximally diversified portfolio.

The appreciation in net asset value may be compared with the S&P/TSX Composite Total return index.

The S&P/TSX index is a capitalization-weighted index designed to measure equity market performance of stocks listed on the TSX (Toronto Stock Exchange). This series approximates the minimum possible dividend reinvestment. The dividend is reinvested after deduction of withholding tax by applying the maximum rate of the company's country of incorporation applicable to institutional investors.

For additional information, the index is available on the www.standardandpoors.com website.

The Compartment does not use an index-based management strategy, it is actively managed. As a consequence, its performance may differ substantially from the benchmark, which is used to define the investment universe and determine the global risk profile of the Compartment. The weightings of the Compartment's portfolio holdings may diverge significantly from their equivalent weighting in the index.

Investment strategy of the Compartment

At least 90% of the Compartment's assets are thus constantly kept exposed to Canadian equity markets, including the small-and mid-cap. The Compartment reserves the right to invest up to 100% of its assets in single-underlying Contracts for Differences (CFDs), if justified by market conditions and in order to curb the cost of trading on the various markets. CFDs are futures contracts entered into with a counterparty settled through cash payments rather than through physical delivery of financial instruments. The Compartment may thus take advantage of the (liquidity and pricing) characteristics of these instruments compared with the financial instruments in which it invests directly.

In an objective of diversification, the Fund reserves the right to invest up to 20% of its assets in closed-ended Real Estate Investment Trust (REIT).

The shares to which the Compartment is exposed are selected based on the quantitative and systematic models developed by the Management Company, which help to optimise the level of diversification achieved relative to the S&P/TSX Composite Total Return index. These models also determine both the list of eligible stocks and their portfolio weighting. The sector breakdown may be taken into account to limit concentration into a particular sector.

To maintain exposure as close as possible to the results of the model, the Compartment may build or add to its exposure through American Depository Receipt (ADR) and Global Depository Receipt (GDR), for up to 100% of its net assets, and/or though other OTC contracts in order to enhance risk control and minimise transaction costs. Investments in American Depository Receipt (ADR), Global Depository Receipt (GDR), and Real Estate Investment Trusts (REIT) are made in compliance with the restrictions laid down in Article 41 of the Law.

It may also use forward financial instruments (notably including futures contracts) up to a maximum of one times the assets (maximum leverage of 110%) with a view to making adjustments from time to time owing to movements in subscriptions and redemptions and/or to hedge currency risk.

In order to obtain maximum remuneration of its liquidities, the Compartment can invest in money market instruments for up to 10% of its assets.

In addition, the Compartment may make temporary securities purchases and sales for up to 75% of its assets and also, as ancillary, may make temporary deposits and borrow cash in the event that a debit balance was to appear.

The Compartment qualifies under article 8 of SFDR. The investment strategy does not have a sustainable investment objective but promotes environmental and social characteristics. The strategy notably follows the 4 pillars of TOBAM's SRI policy: exclusion, carbon reduction, ESG integration and responsible stewardship via voting and engagement.

The Management Company considers ESG factors and applies a sustainability approach in its investment process for the Compartment as further detailed in the Appendix 8.1 Environmental and/or Social Characteristics - Pre-contractual disclosures in compliance with SFDR Level II. Description of the asset classes used to achieve the investment objective

The asset classes included in the portfolio are the following:

a) Equities

In pursuit of the strategy presented above, the Compartment will invest in the Canadian equities market that is depending on the outlook as seen by the Management Company, the Compartment may invest in shares of companies listed in Canada, irrespective of the companies' size and the sector of the economy to which they belong. This exposure may be gained either through CFDs or direct securities, depending on market conditions. This exposure will not fall below 90% of the Compartment's assets. The Compartment may build or add to its exposure through American Depository Receipts (ADRs) and Global Depository Receipts (GDRs), for up to 100% of its net assets.

The Compartment may invest up to 20% of its assets in closed-ended Real Estate Investment Trust (REIT).

b) Money market instruments

For treasury purposes, the Compartment may trade, up to 10% of its assets, in money-market instruments (government bonds for OECD states, money-market funds).

In order to achieve its investment objective, if execution of the investment strategy leads the Management Company to opt for CFDs, the portfolio may comprise a significant proportion of instruments (notably certificates of deposit, European commercial paper, treasury bills) with a minimum rating of AA- (S&P) or Aa3 (Moody's). In case of separation between the two ratings, the Management Company will select the lowest rating.

c) Shares or units of investment funds

The Compartment may invest maximum 10% of its assets in shares or units of UCITS which themselves invest maximum 10% of their assets in shares or units of UCITS or investment funds.

These funds may be managed by the Management Company or an affiliated company. The investment strategies of these funds are compatible with that of the Compartment.

The Compartment may invest maximum 10% of its assets in one or more Compartments of the Company.

1) Derivatives used to achieve the investment objective

The Compartment may use financial futures up to a maximum of one time its assets. The Compartment's leveraged exposure may not exceed 110%.

The Compartment will invest in regulated, organized markets and over-the-counter.

The Compartment will use derivatives instrument for hedging and exposure purposes and to achieve the investment objective (including replication of synthetic exposure to baskets of equities or indices).

The hedging derivatives transaction shall aim to cover equity risk and currency risk of the Compartment.

The types of instruments used by the Management Company will mainly be futures on equities or stock market indices, swaps on currencies or equities and CFDs.

2) Deposits and cash

The Compartment may hold, up to 20% of its net assets, ancillary liquid assets which consists of bank deposits at sight such as cash held in current accounts with a bank accessible at any time.

The Compartment may make limited use of other deposits in order to achieve its investment objective, for treasury purposes and/or in in case of unfavourable market conditions.

3) Cash borrowing

The Compartment may borrow up to the equivalent of 10% of its net assets in cash on a temporary basis and for technical needs only.

4) Temporary purchases and sales of securities

The attention of the Shareholders is drawn to the fact that the below wording, reporting the increased use of securities lending, applies as of 29 May 2023.

In addition, the Compartment may engage in security lending for up to 75% of its assets.
The Compartment mayalso, as ancillary, make temporary deposits and borrow cash in the event that a debit balance was to appear.

The Compartment will enter into securities lending transactions opportunistically in circumstances where the Management Company believes that the objective described below could be achieved.

In the context of investments in specials and general collateral the Compartment will use securities lending in order to increase the return of the portfolio.

The expected proportion of the Compartment's assets which may be subject to securities lending depends on the demand of market participants for the securities forming part of the Compartment's portfolio at any time.

This demand depends notably on the interest of such securities, the size of the lendable positions, the presence of specials or securities used as general collateral, the potential duration of the loan (the securities being subject to portfolio adjustments or rebalancing, and thus sell trades), and the type of collateral accepted by the Compartment.

The Compartment's use of, or investment in, securities lending transactions will be as follows:

Type of transaction	Expected proportion	Maximum proportion
Securities lending	0% to 30%	75%

Reference Currency

The reference currency of the Compartment is CAD.

Profile of the Typical Investor

The Compartment is a high-risk vehicle. To determine their level of investment, investors should consider their personal assets, the regulations applicable to them, their current financial needs over a recommended minimum investment horizon of more than five years, and also their willingness to take risks or their preference for a more prudent investment. The recommended minimum investment horizon is more than 5 years.

Form of Shares and Classes

The Share Classes of the Compartment will be issued in registered form

Share Classes	**A** **Isin Code:** **LU1067858131**	**B** **Isin Code:** **LU1067858214**	**Z** **Isin Code:** **LU1666143760**
Currency	CAD	CAD	CAD
Type of Shares	Accumulation		
Target Investors	Institutional investors	All investors	Institutional investors

Minimum initial subscription	10 Shares	1 Share	10 Shares
Minimum holding amount	1 Share	1 Share	1 Share
Valuation Day	Every Business Day, with the exception of days on which the Canadian markets are closed (based on the official Toronto Montreal Exchange Group calendar)		
Management Company Fee	1%	2%	0%
Administration Fee & Depositary Fee	0.20%	0.20%	0.20%
Subscription paid to the Management Company	None	Up to 3%	Up to 5%
Redemption Fee paid to the Management Company	Up to 1%	Up to 1%	Up to 5%
Cut-off	12.00 p.m. CET on the relevant Valuation Day		
Subscription Settlement Day	2 days, according to the official Toronto Montreal Exchange Group calendar following the Valuation Day		

Launch date

This Compartment has been launched by way of a cross-border operation with the French UCITS FCP TOBAM Anti-Benchmark Canada Equity Fund. The launch date of this Compartment was 2 October 2014.

The initial subscription prices of the Share Classes of this Compartment corresponded to the NAV of their equivalent Share Classes in the French UCITS FCP TOBAM Anti-Benchmark Canada Equity Fund.

The Share Class B of this Compartment will be created with the following initial subscription price:

Class:	Initial subscription price:
Class B	CAD 100
Class Z	CAD 10,000

Total Expense Ratio

The latest calculated total expense ratio rate can be found in the Company’s latest financial report.

Risk Management

The method used to calculate overall exposure is the commitment method.

Compartment Specific Risk Factors

The funds will be invested primarily in financial instruments selected by the Management Company. These instruments will be subject to market movements and fluctuations. The Management Company invests according to a systematic, fundamentals-based model: there is a risk that the equities selected may not be the best performing stocks.

1) Equity risk

If the equities or indices to which the portfolio is exposed decline, the Compartment's net asset value will fall.

In the small- and mid-cap markets, the trading volume of listed shares is limited, and so market movements tend to be larger on the downside and also more rapid than for large-cap stocks. The Compartment's net asset value may thus decline more rapidly and more strongly.

Investors' attention is drawn to the fact that small-cap markets are intended to host businesses that, owing to their specific characteristics, may carry risks for investors.

2) Risk associated with the Management Company's investment process

Investors' attention is drawn to the fact that the portfolio is constructed and its assets selected and weighted using processes developed by the Management Company. The Compartment's investment process is based on a systematic model designed to identify signals based on past statistical results.

There is a risk that the model may not be efficient, since there is no guarantee that past market situations will repeat themselves in the future. The aim of the processes developed by TOBAM is to achieve healthy diversification of the Compartment's portfolio, and so use of these processes may lead the Management Company to not select the top-performing assets.

3) Risk associated with the use of financial futures

The Compartment may use some financial futures for up to one times its assets. The Compartment may thus be exposed for up to 110% of its assets to the market, assets, index and economic and/or financial instrument or parameter, which can imply a risk of reduction in the net asset value of the Compartment that might be more significant and quicker that the one observed on the markets where the Compartment is invested.

4) Currency risk

Currency risk is the risk of depreciation in the currencies in which the Compartment invests relative to the reference currency. This currency risk will be managed according to market opportunities and may thus account for a significant proportion of the risk. In the event of depreciation in foreign currencies, investors are thus exposed to a decline in the value of their units.

5) Counterparty risk

The Compartment may incur a loss in the event of default by a counterparty with which certain transactions were conducted, leading to a decline in the Compartment's net asset value.

6) Interest rate risk

This is the risk of depreciation in fixed-income instruments deriving from interest-rate fluctuations. Should interest rates rise, the Compartment's net asset value may decline. The Compartment's exposure to fixed-income products is secondary.

7) Credit risk

This is the risk of depreciation in shares issued by a private-sector issuer or default by the latter. The value of the debt securities in which the Compartment is invested may decline, leading to a fall in net asset value.

Template pre-contractual disclosure for the financial products referred to in Article 8, paragraphs 1, 2 and 2a, of Regulation (EU) 2019/2088 and Article 6, first paragraph, of Regulation (EU) 2020/852

Product name: Most Diversified Portfolio SICAV - TOBAM Anti-Benchmark Canada Equity Fund

Legal entity identifier: 54930057CU5JXSWR8M43

Sustainable investment means an investment in an economic activity that contributes to an environmental or social objective, provided that the investment does not significantly harm any environmental or social objective and that the investee companies follow good governance practices.

The **EU Taxonomy** is a classification system laid down in Regulation (EU) 2020/852, establishing a list of **environmentally sustainable economic activities**. That Regulation does not lay down a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

Environmental and/or social characteristics

Does this financial product have a sustainable investment objective?

☐ **Yes**	☒ **No**
☐ It will make a minimum of **sustainable investments with an environmental objective:** ___%	☒ It **promotes Environmental/Social (E/S) characteristics** and while it does not have as its objective a sustainable investment, it will have a minimum proportion of 40% of sustainable investments
☐ in economic activities that qualify as environmentally sustainable under the EU Taxonomy	☐ with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy
☐ in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy	☒ with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy
	☐ with a social objective
☐ It will make a minimum of **sustainable investments with a social objective:** ___%	☐ It promotes E/S characteristics, but **will not make any sustainable investments**

What environmental and/or social characteristics are promoted by this financial product?

The Compartment's primary investment objective is to be exposed to Canadian equities, by systematically applying the Management Company's investment process, which aims to outperform the reference index by minimizing risk factor concentration via a maximally diversified portfolio.

This process integrates environmental, social and governance (ESG) risks and opportunities to the sustainability of long-term company returns. The Compartment aims to promote low carbon approaches, commitment to climate action and companies with good governance.

In particular, the Compartment aims to promote the following E/S characteristics:

o Low carbon approach by applying a systematic carbon footprint reduction of at least 20% versus the reference investment universe's carbon footprint.

o Promotion of companies with good governance using raw data and their ESG footprint.

The Compartment has designated S&P/TSX Composite Total return Index as a reference index to compare its ESG characteristics, such as carbon emissions or ESG footprint.

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

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

In order to achieve the above characteristics promoted by the Compartment, the Management Company has put in place an ambitious ESG policy made of key pillars and sustainability indicators. The Compartment uses the following sustainability indicators to attain each of the environmental and social characteristics promoted by the Compartment:

- **Carbon Emissions Reduction:** The Management Company applies a systematic carbon footprint reduction of at least 20% versus the S&P/TSX Composite Total return Index's carbon footprint. The calculation of the carbon footprint is based on the greenhouse gas emissions scope 1 (i.e. direct emissions from owned or controlled sources) and scope 2 (i.e. indirect emissions from the generation of purchased energy). Data on emissions used is obtained from a number of sources including company reports, CDP questionnaire (Carbon Disclosure Project) or an estimation model.

- **ESG Footprint:** The Management Company has put in place a strict E, S and G integration process for all listed companies in its investment universe; using officially published data from Bloomberg.

✓ E: For example: existence of climate change / biodiversity / energy efficiency policies; green building, water and waste usage
✓ S: For example: Ethics/Equal opportunity/training/ consumer data protection/whistleblowing policies, CSR committee in place, supply chain management
✓ G: For example: Number of board meetings per year, ratio of independent directors, chairman tenure, ratio of nonexecutive directors in boards

From that raw data, the Management Company has built a proprietary methodology to compute the "E,S,G footprints" of each individual holding in the portfolio and as such determine the overall E,S,G Footprints of the portfolio.

The Management Company has constrained its investment decision-making process to reach E,S,G footprints of the Compartment, at minima at the same level as the E,S,G footprints of the reference index the S&P/TSX Composite Total return index.

- ***What are the objectives of the sustainable investments that the financial product partially intends to make and how does the sustainable investment contribute to such objectives?***

The sustainable investments within the Compartment contribute to Environmental objectives including climate change mitigation and adaptation (however not in the meaning of the Taxonomy Regulation) or commitment to science-based emissions reduction targets ("SBTI").

To determine the share of sustainable investments, the Management Company consider the environmental objective for companies that have:

- A carbon intensity (carbon emissions normalized by the Enterprise Value including Cash) below 80% of the average carbon intensity of the reference the S&P/TSX Composite Total return Index

Or

Made a commitment to the SBTI initiative. (This engagement is followed by the Management Company's research team on an annual basis).

- Are not involved in severe breaches or controversies in regard to the labor rights, human rights, environmental or corruption, and that are not part of the following sectors: tobacco, controversial weapons, coal mining and fossil fuels

And

Have not been targeted by any significant environmental fines over the past years.

- Have a G score for Good Governance practices (as defined by the Management Company ESG Footprint proprietary methodology) in the top 80% of the reference index the S&P/TSX Composite Total return Index.

How do the sustainable investments that the financial product partially intends to make, not cause significant harm to any environmental or social sustainable investment objective?

Companies the Compartment invests in, contribute to achieve the Compartments' carbon reduction objective, ESG footprint commitment while not significantly harming any environmental or social sustainable investment objectives. Before any investment is made by the Compartment (not only sustainable investments but all investments), the investment has to pass a negative screening, further including the consideration of the principal adverse impacts described in the below section. Hence no companies involved in controversial sectors or activities not aligned with TOBAM's policy, can be eligible for investments for the Compartment.

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

The following Principal Adverse Impacts ("PAI") indicators as defined in SFDR Level II have been considered:

- PAI #7 : Activities negatively affecting biodiversity
- PAI #10 : Violations of UN Global Compact principles and OECD guidelines
- PAI #14 : Exposure to Controversial Weapons

The principal adverse impacts on sustainability indicators have been take into account through an exclusionary investment policy.

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

The Management Company will not invest in any company that has been classified as failing to comply with key international norms (ISS Ethix Norm-based screening) such as for example the UN Global Compact Principles, OECD Guidelines for Multinational Enterprises, Guiding Principles on Business and Human rights.

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

The "do no significant harm" principle applies only to those investments underlying the financial product that take into account the EU criteria for environmentally sustainable economic activities. The investments underlying the remaining portion of this financial product do not take into account the EU criteria for environmentally sustainable economic activities.

Any other sustainable investments must also not significantly harm any environmental or social objectives.

Does this financial product consider principal adverse impacts on sustainability factors?

Principal adverse impacts are the most significant negative impacts of investment decisions on sustainability factors relating to environmental, social and employee matters, respect for human rights, anti-corruption and anti-bribery matters.

✖ Yes, the Management Company has committed to monitor the 14 mandatory and 2 optional environmental and social indicators to show the impact of the Compartment's investments against these PAI indicators.

Furthermore, the Compartment considers principal adverse impacts on sustainability factors and only the following PAI have been taken into account into the investment process:

- PAI #1: GHG (Greenhouse Gas) emissions - Scope 1 & 2
- PAI #2: Carbon footprint
- PAI #3: GHG intensity of investee companies

The Compartment by targeting an overall carbon reduction of at least 20% compared to the reference index S&P/TSX Composite Total return Index's carbon footprint, is looking to invest in a combination of stocks that achieve this overall carbon reduction, by considering carbon emissions scope 1 and 2.

- PAI #7: Activities negatively affecting biodiversity

The Management Company proprietary ESG footprint methodology considers raw data published by companies in order to compute an ESG footprint, by notably looking for example at the existence or not of key policies relevant to the biodiversity (for example: biodiversity policy, water usage policy, waste reduction policy, climate change policy…).

In addition to the previous PAI, the following social sustainability indicators have been considered:

- PAI #10: Violations of UN GC principles and (OECD) Guidelines
- PAI #13: Board Gender Diversity
- PAI #14: Exposure to controversial weapons

PAI reports are available on the Compartment annual report.

☐ No

What investment strategy does this financial product follow?

The investment strategy of the Compartment is a Canadian market equities strategy, systematically applying the Management Company's investment process, which aims to outperform the reference index by minimizing risk factor concentration via a maximally diversified portfolio.

The Compartment aims to promote low carbon approaches, commitment to climate action and companies with good governance.

The Management Company applies systematically its ESG methodology in the investment decision-making process.

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

What are the binding elements of the investment strategy used to select the investments to attain each of the environmental or social characteristics promoted by this financial product?

The Compartment applies the following binding elements to select investments and attain the environmental and social characteristics described above:

- **Exclusion policy:** the Management Company applies a general exclusion policy, restricting the investment universe and excluding companies based either on their involvement in certain activities (sector or product based) or based on controversies or breaches to key international norms. The key exclusions used by the Management Company are reflected in the below table:

Sector /Product	**Criteria**
Producer and distributors of tobacco	Limit (5% of the revenues)
Coal and coal-based producers and distributors	Limit (10% of the revenues)
Development, production, maintenance or distribution of controversial and prohibited weapons	Exclusion
Breach or violation of International Treaties, Conventions & Standards such as OECD Guidelines for Multinational Enterprises, ILO Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy, UN Global Compact, Guiding Principles on Business and Human Rights	Exclusion

Further details on the exclusion policy can be found in the following link: https://www.tobam.fr/our-beliefs/exclusion-policy/

- **ESG Integration:** The Management Company has put in place a strict E, S and G integration process for all listed companies in its investment universe; using officially published data from Bloomberg.

✓ E: For example: existence of climate change / biodiversity / energy efficiency policies; green building, water and waste usage

✓ S: For example: Ethics/Equal opportunity/training/ consumer data protection/whistleblowing policies, CSR committee in place, supply chain management

✓ G: For example: Number of board meetings per year, ratio of independent directors, chairman tenure, ratio of nonexecutive directors in boards

From that raw data, the Management Company has built a proprietary methodology to compute the "E,S,G footprints" of each individual holding in the portfolio and as such determine the overall E,S,G Footprints of the portfolio. The E, S and G footprint aggregates and normalizes (for industry, size and regional biases) the information contained in each of the above mentioned items by E, S and G pillar. The normalization also corrects differences in scale of the different pieces of raw data. The final footprint is an equal weighted measure of the three pillars. The Management Company then adds a constraint into its quantitative portfolio optimization process, to ensure that the E, S and G footprints of the respective portfolio (computed based on the holdings' individual E, S and G footprints) are respectively at least at the same level as the E, S and G footprints of the reference index S&P/TSX Composite Total return Index.

- **Carbon Emissions Reduction & Commitment to SBTI:**

In addition, the Management Company analyses the carbon emissions of each holding in its investment universe, computes the carbon footprint of the portfolio and applies a systematic portfolio carbon footprint reduction of at least 20% versus the reference index the S&P/TSX Composite Total return Index's carbon footprint. The calculation of the carbon footprint is based on the greenhouse gas emissions scope 1 and scope 2. Data on emissions used is obtained from a number of sources including company reports, CDP questionnaire (Carbon Disclosure Project) or an estimation model.

The Management Company is also monitoring the companies' commitment to the SBTI as a way to monitor best effort toward more incorporation of best practices. This feature is monitored on a yearly basis.

- **Responsible Ownership:** The Management Company applies a responsible voting policy and has built an ambitious engagement policy to support its commitment to sustainability and address via engagement and dialogues, issues relative to ESG and sustainability.

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

Not applicable.

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

In order to assess good governance practices, the Management Company consider the G scoring of its proprietary ESG footprint methodology, and ensure that the G scoring of the Compartment is matching the reference index S&P/TSX Composite Total return Index's G scoring.

Good governance practices include sound management structures, employee relations, remuneration of staff and tax compliance.

What is the asset allocation planned for this financial product?

#1: 90% of the assets of this Compartment are aligned (promote) E/S characteristics.

#1A: at least 40% of those assets fall under the sustainable share of investment with non EU Taxonomy aligned environmental objectives.

Asset allocation describes the share of investments in specific assets.

These sustainable investments contribute to environmental objectives, including climate change mitigation and adaptation (however not in the meaning of the Taxonomy Regulation) or commitment to SBTI.

The model used by TOBAM for the determination of the sustainable investments combines the pass or fail approach and the weighted-revenue approach with threshold for the carbon emissions and governance.

To determine the share of sustainable investments, the Management Company considers the environmental objective for companies that have:

Environmental objective determined as:

o Companies that have carbon emission intensity (carbon emissions normalized by the Enterprise Value Including Cash) below 80% of the average emissions carbon intensity of the reference index the S&P/TSX Composite Total return Index

Or

o Companies that have made a commitment to the SBTI initiative (this engagement is followed by the Management Company's research team on an annual basis).

Do Not Significantly Harm characteristics:

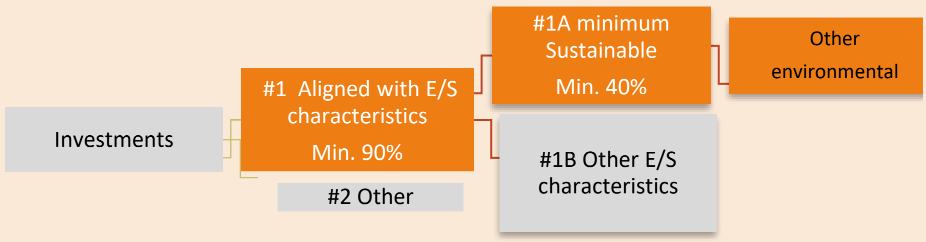
o Companies that are not involved in severe breaches or controversies in regard to the labor rights, human rights, environmental or corruption, and that are not part of the following sectors: tobacco, controversial weapons, coal mining and fossil fuels

And

o Companies that have not been targeted by any significant environmental fines over the past years.

Good Governance practices are defined as companies that have a G score (as defined by the Management Company ESG Footprint proprietary methodology) in the top 80% of the reference index the S&P/TSX Composite Total return Index.

Please note that investments falling under section #1B on the below diagram 'non sustainable investment share of the Compartment', still comply with all of the Compartment ESG policy (exclusions, carbon reduction, ESG footprint, voting & engagement), but did not qualify as a sustainable investment.



#1 Aligned with E/S characteristics includes the investments of the financial product used to attain the environmental or social characteristics promoted by the financial product.

#2Other includes the remaining investments of the financial product which are neither aligned with the environmental or social characteristics, nor are qualified as sustainable investments.

The category **#1 Aligned with E/S characteristics** covers:
- The sub-category **#1A Sustainable** covers sustainable investments with environmental or social objectives.
- The sub-category **#1B Other E/S characteristics** covers investments aligned with the environmental or social characteristics that do not qualify as sustainable investments.

***How does the use of derivatives attain the environmental or social characteristics promoted by the financial product*?**

The Compartment may use financial derivative instruments for investment, efficient portfolio management and/or hedging purposes, and this will not impact in any way the exposure to sustainable assets, or the ESG characteristics of the Compartment.

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

This Compartment commits to a 0% alignment with the EU Taxonomy.

Taxonomy-aligned activities are expressed as a share of:
- **turnover** reflecting the share of revenue from green activities of investee companies
- **capital expenditure** (CapEx) showing the green investments made by investee companies, e.g. for a transition to a green economy.
- **operational expenditure** (OpEx) reflecting green operational activities of investee companies.

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

- ***Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy[1]?***

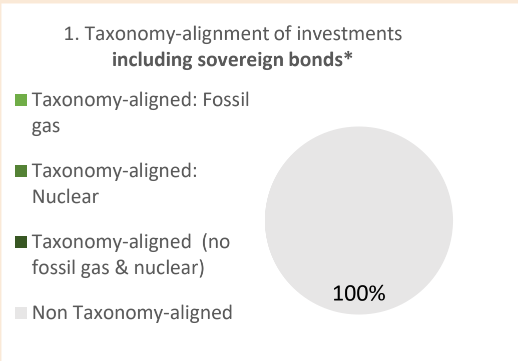
☐ Yes :

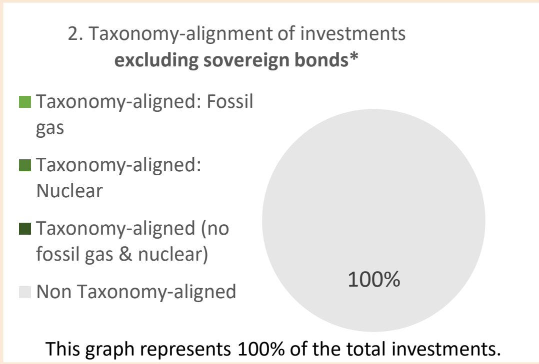
☐ In fossil gas ☐ In nuclear energy

☒ No

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

The two graphs below show in green the minimum percentage of investments that are aligned with the EU Taxonomy. As there is no appropriate methodology to determine the Taxonomy-alignment of sovereign bonds*, the first graph shows the Taxonomy alignment in relation to all the investments of the financial product including sovereign bonds, while the second graph shows the Taxonomy alignment only in relation to the investments of the financial product other than sovereign bonds.





* **For the purpose of these graphs, 'sovereign bonds' consist of all sovereign exposures**

Enabling activities directly enable other activities to make a substantial contribution to an environmental objective.

Transitional activities are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.

- ***What is the minimum share of investments in transitional and enabling activities?***

As the Compartment does not have a minimum Taxonomy alignement, there is no minimum share in transitional and enabling activities.

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

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

The minimum share of sustainable investment with an environmental objective that is not aligned with the EU Taxonomy is 40%.

What is the minimum share of socially sustainable investments?

Not applicable.

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

Investments falling under category "#2 Other", are investments such as derivatives, cash or cash equivalent, not integrating E/S characteristics, where ESG key features and analysis have not been performed, and E/S characteristics not considered.

No minimum environmental or social safeguards apply to the above elements.

Is a specific index designated as a reference benchmark to determine whether this financial product is aligned with the environmental and/or social characteristics that it promotes?

No, but the Compartment has designated a reference benchmark (S&P/TSX Composite Total return Index). This index is used as a reference to compare the Compartment ESG characteristics, such as carbon emissions or ESG footprint, with the reference benchmark.

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

- ***How is the reference benchmark continuously aligned with each of the environmental or social characteristics promoted by the financial product?***

  The reference index used by the Compartment is not an ESG benchmark and is not consistent with the ESG characteristics promoted by the Compartment. All ESG calculations or comparisons are computed using the Compartment's benchmark, as a good proxy of the Compartment investment universe.

- ***How is the alignment of the investment strategy with the methodology of the index ensured on a continuous basis?***

  The reference index the S&P/TSX Composite Total return Index is a capitalization-weighted index designed to measure equity market performance of stocks listed on the TSX (Toronto Stock Exchange), which is in line with the Compartment investment universe.

  The investment universe of the reference index is regularly monitored by the Management Company research team to ensure the consistency with the Compartment's investment universe, in order to ensure relevance of ESG and performance comparisons.

- ***How does the designated index differ from a relevant broad market index?***

  The reference index the S&P/TSX Composite Total return Index is a capitalization-weighted index designed to measure equity market performance of stocks listed on the TSX (Toronto Stock Exchange), which is in line with the Compartment investment universe.

- ***Where can the methodology used for the calculation of the designated index be found?***

  https://www.spglobal.com/spdji/en/indices/equity/sp-tsx-composite-index/#overview

Where can I find more product specific information online?

More product-specific information can be found on the website:
https://www.tobam.fr/key-documents-policies/

APPENDIX 9. Most Diversified Portfolio SICAV - TOBAM Anti-Benchmark All Countries World Equity Fund

Investment Objective, Benchmark of the Compartment

The Compartment's primary investment objective is to be exposed to global developed and emerging market equities, by systematically applying the Management Company's investment process, which aims to outperform the reference index by minimising risk factor concentration via a maximally diversified portfolio.

Changes in the net asset value can be compared to the Bloomberg World Large & Mid Cap Net Return Index.

The Bloomberg World Large & Mid Cap Net Return Index is a capitalization-weighted index designed to measure global developed and emerging equity market performance of stocks. This series approximates the minimum possible dividend reinvestment. The dividend is reinvested after deduction of withholding tax by applying the maximum rate of the company's country of incorporation applicable to institutional investors.

For additional information, the index is available on the www.bloomberg.com/indices.

The Compartment does not use an index-based management strategy, it is actively managed. As a consequence, its performance may differ substantially from the benchmark, which is used to define the investment universe and determine the global risk profile of the Compartment. A majority of the Compartment's equity securities will be components of the benchmark. The weightings of the Compartment's portfolio holdings may diverge significantly from their equivalent weighting in the index.

Investment strategy of the Compartment

At least 90% of the Compartment's assets are thus constantly kept exposed to global developed and emerging equity markets, including the small-and mid-cap. The Compartment reserves the right to invest up to 100% of its assets in single-underlying Contracts for Differences (CFDs), if justified by market conditions and in order to curb the cost of trading on the various markets. CFDs are futures contracts entered into with a counterparty settled through cash payments rather than through physical delivery of financial instruments. The Compartment may thus take advantage of the (liquidity and pricing) characteristics of these instruments compared with the financial instruments in which it invests directly.

In an objective of diversification, the Compartment reserves the right to invest up to 20% of its assets in closed-ended Real Estate Investment Trust (REIT).

The shares to which the Compartment is exposed are selected based on the quantitative and systematic models developed by the Management Company, which help to optimise the level of diversification achieved relative to the Bloomberg World Large & Mid Cap Net Return Index. These models also determine both the list of eligible stocks and their portfolio weighting. The sector breakdown may be taken into account to limit concentration into a particular sector.

To maintain exposure as close as possible to the results of the model, the Compartment may build or add to its exposure through American Depository Receipt (ADR) and Global Depository Receipt (GDR), for up to 100% of its net assets, and/or though other OTC contracts in order to enhance risk control and minimise transaction costs. Investments in American Depository Receipt (ADR), Global Depository Receipt (GDR), and Real Estate Investment Trusts (REIT) are made in compliance with the restrictions laid down in Article 41 of the Law.

It may also use forward financial instruments (notably including futures contracts) up to a maximum of one time the assets (maximum leverage of 110%) with a view to making adjustments from time to time owing to movements in subscriptions and redemptions and/or to hedge currency risk.

In order to obtain maximum remuneration of its liquidities, the Compartment can invest in money market instruments for up to 10% of its assets.

In addition, the Compartment may make temporary securities purchases and sales for up to 75% of its assets and also, as ancillary, may make temporary deposits and borrow cash in the event that a debit balance were to appear.

The Compartment qualifies under article 8 of SFDR. The investment strategy does not have a sustainable investment objective but promotes environmental and social characteristics. The strategy notably follows the 4 pillars of TOBAM's SRI policy: exclusion, carbon reduction, ESG integration and responsible stewardship via voting and engagement.

The Management Company considers ESG factors and applies a sustainability approach in its investment process for the Compartment as further detailed in the Appendix 9.1 Environmental and/or Social Characteristics - Pre-contractual disclosures in compliance with SFDR Level II.

1) Description of the asset classes used to achieve the investment objective

The asset classes included in the portfolio are the following:

a) Equities

In pursuit of the strategy presented above, the Compartment will invest in the global developed and emerging markets that are depending on the outlook as seen by the Management Company. The Compartment may invest in shares of companies listed in the developed and emerging countries, irrespective of the companies' size and the sector of the economy to which they belong. This exposure may be gained either through CFDs or direct securities, depending on market conditions. This exposure will not fall below 90% of the Compartment's assets. The Compartment may build or add to its exposure through American Depository Receipts (ADRs) and Global Depository Receipts (GDRs), for up to 100% of its net assets.

The Compartment may invest up to 20% of its assets in closed-ended Real Estate Investment Trust (REIT).

b) Money market instruments

For treasury purposes, the Compartment may trade, up to 10% of its assets, in money-market instruments (government bonds for OECD states, money-market funds).

In order to achieve its investment objective, if execution of the investment strategy leads the Management Company to opt for CFDs, the portfolio may comprise a significant proportion of instruments (notably certificates of deposit, European commercial paper, treasury bills) with a minimum rating of AA- (S&P) or Aa3 (Moody's). In case of separation between the two ratings, the Management Company will select the lowest rating.

c) Shares or units of investment funds

The Compartment may invest maximum 10% of its assets in shares or units of UCITS which themselves invest maximum 10% of their assets in shares or units of UCITS or investment funds.

These funds may be managed by the Management Company or an affiliated company. The investment strategies of these funds are compatible with that of the Compartment.

The Compartment may invest maximum 10% of its assets in one or more Compartments of the Company.

2) Derivatives used to achieve the investment objective

The Compartment may use financial futures up to a maximum of one time its assets. The Compartment's leveraged exposure may not exceed 110%.

The Compartment will invest in regulated, organized markets and over-the-counter.

The Compartment will use derivatives instrument for hedging and exposure purposes and to achieve the investment objective (including replication of synthetic exposure to baskets of equities or indices).

The hedging derivatives transaction shall aim to cover equity risk and currency risk of the Compartment.

The types of instruments used by the Management Company will mainly be futures on equities or stock market indices, swaps on currencies or equities and CFDs.

3) Deposits and cash

The Compartment may hold, up to 20% of its net assets, ancillary liquid assets which consists of bank deposits at sight such as cash held in current accounts with a bank accessible at any time.

The Compartment may make limited use of other deposits in order to achieve its investment objective, for treasury purposes and/or in in case of unfavourable market conditions.

4) Cash borrowing

The Compartment may borrow up to the equivalent of 10% of its net assets in cash on a temporary basis and for technical needs only.

5) Temporary purchases and sales of securities

The attention of the Shareholders is drawn to the fact that the below wording, reporting the increased use of securities lending, applies as of 29 May 2023.

In addition, the Compartment may engage in security lending for up to 75% of its assets.
The Compartment mayalso, as ancillary, make temporary deposits and borrow cash in the event that a debit balance was to appear.

The Compartment will enter into securities lending transactions opportunistically in circumstances where the Management Company believes that the objective described below could be achieved.

In the context of investments in specials and general collateral the Compartment will use securities lending in order to increase the return of the portfolio.

The expected proportion of the Compartment's assets which may be subject to securities lending depends on the demand of market participants for the securities forming part of the Compartment's portfolio at any time.

This demand depends notably on the interest of such securities, the size of the lendable positions, the presence of specials or securities used as general collateral, the potential duration of the loan (the securities being subject to portfolio adjustments or rebalancing, and thus sell trades), and the type of collateral accepted by the Compartment.

The Compartment's use of, or investment in, securities lending transactions will be as follows:

Type of transaction	Expected proportion	Maximum proportion
Securities lending	0% to 30%	75%

Reference Currency

The reference currency of the Compartment is USD.

Profile of the Typical Investor

The Compartment is a high risk vehicle. To determine their level of investment, investors should consider their personal assets, the regulations applicable to them, their current financial needs over a recommended minimum investment horizon of more than five years, and also their willingness to take risks or their preference for a more prudent investment. The recommended minimum investment horizon is more than 5 years.

Form of Shares and Classes

The Share Classes of the Compartment will be issued in registered form.

Share Classes	**A** **Isin Code:** **LU1067858560**	**B** **Isin Code:** **LU1067858644**	**R1** **Isin Code:** **LU1067858727**	**Z** **Isin Code:** **LU1666143844**
Currency	USD	USD	USD	USD
Type of Shares	Accumulation			
Target Investors	Institutional investors	All investors	All investors	Institutional investors

Minimum initial subscription	10 Shares	1 Share	1 Share	10 Shares
Minimum holding amount	1 Share	1 Share	1 Share	1 Share
Valuation Day	Every Business Day, with the exception of days on which the American markets are closed (based on the official NYSE Euronext calendar)			
Management Company Fee	1.3%	2%	0.63%	0%
Administration Fee & Depositary Fee	0.22%	0.22%	0.22%	0.22%
Subscription Fee paid to the Management Company	None	Up to 3%	Up to 5%	Up to 5%
Redemption Fee paid to the Management Company	Up to 1%	Up to 1%	Up to 1%	Up to 5%
Cut-off	12.00 p.m. CET the Business Day before the relevant Valuation Day			
Subscription / Redemption Settlement Day	2 days, according to the official NYSE Euronext calendar, following the Valuation Day			

R units: these units are intended for "all investors" seeking a low initial investment and a "clean fee" structure. The R "clean fee" share class will not carry any fees payable to distributors.

Launch date

This Compartment has been launched by way of a cross-border operation with the French UCITS FCP TOBAM Anti-Benchmark All Countries World Equity Fund. The launch date of this Compartment was 9 October 2014.

The initial subscription prices of the Share Classes of this Compartment corresponded to the NAV of their equivalent Share Classes in the French UCITS FCP TOBAM Anti-Benchmark All Countries World Equity Fund.

The following Share Classes of this Compartment will be created with the following initial subscription prices:

Class:	Initial subscription prices:
Class B	USD 100
Class R1	USD 100
Class Z	USD 10,000

Total Expense Ratio

The latest calculated total expense ratio rate can be found in the Company's latest financial report.

Risk Management

The method used to calculate overall exposure is the commitment method.

Compartment Specific Risk Factors

The funds will be invested primarily in financial instruments selected by the Management Company. These instruments will be subject to market movements and fluctuations. The Management Company invests according to a systematic, fundamentals-based model: there is a risk that the equities selected may not be the best performing stocks.

1) Equity risk

If the equities or indices to which the portfolio is exposed decline, the Compartment's net asset value will fall.

In the small- and mid-cap markets, the trading volume of listed shares is limited, and so market movements tend to be larger on the downside and also more rapid than for large-cap stocks. The Compartment's net asset value may thus decline more rapidly and more strongly.

Investors' attention is drawn to the fact that small-cap markets are intended to host businesses that, owing to their specific characteristics, may carry risks for investors.

2) Risk associated with the Management Company's investment process

Investors' attention is drawn to the fact that the portfolio is constructed and its assets selected and weighted using processes developed by the Management Company. The Compartment's investment process is based on a systematic model designed to identify signals based on past statistical results.

There is a risk that the model may not be efficient, since there is no guarantee that past market situations will repeat themselves in the future. The aim of the processes developed by TOBAM is to achieve healthy diversification of the Compartment's portfolio, and so use of these processes may lead the Management Company to not select the top-performing assets.

3) Risk associated with the emerging market equities

The equities of emerging countries provide a more limited liquidity than equities of developed countries. Consequently, the possession of these securities may increase the level of portfolio risk. The movements of market decline may be greater and faster than in developed countries, the net asset value may decline more sharply and quickly.

4) Risk associated with the use of financial futures

The Compartment may use some financial futures for up to one times its assets. The Compartment may thus be exposed for up to 110% of its assets to the market, assets, index and economic and/or financial instrument or parameter, which can imply a risk of reduction in the net asset value of the Compartment that might be more significant and quicker that the one observed on the markets where the Compartment is invested.

5) Currency risk

Currency risk is the risk of depreciation in the currencies in which the Compartment invests relative to the reference currency. This currency risk will be managed according to market opportunities and may thus account for a significant proportion of the risk. In the event of depreciation in foreign currencies, investors are thus exposed to a decline in the value of their units.

6) Counterparty risk

The Compartment may incur a loss in the event of default by a counterparty with which certain transactions were conducted, leading to a decline in the Compartment's net asset value.

7) Interest rate risk

This is the risk of depreciation in fixed-income instruments deriving from interest-rate fluctuations. Should interest rates rise, the Compartment's net asset value may decline. The Compartment's exposure to fixed-income products is secondary.

8) Credit risk

This is the risk of depreciation in shares issued by a private-sector issuer or default by the latter. The value of the debt securities in which the Compartment is invested may decline, leading to a fall in net asset value.

Template pre-contractual disclosure for the financial products referred to in Article 8, paragraphs 1, 2 and 2a, of Regulation (EU) 2019/2088 and Article 6, first paragraph, of Regulation (EU) 2020/852

Product name: Most Diversified Portfolio SICAV - TOBAM Anti-Benchmark All Countries World Equity Fund

Legal entity identifier: 549300BQ5SNT8TIDR187

Sustainable investment means an investment in an economic activity that contributes to an environmental or social objective, provided that the investment does not significantly harm any environmental or social objective and that the investee companies follow good governance practices.

The **EU Taxonomy** is a classification system laid down in Regulation (EU) 2020/852, establishing a list of **environmentally sustainable economic activities**. That Regulation does not lay down a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

Environmental and/or social characteristics

Does this financial product have a sustainable investment objective?

☐ **Yes**

☒ **No**

☐ It will make a minimum of **sustainable investments with an environmental objective:** ___%

- ☐ in economic activities that qualify as environmentally sustainable under the EU Taxonomy
- ☐ in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy

☐ It will make a minimum of **sustainable investments with a social objective:** ___%

☒ It **promotes Environmental/Social (E/S) characteristics** and while it does not have as its objective a sustainable investment, it will have a minimum proportion of 40% of sustainable investments

- ☐ with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy
- ☒ with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy
- ☐ with a social objective

☐ It promotes E/S characteristics, but **will not make any sustainable investments**

What environmental and/or social characteristics are promoted by this financial product?

The Compartment's primary investment objective is to be exposed to global developed and emerging market equities, by systematically applying the Management Company's investment process, which aims to outperform the reference index by minimizing risk factor concentration via a maximally diversified portfolio.

This process integrates environmental, social and governance (ESG) risks and opportunities to the sustainability of long-term company returns. The Compartment aims to promote low carbon approaches, commitment to climate action and companies with good governance.

In particular, the Compartment aims to promote the following E/S characteristics:

- Low carbon approach by applying a systematic carbon footprint reduction of at least 20% versus the reference investment universe's carbon footprint,
- Promotion of companies with good governance using raw data and their ESG footprint.

The Compartment has designated Bloomberg World Large & Mid Cap Net Return Index as a reference index to compare its ESG characteristics, such as carbon emissions or ESG footprint.

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

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

In order to achieve the above characteristics promoted by the Compartment, the Management Company has put in place an ambitious ESG policy made of key pillars and sustainability indicators. The Compartment uses the following sustainability indicators to attain each of the environmental and social characteristics promoted by the Compartment:

- **Carbon Emissions Reduction:** The Management Company applies a systematic carbon footprint reduction of at least 20% versus the reference index the Bloomberg World Large & Mid Cap Net Return Index's carbon footprint. The calculation of the carbon footprint is based on the greenhouse gas emissions scope 1 (i.e. direct emissions from owned or controlled sources) and scope 2 (i.e. indirect emissions from the generation of purchased energy) according to GHG Protocol Corporate Standard. Data on emissions used is obtained from a number of sources including company reports, CDP questionnaire (Carbon Disclosure Project) or an estimation model.

- **ESG Footprint:** The Management Company has put in place a strict E, S and G integration process for all listed companies in its investment universe; using officially published data from Bloomberg.

✓ E: For example: existence of climate change / biodiversity / energy efficiency policies; green building, water and waste usage
✓ S: For example: Ethics/Equal opportunity/training/ consumer data protection/whistleblowing policies, CSR committee in place, supply chain management
✓ G: For example: Number of board meetings per year, ratio of independent directors, chairman tenure, ratio of nonexecutive directors in boards

From that raw data, the Management Company has built a proprietary methodology to compute the "E,S,G footprints" of each individual holding in the portfolio and as such determine the overall E,S,G Footprints of the portfolio.

The Management Company has constrained its investment decision-making process to reach E,S,G footprints of the Compartment, at minima at the same level as the E,S,G footprints of the reference index the Bloomberg World Large & Mid Cap Net Return Index.

- ***What are the objectives of the sustainable investments that the financial product partially intends to make and how does the sustainable investment contribute to such objectives?***

The sustainable investments within the Compartment contribute to Environmental objectives including climate change mitigation and adaptation (however not in the meaning of the Taxonomy Regulation) or commitment to science-based emissions reduction targets ("SBTI").

To determine the share of sustainable investments, the Management Company consider the environmental objective for companies that have:

- A carbon intensity (carbon emissions normalized by the Enterprise Value including Cash) below 80% of the average carbon intensity of the reference index the Bloomberg World Large & Mid Cap Net Return Index

Or

Made a commitment to the SBTI initiative. (This engagement is followed by the Management Company's research team on an annual basis).

- Are not involved in severe breaches or controversies in regard to the labor rights, human rights, environmental or corruption, and that are not part of the following sectors: tobacco, controversial weapons, coal mining and fossil fuels

And

Have not been targeted by any significant environmental fines over the past years.

- Have a G score for Good Governance practices (as defined by the Management Company ESG Footprint proprietary methodology) in the top 80% of the reference index the Bloomberg World Large & Mid Cap Net Return Index.

How do the sustainable investments that the financial product partially intends to make, not cause significant harm to any environmental or social sustainable investment objective?

Companies the Compartment invests in, contribute to achieve the Compartments' carbon reduction objective, ESG footprint commitment while not significantly harming any environmental or social sustainable investment objectives. Before any investment is made by the Compartment (not only sustainable investments but all investments), the investment has to pass a negative screening, further including the consideration of the principal adverse impacts described in the below section. Hence no companies involved in controversial sectors or activities not aligned with TOBAM's policy, can be eligible for investments for the Compartment.

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

The following Principal Adverse Impacts ("PAI") indicators as defined in SFDR Level II have been considered:

- PAI #7 : Activities negatively affecting biodiversity
- PAI #10 : Violations of UN Global Compact principles and OECD guidelines
- PAI #14 : Exposure to Controversial Weapons

The principal adverse impacts on sustainability indicators have been taken into account through an exclusionary investment policy.

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

The Management Company will not invest in any company that has been classified as failing to comply with key international norms (ISS Ethix Norm-based screening) such as for example the UN Global Compact Principles, OECD Guidelines for Multinational Enterprises, Guiding Principles on Business and Human rights.

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

The "do no significant harm" principle applies only to those investments underlying the financial product that take into account the EU criteria for environmentally sustainable economic activities. The investments underlying the remaining portion of this financial product do not take into account the EU criteria for environmentally sustainable economic activities.

Any other sustainable investments must also not significantly harm any environmental or social objectives.

Principal adverse impacts are the most significant negative impacts of investment decisions on sustainability factors relating to environmental, social and employee matters, respect for human rights, anti-corruption and anti-bribery matters.

Does this financial product consider principal adverse impacts on sustainability factors?

✖ Yes, the Management Company has committed to monitor the 14 mandatory and 2 optional environmental and social indicators to show the impact of the Compartment's investments against these PAI indicators.

Furthermore, the Compartment considers principal adverse impacts on sustainability factors and only the following PAI have been taken into account into the investment process:

- PAI #1: GHG (Greenhouse Gas) emissions - Scope 1 & 2
- PAI #2: Carbon footprint
- PAI #3: GHG intensity of investee companies

The Compartment by targeting an overall carbon reduction of at least 20% compared to the reference index Bloomberg World Large & Mid Cap Net Return Index's carbon footprint, is looking to invest in a combination of stocks that achieve this overall carbon reduction, by considering carbon emissions scope 1 and 2.

- PAI #7: Activities negatively affecting biodiversity

The Management Company proprietary ESG footprint methodology considers raw data published by companies in order to compute an ESG footprint, by notably looking for example at the existence or not of key policies relevant to the biodiversity (for example: biodiversity policy, water usage policy, waste reduction policy, climate change policy…).

In addition to the previous PAI, the following social sustainability indicators have been considered:

- PAI #10: Violations of UN Global Compact principles and (OECD) Guidelines
- PAI #13: Board Gender Diversity

- PAI #14: Exposure to controversial weapons

PAI reports are available on the Compartment annual report.

☐ No

What investment strategy does this financial product follow?

The investment strategy of this Compartment is a global developed and emerging market equities strategy, systematically applying the Management Company's investment process, which aims to outperform the reference index by minimizing risk factor concentration via a maximally diversified portfolio.

The Compartment aims to promote low carbon approaches, commitment to climate action and companies with good governance.

The Management Company applies systematically its ESG methodology in the investment decision-making process.

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

What are the binding elements of the investment strategy used to select the investments to attain each of the environmental or social characteristics promoted by this financial product?

The Compartment applies the following binding elements to select investments and attain the environmental and social characteristics described above:

- **Exclusion policy:** the Management Company applies a general exclusion policy, restricting the investment universe and excluding companies based either on their involvement in certain activities (sector or product based) or based on controversies or breaches to key international norms. The key exclusions used by the Management Company are reflected in the below table:

Sector /Product	**Criteria**
Producer and distributors of tobacco	Limit (5% of the revenues)
Coal and coal-based producers and distributors	Limit (10% of the revenues)
Development, production, maintenance or distribution of controversial and prohibited weapons	Exclusion
Breach or violation of International Treaties, Conventions & Standards such as OECD Guidelines for Multinational Enterprises, ILO Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy, UN Global Compact, Guiding Principles on Business and Human Rights	Exclusion

Further details on the exclusion policy can be found in the following link: https://www.tobam.fr/our-beliefs/exclusion-policy/.

- **ESG Integration:** The Management Company has put in place a strict E, S and G integration process for all listed companies in its investment universe; using officially published data from Bloomberg.

✓ E: For example: existence of climate change / biodiversity / energy efficiency policies; green building, water and waste usage

✓ S: For example: Ethics/Equal opportunity/training/ consumer data protection/whistleblowing policies, CSR committee in place, supply chain management

✓ G: For example: Number of board meetings per year, ratio of independent directors, chairman tenure, ratio of nonexecutive directors in boards.

From that raw data, the Management Company has built a proprietary methodology to compute the "E,S,G footprints" of each individual holding in the portfolio and as such determine the overall E,S,G Footprints of the portfolio. The E, S and G footprint aggregates and normalizes (for industry, size and regional biases) the information contained in each of the above mentioned items by E, S and G pillar. The normalization also corrects differences in scale of the different pieces of raw data. The final footprint is an equal weighted measure of the three pillars. The Management Company then adds a constraint into its quantitative portfolio optimization process, to ensure that the E, S and G footprints of the respective portfolio (computed based on the holdings' individual E, S and G footprints) are respectively at least at the same level as the E, S and G footprints of the reference index Bloomberg World Large & Mid Cap Net Return Index.

- **Carbon reduction and commitment to SBTI:**

In addition, the Management Company analyses the carbon emissions of each holding in its investment universe, computes the carbon footprint of the portfolio and applies a systematic portfolio carbon footprint reduction of at least 20% versus the reference index the Bloomberg World Large & Mid Cap Net Return Index's carbon footprint. The calculation of the carbon footprint is based on the greenhouse gas emissions scope 1 and scope 2. Data on emissions used is obtained from a number of sources including company reports, CDP questionnaire (Carbon Disclosure Project) or an estimation model.

The Management Company is also monitoring the companies' commitment to the SBTI as a way to monitor best effort toward more incorporation of best practices. This feature is monitored on a yearly basis.

- **Responsible Ownership:** The Management Company applies a responsible voting policy and has built an ambitious engagement policy to support its commitment to sustainability and address via engagement and dialogues, issues relative to ESG and sustainability.

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

Not applicable.

Good governance practices include sound management structures, employee relations, remuneration of staff and tax compliance.

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

In order to assess good governance practices, the Management Company consider the G scoring of its proprietary ESG footprint methodology, and ensure that the G scoring of the portfolio is matching the reference index Bloomberg World Large & Mid Cap Net Return Index's G scoring.

Asset allocation describes the share of investments in specific assets.

What is the asset allocation planned for this financial product?

#1: 90% of the assets of this Compartment are aligned (promote) E/S characteristics.

#1A: at least 40% of those assets fall under the sustainable share of investment with non EU Taxonomy aligned environmental objectives.

These sustainable investments contribute to environmental objectives, including climate change mitigation and adaptation (however not in the meaning of the Taxonomy Regulation) or commitment to SBTI.

The model used by TOBAM for the determination of the sustainable investments combines the pass or fail approach and the weighted-revenue approach with threshold for the carbon emissions and governance.
To determine the share of sustainable investments, the Management Company considers the environmental objective for companies that have:

Environmental objective determined as:

- Companies that have carbon emission intensity (carbon emissions normalized by the Enterprise Value Including Cash) below 80% of the average emissions carbon intensity of the reference index the Bloomberg World Large & Mid Cap Net Return Index

Or

- Companies that have made a commitment to the SBTI initiative (this engagement is followed by the Management Company's research team on an annual basis).

Do Not Significantly Harm characteristics:

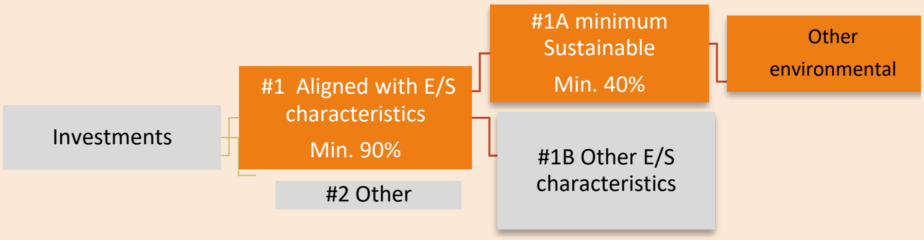
- Companies that are not involved in severe breaches or controversies in regard to the labor rights, human rights, environmental or corruption, and that are not part of the following sectors: tobacco, controversial weapons, coal mining and fossil fuels

And

- Companies that have not been targeted by any significant environmental fines over the past years.

Good Governance practices are defined as companies that have a G score (as defined by the Management Company ESG Footprint proprietary methodology) in the top 80% of the reference index the Bloomberg World Large & Mid Cap Net Return Index.

Please note that investments falling under section #1B on the below diagram 'non sustainable investment share of the Compartment', still comply with all of the Compartment ESG policy (exclusions, carbon reduction, ESG footprint, voting & engagement), but did not qualify as a sustainable investment.



#1 Aligned with E/S characteristics includes the investments of the financial product used to attain the environmental or social characteristics promoted by the financial product.

#2Other includes the remaining investments of the financial product which are neither aligned with the environmental or social characteristics, nor are qualified as sustainable investments.

The category **#1 Aligned with E/S characteristics** covers:
- The sub-category **#1A Sustainable** covers sustainable investments with environmental or social objectives.
- The sub-category **#1B Other E/S characteristics** covers investments aligned with the environmental or social characteristics that do not qualify as sustainable investments.

- ***How does the use of derivatives attain the environmental or social characteristics promoted by the financial product*?**

The Compartment may use financial derivative instruments for investment, efficient portfolio management and/or hedging purposes, and this will not impact in any way the exposure to sustainable assets, or the ESG characteristics of the Compartment.

Taxonomy-aligned activities are expressed as a share of:
- **turnover** reflecting the share of revenue from green activities of investee companies
- **capital expenditure** (CapEx) showing the green investments made by investee companies, e.g. for a transition to a green economy.
- **operational expenditure** (OpEx) reflecting green operational activities of investee companies.

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

This Compartment commits to a 0% alignment with the EU Taxonomy.

- ***Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy*[1]?**

☐ Yes :

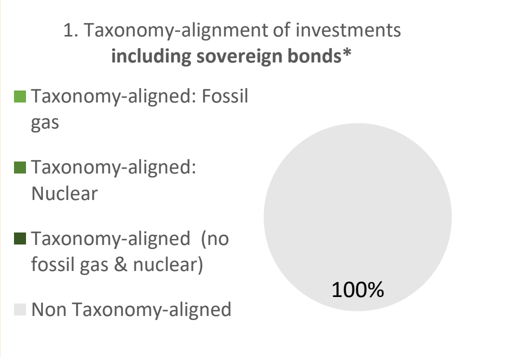
☐ In fossil gas ☐ In nuclear energy

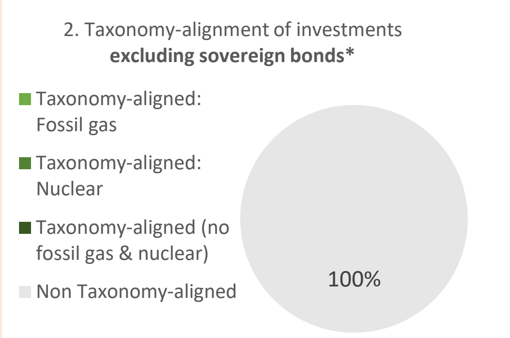
☒ No

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

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

The two graphs below show in green the minimum percentage of investments that are aligned with the EU Taxonomy. As there is no appropriate methodology to determine the Taxonomy-alignment of sovereign bonds*, the first graph shows the Taxonomy alignment in relation to all the investments of the financial product including sovereign bonds, while the second graph shows the Taxonomy alignment only in relation to the investments of the financial product other than sovereign bonds.





This graph represents 100% of the total investments.

*** For the purpose of these graphs, 'sovereign bonds' consist of all sovereign exposures**

Enabling activities directly enable other activities to make a substantial contribution to an environmental objective.

Transitional activities are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.

What is the minimum share of investments in transitional and enabling activities?

As the Compartment does not have a minimum Taxonomy alignement, there is no minimum share in transitional and enabling activities.

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

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

The minimum share of sustainable investments with an environmental objective that is not aligned with the EU Taxonomy is 40%.

What is the minimum share of socially sustainable investments?

Not applicable.

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

Investments falling under category "#2 Other", are investments such as derivatives, cash or cash equivalent, not integrating E/S characteristics, where ESG key features and analysis have not been performed, and E/S characteristics not considered.

No minimum environmental or social safeguards apply to the above elements.

Is a specific index designated as a reference benchmark to determine whether this financial product is aligned with the environmental and/or social characteristics that it promotes?

No, but the Compartment has designated a reference benchmark (Bloomberg World Large & Mid Cap Net Return Index). This index is used as a reference to compare the Compartment ESG characteristics, such as carbon emissions or ESG footprint, with the reference benchmark.

- ***How is the reference benchmark continuously aligned with each of the environmental or social characteristics promoted by the financial product?***

  The reference index used by the Compartment is not an ESG benchmark and is not consistent with the ESG characteristics promoted by the Compartment. All ESG calculations or comparisons are computed using Bloomberg World Large & Mid Cap Net Return Index k, as a good proxy of the Compartment investment universe.

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

- ***How is the alignment of the investment strategy with the methodology of the index ensured on a continuous basis?***

  The reference index the Bloomberg World Large & Mid Cap Net Return Index is a broad market index, capturing developed and emerging markets equities, which is in line with the Compartment investment universe.

  The investment universe of the reference index is regularly monitored by the Management Company research team to ensure the consistency with the Compartment's investment universe, in order to ensure relevance of ESG and performance comparisons.

- ***How does the designated index differ from a relevant broad market index?***

  The reference index the Bloomberg World Large & Mid Cap Net Return Index is a broad market index, capturing developed and emerging markets equities, which is in line with the Compartment investment universe.

- ***Where can the methodology used for the calculation of the designated index be found?***

  https://assets.bbhub.io/professional/sites/27/Global-Equity-Index-Methodology.pdf

Where can I find more product specific information online?

More product-specific information can be found on the website:
https://www.tobam.fr/key-documents-policies/

APPENDIX 10. Most Diversified Portfolio SICAV – TOBAM Anti-Benchmark Global Investment Grade Fund

Investment Objective, Benchmark of the Compartment

The Compartment's primary investment objective is to outperform the reference index and provide long-term capital appreciation to Global Credit and Fixed Income securities denominated in USD, CAD, EUR, GBP, JPY and AUD.

Following the Management Company's investment approach, the strategy aims to maintain a high degree of diversification when selecting securities and their weightings in the investment universe.

The Management Company invests according to a quantitative, fundamentals-based model: there is a risk that the securities selected may not be the best performing.

The appreciation in net asset value may be compared to the ICE BofAML Global Corporate Index (Bloomberg ticker: G0BC).

This Compartment is not managed as an index-tracking vehicle, it is actively managed. As a consequence, its performance may diverge significantly from the benchmark index, which is used to define the investment universe and determine the global risk profile of the Compartment.

Investment strategy of the Compartment

At least 60% of the Compartment's assets will be invested in Global Credit and Fixed Income markets, including Global Investment Grade debt (i.e. securities whose average rating as defined by ICE is BBB3 or above).

For additional information, the index is available on https://indices.theice.com website.

Security selection is achieved through technical and fundamental analysis, conducted within a universe of well diversified bonds, in order to deliver a highly diversified portfolio of attractive issues. At least, 70% of the securities selected will be included in the ICE BofAML Global Corporate Index. The weightings of the Compartment's portfolio holdings may diverge significantly from their equivalent weighting in the index.

The Compartment may invest up to 15% of its assets in securities that have a rating below Investment Grade for diversification purposes.

The range of interest-rate sensitivity within which the Compartment is managed is between 0 and 10.

The Compartment may invest up to 5% in distressed and defaulted securities.

The Compartment may also use forward financial instruments (notably including futures contracts), Credit Default Swaps and their indices, iBoxx Standardized Total Return Swaps and Interest Rate Swaps up to a maximum of one time the assets for the purpose of pursuing its investment goal and with a view to making duration adjustments.

In order to obtain maximum remuneration of its liquidity, the Compartment can invest in money market instruments up to 30% of its assets.

In addition, the Compartment may engage in security lending for up to 75% of its assets and, as ancillary, may make temporary deposits and borrow cash in the event that a debit balance was to appear.

The Compartment qualifies under article 8 of SFDR. The investment strategy does not have a sustainable investment objective but promotes environmental and social characteristics. The strategy notably follows the 4 pillars of TOBAM's SRI policy: exclusion, carbon reduction, ESG integration and responsible stewardship via engagement.

The Management Company considers ESG factors and applies a sustainability approach in its investment process for the Compartment as further detailed in the Appendix 10.1 Environmental and/or Social Characteristics – Pre-contractual disclosures in compliance with SFDR Level II. Description of the asset classes used to achieve the investment objective

The asset classes included in the portfolio are the following:

a) Fixed Income Securities

In pursuit of the strategy presented above, the Compartment will invest in Global Credit and Fixed Income Securities. Depending on the outlook of the Management Company, the Compartment may invest in Global Investment Grade Corporates or High Yield Corporates, irrespective of the issuance' size and the sector of the economy to which they belong. This exposure will not fall below 60% of the Compartment's assets.

b) Money market instruments

For treasury purposes, the Compartment may trade, up to 30% of its assets, in money-market instruments (US government bonds, money-market funds) of which maximum 10% in Money Market Funds.

c) Shares or units of investment funds:

The Compartment may invest maximum 10% of its assets in shares or units of UCITS which themselves invest maximum 10% of their assets in shares or units of UCITS or investment funds.

These funds may be managed by the Management Company or an affiliated company. The investment strategies of these funds are compatible with that of the Compartment.

The Compartment may invest maximum 10% of its assets in one or more Compartments of the Company.

1) Derivatives used to achieve the investment objective

The Compartment may use financial futures, Credit Default Swaps and their indices, iBoxx Standardized Total Return Swaps up to a maximum of one time its assets.

The Compartment will invest in regulated, organized markets and over-the-counter.

The Compartment will use derivatives instrument for hedging and exposure purposes and to achieve the investment objective.

The types of instruments used by the Management Company will mainly be futures contracts, credit default swaps and their indices, iBoxx Standardized Total Return Swaps and Interest Rate swaps. Credit derivatives, be it CDS indices or TRS on credit cash indices will be used opportunistically in circumstances where the Management Company believes that the objective described below could be achieved.

The Compartment will use TRS for liquidity management purpose in order to keep cash amount to face potential redemption without incurring transaction costs while maintaining the Compartment's overall exposure in line with its mandate.

The Compartment's use of, or investment in, TRS will be as follows:

Type of transaction	Expected proportion	Maximum proportion
Total Return Swaps	0% to 10%	30%

2) Deposits and cash

The Compartment may hold, up to 20% of its net assets, ancillary liquid assets which consists of bank deposits at sight such as cash held in current accounts with a bank accessible at any time.

The Compartment may make limited use of other deposits in order to achieve its investment objective, for treasury purposes and/or in in case of unfavourable market conditions.

3) Cash borrowing

The Compartment may borrow up to the equivalent of 10% of its net assets in cash on a temporary basis and for technical needs only.

4) Temporary purchases and sales of securities

The attention of the Shareholders is drawn to the fact that the below wording, reporting the discontinuation of securities lending transactions and the introduction of repurchase transactions, applies as of 29 May 2023.

In addition, the Compartment may engage in repurchase transactions for up to 75% of its assets.
The Compartment may also, as ancillary, make temporary deposits and borrow cash in the event that a debit balance was to appear.

The Compartment will enter into repurchase transactions opportunistically in circumstances where the Management Company believes that the objective described below could be achieved.

In the context of investments in specials and general collateral the Compartment will use repurchase in order to increase the return of the portfolio.

The expected proportion of the Compartment's assets which may be subject to repurchase transactions depends on the demand of market participants for the transactions forming part of the Compartment's portfolio at any time.

This demand depends notably on the interest of such securities, the size of the lendable positions, the presence of specials or securities used as general collateral, the potential duration of the loan (the securities being subject to portfolio adjustments or rebalancing, and thus sell trades), and the type of collateral accepted by the Compartment.

The Compartment's use of, or investment in, repurchase transactions will be as follows:

Type of transaction	Expected proportion	Maximum proportion
Repurchase transactions	0% to 30%	75%

Form of Shares and Classes

Share Classes	**A** **Isin Code:** **LU1067859451**	**A1** **Isin Code :** **LU1991025245**	**A4** **Isin Code:** **LU2451275379**	**B** **Isin Code:** **LU1067859535**	**R1** **Isin Code :** **LU1382363312**	**Z** **Isin Code:** **LU1666143927**	**Z1** **Isin Code:** **LU1991025328**	**Z2** **Isin Code:** **LU2010630437**
Currency	USD	USD	CHF	USD	USD	USD	EUR	USD
Type of Shares	Accumulation							Distribution
Target Investors	Institutional investors	Institutional investors	Institutional investors	All investors	All investors	Institutional investors	Institutional investors	Institutional investors
Minimum initial subscription	10 Shares	10 Shares	10 Shares	1 Share	1 Share	10 Shares	10 Shares	10 Shares
Minimum holding amount	1 Share	1 Share	1 Share	1 Share	1 Share	1 Share	1 Share	1 Share
Valuation Day	Every Business Day with the exception of public holidays and non-settlement days for exchanges based in the UK, France, Luxembourg and days on which US markets are closed or close early (based on the official US Government Bond Market Calendar)							

Management Company Fee	Up to 0.55%	Up to 0.55%	Up to 0.55%	1.10%	0.45%	0%	0%	0%
Administration Fee & Depositary Fee	0.20%	0.20%	0.20%	0.20%	0.20%	0.20%	0.20%	0.20%
Hedge	Unhedged	Hedged against foreign exchange risk*	Hedged against foreign exchange risk*	Unhedged	Hedged against foreign exchange risk*	Unhedged	Hedged against foreign exchange risk*	Unhedged
Subscription Fee paid to the Management Company	Up to 0.5%	Up to 0.5%	Up to 0.5%	Up to 3%	Up to 5%	Up to 5%	Up to 5%	Up to 5%
Redemption Fee paid to the Management Company	None	None	None	Up to 1%	Up to 1%	Up to 5%	Up to 5%	Up to 5%
Cut-off	12.00 p.m. CET the Business Day before the relevant valuation day							
Subscription / Redemption Settlement Day	2 days, according to the official US Government Bond Market Calendar following the Valuation Day							

Reference Currency

The reference currency of the Compartment is USD.

Profile of the Typical Investor

The Compartment is a high risk vehicle. To determine their level of investment, investors should consider their personal assets, the regulations applicable to them, their current financial needs over a recommended minimum investment horizon of more than five years, and also their willingness to take risks or their preference for a more prudent investment. The recommended minimum investment horizon is more than five years.

Form of Shares and Classes

The Share Classes of the Compartment will be issued in registered form.

R units: these units are intended for “all investors” seeking a low initial investment and a “clean fee” structure. The R “clean fee” share class will not carry any fees payable to distributors.

** Share Classes A1, A4, Z1 and R1 are hedged against foreign exchange risk with a 10% tolerance.*

The Share Classes A1, A4, R1 and Z1 do not hedge currency risk against the reference currency of the Compartment (USD) but hedge the foreign exchange risk of all currency exposures held in the portfolio against the currency of the *concerned share class (USD for A1 and R1, CHF for A4, EUR for the Z1 class). The reference benchmarks for each of these share classes will be the BofA Merrill Lynch Global High Yield Index hedged in the share class currency (USD for A1 and R1, CHF for A4, EUR for the Z1 class).*

Launch date

The initial subscription date for the Compartment was on 12 May 2014 with the following initial subscription prices:

Class	Initial subscription prices
Class A	USD 10,000
Class A1	USD 10,000
Class A4	CHF 10,000
Class B	USD 100
Class R1	USD 100
Class Z	USD 10,000
Class Z1	EUR 10,000
Class Z2	USD 10,000

Total Expense Ratio

The latest calculated total expense ratio rate can be found in the Company's latest financial report.

Risk Management

The method used to calculate overall exposure is the commitment method.

Compartment Specific Risk Factors

The funds will be invested primarily in financial instruments selected by the Management Company. These instruments will be subject to market movements and fluctuations. The Management Company invests according to a quantitative, fundamentals-based model: there is a risk that the securities selected may not be the best performing stocks.

1) Capital risk

The Fund does not carry any guarantee or protection, and the capital invested at the outset may not be returned in full.

2) Credit risk

This is the risk of depreciation in debt securities issued by a private-sector issuer or default by the latter. The value of the debt securities in which the Compartment is invested may decline, leading to a fall in net asset value.

3) High Yield Bond risk

Investments in High Yield bonds can involve a substantial risk of loss. High Yield bonds are considered to be speculative with respect to the issuer's ability to pay interest and principal. These securities, which are rated below investment grade, have a higher risk of issuer default, are subject to greater price volatility than investment grade securities and may be illiquid.

4) Interest rate risk

This is the risk of depreciation in fixed-income instruments deriving from interest-rate fluctuations. Should interest rates rise, the Compartment's net asset value may decline.

5) Counterparty risk

The Compartment may incur a loss in the event of default by a counterparty with which certain transactions were conducted, leading to a decline in the Compartment's net asset value.

6) Currency risk

Currency risk is the risk that the investment currencies may weaken in relation to the base currency of the portfolio (US dollar). In the event of depreciation in foreign currencies, investors are thus exposed to a decline in the value of their units. The A, B and Z Share classes are exposed to currency risk. A1, A4, R1 and Z1 Share classes are hedged with regard to currency risk back in the currency of the share and are thus minimally exposed to the risk of a depreciation of foreign currencies against the shareclass currency.

7) Risk associated with the Management Company's investment process

Investors' attention is drawn to the fact that the portfolio is constructed and its assets selected and weighted using processes developed by the Management Company. The Compartment's investment process is based on a model designed to identify signals based on past statistical results.

There is a risk that the model may not be efficient, since there is no guarantee that past market situations will repeat themselves in the future. The aim of the processes developed by TOBAM is to achieve healthy diversification of the Compartment's portfolio, and so use of these processes may lead the Management Company to not select the top-performing assets.

8) Risk associated with the use of derivatives

The Compartment may use some derivatives for up to one time its assets.

9) Distressed securities risk

Distressed Securities Investment in a security issued by a company that is either in default or in high risk of default ("Distressed Securities") involves significant risk. Such investments will only be made when the Management Company believes either that the security trades at a materially different level from the Management company's perception of fair value or that it is reasonably likely that the issuer of the securities will make an exchange offer or will be the subject of a plan of reorganisation; however, there can be no assurance that such an exchange offer will be made or that such a plan of reorganisation will be adopted or that any securities or other assets received in connection with such an exchange offer or plan of reorganisation will not have a lower value or income potential than anticipated when the investment was made. In addition, a significant period of time may pass between the time at which the investment in Distressed Securities is made and the time that any such exchange offer or plan of reorganisation is completed. During this period, it is unlikely that any interest payments on the Distressed Securities will be received, there will be significant uncertainty as to whether fair value will be achieved or not and the exchange offer or plan of reorganisation will be completed, and there may be a requirement to bear certain expenses to protect the investing Fund's interest in the course of negotiations surrounding any potential exchange or plan of reorganisation. Furthermore, constraints on investment decisions and actions with respect to Distressed Securities due to tax considerations may affect the return realised on the Distressed Securities.

Template pre-contractual disclosure for the financial products referred to in Article 8, paragraphs 1, 2 and 2a, of Regulation (EU) 2019/2088 and Article 6, first paragraph, of Regulation (EU) 2020/852

Product name: Most Diversified Portfolio SICAV – TOBAM Anti-Benchmark Global Investment Grade Fund

Legal entity identifier: 549300DJ6OW3PH8K6T53

Sustainable investment means an investment in an economic activity that contributes to an environmental or social objective, provided that the investment does not significantly harm any environmental or social objective and that the investee companies follow good governance practices.

The **EU Taxonomy** is a classification system laid down in Regulation (EU) 2020/852, establishing a list of **environmentally sustainable economic activities**. That Regulation does not lay down a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

Environmental and/or social characteristics

Does this financial product have a sustainable investment objective?

☐ **Yes**

☐ It will make a minimum of **sustainable investments with an environmental objective:** ___%

- ☐ in economic activities that qualify as environmentally sustainable under the EU Taxonomy
- ☐ in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy

☐ It will make a minimum of **sustainable investments with a social objective:** ___%

☒ **No**

☒ It **promotes Environmental/Social (E/S) characteristics** and while it does not have as its objective a sustainable investment, it will have a minimum proportion of 40% of sustainable investments

- ☐ with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy
- ☒ with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy
- ☐ with a social objective

☐ It promotes E/S characteristics, but **will not make any sustainable investments**

What environmental and/or social characteristics are promoted by this financial product?

The Compartment's primary investment objective is to outperform the reference index and provide long-term capital appreciation to Global Credit and Fixed Income securities denominated in USD, CAD, EUR, GBP, JPY and AUD.

This process integrates environmental, social and governance (ESG) risks and opportunities to the sustainability of long-term company returns. The Compartment aims to promote low carbon approaches, commitment to climate action and companies with good governance.

In particular, the Compartment aims to promote the following E/S characteristics:

- Low carbon approach by applying a systematic carbon footprint reduction of at least 20% versus the reference investment universe's carbon footprint,
- Promotion of companies with good governance using raw data and their ESG footprint.

The Compartment has designated ICE BofAML Global Corporate Index as a reference index to compare its ESG characteristics, such as carbon emissions or ESG footprint.

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

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

In order to achieve the above characteristics promoted by the Compartment, the Management Company has put in place an ambitious ESG policy made of key pillars and sustainability indicators. The Compartment uses the following sustainability indicators to attain each of the environmental and social characteristics promoted by the Compartment:

- **Carbon Emissions Reduction:** The Management Company applies a systematic carbon footprint reduction of at least 20% versus the reference index the ICE BofAML Global Corporate Index's carbon footprint. The calculation of the carbon footprint is based on the greenhouse gas emissions scope 1 (i.e. direct emissions from owned or controlled sources) and scope 2 (i.e. indirect emissions from the generation of purchased energy) according to GHG Protocol Corporate Standard. Data on emissions used is obtained from a number of sources including company reports, CDP questionnaire (Carbon Disclosure Project) or an estimation model.

- **ESG Footprint:** The Management Company has put in place a strict E, S and G integration process for all listed companies in its investment universe; using officially published data from Bloomberg.

✓ E: For example: existence of climate change / biodiversity / energy efficiency policies; green building, water and waste usage
✓ S: For example: Ethics/Equal opportunity/training/ consumer data protection/whistleblowing policies, CSR committee in place, supply chain management
✓ G: For example: Number of board meetings per year, ratio of independent directors, chairman tenure, ratio of nonexecutive directors in boards

From that raw data, the Management Company has built a proprietary methodology to compute the "E,S,G footprints" of each individual holding in the portfolio and as such determine the overall E,S,G Footprints of the portfolio. The Management Company has constrained its investment decision-making process to reach E,S,G footprints of the Compartment, at minima at the same level as the E,S,G footprints of the reference index the ICE BofAML Global Corporate Index.

What are the objectives of the sustainable investments that the financial product partially intends to make and how does the sustainable investment contribute to such objectives?

The sustainable investments within the Compartment contribute to Environmental objectives including climate change mitigation and adaptation (however not in the meaning of the Taxonomy Regulation) or commitment to science-based emissions reduction targets ("SBTI").

To determine the share of sustainable investments, the Management Company consider the environmental objective for companies that have:

- A carbon intensity (carbon emissions normalized by the Enterprise Value including Cash) below 80% of the average carbon intensity of the reference index the ICE BofAML Global Corporate Index

Or

Made a commitment to the SBTI initiative. (This engagement is followed by the Management Company's research team on an annual basis).

- Are not involved in severe breaches or controversies in regard to the labor rights, human rights, environmental or corruption, and that are not part of the following sectors: tobacco, controversial weapons, coal mining and fossil fuels

And

Have not been targeted by any significant environmental fines over the past years.

- Have a G score for Good Governance practices (as defined by the Management Company ESG Footprint proprietary methodology) in the top 80% of the reference index the ICE BofAML Global Corporate Index.

How do the sustainable investments that the financial product partially intends to make, not cause significant harm to any environmental or social sustainable investment objective?

Companies the Compartment invests in, contribute to achieve the Compartments' carbon reduction objective, ESG footprint commitment while not significantly harming any environmental or social sustainable investment objectives. Before any investment is made by the Compartment (not only sustainable investments but all investments), the investment has to pass a negative screening, further including the consideration of the principal adverse impacts described in the below section. Hence no companies involved in controversial sectors or activities not aligned with TOBAM's policy, can be eligible for investments for the Compartment.

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

The following Principal Adverse Impacts ("PAI") indicators as defined in SFDR Level II have been considered:

- PAI #7 : Activities negatively affecting biodiversity
- PAI #10 : Violations of UN Global Compact principles and OECD guidelines
- PAI #14 : Exposure to Controversial Weapons

The principal adverse impacts on sustainability indicators have been taken into account through an exclusionary investment policy.

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

The Management Company will not invest in any company that has been classified as failing to comply with key international norms (ISS Ethix Norm-based screening) such as for example the UN Global Compact Principles, OECD Guidelines for Multinational Enterprises, Guiding Principles on Business and Human rights.

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

The "do no significant harm" principle applies only to those investments underlying the financial product that take into account the EU criteria for environmentally sustainable economic activities. The investments underlying the remaining portion of this financial product do not take into account the EU criteria for environmentally sustainable economic activities.

Any other sustainable investments must also not significantly harm any environmental or social objectives.

Does this financial product consider principal adverse impacts on sustainability factors?

Principal adverse impacts are the most significant negative impacts of investment decisions on sustainability factors relating to environmental, social and employee matters, respect for human rights, anti-corruption and anti-bribery matters.

✖ Yes, the Management Company has committee to monitor the 14 mandatory and 2 optional environmental and social indicators to show the impact of the Compartment's investments against these PAI indicators.

Furthermore, this Compartment considers principal adverse impacts on sustainability factors and only the following PAI have been taken into account into the investment process:

- PAI #1: GHG (Greenhouse Gas) emissions - Scope 1 & 2
- PAI #2: Carbon footprint
- PAI #3: GHG intensity of investee companies

The Compartment by targeting an overall carbon reduction of at least 20% compared to the reference index ICE BofAML Global Corporate Index 's carbon footprint, is looking to invest in a combination of stocks that achieve this overall carbon reduction, by considering carbon emissions scope 1 and 2.

- PAI #7: Activities negatively affecting biodiversity

The Management Company proprietary ESG footprint methodology considers raw data published by companies in order to compute an ESG footprint, by notably looking for example at the existence or not of key policies relevant to the biodiversity (for example: biodiversity policy, water usage policy, waste reduction policy, climate change policy…).

In addition to the previous PAI, the following social sustainability indicators have been considered:

- PAI #10: Violations of UN Global Compact principles and (OECD) Guidelines
- PAI #13: Board Gender Diversity
- PAI #14: Exposure to controversial weapons

PAI reports are available on the Compartment annual report.

☐ No

What investment strategy does this financial product follow?

The investment strategy of the Compartment is to outperform the reference index and provide long-term capital appreciation to Global Credit and Fixed Income securities denominated in USD, CAD, EUR, GBP, JPY and AUD.

The Compartment aims to promote low carbon approaches, commitment to climate action and companies with good governance.

The Management Company applies systematically its ESG methodology in the investment decision-making process.

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

What are the binding elements of the investment strategy used to select the investments to attain each of the environmental or social characteristics promoted by this financial product?

The Compartment applies the following binding elements to select investments and attain the environmental and social characteristics described above:

- **Exclusion policy:** the Management Company applies a general exclusion policy, restricting the investment universe and excluding companies based either on their involvement in certain activities (sector or product based) or based on controversies or breaches to key international norms. The key exclusions used by the Management Company are reflected in the below table:

Sector /Product	**Criteria**
Producer and distributors of tobacco	Limit (5% of the revenues)
Coal and coal-based producers and distributors	Limit (10% of the revenues)
Development, production, maintenance or distribution of controversial and prohibited weapons	Exclusion
Breach or violation of International Treaties, Conventions & Standards such as OECD Guidelines for Multinational Enterprises, ILO Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy, UN Global Compact, Guiding Principles on Business and Human Rights	Exclusion

Further details on the exclusion policy can be found in the following link: https://www.tobam.fr/our-beliefs/exclusion-policy/

- **ESG Integration:** The Management Company has put in place a strict E, S and G integration process for all listed companies in its investment universe; using officially published data from Bloomberg.

✓ E: For example: existence of climate change / biodiversity / energy efficiency policies; green building, water and waste usage

✓ S: For example: Ethics/Equal opportunity/training/ consumer data protection/whistleblowing policies, CSR committee in place, supply chain management

✓ G: For example: Number of board meetings per year, ratio of independent directors, chairman tenure, ratio of nonexecutive directors in boards

From that raw data, the Management Company has built a proprietary methodology to compute the “E,S,G footprints” of each individual holding in the portfolio and as such determine the overall E,S,G Footprints of the portfolio. The E, S and G footprint aggregates and normalizes (for industry, size and regional biases) the information contained in each of the above mentioned items by E, S and G pillar. The normalization also corrects differences in scale of the different pieces of raw data. The final footprint is an equal weighted measure of the three pillars. The Management Company then adds a constraint into its quantitative portfolio optimization process, to ensure that the E, S and G footprints of the respective portfolio (computed based on the holdings’ individual E, S and G footprints) are respectively at least at the same level as the E, S and G footprints of the reference index ICE BofAML Global Corporate Index.

- **Carbon Emissions Reduction & Commitment to SBTI:**

In addition, the Management Company analyses the carbon emissions of each holding in its investment universe, computes the carbon footprint of the portfolio and applies a systematic portfolio carbon footprint reduction of at least 20% versus the reference index the ICE BofAML Global Corporate Index’s carbon footprint. The calculation of the carbon footprint is based on the greenhouse gas emissions scope 1 and scope 2. Data on emissions used is obtained from a number of sources including company reports, CDP questionnaire (Carbon Disclosure Project) or an estimation model.

The Management Company is also monitoring the companies’ commitment to the SBTI as a way to monitor best effort toward more incorporation of best practices. This feature is monitored on a yearly basis.

- **Responsible Ownership:** The Management Company has built an ambitious engagement policy to support its commitment to sustainability and address via engagement and dialogues, issues relative to ESG and sustainability.

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

Not applicable.

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

In order to assess good governance practices, the Management Company consider the G scoring of its proprietary ESG footprint methodology, and ensure that the G scoring of the Compartment is matching the reference index ICE BofAML Global Corporate Index’s G scoring.

Good governance practices include sound management structures, employee relations, remuneration of staff and tax compliance.

What is the asset allocation planned for this financial product?

#1: 90% of the assets of this Compartment are aligned (promote) E/S characteristics.

#1A: at least 40% of those assets fall under the sustainable share of investment with non EU Taxonomy aligned environmental objectives.

Asset allocation describes the share of investments in specific assets.

These sustainable investments contribute to environmental objectives, including climate change mitigation and adaptation (however not in the meaning of the Taxonomy Regulation) or commitment to SBTI.

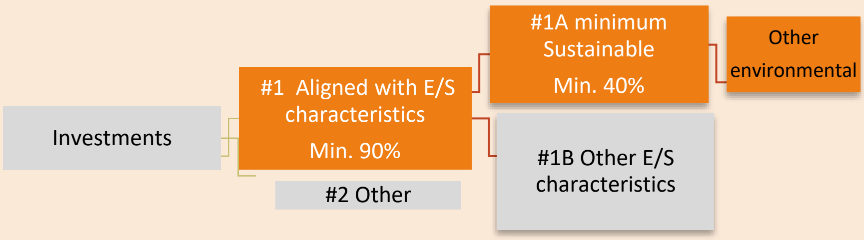
The model used by TOBAM for the determination of the sustainable investments combines the pass or fail approach and the weighted-revenue approach with threshold for the carbon emissions and governance.
To determine the share of sustainable investments, the Management Company considers the environmental objective for companies that have:

Environmental objective determined as:
○ Companies that have carbon emission intensity (carbon emissions normalized by the Enterprise Value Including Cash) below 80% of the average emissions carbon intensity of the reference index the ICE BofAML Global Corporate Index
Or
○ Companies that have made a commitment to the SBTI initiative (this engagement is followed by the Management Company's research team on an annual basis).

Do Not Significantly Harm characteristics:
○ Companies that are not involved in severe breaches or controversies in regard to the labor rights, human rights, environmental or corruption, and that are not part of the following sectors: tobacco, controversial weapons, coal mining and fossil fuels
And
○ Companies that have not been targeted by any significant environmental fines over the past years.

Good Governance practices are defined as companies that have a G score (as defined by the Management Company ESG Footprint proprietary methodology) in the top 80% of the reference index the ICE BofAML Global Corporate Index.

Please note that investments falling under section #1B on the below diagram 'non sustainable investment share of the Compartment', still comply with all of the Compartment ESG policy (exclusions, carbon reduction, ESG footprint, voting & engagement), but did not qualify as a sustainable investment.



#1 Aligned with E/S characteristics includes the investments of the financial product used to attain the environmental or social characteristics promoted by the financial product.

#2Other includes the remaining investments of the financial product which are neither aligned with the environmental or social characteristics, nor are qualified as sustainable investments.

The category **#1 Aligned with E/S characteristics** covers:
- The sub-category **#1A Sustainable** covers sustainable investments with environmental or social objectives.
- The sub-category **#1B Other E/S characteristics** covers investments aligned with the environmental or social characteristics that do not qualify as sustainable investments.

Taxonomy-aligned activities are expressed as a share of:
- **turnover** reflecting the share of revenue from green activities of investee companies
- **capital expenditure** (CapEx) showing the green investments made by investee companies, e.g. for a transition to a green economy.
- **operational expenditure** (OpEx) reflecting green operational activities of investee companies.

***How does the use of derivatives attain the environmental or social characteristics promoted by the financial product*?**

The Compartment may use financial derivative instruments for investment, efficient portfolio management and/or hedging purposes, and this will not impact in any way the exposure to sustainable assets, or the ESG characteristics of the Compartment.

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

This Compartment commits to a 0% alignment with the EU Taxonomy.

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

Enabling activities directly enable other activities to make a substantial contribution to an environmental objective.

Transitional activities are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.

Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy[1]?

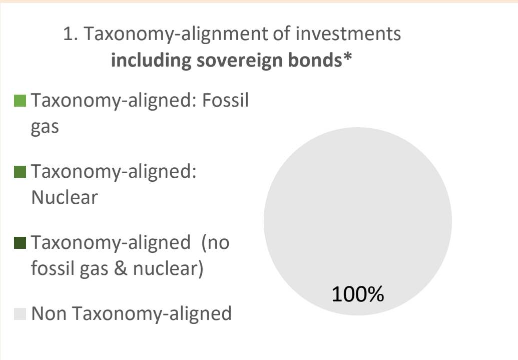
☐ Yes :

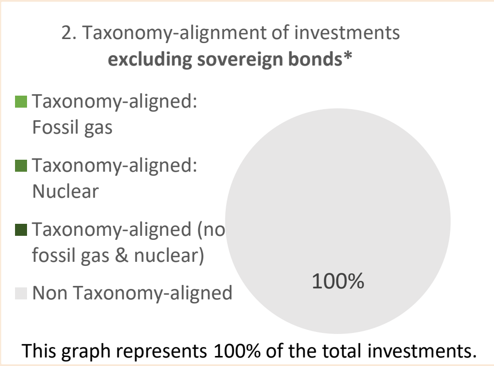
☐ In fossil gas ☐ In nuclear energy

☒ No

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

The two graphs below show in green the minimum percentage of investments that are aligned with the EU Taxonomy. As there is no appropriate methodology to determine the Taxonomy-alignment of sovereign bonds*, the first graph shows the Taxonomy alignment in relation to all the investments of the financial product including sovereign bonds, while the second graph shows the Taxonomy alignment only in relation to the investments of the financial product other than sovereign bonds.





*** For the purpose of these graphs, 'sovereign bonds' consist of all sovereign exposures**

What is the minimum share of investments in transitional and enabling activities?

As the Compartment does not have a minimum Taxonomy alignement, there is no minimum share in transitional and enabling activities.

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

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

The minimum share of sustainable investments with an environmental objective that is not aligned with the EU Taxonomy is 40%.

What is the minimum share of socially sustainable investments?

Not applicable.

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

Investments falling under category "#2 Other", are investments such as derivatives, cash or cash equivalent, not integrating E/S characteristics, where ESG key features and analysis have not been performed, and E/S characteristics not considered.

No minimum environmental or social safeguards apply to the above elements.

Is a specific index designated as a reference benchmark to determine whether this financial product is aligned with the environmental and/or social characteristics that it promotes?

No, but the Compartment has designated a reference benchmark (ICE BofAML Global Corporate Index). This index is used as a reference to compare the Compartment ESG characteristics, such as carbon emissions or ESG footprint, with the reference benchmark.

- ***How is the reference benchmark continuously aligned with each of the environmental or social characteristics promoted by the financial product?***

  The reference index used by the Compartment is not an ESG benchmark and is not consistent with the ESG characteristics promoted by the Compartment. All ESG calculations or comparisons are computed using the Compartment's benchmark, as a good proxy of the Compartment investment universe.

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

- ***How is the alignment of the investment strategy with the methodology of the index ensured on a continuous basis?***

  The reference index the ICE BofAML Global Corporate Index tracks the performance of global investment grade rated corporate debt publicly which is in line with the Compartment investment universe.

  The investment universe of the reference index is regularly monitored by the Management Company research team to ensure the consistency with the Compartment's investment universe, in order to ensure relevance of ESG and performance comparisons.

- ***How does the designated index differ from a relevant broad market index?***

  The reference index the ICE BofAML Global Corporate Index is a broad market index tracking the performance of global investment grade rated corporate debt publicly which is in line with the Compartment investment universe.

- ***Where can the methodology used for the calculation of the designated index be found?***

  https://indices.theice.com/

Where can I find more product specific information online?

More product-specific information can be found on the website:
https://www.tobam.fr/key-documents-policies/

APPENDIX 11. Most Diversified Portfolio SICAV - TOBAM Anti-Benchmark Global High Yield Fund

Investment Objective, Benchmark of the Compartment

The Compartment's primary investment objective is to outperform the reference index and provide long-term capital appreciation from Global High Yield Credit securities denominated in USD, EUR, GBP and CAD.

Following the Management Company's investment approach, the strategy aims to maintain a high degree of diversification when selecting securities and their weightings in the investment universe.

The appreciation in net asset value may be compared to the ICE BofA Global High Yield Index (Bloomberg ticker: HW00) in USD.

For additional information, the index is available on https://www.theice.com/market-data/indices/real-time

The Compartment does not use an index-based management strategy, it is actively managed. As a consequence, its performance may differ substantially from the benchmark, which is used to define the investment universe and determine the global risk profile of the Compartment. A majority of the benchmark's securities will be components of the Compartment. The weightings of the Fund's portfolio holdings will diverge significantly from their equivalent weighting in the index.

Investment strategy of the Compartment

At least 60% of the Compartment's assets are constantly kept invested to Global High Yield Credit and Fixed Income markets, including High Yield corporate debt securities denominated in USD, EUR, GBP or CAD.

Security selection is achieved through technical and fundamental analysis, conducted within a universe of well diversified bonds, in order to deliver a highly diversified portfolio of attractive issues. The degree of diversification of the portfolio is dynamically monitored through a quantitative model. At least, 70% of the securities selected are included in the ICE BofA Global High Yield Index.

Furthermore, as the ICE BofA Global High Yield Index includes distressed bonds, the Compartment may hold such securities as well. Distressed Securities are defined as securities issued by a company that is either in default or in high risk of default.

Defaulted securities or bonds in the midst of a restructuring process shall not exceed 10% of the assets of the Compartment at any point in time.

Range of interest-rate sensitivity
0 to 10

The range of interest-rate sensitivity within which the Compartment is managed is between 0 and 10.
The Compartment may also use forward financial instruments (notably including futures contracts), Credit Default Swaps and their indices, iBoxx Standardized Total Return Swaps and Interest Rate Swaps up to a maximum of one time the assets for the purpose of pursuing its investment goal and with a view to making duration adjustments.
In order to obtain maximum remuneration of its liquidity, the Compartment can invest in money market instruments up to 40% of its assets.

In addition, the Compartment may engage in security lending for up to 75% of its assets and also, as ancillary, may make temporary deposits and borrow cash in the event that a debit balance was to appear.

The Compartment qualifies under article 8 of SFDR. The investment strategy does not have a sustainable investment objective but promotes environmental and social characteristics. The strategy notably follows the 4 pillars of TOBAM's SRI policy: exclusion, carbon reduction, ESG integration and responsible stewardship via engagement.

The Management Company considers ESG factors and applies a sustainability approach in its investment process for the Compartment as further detailed in the Appendix 11.1 Environmental and/or Social Characteristics - Pre-contractual disclosures in compliance with SFDR Level II. Description of the asset classes used to achieve the investment objective

The asset classes included in the portfolio are the following:

a) Fixed Income Securities

In pursuit of the strategy presented above, the Compartment will invest in North American and European Credit and Fixed Income Securities. Depending on the outlook of the Management Company, the Compartment may invest in High Yield Corporates, irrespective of the issuance' size and the sector of the economy to which they belong. This exposure will not fall below 60% of the Compartment's assets.

A High Yield bond, is defined as a bond with a credit rating (based on an average of Moody's, Standard & Poor's and Fitch)" strictly below Baa3/BBB-/BBB-.

As the Compartment is carrying the same risk profile as the ICE BofA Global High Yield Index, the average rating of the Compartment shall not diverge materially from the Index.
Historically, the Index has been consistently rated on average around the B1/B+/B+ level.

b) Money market instruments

For treasury purposes, the Compartment may trade, up to 40% of its assets, in money-market instruments (US, Canadian and European government bonds, money-market funds) of which maximum 10% in Money Market Funds.

c) Shares or units of investment funds:

The Compartment may invest maximum 10% of its assets in shares or units of UCITS which themselves invest maximum 10% of their assets in shares or units of UCITS or investment funds.

These funds may be managed by the Management Company or an affiliated company. The investment strategies of these funds are compatible with that of the Compartment.

The Compartment may invest maximum 10% of its assets in one or more Compartments of the Company.

1) Derivatives used to achieve the investment objective

The Compartment may use financial futures, Credit Default Swaps and their indices, iBoxx Standardized Total Return Swaps, Interest Rate Swaps currency forward and swaps up to a maximum of one time its assets.

The Compartment will invest in regulated, organized markets and over-the-counter.

The Compartment will use derivatives instrument for hedging and exposure purposes and to achieve the investment objective.

The types of instruments used by the Management Company will mainly be currency forward and swaps, futures contracts and Credit Default Swaps and their indices, iBoxx Standardized Total Return Swaps.

Credit derivatives, be it CDS indices or TRS on credit cash indices will be used opportunistically in circumstances where the Management Company believes that the objective described below could be achieved.

The Compartment will use TRS for liquidity management purpose in order to keep cash amount to face potential redemption without incurring transaction costs while maintaining the Compartment's overall exposure in line with its mandate.

The Compartment's use of, or investment in, TRS will be as follows:

Type of transaction	**Expected proportion**	**Maximum proportion**
Total Return Swaps	0% to 10%	30%

2) Deposits and cash

The Compartment may hold, up to 20% of its net assets, ancillary liquid assets which consists of bank deposits at sight such as cash held in current accounts with a bank accessible at any time.

The Compartment may make limited use of other deposits in order to achieve its investment objective, for treasury purposes and/or in in case of unfavourable market conditions.

3) Cash borrowing

The Compartment may borrow up to the equivalent of 10% of its net assets in cash on a temporary basis and for technical needs only.

4) Temporary purchases and sales of securities

The attention of the Shareholders is drawn to the fact that the below wording, reporting the discontinuation of securities lending transactions and the introduction of repurchase transactions, applies as of 29 May 2023.

In addition, the Compartment may engage in repurchase transactions for up to 75% of its assets.
The Compartment may also, as ancillary, make temporary deposits and borrow cash in the event that a debit balance was to appear.

The Compartment will enter into repurchase transactions opportunistically in circumstances where the Management Company believes that the objective described below could be achieved.

In the context of investments in specials and general collateral the Compartment will use repurchase transactions in order to increase the return of the portfolio.

The expected proportion of the Compartment's assets which may be subject to repurchase transactions depends on the demand of market participants for the transactions forming part of the Compartment's portfolio at any time.

This demand depends notably on the interest of such securities, the size of the lendable positions, the presence of specials or securities used as general collateral, the potential duration of the loan (the securities being subject to portfolio adjustments or rebalancing, and thus sell trades), and the type of collateral accepted by the Compartment.

The Compartment's use of, or investment in, repurchase transactions will be as follows:

Type of transaction	**Expected proportion**	**Maximum proportion**
Repurchase transactions	0% to 30%	75%

Reference Currency

The reference currency of the Compartment is USD.

Profile of the Typical Investor

The Compartment is a high-risk vehicle. To determine their level of investment, investors should consider their personal assets, the regulations applicable to them, their current financial needs over a recommended minimum investment horizon of more than five years, and also their willingness to take risks or their preference for a more prudent investment. The recommended minimum investment horizon is more than five years.

Form of Shares and Classes

The Share Classes of the Compartment will be issued in registered form.

Share Classes	**A** **Isin Code: LU1543552787**	**A1*** **Isin Code: LU1543552860**	**A2** **Isin Code: LU2401721514**	**A3*** **Isin Code: LU2401721605**	**A4*** **Isin Code : LU2451275536**	**B** **Isin Code : LU2033310025**	**B3*** **Isin Code : LU2451275452**	**R1*** **Isin Code : LU1543552944**	**R3*** **Isin Code: LU2401721787**	**Z** **Isin Code: LU1666144149**	**Z1** **Isin Code: LU2033309795**	**Z2** **Isin Code: LU2010630510**
Currency	USD	USD	EUR	EUR	CHF	USD	EUR	USD	EUR	USD	EUR	USD
Type of Shares	Accumulation											Distribution

Target Investors	Institutional investors	Institutional investors	Institutional investors	Institutional investors	Institutional investors	All investors	All investors	All investors	All investors	Institutional investors	Institutional investors	Institutional investors
Minimum initial subscription	10 Shares	10 Shares	10 Shares	10 Shares	10 Shares	1 Share	1 Share	1 Share	1 Share	10 Shares	10 Shares	10 Shares
Minimum holding amount	1 Share	1 Share	1 Share	1 Share	1 Share	1 Share	1 Share	1 Share	1 Share	1 Share	1 Share	1 Share
Valuation Day	Every Business Day with the exception of public holidays and non-settlement days for exchanges based in the UK, France, Luxembourg and days when the US market are closed or close early (based on the official US Government Bond Market Calendar)											
Management Company Fee	Up to 0.65%	Up to 0.65%	Up to 0.65%	Up to 0.65%	Up to 0.65%	1.30%	1.30%	0.55%	0.55%	0%	0%	0%
Administration Fee & Depositary Fee	0.20%	0.20%	0.20%	0.20%	0.20%	0.20%	0.20%	0.20%	0.20%	0.20%	0.20%	0.20%
Hedge	Unhedged	Hedged against foreign exchange risk*	Unhedged	Hedged against foreign exchange risk*	Hedged against foreign exchange risk*	Unhedged	Hedged against foreign exchange risk*	Hedged against foreign exchange risk*	Hedged against foreign exchange risk*	Unhedged	Hedged against foreign exchange risk*	Unhedged
Subscription Fee paid to the Management Company	Up to 0.5%	Up to 0.5%	Up to 0.5%	Up to 0.5%	Up to 0.5%	Up to 3%	Up to 3%	Up to 5%	Up to 5%	Up to 5%	Up to 5%	Up to 5%
Redemption Fee paid to the Management Company	None	None	None	None	None	Up to 1%	Up to 1%	Up to 1%	Up to 1%	Up to 5%	Up to 5%	Up to 5%
Cut-off	2.00 p.m. CET the Business Day before the relevant Valuation day											
Subscription / Redemption Settlement Day	2 days, according to the official US Government Bond Market calendar following the Valuation Day.											

R units: these units are intended for “all investors” seeking a low initial investment and a “clean fee” structure. The R “clean fee” share class will not carry any fees payable to distributors.

** Share Classes A1, A3, A4, B3, R1, R3 and Z1 are hedged against foreign exchange risk with a 10% tolerance.*

The Share Classes A1, A3, A4, B3, R1, R3 and Z1 do not hedge currency risk against the reference currency of the Compartment (USD) but hedge the foreign exchange risk of all currency exposures held in the portfolio against the *currency of the concerned share class (USD for A1 and R1, CHF for A4, EUR for A3, B3, R3 and Z1 class). The reference benchmarks for each of these share classes will be the BofA Merrill Lynch Global High Yield Index hedged in the share class currency (USD for A1 and R1, CHF for A4, EUR for A3, B3, R3 and Z1 class).*

Launch date

The initial subscription date for the first share classes of the Compartment was on 21 February 2017 with the following initial subscription prices:

Class	Initial subscription prices:
Class A	USD 10,000
Class A1	USD 10,000
Class A2	EUR 10,000
Class A3	EUR 10,000
Class A4	CHF 10,000
Class B	USD 100
Class B3	EUR 100
Class R1	USD 100
Class R3	EUR 100
Class Z	USD 10,000
Class Z1	EUR 10,000
Class Z2	USD 10,000

Total Expense Ratio

The latest calculated total expense ratio rate will be available in the Company's latest financial report.

Risk Management

The method used to calculate overall exposure is the commitment method.

Compartment Specific Risk Factors

The funds will be invested primarily in financial instruments selected by the Management Company. These instruments will be subject to market movements and fluctuations. The Management Company invests according to a quantitative, fundamentals-based model: there is a risk that the securities selected may not be the best performing stocks.

1) Capital risk

The Fund does not carry any guarantee or protection, and the capital invested at the outset may not be returned in full.

2) Credit risk

This is the risk of depreciation in debt securities issued by a private-sector issuer or default by the latter. The value of the debt securities in which the Compartment is invested may decline, leading to a fall in net asset value.

3) High Yield Bond risk

Investments in High Yield bonds can involve a substantial risk of loss. High Yield bonds are considered to be speculative with respect to the issuer's ability to pay interest and principal. These securities, which are rated below investment grade, have a higher risk of issuer default, are subject to greater price volatility than investment grade securities and may be illiquid.

4) Interest rate risk

This is the risk of depreciation in fixed-income instruments deriving from interest-rate fluctuations. Should interest rates rise, the Compartment's net asset value may decline.

5) Currency risk

Currency risk is the risk that the investment currencies may weaken in relation to the base currency of the portfolio (US dollar). In the event of depreciation in foreign currencies, investors are thus exposed to a decline in the value of their units. The A, B and Z Share classes are exposed to currency risk. A1, A3, A4, B3, R1, R3 and Z1 Share classes are hedged with regard to currency risk back in the currency of the share and are thus minimally exposed to the risk of a depreciation of foreign currencies against the share class currency.

6) Counterparty risk

The Compartment may incur a loss in the event of default by a counterparty with which certain transactions were conducted, leading to a decline in the Compartment's net asset value.

7) Risk associated with the Management Company's investment process

Investors' attention is drawn to the fact that the portfolio is constructed and its assets selected and weighted using processes developed by the Management Company. The Compartment's investment process is based on a model designed to identify signals based on past statistical results.

There is a risk that the model may not be efficient, since there is no guarantee that past market situations will repeat themselves in the future. The aim of the processes developed by TOBAM is to achieve healthy diversification of the Compartment's portfolio, and so use of these processes may lead the Management Company to not select the top-performing assets.

8) Risk associated with the use of derivatives

The Compartment may use some derivatives for up to one time its assets.

9) Distressed securities risk

Distressed Securities Investment in a security issued by a company that is either in default or in high risk of default ("Distressed Securities") involves significant risk. Such investments will only be made when the Management Company believes either that the security trades at a materially different level from the Management company's perception of fair value or that it is reasonably likely that the issuer of the securities will make an exchange offer or will be the subject of a plan of reorganisation; however, there can be no assurance that such an exchange offer will be made or that such a plan of reorganisation will be adopted or that any securities or other assets received in connection with such an exchange offer or plan of reorganisation will not have a lower value or income potential than anticipated when the investment was made. In addition, a significant period of time may pass between the time at which the investment in Distressed Securities is made and the time that any such exchange offer or plan of reorganisation is completed. During this period, it is unlikely that any interest payments on the Distressed Securities will be received, there will be significant uncertainty as to whether fair value will be achieved or not and the exchange offer or plan of reorganisation will be completed, and there may be a requirement to bear certain expenses to protect the investing Fund's interest in the course of negotiations surrounding any potential exchange or plan of reorganisation. Furthermore, constraints on investment decisions and actions with respect to Distressed Securities due to tax considerations may affect the return realised on the Distressed Securities.

Template pre-contractual disclosure for the financial products referred to in Article 8, paragraphs 1, 2 and 2a, of Regulation (EU) 2019/2088 and Article 6, first paragraph, of Regulation (EU) 2020/852

Product name: Most Diversified Portfolio SICAV - TOBAM Anti-Benchmark Global High Yield Fund **Legal entity identifier: 2221009IV7X7KW2J9407**

Sustainable investment means an investment in an economic activity that contributes to an environmental or social objective, provided that the investment does not significantly harm any environmental or social objective and that the investee companies follow good governance practices.

The **EU Taxonomy** is a classification system laid down in Regulation (EU) 2020/852, establishing a list of **environmentally sustainable economic activities**. That Regulation does not lay down a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

Environmental and/or social characteristics

Does this financial product have a sustainable investment objective?

☐ **Yes**	☒ **No**
☐ It will make a minimum of **sustainable investments with an environmental objective:** ___%	☒ It **promotes Environmental/Social (E/S) characteristics** and while it does not have as its objective a sustainable investment, it will have a minimum proportion of 40% of sustainable investments
☐ in economic activities that qualify as environmentally sustainable under the EU Taxonomy	☐ with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy
☐ in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy	☒ with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy
	☐ with a social objective
☐ It will make a minimum of **sustainable investments with a social objective:** ___%	☐ It promotes E/S characteristics, but **will not make any sustainable investments**

What environmental and/or social characteristics are promoted by this financial product?

The Compartment's primary investment objective is to outperform the reference index and provide long-term capital appreciation from Global High Yield Credit securities denominated in USD, EUR, GBP and CAD.

This process integrates environmental, social and governance (ESG) risks and opportunities to the sustainability of long-term company returns. The Compartment aims to promote low carbon approaches, commitment to climate action and companies with good governance.

In particular, the Compartment aims to promote the following E/S characteristics:

- Low carbon approach by applying a systematic carbon footprint reduction of at least 50% versus the reference investment universe's carbon footprint,

- Commitment to climate action and climate change mitigation by optimizing constraint of temperature contribution of each holding to reach a 1.5°C portfolio,
- Promotion of companies with good governance using raw data and their ESG footprint.

The Compartment has designated ICE BofA Global High Yield Index as a reference index to compare its ESG characteristics, such as carbon emissions or ESG footprint.

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

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

In order to achieve the above characteristics promoted by this Compartment, the Management Company has put in place an ambitious ESG policy made of key pillars and sustainability indicators. This Compartment uses the following sustainability indicators to attain each of the environmental and social characteristics promoted by the Compartment:

- **Carbon Emissions Reduction:** The Management Company applies a systematic carbon footprint reduction of at least 50% versus the reference index ICE BofA Global High Yield Index's carbon footprint. The calculation of the carbon footprint is based on the greenhouse gas emissions scope 1 (i.e. direct emissions from owned or controlled sources), scope 2 (i.e. indirect emissions from the generation of purchased energy) and scope 3 (i.e. indirect emissions resulting from value chain activities) when possible, according to GHG Protocol Corporate Standard. Data on emissions used is obtained from a number of sources including company reports, CDP questionnaire (Carbon Disclosure Project) or an estimation model.

- **ESG Footprint:** The Management Company has put in place a strict E, S and G integration process for all listed companies in its investment universe; using officially published data from Bloomberg.

✓ E: For example: existence of climate change / biodiversity / energy efficiency policies; green building, water and waste usage

✓ S: For example: Ethics/Equal opportunity/training/ consumer data protection/whistleblowing policies, CSR committee in place, supply chain management

✓ G: For example: Number of board meetings per year, ratio of independent directors, chairman tenure, ratio of non-executive directors in boards

From that raw data, the Management Company has built a proprietary methodology to compute the "E,S,G footprints" of each individual holding in the portfolio and as such determine the overall E,S,G Footprints of the portfolio. The Management Company has constrained its investment decision-making process to reach E,S,G footprints of the Compartment, at minima at the same level as the E,S,G footprints of the reference index ICE BofA Global High Yield Index.

- **Optimization constraint of temperature contribution** of each holding to reach a 1.5° C portfolio in line with the latest Intergovernmental Panel on Climate Change (IPCC) climate scenarios.

What are the objectives of the sustainable investments that the financial product partially intends to make and how does the sustainable investment contribute to such objectives?

The sustainable investments within this Compartment contribute to Environmental objectives including climate change mitigation and adaptation (however not in the meaning of Taxonomy Regulation) or commitment to science-based emissions reduction targets (“SBTI”).

To determine the share of sustainable investments, the Management Company consider the environmental objective for companies that have:

- A carbon intensity (carbon emissions normalized by the Enterprise Value including Cash) below 80% of the average carbon intensity of the reference index ICE BofA Global High Yield Index

Or

Made a commitment to the SBTI initiative. (This engagement is followed by the Management Company’s research team on an annual basis).

- Are not involved in severe breaches or controversies in regard to the labor rights, human rights, environmental or corruption, and that are not part of the following sectors: tobacco, controversial weapons, coal mining and fossil fuels

And

Have not been targeted by any significant environmental fines over the past years.

- Have a G score for Good Governance practices (as defined by the Management Company ESG Footprint proprietary methodology) in the top 80% of the reference index the ICE BofA Global High Yield Index.

How do the sustainable investments that the financial product partially intends to make, not cause significant harm to any environmental or social sustainable investment objective?

Companies the Compartment invests in, contribute to achieve the Compartments’ carbon reduction objective, ESG footprint commitment while not significantly harming any environmental or social sustainable investment objectives. Before any investment is made by the Compartment (not only sustainable investments but all investments), the investment has to pass a negative screening, further including the consideration of the principal adverse impacts described in the below section. Hence no companies involved in controversial sectors or activities not aligned with TOBAM’s policy, can be eligible for investments for the Compartment.

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

The following Principal Adverse Impacts ("PAI") indicators as defined in SFDR Level II have been considered:

- PAI #4 : Exposure to companies active in the fossil fuel sector
- PAI #7 : Activities negatively affecting biodiversity
- PAI #10 : Violations of UN Global Compact principles and OECD guidelines
- PAI #14 : Exposure to Controversial Weapons

The principal adverse impacts on sustainability indicators have been taken into account through an exclusionary investment policy.

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

The Management Company will not invest in any company that has been classified as failing to comply with key international norms (ISS Ethix Norm-based screening) such as for example the UN Global Compact Principles, OECD Guidelines for Multinational Enterprises, Guiding Principles on Business and Human rights.

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

The "do no significant harm" principle applies only to those investments underlying the financial product that take into account the EU criteria for environmentally sustainable economic activities. The investments underlying the remaining portion of this financial product do not take into account the EU criteria for environmentally sustainable economic activities.

Any other sustainable investments must also not significantly harm any environmental or social objectives.

Principal adverse impacts are the most significant negative impacts of investment decisions on sustainability factors relating to environmental, social and employee matters, respect for human rights, anti-corruption and anti-bribery matters.

Does this financial product consider principal adverse impacts on sustainability factors?

✖ Yes, the Management Company has committed to monitor the 14 mandatory and 2 optional environmental and social indicators to show the impact of the Compartment's investments against these PAI indicators.
Furthermore, this Compartment considers principal adverse impacts on sustainability factors and only the following PAI have been taken into account into the investment process:

- PAI #1: GHG (Greenhouse Gas) emissions - Scope 1 & 2
- PAI #2: Carbon footprint
- PAI #3: GHG intensity of investee companies

The Compartment by targeting an overall carbon reduction of at least 50% compared to the reference index ICE BofA Global High Yield Index's carbon footprint, is looking to invest in a combination of stocks that achieve this overall carbon reduction, by considering carbon emissions scope 1, 2 and 3.

- PAI #4: Exposure to companies active in the fossil fuel sector (Share of investments in companies active in the fossil)

The sector is excluded from the investment universe of this Compartment.

- PAI #7: Activities negatively affecting biodiversity

The Management Company proprietary ESG footprint methodology considers raw data published by companies in order to compute an ESG footprint, by notably looking for example at the existence or not of key policies relevant to the biodiversity (for example: biodiversity policy, water usage policy, waste reduction policy, climate change policy…).

In addition to the previous PAI, the following social sustainability indicators have been considered:

- PAI #10: Violations of UN Global Compact principles and (OECD) Guidelines
- PAI #13: Board Gender Diversity
- PAI #14: Exposure to controversial weapons

PAI reports are available on the Compartment annual report.

No

What investment strategy does this financial product follow?

The Compartment's investment strategy is to outperform the reference index and provide long-term capital appreciation from Global High Yield Credit securities denominated in USD, EUR, GBP and CAD. Following the Management Company's investment approach, the strategy aims to maintain a high degree of diversification when selecting securities and their weightings in the investment universe.

This process integrates environmental, social and governance (ESG) risks and opportunities to the sustainability of long-term company returns.

The Compartment aims to promote low carbon approaches, commitment to climate action and companies with good governance.

The Management Company applies systematically its ESG methodology in the investment decision-making process.

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

What are the binding elements of the investment strategy used to select the investments to attain each of the environmental or social characteristics promoted by this financial product?

The Compartment applies the following binding elements to select investments and attain the environmental and social characteristics described above:

- **Restrictive Exclusion Policy:** the Management Company applies a general exclusion policy, restricting the investment universe and excluding companies based either on their involvement in certain activities (sector or product based) or based on controversies or breaches to key international norms. The key exclusions used by the Management Company are reflected in the below table:

Sector /Product	**Criteria**

Producer and distributors of tobacco	Limit (5% of the revenues)
Coal and coal-based producers and distributors	Limit (10% of the revenues)
Development, production, maintenance or distribution of controversial and prohibited weapons	Exclusion
Breach or violation of International Treaties, Conventions & Standards such as OECD Guidelines for Multinational Enterprises, ILO Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy, UN Global Compact, Guiding Principles on Business and Human Rights	Exclusion

In addition, the Compartment excludes companies with significant involvement in the production, sales or extraction of fossil fuels (including coal, coal power generation, oil and gas) from the investment universe of the Compartment.

Further details on the exclusion policy can be found in the following link: https://www.tobam.fr/our-beliefs/exclusion-policy/

- **ESG Integration:** The Management Company has put in place a strict E, S and G integration process for all listed companies in its investment universe; using officially published data from Bloomberg.

✓ E: For example: existence of climate change / biodiversity / energy efficiency policies; green building, water and waste usage

✓ S: For example: Ethics/Equal opportunity/training/ consumer data protection/whistleblowing policies, CSR committee in place, supply chain management

✓ G: For example: Number of board meetings per year, ratio of independent directors, chairman tenure, ratio of nonexecutive directors in boards

From that raw data, the Management Company has built a proprietary methodology to compute the "ESG footprint" of each individual holding in the portfolio and as such determine the overall ESG Footprint of the portfolio. The E, S and G footprint aggregates and normalizes (for industry, size and regional biases) the information contained in each of the above mentioned items by E, S and G pillar. The normalization also corrects differences in scale of the different pieces of raw data. The final footprint is an equal weighted measure of the three pillars. The Management Company then adds a constraint into its quantitative portfolio optimization process, to ensure that the E, S and G footprints of the respective portfolio (computed based on the holdings' individual E, S and G footprints) are respectively at least at the same level as the E, S and G footprints of the reference index ICE BofA Global High Yield Index.

- **Carbon Emissions Reduction & Commitment to SBTI:**

In addition, the Management Company analyses the carbon emissions of each holding in its investment universe, computes the carbon footprint of the portfolio and applies a systematic portfolio carbon footprint reduction of at least 50% versus the reference index the ICE BofA Global High Yield Index's carbon footprint. The calculation of the carbon footprint is based on the greenhouse gas emissions scope 1, scope 2 and scope 3 when available. Data on emissions used is obtained from a number of sources including company reports, CDP questionnaire (Carbon Disclosure Project) or an estimation model.

The Management Company is also monitoring the companies' commitment to the SBTI as a way to monitor best effort toward more incorporation of best practices. This feature is monitored on a yearly basis.

- **Optimization constraint of temperature contribution** of each holding to reach a 1.5° C portfolio in line with the latest Intergovernmental Panel on Climate Change (IPCC) climate scenarios.

- **Responsible Ownership:** The Management Company has built an ambitious engagement policy to support its commitment to sustainability and address via engagement and dialogues, issues relative to ESG and sustainability.

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

Not applicable.

Good governance practices include sound management structures, employee relations, remuneration of staff and tax compliance.

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

In order to assess good governance practices, the Management Company consider the G scoring of its proprietary ESG footprint methodology, and ensure that the G scoring of the Compartment is matching the reference index ICE BofA Global High Yield Index's G scoring.

What is the asset allocation planned for this financial product?

Asset allocation describes the share of investments in specific assets.

#1: 90% of the assets of this Compartment are aligned (promote) E/S characteristics.

#1A: at least 40% of those assets fall under the sustainable share of investment with non EU Taxonomy aligned environmental objectives.

These sustainable investments contribute to environmental objectives, including climate change mitigation and adaptation (however not in the meaning of the Taxonomy Regulation) or commitment to SBTI.

The model used by TOBAM for the determination of the sustainable investments combines the pass or fail approach and the weighted-revenue approach with threshold for the carbon emissions and governance.
To determine the share of sustainable investments, the Management Company considers the environmental objective for companies that have:

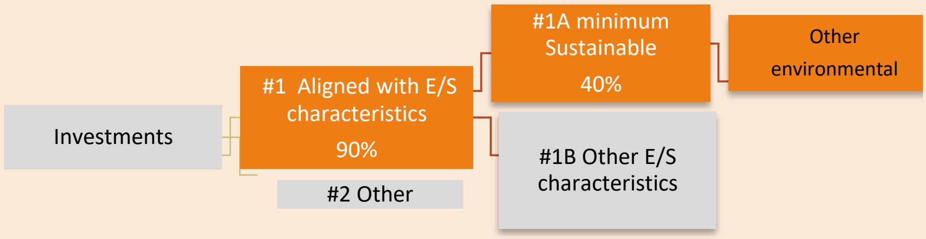
Environmental objective determined as:
o Companies that have carbon emission intensity (carbon emissions normalized by the Enterprise Value Including Cash) below 80% of the average emissions carbon intensity of the reference index the ICE BofA Global High Yield Index
Or

○ Companies that have made a commitment to the SBTI initiative (this engagement is followed by the Management Company's research team on an annual basis).

Do Not Significantly Harm characteristics:
○ Companies that are not involved in severe breaches or controversies in regard to the labor rights, human rights, environmental or corruption, and that are not part of the following sectors: tobacco, controversial weapons, coal mining and fossil fuels
And
○ Companies that have not been targeted by any significant environmental fines over the past years.

Good Governance practices are defined as companies that have a G score (as defined by the Management Company ESG Footprint proprietary methodology) in the top 80% of the reference index the ICE BofA Global High Yield Index.

Please note that investments falling under section #1B on the below diagram 'non sustainable investment share of the Compartment', still comply with all of the Compartment ESG policy (exclusions, carbon reduction, ESG footprint, voting & engagement), but did not qualify as a sustainable investment.



#1 Aligned with E/S characteristics includes the investments of the financial product used to attain the environmental or social characteristics promoted by the financial product.

#2Other includes the remaining investments of the financial product which are neither aligned with the environmental or social characteristics, nor are qualified as sustainable investments.

The category **#1 Aligned with E/S characteristics** covers:
- The sub-category **#1A Sustainable** covers sustainable investments with environmental or social objectives.
- The sub-category **#1B Other E/S characteristics** covers investments aligned with the environmental or social characteristics that do not qualify as sustainable investments.

***How does the use of derivatives attain the environmental or social characteristics promoted by the financial product*?**

The Compartment may use financial derivative instruments for investment, efficient portfolio management and/or hedging purposes, and this will not impact in any way the exposure to sustainable assets, or the ESG characteristics of the Compartment.

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

Taxonomy-aligned activities are expressed as a share of:

- **turnover** reflecting the share of revenue from green activities of investee companies
- **capital expenditure** (CapEx) showing the green investments made by investee companies, e.g. for a transition to a green economy.
- **operational expenditure** (OpEx) reflecting green operational activities of investee companies.

This Compartment commits to a 0% alignment with the EU Taxonomy.

Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy[1]?

☐ Yes :

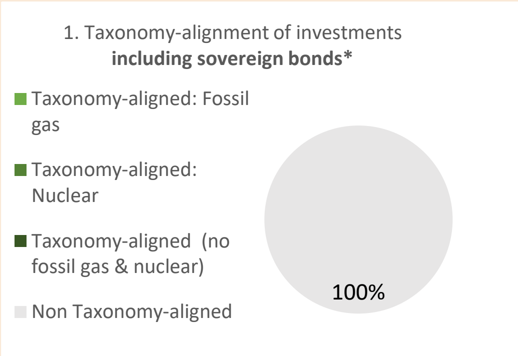
☐ In fossil gas ☐ In nuclear energy

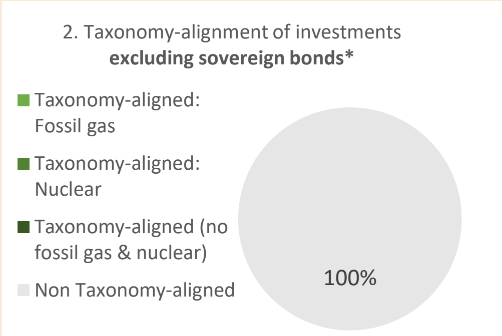
☒ No

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

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

The two graphs below show in green the minimum percentage of investments that are aligned with the EU Taxonomy. As there is no appropriate methodology to determine the Taxonomy-alignment of sovereign bonds*, the first graph shows the Taxonomy alignment in relation to all the investments of the financial product including sovereign bonds, while the second graph shows the Taxonomy alignment only in relation to the investments of the financial product other than sovereign bonds.





This graph represents 100% of the total investments.

*** For the purpose of these graphs, 'sovereign bonds' consist of all sovereign exposures**

Enabling activities directly enable other activities to make a substantial contribution to an environmental objective.

Transitional activities are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.

What is the minimum share of investments in transitional and enabling activities?

As the Compartment does not have a minimum Taxonomy alignement, there is no minimum share in transitional and enabling activities.

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

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

The minimum share of sustainable investments with an environmental objective that is not aligned with the EU Taxonomy is 40%.

What is the minimum share of socially sustainable investments?

Not applicable.

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

Investments falling under category "#2 Other", are investments such as derivatives, cash or cash equivalent, not integrating E/S characteristics, where ESG key features and analysis have not been performed, and E/S characteristics not considered.

No minimum environmental or social safeguards apply to the above elements.

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

Is a specific index designated as a reference benchmark to determine whether this financial product is aligned with the environmental and/or social characteristics that it promotes?

No, but the Compartment has designated a reference benchmark (ICE BofA Global High Yield Index). This index is used as a reference to compare the Compartment ESG characteristics, such as carbon emissions or ESG footprint, with the reference benchmark.

- ***How is the reference benchmark continuously aligned with each of the environmental or social characteristics promoted by the financial product?***

  The reference index used by the Compartment is not an ESG benchmark and is not consistent with the ESG characteristics promoted by the Compartment. All ESG calculations or comparisons are computed using the Compartment's benchmark, as a good proxy of the Compartment investment universe.

- ***How is the alignment of the investment strategy with the methodology of the index ensured on a continuous basis?***

  The reference index the ICE BofA Global High Yield Index is a broad market indexes, capturing global high yield markets securities, which is in line with the Compartment investment universe.

  The investment universe of the reference index is regularly monitored by the Management Company research team to ensure the consistency with the Compartment's investment universe, in order to ensure relevance of ESG and performance comparisons.

- ***How does the designated index differ from a relevant broad market index?***

  The reference index the ICE BofA Global High Yield Index is a broad market indexes, capturing global high yield markets securities, which is in line with the Compartment investment universe.

- ***Where can the methodology used for the calculation of the designated index be found?***

  https://indices.theice.com/

Where can I find more product specific information online?

More product-specific information can be found on the website:
https://www.tobam.fr/key-documents-policies/

APPENDIX 12. Most Diversified Portfolio SICAV TOBAM Anti-Benchmark World Ex-USA Equity Fund

Investment Objective, Benchmark of the Compartment

The Compartment's primary investment objective is to be exposed to global developed market equities, by systematically applying the Management Company's investment process, which aims to outperform the reference index by minimizing risk factor concentration via a maximally diversified portfolio.

Changes in the net asset value can be compared to the Bloomberg Developed Markets ex US Large & Mid Cap Net Return Index, (closing price).

The Bloomberg Developed Markets ex US Large & Mid Cap Net Return Index includes large and mid-cap equities across 22 of 23 Developed Markets DM countries*--excluding the United States selected firstly on geographical and then on sector criteria. This index, stated in US dollars, is published by Bloomberg. The shares that make up the index are selected on the basis of size, liquidity and free-float capital freely available for trading on a regulated market. Index levels include the minimum possible reinvestments linked to dividends paid out on the shares in the index. A dividend is considered to be reinvested after deduction of taxes. The rate of tax applied is that for a non-resident investor who does not benefit from double taxation treaties.

The index is available at www.bloomberg.com/indices

The Compartment does not use an index-based management strategy, it is actively managed. As a consequence, its performance may differ substantially from the benchmark, which is used to define the investment universe and determine the global risk profile of the Compartment. A majority of the Compartment's equity securities will be components of the benchmark. The weightings of the Compartment's portfolio holdings may diverge significantly from their equivalent weighting in the index.

Investment strategy of the Compartment

At least 90% of the Compartment's assets are constantly kept exposed to the international small-, mid- and large-cap equity markets.

In addition to the portfolio's minimum 90% exposure to international equities, the Compartment may also be exposed to different markets or asset classes in order to meet its investment objective.

For the purpose of diversification, the Compartment may invest up to 20% of its assets in closed-ended Real Estate Investment Trusts (REIT).

The equities in which the Compartment invests are selected on the basis of quantitative models developed by the management company, which enable it to maximize the level of diversification provided in relation to the benchmark. The resulting Compartment, combined with other "long only" investments, is expected to improve the results of the asset allocation by, among other things, improving the Sharpe ratio and reducing volatility. The aim of the management models used is to increase diversification in relation to the benchmark index. The sector breakdown may be taken into account to limit concentration into a particular sector.

In order to support its investment objective (obtain maximum remuneration of its liquidities), the Compartment can invest directly or via funds on different markets or asset classes (money market instruments or listed index funds) for up to 10% of its assets.

In order to be continually exposed as closely as possible to the results of the model and therefore meet its investment objective, the Compartment may invest in listed index funds. To maintain exposure as close as possible to the results of the model, the Compartment may build or add to its exposure through American Depository Receipt (ADR) and Global Depository Receipt (GDR), for up to 100% of its net assets, and/or through other OTC contracts in order to enhance risk control and minimize transaction costs. Investments in American Depository Receipt (ADR), Global Depository Receipt (GDR) are made in compliance with the restrictions laid down in Article 41 of the Law. Investments in Real Estate Investment Trusts (REIT) are made in compliance with the restrictions laid down in Article 41 of the Law and article 2 or the Grand Ducal Regulation of 8 February 2008 relating to certain definitions of the Law of 2010.

If justified by extreme market conditions and in order to curb the cost of trading on the various markets, the Compartment reserves the right to invest up to 100% of its assets in mono-underlying Contracts for Differences (CFDs), CFDs are futures contracts entered into with a counterparty settled through cash payments rather than through physical delivery of financial instruments. The Compartment may thus take advantage of the (liquidity and pricing) characteristics of these instruments compared with the financial instruments in which it invests directly.

It may also invest up to 100% of its assets in forward financial instruments (such as futures contracts) in order to make occasional adjustments to allow for subscriptions and redemptions and/or to hedge currency risk. The Compartment may also build up or supplement its exposure by investing in OTC contracts in order to improve risk management and reduce trading costs.

The Compartment will thus be able to benefit from the flexibility these instruments may offer (particularly in terms of liquidity and price) relative to the financial instruments in which it invests directly.

The Compartment may also use deposits and temporary purchases and sales of securities, and may borrow cash in the event that it becomes overdrawn.

The Compartment qualifies under article 8 of SFDR. The investment strategy does not have a sustainable investment objective but promotes environmental and social characteristics. The strategy notably follows the 4 pillars of TOBAM's SRI policy: exclusion, carbon reduction, ESG integration and responsible stewardship via voting and engagement.

The Management Company considers ESG factors and applies a sustainability approach in its investment process for the Compartment as further detailed in the Appendix 12.1 Environmental and/or Social Characteristics – Pre-contractual disclosures in compliance with SFDR Level II. 1) Description of the asset classes used to achieve the investment objective

1) The asset classes included in the portfolio are the following:

a) Equities

To implement the above strategy, the Compartment will invest in the international equities market that is depending on the outlook as seen by the Management Company, the Compartment may invest in shares of companies listed in developed countries as defined by BLOOMBERG, irrespective of the companies' size and the sector of the economy to which they belong. At least 90% of the Compartment's net assets will be exposed to international equities. This exposure may be gained either through CFDs or direct securities, depending on market conditions. This exposure will not fall below 90% of the Compartment's assets. The securities could include American Depository Receipt (ADR) and Global Depository Receipt (GDR), for up to 100% of its net assets. American Depositary Receipt (ADR) and Global Depositary Receipt (GDR) will not include embedded derivatives.

The Compartment may invest up to 20% of its assets in closed-ended Real Estate Investment Trusts (REIT).

b) Money market instruments

For treasury purposes, the Compartment may invest up to 10% of its assets in money market instruments, including money market funds and transferable debt securities.

In order to achieve its investment objective, if execution of the investment strategy leads the Management Company to opt for CFDs, the portfolio may comprise a significant proportion of instruments (notably certificates of deposit, European commercial paper, treasury bills) with a minimum rating of AA- (S&P) or Aa3 (Moody's). In case of separation between the two ratings, the Management Company will select the lowest rating.

c) Shares or units of investment funds

The Compartment may invest maximum 10% of its assets in shares or units of UCITS which themselves invest maximum 10% of their assets in shares or units of UCITS or investment funds.

The Compartment may invest up to 20% of its net assets in closed-ended Real Estate Investment Trusts (REIT).

These funds may be managed by the Management Company or an affiliated company. The investment strategies of these funds are compatible with that of the Compartment.

The Compartment may invest maximum 10% of its assets in one or more Compartments of the Company.

2) Derivatives used to achieve the investment objective

The Compartment may use financial futures up to a maximum of one time its assets. The Compartment's leveraged exposure may not exceed 110%.

The Compartment will invest in regulated, organized markets and over-the-counter.

The Compartment will use derivatives instrument for hedging and exposure purposes, and to achieve the investment objective (including replication of synthetic exposure to baskets of equities or indices).

The hedging derivatives transaction shall aim to cover equity risk and foreign exchange risk of the Compartment.

The types of instruments used by the Management Company will mainly be futures on equities or stock market indices, swaps on currencies or equities and CFDs.

3) Deposits and cash

The Compartment may hold, up to 20% of its net assets, ancillary liquid assets which consists of bank deposits at sight such as cash held in current accounts with a bank accessible at any time.

The Compartment may make limited use of other deposits in order to achieve its investment objective, for treasury purposes and/or in case of unfavourable market conditions.

4) Cash borrowing

The Compartment may borrow up to the equivalent of 10% of its net assets in cash on a temporary basis and for technical needs only.

5) Temporary purchases and sales of securities

The attention of the Shareholders is drawn to the fact that the below wording, reporting the increased use of securities lending, applies as of 29 May 2023.

In addition, the Compartment may engage in security lending for up to 75% of its assets.
The Compartment may also, as ancillary, make temporary deposits and borrow cash in the event that a debit balance was to appear.

The will enter into securities lending transactions opportunistically in circumstances where the Management Company believes that the objective described below could be achieved.

In the context of investments in specials and general collateral the Compartment will use securities lending in order to increase the return of the portfolio.

The expected proportion of the Compartment's assets which may be subject to securities lending depends on the demand of market participants for the securities forming part of the Compartment's portfolio at any time.

This demand depends notably on the interest of such securities, the size of the lendable positions, the presence of specials or securities used as general collateral, the potential duration of the loan (the securities being subject to portfolio adjustments or rebalancing, and thus sell trades), and the type of collateral accepted by the Compartment.

The Compartment's use of, or investment in, securities lending transactions will be as follows:

Type of transaction	Expected proportion	Maximum proportion
Securities lending	0% to 30%	75%

Reference Currency

The reference currency of the Compartment is USD.

Profile of the Typical Investor

The Compartment is a high risk vehicle. To determine their level of investment, investors should consider their personal assets, the regulations applicable to them, their current financial needs over a recommended minimum investment horizon of more than five years, and also their willingness to take risks or their preference for a more prudent investment. The recommended minimum investment horizon is more than 5 years.

Form of Shares and Classes

The Share Classes of the Compartment will be issued in registered form.

Investors subscribing for Shares denomminated in EUR or GBP are subject to EUR/GBP currency risk given the conversion of the net asset value.

Share Classes	**A** **Isin Code:** **LU1805044515**	**A1** **Isin Code:** **LU1805044606**	**B** **Isin Code:** **LU1805044788**	**R** **Isin Code:** **LU1805044861**	**Z** **Isin Code:** **LU1805044945**
Currency	USD	EUR	USD	GBP	USD
Type of Shares	Accumulation				
Target Investors	Institutional investors		All investors		Institutional investors
Minimum initial subscription	10 Shares	10 Shares	1 Share	1 Share	10 Shares
Minimum holding amount	1 Share	1 Share	1 Share	1 Share	1 Share
Valuation Day	Every Business Day, with the exception of days on which the American markets are closed (based on the official NYSE Euronext calendar)				
Management Company Fee	1.2%	1.2%	2%	0.55%	0%
Administration Fee & Depositary Fee	0.20%	0.20%	0.20%	0.20%	0.20%
Subscription Fee paid to the Management Company	None	None	Up to 3%	Up to 5%	Up to 5%
Redemption Fee paid to the Management Company	Up to 1%	Up to 1%	Up to 1%	Up to 1%	Up to 5%
Cut-off	12.00 p.m. CET the Business Day before the relevant Valuation Day				
Subscription / Redemption Settlement Day	2 days, according to the official NYSE Euronext calendar, following the Valuation Day				

R units: these units are intended for "all investors" seeking a low initial investment and a "clean fee" structure. The R "clean fee" share class will not carry any fees payable to distributors.

Launch date

The initial subscription date for the Compartment was on 30 April 2018 with the following initial subscription prices:

The following Share Classes of this Compartment will be created with the following initial subscription prices:

Class:	Initial subscription prices:
Class A	USD 10,000
Class A1	EUR 10,000
Class B	USD 100
Class R	GBP 100
Class Z	USD 10,000

Total Expense Ratio

The latest calculated total expense ratio rate can be found in the Company's latest financial report.

Risk Management

The method used to calculate overall exposure is the commitment method.

Compartments Specific Risk Factors

The funds will be invested primarily in financial instruments selected by the Management Company. These instruments will be subject to market movements and fluctuations. The Management Company invests according to a systematic, fundamentals-based model: there is a risk that the equities selected may not be the best performing stocks.

1) Equity risk

If the equities or indices to which the portfolio is exposed fall, the net asset value of the Compartment may also fall.

Since the volume of small and mid-cap stocks listed on the stock exchange is relatively low, market downturns are more pronounced and more rapid than for large caps. The net asset value of the Compartment may therefore decline more quickly and more significantly.

Investors' attention is drawn to the fact that the small-cap markets are intended to accommodate businesses that, due to their specific characteristics, may pose a risk for investors.

2) Risk associated with the Management Company's investment process

Investors should note that portfolio construction and the selection and weighting of assets are based on a process developed by the Management Company. The Compartment's investment process is based on a systematic model designed to identify signals based on past statistical results.

There is a risk that the model may not be efficient, as there is no guarantee that past market situations will be repeated in the future. Since the aim of the processes developed by the Management Company is to achieve good diversification of the Compartment's portfolio, using these processes may lead the Management Company to not select the top-performing assets.

3) Risk associated with the use of financial futures

The Compartment may use some financial futures for up to 110% of its assets. The Compartment may thus be exposed for up to 110% of its assets to the market, assets, index and economic and/or financial instrument or parameter, which can imply a risk of reduction in the net asset value of the Compartment that might be more significant and quicker that the one observed on the markets where the Compartment is invested.

4) Currency risk (up to 100%)

Currency risk is the risk of depreciation in the currencies in which the Compartment invests relative to the reference currency. This currency risk will be managed according to market opportunities and may thus account for a significant proportion of the risk. In the event of depreciation in foreign currencies, investors are thus exposed to a decline in the value of their units.

5) Counterparty risk

The Compartment may incur a loss in the event of default by a counterparty with which certain transactions were conducted, leading to a decline in the Compartment's net asset value.

6) Interest rate risk

This refers to the risk of a fall in the value of fixed income instruments resulting from changes in interest rates. If interest rates rise, the Compartment's net asset value may fall. The Compartment has limited exposure to interest rate products.

7) Credit risk

This is the risk of a decline in shares issued by a private or public issuer or default by the latter. The value of the debt securities in which the Compartment is invested may decline, leading to a fall in net asset value.

Template pre-contractual disclosure for the financial products referred to in Article 8, paragraphs 1, 2 and 2a, of Regulation (EU) 2019/2088 and Article 6, first paragraph, of Regulation (EU) 2020/852

Product name: Most Diversified Portfolio SICAV - TOBAM Anti-Benchmark World Ex-USA Equity Fund

Legal entity identifier: 549300075F0CTX7A0P02

Sustainable investment means an investment in an economic activity that contributes to an environmental or social objective, provided that the investment does not significantly harm any environmental or social objective and that the investee companies follow good governance practices.

The **EU Taxonomy** is a classification system laid down in Regulation (EU) 2020/852, establishing a list of **environmentally sustainable economic activities**. That Regulation does not lay down a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

Environmental and/or social characteristics

Does this financial product have a sustainable investment objective?

☐ **Yes**

- ☐ It will make a minimum of **sustainable investments with an environmental objective:** ___%
  - ☐ in economic activities that qualify as environmentally sustainable under the EU Taxonomy
  - ☐ in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy
- ☐ It will make a minimum of **sustainable investments with a social objective:** ___%

☒ **No**

- ☒ It **promotes Environmental/Social (E/S) characteristics** and while it does not have as its objective a sustainable investment, it will have a minimum proportion of 40% of sustainable investments
  - ☐ with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy
  - ☒ with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy
  - ☐ with a social objective
- ☐ It promotes E/S characteristics, but **will not make any sustainable investments**

What environmental and/or social characteristics are promoted by this financial product?

The Compartment's primary investment objective is to be exposed to global developed market equities, by systematically applying the Management Company's investment process, which aims to outperform the reference index by minimizing risk factor concentration via a maximally diversified portfolio.

This process integrates environmental, social and governance (ESG) risks and opportunities to the sustainability of long-term company returns. The Compartment aims to promote low carbon approaches, commitment to climate action and companies with good governance.

In particular, the Compartment aims to promote the following E/S characteristics:

- Low carbon approach by applying a systematic carbon footprint reduction of at least 20% versus the reference investment universe's carbon footprint,
- Promotion of companies with good governance using raw data and their ESG footprint.

The Compartment has designated Bloomberg Developed Markets ex US Large & Mid Cap Net Return Index as a reference index to compare its ESG characteristics, such as carbon emissions or ESG footprint.

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

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

In order to achieve the above characteristics promoted by the Compartment, the Management Company has put in place an ambitious ESG policy made of key pillars and sustainability indicators. The Compartment uses the following sustainability indicators to attain each of the environmental and social characteristics promoted by the Compartment:

- **Carbon Emissions Reduction:** The Management Company applies a systematic carbon footprint reduction of at least 20% versus the reference index Bloomberg Developed Markets ex US Large & Mid Cap Net Return Index's carbon footprint. The calculation of the carbon footprint is based on the greenhouse gas emissions scope 1 (i.e. direct emissions from owned or controlled sources) and scope 2 (i.e. indirect emissions from the generation of purchased energy) according to GHG Protocol Corporate Standard. Data on emissions used is obtained from a number of sources including company reports, CDP questionnaire (Carbon Disclosure Project) or an estimation model.

- **ESG Footprint:** The Management Company has put in place a strict E, S and G integration process for all listed companies in its investment universe; using officially published data from Bloomberg.

✓ E: For example: existence of climate change / biodiversity / energy efficiency policies; green building, water and waste usage
✓ S: For example: Ethics/Equal opportunity/training/ consumer data protection/whistleblowing policies, CSR committee in place, supply chain management
✓ G: For example: Number of board meetings per year, ratio of independent directors, chairman tenure, ratio of nonexecutive directors in boards

From that raw data, the Management Company has built a proprietary methodology to compute the "E,S,G footprints" of each individual holding in the portfolio and as such determine the overall E,S,G Footprints of the portfolio. The Management Company has constrained its investment decision-making process to reach E,S,G footprints of the Compartment, at minima at the same level as the E,S,G footprints of the reference index the Bloomberg Developed Markets ex US Large & Mid Cap Net Return Index.

What are the objectives of the sustainable investments that the financial product partially intends to make and how does the sustainable investment contribute to such objectives?

The sustainable investments within the Compartment contribute to Environmental objectives including climate change mitigation and adaptation (however not in the meaning of Taxonomy Regulation) or commitment to science-based emissions reduction targets ("SBTI").

To determine the share of sustainable investments, the Management Company consider the environmental objective for companies that have:

- A carbon intensity (carbon emissions normalized by the Enterprise Value including Cash) below 80% of the average carbon intensity of the reference index Bloomberg Developed Markets ex US Large & Mid Cap Net Return Index

Or

Made a commitment to the SBTI initiative. (This engagement is followed by the Management Company's research team on an annual basis).

- Are not involved in severe breaches or controversies in regard to the labor rights, human rights, environmental or corruption, and that are not part of the following sectors: tobacco, controversial weapons, coal mining and fossil fuels

And

Have not been targeted by any significant environmental fines over the past years.

- Have a G score for Good Governance practices (as defined by the Management Company ESG Footprint proprietary methodology) in the top 80% of the reference index the Bloomberg Developed Markets ex US Large & Mid Cap Net Return Index.

How do the sustainable investments that the financial product partially intends to make, not cause significant harm to any environmental or social sustainable investment objective?

Companies the Compartment invests in, contribute to achieve the Compartments' carbon reduction objective, ESG footprint commitment while not significantly harming any environmental or social sustainable investment objectives. Before any investment is made by the Compartment (not only sustainable investments but all investments), the investment has to pass a negative screening, further including the consideration of the principal adverse impacts described in the below section. Hence no companies involved in controversial sectors or activities not aligned with TOBAM's policy, can be eligible for investments for the Compartment.

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

The following Principal Adverse Impacts ("PAI") indicators as defined in SFDR Level II have been considered:

- PAI #7 : Activities negatively affecting biodiversity
- PAI #10 : Violations of UN Global Compact principles and OECD guidelines
- PAI #14 : Exposure to Controversial Weapons

The principal adverse impacts on sustainability indicators have been take into account through an exclusionary investment policy.

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

The Management Company will not invest in any company that has been classified as failing to comply with key international norms (ISS Ethix Norm-based screening) such as for example the UN Global Compact Principles, OECD Guidelines for Multinational Enterprises, Guiding Principles on Business and Human rights.

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

The "do no significant harm" principle applies only to those investments underlying the financial product that take into account the EU criteria for environmentally sustainable economic activities. The investments underlying the remaining portion of this financial product do not take into account the EU criteria for environmentally sustainable economic activities.

Any other sustainable investments must also not significantly harm any environmental or social objectives.

Does this financial product consider principal adverse impacts on sustainability factors?

Principal adverse impacts are the most significant negative impacts of investment decisions on sustainability factors relating to environmental, social and employee matters, respect for human rights, anti-corruption and anti-bribery matters.

✖ Yes, the Management Company has committed to monitor the 14 mandatory and 2 optional environmental and social indicators to show the impact of the Compartment's investments against these PAI indicators.

Furthermore, the Compartment considers principal adverse impacts on sustainability factors and only the following PAI have been taken into account into the investment process:

- PAI #1: GHG (Greenhouse Gas) emissions - Scope 1 & 2
- PAI #2: Carbon footprint
- PAI #3: GHG intensity of investee companies

The Compartment by targeting an overall carbon reduction of at least 20% compared to the reference index Bloomberg Developed Markets ex US Large & Mid Cap Net Return Index 's carbon footprint, is looking to invest in a combination of stocks that achieve this overall carbon reduction, by considering carbon emissions scope 1 and 2.

- PAI #7: Activities negatively affecting biodiversity

The Management Company proprietary ESG footprint methodology considers raw data published by companies in order to compute an ESG footprint, by notably looking for example at the existence or not of key policies relevant to the biodiversity (i.e.for example: biodiversity policy, water usage policy, waste reduction policy, climate change policy…).

In addition to the previous PAI, the following social sustainability indicators have been considered:

- PAI #10: Violations of UN Global Compact principles and (OECD) Guidelines
- PAI #13: Board Gender Diversity
- PAI #14: Exposure to controversial weapons

PAI reports are available on the Compartment annual report.

☐ No

What investment strategy does this financial product follow?

The investment strategy of the Compartment is a global developed market equities strategy, systematically applying the Management Company's investment process, which aims to outperform the reference index by minimizing risk factor concentration via a maximally diversified portfolio.

The Compartment aims to promote low carbon approaches, commitment to climate action and companies with good governance.

The Management Company applies systematically its ESG methodology in the investment decision-making process.

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

What are the binding elements of the investment strategy used to select the investments to attain each of the environmental or social characteristics promoted by this financial product?

The Compartment applies the following binding elements to select investments and attain the environmental and social characteristics described above:

- **Exclusion policy:** the Management Company applies a general exclusion policy, restricting the investment universe and excluding companies based either on their involvement in certain activities (sector or product based) or based on controversies or breaches to key international norms. The key exclusions used by the Management Company are reflected in the below table:

Sector /Product	**Criteria**
Producer and distributors of tobacco	Limit (5% of the revenues)
Coal and coal-based producers and distributors	Limit (10% of the revenues)
Development, production, maintenance or distribution of controversial and prohibited weapons	Exclusion
Breach or violation of International Treaties, Conventions & Standards such as OECD Guidelines for Multinational Enterprises, ILO Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy, UN Global Compact, Guiding Principles on Business and Human Rights	Exclusion

Further details on the exclusion policy can be found in the following link: https://www.tobam.fr/our-beliefs/exclusion-policy/.

- **ESG Integration:** The Management Company has put in place a strict E, S and G integration process for all listed companies in its investment universe; using officially published data from Bloomberg.

✓ E: For example: existence of climate change / biodiversity / energy efficiency policies; green building, water and waste usage

✓ S: For example: Ethics/Equal opportunity/training/ consumer data protection/whistleblowing policies, CSR committee in place, supply chain management

✓ G: For example: Number of board meetings per year, ratio of independent directors, chairman tenure, ratio of nonexecutive directors in boards

From that raw data, the Management Company has built a proprietary methodology to compute the "E,S,G footprints" of each individual holding in the portfolio and as such determine the overall E,S,G Footprints of the portfolio. The E, S and G footprint aggregates and normalizes (for industry, size and regional biases) the information contained in each of the above mentioned items by E, S and G pillar. The normalization also corrects differences in scale of the different pieces of raw data. The final footprint is an equal weighted measure of the three pillars. The Management Company then adds a constraint into its quantitative portfolio optimization process, to ensure that the E, S and G footprints of the respective portfolio (computed based on the holdings' individual E, S and G footprints) are respectively at least at the same level as the E, S and G footprints of the reference index Bloomberg Developed Markets ex US Large & Mid Cap Net Return Index.

- **Carbon Emissions Reduction & Commitment to SBTI:**

In addition, the Management Company analyses the carbon emissions of each holding in its investment universe, computes the carbon footprint of the portfolio and applies a systematic portfolio carbon footprint reduction of at least 20% versus the reference index Bloomberg Developed Markets ex US Large & Mid Cap Net Return Index's carbon footprint. The calculation of the carbon footprint is based on the greenhouse gas emissions scope 1 and scope 2. Data on emissions used is obtained from a number of sources including company reports, CDP questionnaire (Carbon Disclosure Project) or an estimation model.

The Management Company is also monitoring the companies' commitment to the SBTI as a way to monitor best effort toward more incorporation of best practices. This feature is monitored on a yearly basis.

- **Responsible Ownership:** The Management Company applies a responsible voting policy and has built an ambitious engagement policy to support its commitment to sustainability and address via engagement and dialogues, issues relative to ESG and sustainability.

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

Not applicable.

Good governance practices include sound management structures, employee relations, remuneration of staff and tax compliance.

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

In order to assess good governance practices, the Management Company consider the G scoring of its proprietary ESG footprint methodology, and ensure that the G scoring of the portfolio is matching the reference Bloomberg Developed Markets ex US Large & Mid Cap Net Return Index 's G scoring.

Asset allocation describes the share of investments in specific assets.

What is the asset allocation planned for this financial product?

#1: 90% of the assets of this Compartment are aligned (promote) E/S characteristics.

#1A: at least 40% of those assets fall under the sustainable share of investment with non EU Taxonomy aligned environmental objectives.

These sustainable investments contribute to environmental objectives, including climate change mitigation and adaptation (however not in the meaning of the Taxonomy Regulation) or commitment to SBTI.

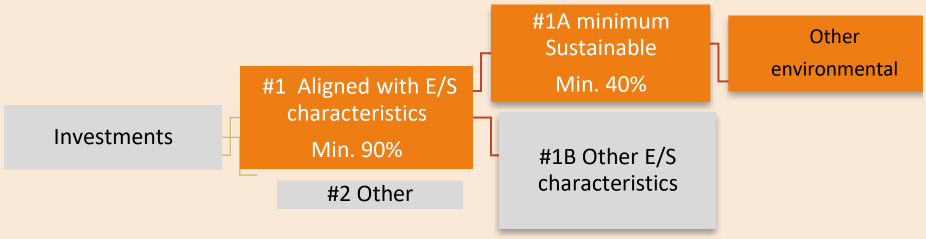
The model used by TOBAM for the determination of the sustainable investments combines the pass or fail approach and the weighted-revenue approach with threshold for the carbon emissions and governance.
To determine the share of sustainable investments, the Management Company considers the environmental objective for companies that have:

Environmental objective determined as:
o Companies that have carbon emission intensity (carbon emissions normalized by the Enterprise Value Including Cash) below 80% of the average emissions carbon intensity of the reference index the Bloomberg Developed Markets ex US Large & Mid Cap Net Return Index
Or
o Companies that have made a commitment to the SBTI initiative (this engagement is followed by the Management Company's research team on an annual basis).

Do Not Significantly Harm characteristics:
o Companies that are not involved in severe breaches or controversies in regard to the labor rights, human rights, environmental or corruption, and that are not part of the following sectors: tobacco, controversial weapons, coal mining and fossil fuels
And
o Companies that have not been targeted by any significant environmental fines over the past years.

Good Governance practices are defined as companies that have a G score (as defined by the Management Company ESG Footprint proprietary methodology) in the top 80% of the reference index the Bloomberg Developed Markets ex US Large & Mid Cap Net Return Index.

Please note that investments falling under section #1B on the below diagram 'non sustainable investment share of the Compartment', still comply with all of the Compartment ESG policy (exclusions, carbon reduction, ESG footprint, voting & engagement), but did not qualify as a sustainable investment.



#1 Aligned with E/S characteristics includes the investments of the financial product used to attain the environmental or social characteristics promoted by the financial product.

#2Other includes the remaining investments of the financial product which are neither aligned with the environmental or social characteristics, nor are qualified as sustainable investments.

The category **#1 Aligned with E/S characteristics** covers:
- The sub-category **#1A Sustainable** covers sustainable investments with environmental or social objectives.
- The sub-category **#1B Other E/S characteristics** covers investments aligned with the environmental or social characteristics that do not qualify as sustainable investments.

How does the use of derivatives attain the environmental or social characteristics promoted by the financial product?

The Compartment may use financial derivative instruments for investment, efficient portfolio management and/or hedging purposes, and this will not impact in any way the exposure to sustainable assets, or the ESG characteristics of the Compartment.

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

This Compartment commits to a 0% alignment with the EU Taxonomy.

Taxonomy-aligned activities are expressed as a share of:
- **turnover** reflecting the share of revenue from green activities of investee companies
- **capital expenditure** (CapEx) showing the green investments made by investee companies, e.g. for a transition to a green economy.
- **operational expenditure** (OpEx) reflecting green operational activities of investee companies.

Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy[1]?

☐ Yes :

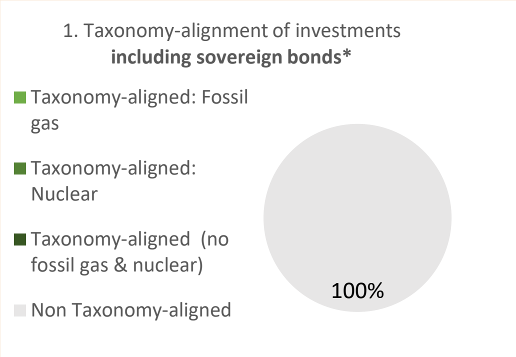
☐ In fossil gas ☐ In nuclear energy

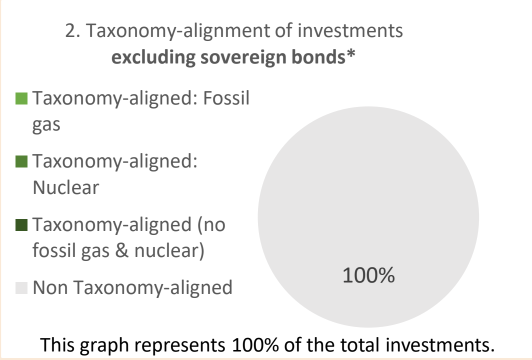
☒ No

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

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

The two graphs below show in green the minimum percentage of investments that are aligned with the EU Taxonomy. As there is no appropriate methodology to determine the Taxonomy-alignment of sovereign bonds*, the first graph shows the Taxonomy alignment in relation to all the investments of the financial product including sovereign bonds, while the second graph shows the Taxonomy alignment only in relation to the investments of the financial product other than sovereign bonds.





*** For the purpose of these graphs, 'sovereign bonds' consist of all sovereign exposures**

Enabling activities directly enable other activities to make a substantial contribution to an environmental objective.

Transitional activities are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.

What is the minimum share of investments in transitional and enabling activities?

As the Compartment does not have a minimum Taxonomy alignement, there is no minimum share in transitional and enabling activities.

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

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

The minimum share of sustainable investments with an environmental objective that are not aligned with the EU Taxonomy is 40%.

What is the minimum share of socially sustainable investments?

Not applicable.

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

Investments falling under category "#2 Other", are investments such as derivatives, cash or cash equivalent, not integrating E/S characteristics, where ESG key features and analysis have not been performed, and E/S characteristics not considered.

No minimum environmental or social safeguards apply to the above elements.

Is a specific index designated as a reference benchmark to determine whether this financial product is aligned with the environmental and/or social characteristics that it promotes?

No, but the Compartment has designated a reference benchmark (Bloomberg Developed Markets ex US Large & Mid Cap Net Return Index). This index is used as a reference to compare the Compartment ESG characteristics, such as carbon emissions or ESG footprint, with the reference benchmark.

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

- ***How is the reference benchmark continuously aligned with each of the environmental or social characteristics promoted by the financial product?***

  The reference index used by the Compartment is not an ESG benchmark and is not consistent with the ESG characteristics promoted by the Compartment. All ESG calculations or comparisons are computed using the Compartment's benchmark, as a good proxy of the Compartment investment universe.

- ***How is the alignment of the investment strategy with the methodology of the index ensured on a continuous basis?***

  The reference index the Bloomberg Developed Markets ex US Large & Mid Cap Net Return Index, capturing large and mid-cap equities across 22 of 23 Developed Markets DM countries-excluding the United States, which is in line with the Compartment investment universe.

  The investment universe of the reference index is regularly monitored by the Management Company research team to ensure the consistency with the Compartment's investment universe, in order to ensure relevance of ESG and performance comparisons.

- ***How does the designated index differ from a relevant broad market index?***

  The reference index the Bloomberg Developed Markets ex US Large & Mid Cap Net Return Index, capturing large and mid-cap equities across 22 of 23 Developed Markets DM countries-excluding the United States, which is in line with the Compartment investment universe.

- ***Where can the methodology used for the calculation of the designated index be found?***

  https://assets.bbhub.io/professional/sites/27/Global-Equity-Index-Methodology.pdf

Where can I find more product specific information online?

More product-specific information can be found on the website:
https://www.tobam.fr/key-documents-policies/

APPENDIX 13. Most Diversified Portfolio SICAV – TOBAM Anti-Benchmark Multi-Asset Fund

Investment Objective

The objective of the Compartment is to achieve an attractive performance over a 5-year investment horizon through dynamic exposure to portfolios of equities and bonds in developed and emerging markets.

The developed and emerging markets targeted are those covered by the Bloomberg Developed Markets Large & Mid Cap Net Return Index and the Bloomberg Emerging Markets Large & Mid Cap Net Return Index. The list of developed market countries and emerging market countries is available at: www.bloomberg.com/indices.

Following the Management Company's investment approach, the allocation aims to maintain a high degree of diversification when selecting strategies and their weightings in the investment universe.

The Compartment does not use an index-based management strategy, it is actively managed. As a consequence, its performance may differ substantially from the benchmark, which is used to define the investment universe and determine the global risk profile of the Compartment. A minority of the benchmark's securities will be components of the Compartment. The weightings of the Fund's portfolio holdings will diverge significantly from their equivalent weighting in the index.

Investment strategy of the Compartment

The securities in which the Compartment invests are selected on the basis of quantitative, fundamentals based models developed by the Management Company.

In order to support its investment objective, the Compartment will invest on different markets or asset classes (Equities, Bonds) for up to 100% of its assets, mainly directly with a 50% cap on High Yield bonds and also through the detention of funds.

For the purpose of diversification, the Compartment may invest in closed-ended Real Estate Investment Trust (REIT). Investments in Real Estate Investment Trusts (REIT) are made in compliance with the restrictions laid down in Article 41 of the Law and article 2 of the Grand Ducal Regulation of the 8 of February 2008 relating to certain definitions of the Law.

The Compartment may also use deposits in the event that it becomes overdrawn.

The Compartment may also use forward financial instruments (notably including futures contracts), Credit Default Swaps and their indices, iBoxx Standardized Total Return Swaps and Interest Rate Swaps up to a maximum of one time the assets for the purpose of pursuing its investment goal and with a view to making duration adjustments.
In addition, the Compartment may engage in security lending for up to 75% of its assets and also, as ancillary, may make temporary deposits and borrow cash in the event that a debit balance was to appear.

The Compartment qualifies under article 8 of SFDR. The investment strategy does not have a sustainable investment objective but promotes environmental and social characteristics. The strategy notably follows the 4 pillars of TOBAM's SRI policy: exclusion, carbon reduction, ESG monitoring and responsible stewardship via voting and engagement.

The Management Company considers ESG factors and applies a sustainability approach in its investment process for the Compartment as further detailed in the Appendix 13.1 Environmental and/or Social Characteristics - Pre-contractual disclosures in compliance with SFDR Level II.

Description of the asset classes used to achieve the investment objective

The asset classes included in the portfolio are the following:

a) Equities

To implement the above strategy, the Compartment may invest in equities or closed-ended REITS up to 100% of its net assets;

b) Bonds

The Compartment may invest in bonds for up to 100% of its net assets with a restriction to 50% of its net assets in "High Yield" bonds.
The Compartment may hold distressed Securities which are defined as securities issued by a company that is either in default or in high risk of default.

Defaulted securities or bonds in the midst of a restructuring process shall not exceed 10% of the assets of the Compartment at any point in time. Notwithstanding anything to the contrary, in case of downgrade of assets, the Management Company will manage the investments of the Compartment in Defaulted Securities in order not to exceed 10% of the assets.

c) Money market instruments

For treasury purposes, the Compartment may invest up to 30% of its assets in money market instruments, including money market funds and transferable debt securities.

In order to achieve its investment objective, if execution of the investment strategy leads the Management Company to opt for CFDs, the portfolio may comprise a significant proportion of instruments (notably certificates of deposit, European commercial paper, treasury bills) with a minimum rating of AA- (S&P) or Aa3 (Moody's). In case of separation between the two ratings, the Management Company will select the lowest rating.

d) Shares or units of investment funds

The Compartment may invest maximum up 10% of its assets in shares or units of UCITS which themselves invest maximum 10% of their assets in shares or units of UCITS or investment funds, but no more than 20% maximum of its assets on each. The Compartment will invest only in funds managed by the Management Company or an affiliated company. The investment strategies of these funds are compatible with that of the Compartment.

These investments shall be denominated in any currency and will be made without any restrictions in terms of geographic allocation, market capitalization, sector, rating or time to maturity.

The Compartment's investment process aims to minimize risk factors and optimize the diversification ratio of constituents in order to achieve an even allocation between their risk factors and generate optimal weightings.

Financial derivative instruments, including futures, forwards, swaps, options, credit derivatives (single issuer Credit Default Swaps and Credit Indices Default Swaps such as "Itraxx" and "CDX"), iBoxx Standardized Total Return Swaps may also be used for hedging, efficient portfolio management, arbitrage and/or to generate exposure and thus expand the exposure of the Compartment to more than the net assets.

1) Derivatives used to achieve the investment objective

The Compartment may use financial futures, Credit Default Swaps and their indices, iBoxx Standardized Total Return Swaps up to a maximum of one time its assets.

The Compartment will invest in regulated, organized markets and over-the-counter.

The Compartment will use derivative instrument for hedging and exposure purposes and to achieve the investment objective.

The types of instruments used by the Management Company will mainly be futures contracts, Credit Default Swaps and their indices, iBoxx Standardized Total Return Swaps and Interest Rate swaps.

Credit derivatives, be it CDS indices or TRS on credit cash indices will be used opportunistically in circumstances where the Management Company believes that the objective described below could be achieved.

The Compartment will use TRS for liquidity management purpose in order to keep cash amount to face potential redemption without incurring transaction costs while maintaining the Compartment's overall exposure in line with its mandate.

The Compartment's use of, or investment in, TRS will be as follows:

Type of transaction	Expected proportion	Maximum proportion
Total Return Swaps	0% to 10%	30%

2) Deposits and cash

The Compartment may hold, up to 20% of its net assets, ancillary liquid assets which consists of bank deposits at sight such as cash held in current accounts with a bank accessible at any time.

The Compartment may make limited use of other deposits in order to achieve its investment objective, for treasury purposes and/or in in case of unfavourable market conditions.

3) Cash borrowing

The Compartment may borrow up to the equivalent of 10% of its net assets in cash on a temporary basis and for technical needs only.

4) Temporary purchases and sales of securities

The attention of the Shareholders is drawn to the fact that the below wording, reporting the increased of use of securities lending and the introduction of repurchase transactions, applies as of 29 May 2023.

In addition, the Compartment may engage in security lending and repurchase transactions for up to 75% of its assets. The Compartment may also, as ancillary, make temporary deposits and borrow cash in the event that a debit balance was to appear.

The Compartment will enter into securities lending and repurchase transactions opportunistically in circumstances where the Management Company believes that the objective described below could be achieved.

In the context of investments in specials and general collateral the Compartment will use securities lending and repurchase transactions in order to increase the return of the portfolio.

The expected proportion of the Compartment's assets which may be subject to securities lending and repurchase transactions depends on the demand of market participants for the securities forming part of the Compartment's portfolio at any time.

This demand depends notably on the interest of such securities, the size of the lendable positions, the presence of specials or securities used as general collateral, the potential duration of the loan (the securities being subject to portfolio adjustments or rebalancing, and thus sell trades), and the type of collateral accepted by the Compartment.

The Compartment's use of, or investment in, securities lending and repurchase transactions will be as follows:

Type of transaction	Expected proportion	Maximum proportion
Securities lending	0% to 30%	75%
Repurchase transactions	0% to 30%	75%

Reference Currency

The reference currency of the Compartment is USD.

Profile of the Typical Investor

In the light of the Compartment's objectives and investment strategies, it is aimed at investors who seek to take advantage of exposure to: equities, bonds and money market instruments aimed at minimizing risk factors and optimizing the diversification ratio of the composite benchmark constituents.

To determine the level of their investment, investors should consider their personal assets, the regulations applicable to them, their current financial needs over a recommended minimum investment horizon of more than five years, and also their willingness to take risks or their preference for a more prudent investment.

The recommended minimum investment horizon is more than 5 years.**Form of shares and classes**

The Share Classes of the Compartment will be issued in registered form.

Share Classes	**A1*** **Isin Code:** **LU1899106733**	**A2** **Isin Code:** **LU2055188861**	**A** **Isin Code:** **LU2055189083**	**B** **Isin Code:** **LU1899106816**	**B1*** **Isin Code :** **LU1899106907**	**R1*** **Isin Code:** **LU1899107038**	**R2** **Isin Code :** **LU2333312523**	**R3*** **Isin Code :** **LU2451275619**	**Z** **Isin Code:** **LU1899107111**	**Z1*** **Isin Code:** **LU2174447131**
Currency	EUR	EUR	USD	USD	EUR	EUR	EUR	USD	USD	EUR
Type of Shares	Accumulation									
Target Investors	Institutional investors	Institutional investors	Institutional investors	All investors	All investors	All investors	All investors	All investors	Institutional investors	Institutional investors
Minimum initial subscription	10 shares	10 shares	10 shares	1 share	1 share	1 share	1 share	1 share	10 shares	10 shares
Minimum holding amount	1 share	1 share	1 share	1 share	1 share	1 share	1 share	1 share	1 share	1 share
Valuation Day	Every Business Day with the exception of public holidays and non-settlement days for exchanges based in the UK, France, Luxembourg and days on which US markets are closed or close early (based on the official US Government Bond Market Calendar									
Management Company Fee	1.20%**	1.20%**	1.20%**	1.85%**	1.85%**	0.70%**	Up to 0.70%**	0.70%**	0%**	0%**
Hedge	100% systematic hedging against foreign exchange risk				100% systematic hedging against foreign exchange risk	100% systematic hedging against foreign exchange risk		100% systematic hedging against foreign exchange risk		100% systematic hedging against foreign exchange risk
Administration Fee & Depositary Fee	0.20%	0.20%	0.20%	0.20%	0.20%	0.20%	0.20%	0.20%	0.20%	0.20%
Subscription Fee paid to the Management Company	None	None	None	Up to 3%	Up to 3%	Up to 5%	Up to 5%	Up to 5%	Up to 5%	Up to 5%
Redemption Fee paid to the Management Company	Up to 1%	Up to 1%	Up to 1%	Up to 1%	Up to 1%	Up to 1%	Up to 1%	Up to 1%	Up to 5%	Up to 5%

Cut-off	12.00 p.m. CET, the Business Day before the relevant Valuation Day
Subscription / Redemption Settlement Day	2 days, according to the official NYSE Euronext calendar, following the Valuation Day

R units: these units are intended for "all investors" seeking a low initial investment and a "clean fee" structure. The R "clean fee" share class will not carry any fees payable to distributors.

** Share Classes A1, B1, R1, R3 and Z1 offer 100% systematic hedging against foreign exchange risk of all currency exposures held in the portfolio against the currency of the concerned Share Class (EUR for A1, B1, R1 and Z1, USD for R3) with a 10% tolerance.*

*** Indirect Management Company Fees charged by the target fund(s) managed by the Management Company or an affiliated company in which the Compartment invests will be rebated to the Compartment by the Management Company.*

Launch date

The initial subscription date for the Compartment was 24/04/2019 with the following initial subscription prices:

Class:	Initial subscription prices:
Class A	USD 100
Class A1	EUR 113.10
Class A2	EUR 100
Class B	USD 120.870
Class B1	EUR 100
Class R1	EUR 110.73
Class R2	EUR 100
Class R3	USD 100
Class Z	USD 10 000
Class Z1	EUR 10 000

Total Expense Ratio

The latest calculated total expense ratio rate can be found in the Company's latest financial report.

Risk Management

The method used to calculate overall exposure is the commitment method.

Compartments Specific Risk Factors

The funds will be invested primarily in financial instruments selected by the Management Company. These instruments will be subject to market movements and fluctuations. The Management Company invests according to a systematic, fundamentals-based model: there is a risk that the securities selected may not be the best performing stocks.

It should be noted that Shares are neither guaranteed nor coupled with capital protection, in such a way that no assurances can be given that they will be redeemed at the price at which they were subscribed to.

1) Capital risk

The Fund does not carry any guarantee or protection, and the capital invested at the outset may not be returned in full.

2) Risk associated with the Management Company's investment process

Investors' attention is drawn to the fact that the portfolio is constructed and its assets selected and weighted using processes developed by the Management Company. The Compartment's investment process is based on a model designed to identify signals based on past statistical results.

There is a risk that the model may not be efficient, since there is no guarantee that past market situations will repeat themselves in the future. The aim of the processes developed by TOBAM is to achieve healthy diversification of the Compartment's portfolio, and so use of these processes may lead the Management Company to not select the top-performing assets.

3) Equity risk

If the equities or indices to which the portfolio is exposed fall, the net asset value of the Compartment may also fall.

Since the volume of small and mid-cap stocks listed on the stock exchange is relatively low, market downturns are more pronounced and more rapid than for large caps. The net asset value of the Compartment may therefore decline more quickly and more significantly.

Investors' attention is drawn to the fact that the small-cap markets are intended to accommodate businesses that, due to their specific characteristics, may pose a risk for investors.

4) Interest rate risk

This is the risk of depreciation in fixed-income instruments deriving from interest-rate fluctuations. Should interest rates rise, the Compartment's net asset value may decline.

5) High Yield Bond risk

Investments in High Yield bonds can involve a substantial risk of loss. High Yield bonds are considered to be speculative with respect to the issuer's ability to pay interest and principal. These securities, which are rated below investment grade, have a higher risk of issuer default, are subject to greater price volatility than investment grade securities and may be illiquid.

6) Credit risk

This is the risk of depreciation in debt securities issued by a private-sector issuer or default by the latter. The value of the debt securities in which the Compartment is invested may decline, leading to a fall in net asset value.

7) Counterparty risk

The Compartment may incur a loss in the event of default by a counterparty with which certain transactions were conducted, leading to a decline in the Compartment's net asset value.

8) Currency risk

Currency risk is the risk that the investment currencies may weaken in relation to the base currency of the portfolio (USD). In the event of depreciation in foreign currencies, investors are thus exposed to a decline in the value of their units. The A, A2, B and Z Shares are exposed to currency risk.
The Share classes A1, B1, R1, R3 and Z1 are hedged with regard to currency risk back in the currency of the share and are thus minimally exposed to the risk of a depreciation of foreign currencies against the Euro.

9) Risk associated with emerging markets equities

The equities of emerging countries may be less liquid than equities of developed countries. Consequently, holding these securities may increase the level of portfolio risk. For example, market declines may be greater and faster than in developed countries, so the Compartment's net asset value may decline more sharply and quickly.

10) Distressed securities risk

Distressed Securities Investment in a security issued by a company that is either in default or in high risk of default ("Distressed Securities") involves significant risk. Such investments will only be made when the Management Company believes either that the security trades at a materially different level from the Management company's perception of fair value or that it is reasonably likely that the issuer of the securities will make an exchange offer or will be the subject of a plan of reorganisation; however, there can be no assurance that such an exchange offer will be made or that such a plan of reorganisation will be adopted or that any securities or other assets received in connection with such an exchange offer or plan of reorganisation will not have a lower value or income potential than anticipated when the investment was made. In addition, a significant period of time may pass between the time at which the investment in Distressed Securities is made and the time that any such exchange offer or plan of reorganisation is completed. During this period, it is unlikely that any interest payments on the Distressed Securities will be received, there will be significant uncertainty as to whether fair value will be achieved or not and the exchange offer or plan of reorganisation will be completed, and there may be a requirement to bear certain expenses to protect the investing Fund's interest in the course of negotiations surrounding any potential exchange or plan of reorganisation. Furthermore, constraints on investment decisions and actions with respect to Distressed Securities due to tax considerations may affect the return realised on the Distressed Securities.

11) Risks associated with investments in shares or units of UCITS or other UCIs

Investments made by the Compartment in the units/shares of UCI/UCITS, including investments by the Compartment in units/shares of other Compartments of the Company, expose the Compartment to risks arising from financial instruments which these UCI/UCITS hold in their portfolio. Certain risks are, however, directly linked to the holding by the Compartment of units/shares of UCI/UCITS. Most of these UCI/UCITS also stipulate the option of temporarily suspending redemption under specific circumstances of an exceptional nature. Investments made in the units/shares of UCI/UCITS may accordingly present a liquidity risk which is higher than investing directly in a portfolio of transferable securities. On the other hand, investing in the units of UCI/UCITS allows the Compartment to gain access in a flexible and efficient way to various professional management styles and to diversify its investments. If the Compartment invests primarily through UCI/UCITS it must ensure that its UCI/UCITS portfolio has the appropriate liquidity characteristics to allow it to meet its own redemption obligations.

If the Compartment invests in units/shares of UCI/UCITS that are managed, directly or by delegation, by the Management Company or by any other company with which the Management Company is linked by common management or control, or by a substantial direct or indirect holding, that Management Company or other company may not charge subscription or redemption fees on account of the Compartment's investment in the units/shares of such UCI/UCITS.

Template pre-contractual disclosure for the financial products referred to in Article 8, paragraphs 1, 2 and 2a, of Regulation (EU) 2019/2088 and Article 6, first paragraph, of Regulation (EU) 2020/852

Product name: Most Diversified Portfolio SICAV – TOBAM Anti-Benchmark Multi-Asset Fund

Legal entity identifier: 5493003B8EG1AR54IU58

Sustainable investment means an investment in an economic activity that contributes to an environmental or social objective, provided that the investment does not significantly harm any environmental or social objective and that the investee companies follow good governance practices.

The **EU Taxonomy** is a classification system laid down in Regulation (EU) 2020/852, establishing a list of **environmentally sustainable economic activities**. That Regulation does not lay down a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

Environmental and/or social characteristics

Does this financial product have a sustainable investment objective?

☐ **Yes**	☒ **No**
☐ It will make a minimum of **sustainable investments with an environmental objective:** ___%	☒ It **promotes Environmental/Social (E/S) characteristics** and while it does not have as its objective a sustainable investment, it will have a minimum proportion of 40% of sustainable investments
☐ in economic activities that qualify as environmentally sustainable under the EU Taxonomy	☐ with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy
☐ in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy	☒ with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy
	☐ with a social objective
☐ It will make a minimum of **sustainable investments with a social objective:** ___%	☐ It promotes E/S characteristics, but **will not make any sustainable investments**

What environmental and/or social characteristics are promoted by this financial product?

The objective of the Compartment is to achieve an attractive performance over a 5-year investment horizon through dynamic exposure to portfolios of equities and bonds in developed and emerging markets. In order to support its investment objective, the Compartment will invest on different markets or asset classes (Equities, Bonds) for up to 100% of its assets.

The process integrates environmental, social and governance (ESG) risks and opportunities to the sustainability of long-term company returns. The Compartment aims to promote low carbon approaches, commitment to climate action and companies with good governance.
In particular, the Compartment aims to promote the following E/S characteristics:

- Low carbon approach by applying a systematic carbon footprint reduction of at least 20% versus the reference investment universe's carbon footprint,
- Promotion of companies with good governance using raw data and their ESG footprint.

The Compartment has designated as a reference index to compare its ESG characteristics, such as carbon emissions or ESG footprint the following:

- Bloomberg World Large & Mid Cap Net Return Index.
- ICE BoFA Global Corporate Index.
- ICE BoFA Global High Yield Index.

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

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

In order to achieve the above characteristics promoted by this Compartment, the Management Company has put in place an ambitious ESG policy made of key pillars and sustainability indicators. This Compartment uses the following sustainability indicators to attain each of the environmental and social characteristics promoted by the Compartment:

- **Carbon Emissions Reduction:** This feature is applicable to the equity and credit bonds holdings of the strategy. The Management Company applies a systematic carbon footprint reduction of at least 20% for each bucket (Equity and Corporate Bonds) versus the respective reference index:

Bloomberg World Large & Mid Cap Net Return Index for the All Countries World (ACWI) equity bucket of the Compartment

ICE BofA Global High Yield Index and ICE BoFA Global Corporate Index for the High Yield and Corporate credit bonds bucket of the Comaprtment

The calculation of the carbon footprint is based on the greenhouse gas emissions scope 1 (i.e. direct emissions from owned or controlled sources) and 2 (i.e. indirect emissions from the generation of purchased energy) according to GHG Protocol Corporate Standard. Data on emissions used is obtained from a number of sources including company reports, CDP questionnaire (Carbon Disclosure Project) or an estimation model.

- **ESG Footprint:** The Management Company has put in place a strict E, S and G integration process for all listed companies in its investment universe; using officially published data from Bloomberg.

✓ E: For example: existence of climate change / biodiversity / energy efficiency policies; green building, water and waste usage

✓ S: For example: Ethics/Equal opportunity/training/ consumer data protection/whistleblowing policies, CSR committee in place, supply chain management

✓ G: For example: Number of board meetings per year, ratio of independent directors, chairman tenure, ratio of nonexecutive directors in boards.

From that raw data, the Management Company has built a proprietary methodology to compute the "E,S,G footprints" of each individual holding in the portfolio (equity or credit holdings) and as such determine the overall E,S,G

From that raw data, the Management Company has built a proprietary methodology to compute the "E,S,G footprints" of each individual holding in the portfolio and as such determine the overall E,S,G Footprints of each of the asset classes buckets (ACWI Equity, Global Investment Grade (GIG) bonds, Global High Yield (GHY) bonds). The Management Company has constrained its investment decision-making process to reach E,S,G footprints of each asset classes bucket, at minima at the same level as the E,S,G footprints of their respective reference index.

What are the objectives of the sustainable investments that the financial product partially intends to make and how does the sustainable investment contribute to such objectives?

The sustainable investments within this Compartment contribute to Environmental objectives including climate change mitigation and adaptation (however not in the meaning of the Taxonomy Regulation) or commitment to science-based emissions reduction targets (“SBTI”).

To determine the share of sustainable investments, the Management Company consider the environmental objective for companies that have:

- A carbon intensity (carbon emissions normalized by the Enterprise Value including Cash) below 80% of the average carbon intensity of their respective asset class’ reference index

Or

Made a commitment to the SBTI initiative. (This engagement is followed by the Management Company’s research team on an annual basis).

- Are not involved in severe breaches or controversies in regard to the labor rights, human rights, environmental or corruption, and that are not part of the following sectors: tobacco, controversial weapons, coal mining and fossil fuels

And

Have not been targeted by any significant environmental fines over the past years.

○ Have a G score for Good Governance practices (as defined by the Management Company ESG Footprint proprietary methodology) in the top 80% of their respective asset class reference index (for the ACWI equity bucket: Bloomberg World Large & Mid Cap Net Return Index, for the GIG Bucket: ICE BoFA Global Corporate Index and for the GHY Bucket: ICE BoFA Global High Yield Index).

How do the sustainable investments that the financial product partially intends to make, not cause significant harm to any environmental or social sustainable investment objective?

Companies the Compartment invests in, contribute to achieve the Compartments’ carbon reduction objective, ESG footprint commitment while not significantly harming any environmental or social sustainable investment objectives. Before any investment is made by the Compartment (not only sustainable investments but all investments), the investment has to pass a negative screening, further including the consideration of the principal adverse impacts described in the below section. Hence no companies involved in controversial sectors or activities not aligned with TOBAM’s policy, can be eligible for investments for the Compartment.

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

The following Principal Adverse Impacts ("PAI") indicators as defined in SFDR Level II have been considered:

- PAI #7 : Activities negatively affecting biodiversity
- PAI #10 : Violations of UN Global Compact principles and OECD guidelines
- PAI #14 : Exposure to Controversial Weapons

The principal adverse impacts on sustainability indicators have been taken into account through an exclusionary investment policy.

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

The Management Company will not invest in any company that has been classified as failing to comply with key international norms (ISS Ethix Norm-based screening) such as for example the UN Global Compact Principles, OECD Guidelines for Multinational Enterprises, Guiding Principles on Business and Human rights.

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

The "do no significant harm" principle applies only to those investments underlying the financial product that take into account the EU criteria for environmentally sustainable economic activities. The investments underlying the remaining portion of this financial product do not take into account the EU criteria for environmentally sustainable economic activities.

Any other sustainable investments must also not significantly harm any environmental or social objectives.

Does this financial product consider principal adverse impacts on sustainability factors?

Principal adverse impacts are the most significant negative impacts of investment decisions on sustainability factors relating to environmental, social and employee matters, respect for human rights, anti-corruption and anti-bribery matters.

✖ Yes, for all eligible assets, the Management Company has committed to monitor the 14 mandatory and 2 optional environmental and social indicators to show the impact of the Compartment's investments against these PAI indicators.

Furthermore, for all eligible assets; this Compartment considers principal adverse impacts on sustainability factors and only the following PAI have been taken into account into the investment process:

- PAI #1: GHG (Greenhouse Gas) emissions - Scope 1 & 2
- PAI #2: Carbon footprint
- PAI #3: GHG intensity of investee companies

The Compartment by targeting an overall carbon reduction of at least 20% compared to the asset class respective index's carbon footprint (meaning for the ACWI equity bucket: Bloomberg World Large & Mid Cap Net Return Index, for the GIG Bucket: ICE BoFA Global Corporate Index and for the GHY Bucket: ICE BoFA Global High Yield Index) and is looking to invest in a combination of assets that achieve this overall carbon reduction by asset classes, by considering carbon emissions scope 1 and 2.

- PAI #7: Activities negatively affecting biodiversity

The Management Company proprietary ESG footprint methodology considers raw data published by companies in order to compute an ESG footprint, by notably looking for example at the existence or not of key policies relevant to the biodiversity (for example: biodiversity policy, water usage policy, waste reduction policy, climate change policy…).

In addition to the previous PAI, the following social Sustainability indicators have been considered:

- PAI #10: Violations of UN Global Compact principles and (OECD) Guidelines
- PAI #13: Board Gender Diversity
- PAI #14: Exposure to controversial weapons

PAI reports for all eligible assets are available on the Compartment annual report.

No

What investment strategy does this financial product follow?

The objective of the Compartment is to achieve an attractive performance over a 5-year investment horizon through dynamic exposure to portfolios of equities and bonds in developed and emerging markets. In order to support its investment objective, the Compartment will invest on different markets or asset classes (Equities, Bonds) for up to 100% of its assets.

The process integrates environmental, social and governance (ESG) risks and opportunities to the sustainability of long-term company returns. This Compartment aims to promote low carbon approaches, commitment to climate action and companies with good governance.

The Management Company applies systematically its ESG methodology in the investment decision-making process.

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

What are the binding elements of the investment strategy used to select the investments to attain each of the environmental or social characteristics promoted by this financial product?

The Compartment applies the following binding elements for all eligible assets to select investments and attain the environmental and social characteristics described above:

- **Exclusion policy:** For all investements in the strategy (eligible, sustainable or not) the Management Company applies a general exclusion policy, restricting the investment universe and excluding companies based either on their involvement in certain activities (sector or product based) or based on controversies or breaches to key international norms. The key exclusions used by the Management Company are reflected in the below table:

Sector /Product	**Criteria**
Producer and distributors of tobacco	Limit (5% of the revenues)

Coal and coal-based producers and distributors	Limit (10% of the revenues)
Development, production, maintenance or distribution of controversial and prohibited weapons	Exclusion
Breach or violation of International Treaties, Conventions & Standards such as OECD Guidelines for Multinational Enterprises, ILO Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy, UN Global Compact, Guiding Principles on Business and Human Rights	Exclusion

Further details on the exclusion policy can be found in the following link: https://www.tobam.fr/our-beliefs/exclusion-policy/

- **ESG Integration:** For all eligible assets, The Management Company has put in place a strict E, S and G integration process for all listed companies in its investment universe; using officially published data from Bloomberg.

✓ E: For example: existence of climate change / biodiversity / energy efficiency policies; green building, water and waste usage

✓ S: For example: Ethics/Equal opportunity/training/ consumer data protection/whistleblowing policies, CSR committee in place, supply chain management

✓ G: For example: Number of board meetings per year, ratio of independent directors, chairman tenure, ratio of nonexecutive directors in boards.

From that raw data, the Management Company has built a proprietary methodology to compute the "E,S,G footprints" of each individual holding in the portfolio and as such determine the overall E,S,G Footprints of each of the asset classes buckets (ACWI Equity, GIG bonds, GHY bonds). The E, S and G footprint aggregates and normalizes (for industry, size and regional biases) the information contained in each of the above mentioned items by E, S and G pillar. The normalization also corrects differences in scale of the different pieces of raw data. The final footprint is an equal weighted measure of the three pillars. The Management Company then adds a constraint into its quantitative portfolio optimization process, to ensure that the E, S and G footprints of the respective portfolio (computed based on the holdings' individual E, S and G footprints) are respectively at least at the same level as the E, S and G footprints of the respective asset class reference index (for the ACWI equity bucket: Bloomberg World Large & Mid Cap Net Return Index, for the GIG Bucket: ICE BoFA Global Corporate Index and for the GHY Bucket: ICE BoFA Global High Yield Index).

- **Carbon Emissions Reduction & Commitment to SBTI:**

For all eligible assets, in addition, the Management Company analyses the carbon emissions of each holding in its investment universe, computes the carbon footprint of the portfolio and applies a systematic portfolio carbon footprint reduction of at least 20% for each bucket (ACWI Equity,Global Investment Grade ("GIG") and Global

High Yield ("GHY") Corporate Bonds) versus their respective reference index (for the ACWI equity bucket: Bloomberg World Large & Mid Cap Net Return Index, for the GIG Bucket: ICE BoFA Global Corporate Index and for the GHY Bucket: ICE BoFA Global High Yield Index).

The calculation of the carbon footprint is based on the greenhouse gas emissions scope 1 and 2. Data on emissions used is obtained from a number of sources including company reports, CDP questionnaire (Carbon Disclosure Project) or an estimation model.

The Management Company is also monitoring the companies' commitment to the SBTI as a way to monitor best effort toward more incorporation of best practices. This feature is monitored on a yearly basis.

- **Responsible Ownership:** The Management Company applies a responsible voting policy on its equity holdings and has built an ambitious engagement policy to support its commitment to sustainability and address via engagement and dialogues, issues relative to ESG and sustainability.

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

Not applicable.

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

Good governance practices include sound management structures, employee relations, remuneration of staff and tax compliance.

In order to assess good governance practices, the Management Company consider the G scoring of its proprietary ESG footprint methodology, for each asset classes buckets, and ensure that the G scoring of each asset class (ACWI equities, GIG bonds and GHY bonds) is matching each asset classes' reference indexes's G scoring (for the ACWI equity bucket: Bloomberg World Large & Mid Cap Net Return Index , for the GIG Bucket: ICE BoFA Global Corporate Index and for the GHY Bucket: ICE BoFA Global High Yield Index).

What is the asset allocation planned for this financial product?

Asset allocation describes the share of investments in specific assets.

#1: 70% of the assets of this Compartment are aligned (promote) E/S characteristics.

#1A: at least 40% of those eligible assets fall under the sustainable share of investment with non EU Taxonomy aligned environmental objectives.

These sustainable investments contribute to environmental objectives, including climate change mitigation and adaptation (however not in the meaning of the Taxonomy Regulation) or commitment to SBTI.

The model used by TOBAM for the determination of the sustainable investments combines the pass or fail approach and the weighted-revenue approach with threshold for the carbon emissions and governance.
To determine the share of sustainable investments, the Management Company considers the environmental objective for companies that have:

Environmental objective determined as :
o Companies that have carbon intensity (carbon emissions normalized by the Enterprise Value Including Cash) below 80% of the average emissions carbon intensity. This is calculated for each bucket (ACWI Equity,Global Investment Grade ("GIG") and Global High Yield ("GHY") Corporate Bonds) versus their respective reference index (for the ACWI equity

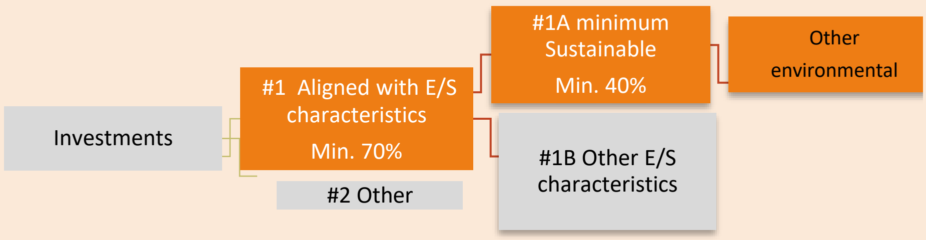
bucket: Bloomberg World Large & Mid Cap Net Return Index, for the GIG Bucket: ICE BoFA Global Corporate Index and for the GHY Bucket: ICE BoFA Global High Yield Index)
Or
o Companies that have made a commitment to the SBTI initiative (this engagement is followed by the Management Company's research team on an annual basis).

Do Not Significantly Harm characteristics:
o Companies that are not involved in severe breaches or controversies in regard to the labor rights, human rights, environmental or corruption, and that are not part of the following sectors: tobacco, controversial weapons, coal mining and fossil fuels
And
o Companies that have not been targeted by any significant environmental fines over the past years.

Good Governance practices are defined as companies that have a G score (as defined by the Management Company ESG Footprint proprietary methodology) in the top 80% of their respective asset class reference index (for the ACWI equity bucket: Bloomberg World Large & Mid Cap Net Return Index, for the GIG Bucket: ICE BoFA Global Corporate Index and for the GHY Bucket: ICE BoFA Global High Yield Index).

Please note that investments falling under section #1B on the below diagram 'non sustainable investment share of the Compartment', still comply with all of the Compartment ESG policy (exclusions, carbon reduction, ESG footprint, voting & engagement), but did not qualify as a sustainable investment.

2# Other Investments: when investments fall out the 70% minimum limit integrating E/S characteristics, ESG key features and anaysis may not have been performed, and E/S characteristics not considered.



#1 Aligned with E/S characteristics includes the investments of the financial product used to attain the environmental or social characteristics promoted by the financial product.

#2Other includes the remaining investments of the financial product which are neither aligned with the environmental or social characteristics, nor are qualified as sustainable investments.

The category **#1 Aligned with E/S characteristics** covers:
- The sub-category **#1A Sustainable** covers sustainable investments with environmental or social objectives.
- The sub-category **#1B Other E/S characteristics** covers investments aligned with the environmental or social characteristics that do not qualify as sustainable investments.

How does the use of derivatives attain the environmental or social characteristics promoted by the financial product?

The Compartment may use financial derivative instruments for investment, efficient portfolio management and/or hedging purposes, and this will not impact in any way the exposure to sustainable assets, or the ESG characteristics of the Compartment.

Taxonomy-aligned activities are expressed as a share of:
- **turnover** reflecting the share of revenue from green activities of investee companies
- **capital expenditure** (CapEx) showing the green investments made by investee companies, e.g. for a transition to a green economy.
- **operational expenditure** (OpEx) reflecting green operational activities of investee companies.

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

This Compartment commits to a 0% alignment with the EU Taxonomy.

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

Enabling activities directly enable other activities to make a substantial contribution to an environmental objective.

Transitional activities are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.

Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy[1]?

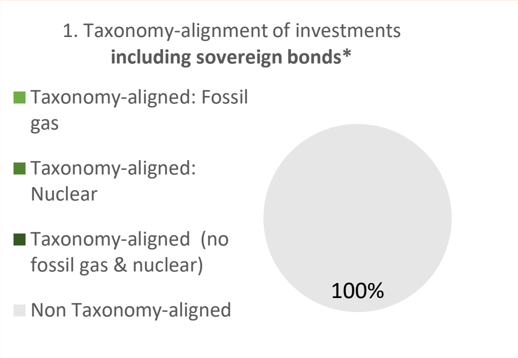
☐ Yes :

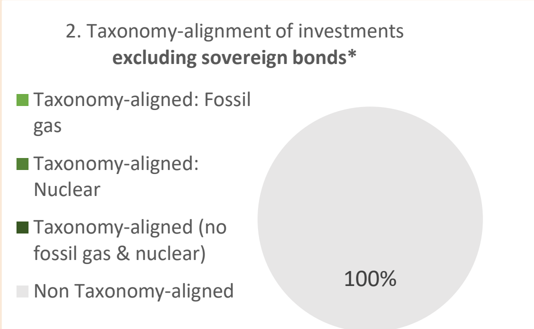
☐ In fossil gas ☐ In nuclear energy

☒ No

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

The two graphs below show in green the minimum percentage of investments that are aligned with the EU Taxonomy. As there is no appropriate methodology to determine the Taxonomy-alignment of sovereign bonds*, the first graph shows the Taxonomy alignment in relation to all the investments of the financial product including sovereign bonds, while the second graph shows the Taxonomy alignment only in relation to the investments of the financial product other than sovereign bonds.





This graph represents 100% of the total investments.

*** For the purpose of these graphs, 'sovereign bonds' consist of all sovereign exposures**

What is the minimum share of investments in transitional and enabling activities?

As the Compartment does not have a minimum Taxonomy alignement, there is no minimum share in transitional and enabling activities.

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

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

The minimum share of sustainable investments with an environmental objective that is not aligned with the EU Taxonomy is 40%.

What is the minimum share of socially sustainable investments?

Not applicable.

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

Investments falling under category "#2 Other", are investments such as derivatives, cash or cash equivalent, not integrating E/S characteristics, where ESG key features and analysis have not been performed, and E/S characteristics not considered.

No minimum environmental or social safeguards apply to the above elements.

Is a specific index designated as a reference benchmark to determine whether this financial product is aligned with the environmental and/or social characteristics that it promotes?

No, but for the purpose of ESG comparisons and key features, the Compartmenthas designated specific indexes, aligned with the various relevant asset classes. These indexes are used as references to compare the Compartment various buckets ESG characteristics, such as carbon emissions or ESG footprint, with the respective asset classes reference benchmarks:

- ACWI equity bucket: Bloomberg World Large & Mid Cap Net Return Index.
- GIG Bucket: ICE BoFA Global Corporate Index

- GHY Bucket: ICE BoFA Global High Yield Index.

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

How is the reference benchmark continuously aligned with each of the environmental or social characteristics promoted by the financial product?

The reference benchmarks used by the Compartment are not ESG benchmarks and are not consistent with the ESG characteristics promoted by the Compartment. All ESG calculations or comparisons are computed using the Compartment's reference benchmark for each asset classes, as a good proxy of the Compartment various investments investment universe.

How is the alignment of the investment strategy with the methodology of the index ensured on a continuous basis?

The investment universe of the reference indexes are regularly monitored by the Management Company research team to ensure the consistency with the Compartment's underlying asset classes investment universe, in order to ensure relevance of ESG and performance comparisons.

How does the designated index differ from a relevant broad market index?

The reference indexes :

- ACWI equity bucket: Bloomberg World Large & Mid Cap Net Return Index
- GIG Bucket: ICE BoFA Global Corporate Index
- GHY Bucket: ICE BoFA Global High Yield Index.

are broad market indexes, capturing the Compartment's underlying asset classes investment universe.

Where can the methodology used for the calculation of the designated index be found?

Details on the reference index can be found on the provider's website:

- https://assets.bbhub.io/professional/sites/27/Global-Equity-Index-Methodology.pdf
- https://www.theice.com market / -data/indices/fixed-income-indices

Where can I find more product specific information online?

More product-specific information can be found on the website:
https://www.tobam.fr/key-documents-policies/

APPENDIX 14. Most Diversified Portfolio SICAV – TOBAM CIH Capital Anti-Benchmark Multi-Asset Fund

This Compartment is dedicated to the CIH Bank.
The Compartment may be distributed by CIH Bank through its banking network.

Investment Objective

In compliance with the relevant provisions of the 2010 Law, the Compartment (the "Feeder Fund") will at all times invest at least 85% of its assets in the Most Diversified Portfolio SICAV – TOBAM Anti-Benchmark Multi-Asset Fund Compartment (the "Master Fund"), another Compartment of the Company described in Appendix 13. The Compartment may hold up to 15% of its assets in ancillary liquid assets, as well as cash equivalents and short-term bank deposits in accordance with the provisions of Article 41(2) of the 2010 Law. However, the Compartment intends to be fully invested in the Master Fund. The Compartment may use derivative financial instruments for hedging purposes only. The Compartment intends to invest in a share class of the Master Fund which bears no management fee (Z1 share class).

The performance of the Compartment may differ from that of the Master Fund due to (i) the expenses borne by the Compartment, and (ii) the liquid assets held.

The Compartment qualifies under article 8 of SFDR. The investment strategy does not have a sustainable investment objective but promotes environmental and social characteristics. The strategy notably follows the 4 pillars of TOBAM's SRI policy: exclusion, carbon reduction, ESG monitoring and responsible stewardship via voting and engagement.

The Management Company considers ESG factors and applies a sustainability approach in its investment process for the Compartment as further detailed the Appendix 14.1 Environmental and/or Social Characteristics - Pre-contractual disclosures in compliance with SFDR Level II.

Description of the asset classes used to achieve the investment objective

The Feeder Fund shall invest at least 85% of its assets in the units/shares of the Master Fund.

The Feeder Fund may hold up to 15% of its assets in one or more of the following:
- ancillary liquid assets (i.e. deposits at sight);
- cash equivalents such as other deposits or money market instruments in order to achieve its investment objective, for treasury purposes and/or in case of unfavourable market conditions;
- financial derivative instruments, which may be used only for hedging purposes.

Reference Currency

The reference currency of the Compartment is EUR.

Profile of the Typical Investor

The Compartment is dedicated to the CIH Bank.

In the light of the Master Fund's objectives and investment strategies, it is aimed at investors who seek to take advantage of exposure to: equities, securities and money market instruments aimed at minimizing risk factors and optimizing the diversification ratio of the composite benchmark constituents.

To determine the level of their investment, investors should consider their personal assets, the regulations applicable to them, their current financial needs over a recommended minimum investment horizon of more than five years, and also their willingness to take risks or their preference for a more prudent investment.

The recommended minimum investment horizon is more than 5 years.

Form of shares and classes

Share Classes	A **Isin Code:** **LU2158750328**	**A1** **Isin Code:** **LU2158750591**	**A2** **Isin Code:** **LU2158750674**
Currency	EUR	EUR	EUR
Type of Shares	Accumulation	Accumulation	
Target Investors	CIH Bank	CIH Bank	CIH Bank
Minimum initial subscription	10 shares	10 shares	10 shares
Minimum holding amount	1 Share	1 Share	1 share
Valuation Day	Every Business Day with the exception of public holidays and non-settlement days for exchanges based in the UK, France, Luxembourg and days on which US markets are closed or close early (based on the official US Government Bond Market Calendar).		
Management Company Fee	1.18%	1.43%	1.93%
Administration Fee & Depositary Fee	Up to 0.20%	Up to 0.20%	Up to 0.20%
Subscription Fee paid to the Management Company	None	None	None
Redemption Fee paid to the Management Company	None	None	None
Cut-off	10.00 a.m. CET, the Business Day before the relevant Valuation Day		
Subscription / Redemption Settlement Day	2 days, according to the official NYSE Euronext calendar, following the Valuation Day		

The Share Classes of the Compartment will be issued in registered form.

The Master Fund may not charge any subscription or redemption fees for the subscription or redemption of its shares by the Feeder Fund.

The Compartment intends to invest in a share class of the Master Fund which bears no management fee (Z1 share class). Administration & Depositary fees of the Master Fund will be charged.

Launch date

Initial Issue Date : The initial issue date will be determined by the Board of Directors.

The following Share Classes of this Compartment have been created with the following initial subscription prices:

Class:	Initial subscription prices:
Class A	EUR 10 000
Class A1	EUR 10 000
Class A2	EUR 10 000

Total Expense Ratio

The latest calculated total expense ratio rate can be found in the Company's latest financial report.

Risk Management

The method used to calculate overall exposure is the commitment method.

Risks Related to the Feeder Fund

The Feeder Fund invests in the Master Fund and as such, the Feeder Fund is subject to the specific risks applicable to the relevant Master Fund.
Before investing in the Feeder Fund, prospective investors should familiarise themselves with the risk factors associated with the Master Fund as disclosed in Appendix 15 of this prospectus or scheme particulars as well as its KIIDs or other documents of the Master Fund.
The Feeder Fund is also exposed to fluctuations in value of the Master Fund. Although the Master Fund's investments are diversified, the investments of the Feeder Fund are not.
Prospective investors must also be aware that the performance and returns of the Feeder Fund may not be fully aligned with that of the Master Fund due to the way in which the Feeder Fund is operated and/or the way in which its assets are invested. For example, the Feeder Fund may not fully invest all of its assets in the Master Fund (some assets may be invested for cash management purposes as an example), currency conversions may not take place at the same time and/or rate, and the share classes of the Feeder Fund and Master Fund may bear different ongoing charges and expenses.

Summary of the Internal Conduct of Business Rules

The Management Company of the Feeder Fund which is the same as the one of the Master Fund has established Internal Conduct of Business Rules in order to ensure, inter alia, that the timing of their NAV calculation and publication of the Compartments involved in the Master-Feeder Structure are coordinated in order to avoid market timing in their units, preventing arbitrage opportunities.

The management Company will ensure that all orders for subscription, redemption or conversion of shares ("Orders") of a Master Fund shall be placed and processed in accordance with the Master Fund offering and constitutional documents and any applicable laws. As a general principle, the Feeder Fund shall not forward Orders to the Master Fund or its agent which the Feeder Fund knows to be, or has reason to believe to be, related to market timing activities of its investors and will only forward such Orders before the applicable cut-off time.

Any transactions in the shares of the Compartment need to be received prior to the cut-off time foreseen in this prospectus and will be valued at a point in time after such cut-off. They will thus be dealt with at an unknown NAV based on the NAV calculated for the Master Fund at a point in time.

Template pre-contractual disclosure for the financial products referred to in Article 8, paragraphs 1, 2 and 2a, of Regulation (EU) 2019/2088 and Article 6, first paragraph, of Regulation (EU) 2020/852

Product name: Most Diversified Portfolio SICAV – TOBAM CIH Capital Anti-Benchmark Multi-Asset Fund

Legal entity identifier: 549300IZRUWKTA1QLL17

Sustainable investment means an investment in an economic activity that contributes to an environmental or social objective, provided that the investment does not significantly harm any environmental or social objective and that the investee companies follow good governance practices.

The **EU Taxonomy** is a classification system laid down in Regulation (EU) 2020/852, establishing a list of **environmentally sustainable economic activities**. That Regulation does not lay down a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

Environmental and/or social characteristics

Does this financial product have a sustainable investment objective?

☐ **Yes**	☒ **No**
☐ It will make a minimum of **sustainable investments with an environmental objective: ___%**	☒ It **promotes Environmental/Social (E/S) characteristics** and while it does not have as its objective a sustainable investment, it will have a minimum proportion of 40% of sustainable investments
☐ in economic activities that qualify as environmentally sustainable under the EU Taxonomy	☐ with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy
☐ in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy	☒ with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy
	☐ with a social objective
☐ It will make a minimum of **sustainable investments with a social objective:** ___%	☐ It promotes E/S characteristics, but **will not make any sustainable investments**

What environmental and/or social characteristics are promoted by this financial product?

Most Diversified Portfolio SICAV – TOBAM CIH Capital Anti-Benchmark Multi-Asset Fund is the feeder fund of the master fund Most Diversified Portfolio SICAV – TOBAM Anti-Benchmark Multi-Asset Fund (the "Master Fund"). Thus, this Compartment applies the same ESG policy as the Master Fund. The Management Company of the Master Fund and feeder fund is the same.

The objective of the Compartment is to achieve an attractive performance over a 5-year investment horizon through dynamic exposure to portfolios of equities and bonds in developed and emerging markets. In order to support its investment objective, the Compartment will invest on different markets or asset classes (Equities, Bonds) for up to 100% of its assets.

The process integrates environmental, social and governance (ESG) risks and opportunities to the sustainability of long-term company returns. The Compartment aims to promote low carbon approaches, commitment to climate action and companies with good governance.

In particular, the Compartment aims to promote the following E/S characteristics:

- Low carbon approach by applying a systematic carbon footprint reduction of at least 20% versus the reference investment universe's carbon footprint,
- Promotion of companies with good governance using raw data and their ESG footprint.

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

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

In order to achieve the above characteristics promoted by this Compartment, the Management Company has put in place an ambitious ESG policy made of key pillars and sustainability indicators. This Compartment uses the following sustainability indicators to attain each of the environmental and social characteristics promoted by the Compartment:

- **Carbon Emissions Reduction:** This feature is applicable to the equity and credit bonds holdings of the strategy. The Management Company applies a systematic carbon footprint reduction of at least 20% for each bucket (Equity and Corporate Bonds) versus the respective reference index:

Bloomberg WorldLarge & Mid Cap Net Return Index for the All Countries World (ACWI) equity bucket of the Compartment

ICE BofA Global High Yield Index and ICE BoFA Global Corporate Index for the High Yield and Corporate credit bonds bucket of the Comaprtment

The calculation of the carbon footprint is based on the greenhouse gas emissions scope 1 (i.e. direct emissions from owned or controlled sources) and 2 (i.e. indirect emissions from the generation of purchased energy) according to GHG Protocol Corporate Standard. Data on emissions used is obtained from a number of sources including company reports, CDP questionnaire (Carbon Disclosure Project) or an estimation model.

- **ESG Footprint:** The Management Company has put in place a strict E, S and G integration process for all listed companies in its investment universe; using officially published data from Bloomberg.

✓ E: For example: existence of climate change / biodiversity / energy efficiency policies; green building, water and waste usage

✓ S: For example: Ethics/Equal opportunity/training/ consumer data protection/whistleblowing policies, CSR committee in place, supply chain management

✓ G: For example: Number of board meetings per year, ratio of independent directors, chairman tenure, ratio of nonexecutive directors in boards.

From that raw data, the Management Company has built a proprietary methodology to compute the "E,S,G footprints" of each individual holding in the portfolio (equity or credit holdings) and as such determine the overall E,S,G.

From that raw data, the Management Company has built a proprietary methodology to compute the "E,S,G footprints" of each individual holding in the portfolio and as such determine the overall E,S,G Footprints of each of the asset classes buckets (ACWI Equity, Global Investment Grade (GIG) bonds, Global High Yield (GHY) bonds). The Management Company has constrained its investment decision-making process to reach E,S,G footprints of each asset classes bucket, at minima at the same level as the E,S,G footprints of their respective reference index.

- ***What are the objectives of the sustainable investments that the financial product partially intends to make and how does the sustainable investment contribute to such objectives?***

The sustainable investments within this Compartment contribute to Environmental objectives including climate change mitigation and adaptation (however not in the meaning of the Taxonomy Regulation) or commitment to science-based emissions reduction targets ("SBTI").

To determine the share of sustainable investments, the Management Company consider the environmental objective for companies that have:

- A carbon intensity (carbon emissions normalized by the Enterprise Value including Cash) below 80% of the average carbon intensity of their respective asset class' reference index

Or

Made a commitment to the SBTI initiative. (This engagement is followed by the Management Company's research team on an annual basis).

- Are not involved in severe breaches or controversies in regard to the labor rights, human rights, environmental or corruption, and that are not part of the following sectors: tobacco, controversial weapons, coal mining and fossil fuels

And

Have not been targeted by any significant environmental fines over the past years.

- Have a G score for Good Governance practices (as defined by the Management Company ESG Footprint proprietary methodology) in the top 80% of the respective asset class reference index (for the ACWI equity bucket: Bloomberg World Large & Mid Cap Net Return Index, for the GIG Bucket: ICE BoFA Global Corporate Index and for the GHY Bucket: ICE BoFA Global High Yield Index).

- ***How do the sustainable investments that the financial product partially intends to make, not cause significant harm to any environmental or social sustainable investment objective?***

Companies the Compartment invests in, contribute to achieve the 's carbon reduction objective, ESG footprint commitment while not significantly harming any environmental or social sustainable investment objectives. Before any investment is made by the Compartment (not only sustainable investments but all investments), the investment has to pass a negative screening, further including the consideration of the principal adverse impacts described in the below section. Hence no companies involved in controversial sectors or activities not aligned with TOBAM's policy, can be eligible for investments for the Compartment.

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

The following Principal Adverse Impacts ("PAI") indicators as defined in SFDR Level II have been considered:

- PAI #7: Activities negatively affecting biodiversity
- PAI #10: Violations of UN Global Compact principles and OECD guidelines
- PAI #14: Exposure to Controversial Weapons

The principal adverse impacts on sustainability indicators have been taken into account by the Compartment through an exclusionary investment policy.

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

The Management Company will not invest in any company that has been classified as failing to comply with key international norms (ISS Ethix Norm-based screening) such as for example the UN Global Compact Principles, OECD Guidelines for Multinational Enterprises, Guiding Principles on Business and Human rights.

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

The "do no significant harm" principle applies only to those investments underlying the financial product that take into account the EU criteria for environmentally sustainable economic activities. The investments underlying the remaining portion of this financial product do not take into account the EU criteria for environmentally sustainable economic activities.

Any other sustainable investments must also not significantly harm any environmental or social objectives.

Principal adverse impacts are the most significant negative impacts of investment decisions on sustainability factors relating to environmental, social and employee matters, respect for human rights, anti-corruption and anti-bribery matters.

Does this financial product consider principal adverse impacts on sustainability factors?

✖ Yes, for all eligible assets, the Management Company has committed to monitor the 14 mandatory and 2 optional environmental and social indicators to show the impact of the Compartment investments against these PAI indicators.
Furthermore, for all eligible assets; this Compartment considers principal adverse impacts on sustainability factors and only the following PAI have been taken into account into the investment process:

- PAI #1: GHG (Greenhouse Gas) emissions - Scope 1 & 2
- PAI #2: Carbon footprint
- PAI #3: GHG intensity of investee companies

The Compartment by targeting an overall carbon reduction of at least 20% compared to the asset class respective benchmarks's carbon footprint, is looking to invest in a combination of assets that achieve this overall carbon reduction by asset classes, by considering carbon emissions scope 1 and 2.

- PAI #7: Activities negatively affecting biodiversity

The Management Company proprietary ESG footprint methodology considers raw data published by companies in order to compute an ESG footprint, by notably looking for example at the existence or not of key policies relevant to the biodiversity (for example: biodiversity policy, water usage policy, waste reduction policy, climate change policy…).

In addition to the previous PAI, the following social Sustainability indicators have been considered:

- PAI #10: Violations of UN Global Compact principles and (OECD) Guidelines
- PAI #13: Board Gender Diversity
- PAI #14: Exposure to controversial weapons

PAI reports for all eligible assets are available on the Compartment annual report.

No

What investment strategy does this financial product follow?

The objective of the Compartment is to achieve an attractive performance over a 5-year investment horizon through dynamic exposure to portfolios of equities and bonds in developed and emerging markets. In order to support its investment objective, the Compartment will invest on different markets or asset classes (Equities, Bonds) for up to 100% of its assets.

The process integrates environmental, social and governance (ESG) risks and opportunities to the sustainability of long-term company returns. This Compartment aims to promote low carbon approaches, commitment to climate action and companies with good governance.

The Management Company applies systematically its ESG methodology in the investment decision-making process.

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

What are the binding elements of the investment strategy used to select the investments to attain each of the environmental or social characteristics promoted by this financial product?

The Compartment applies the following binding elements for all eligible assets to select investments and attain the environmental and social characteristics described above:

- **Exclusion policy:** For all investements in the strategy (eligible, sustainable or not) the Management Company applies a general exclusion policy, restricting the investment universe and excluding companies based either on their involvement in certain activities (sector or product based) or based on controversies or breaches to key international norms. The key exclusions used by the Management Company are reflected in the below table:

Sector /Product	**<u>Criteria</u>**
Producer and distributors of tobacco	Limit (5% of the revenues)
Coal and coal-based producers and distributors	Limit (10% of the revenues)

Development, production, maintenance or distribution of controversial and prohibited weapons	Exclusion
Breach or violation of International Treaties, Conventions & Standards such as OECD Guidelines for Multinational Enterprises, ILO Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy, UN Global Compact, Guiding Principles on Business and Human Rights	Exclusion

Further details on the exclusion policy can be found in the following link: https://www.tobam.fr/our-beliefs/exclusion-policy/.

- **ESG Integration:** For all eligible assets, the Management Company has put in place a strict E, S and G integration process for all listed companies in its investment universe; using officially published data from Bloomberg.

✓ E: For example: existence of climate change / biodiversity / energy efficiency policies; green building, water and waste usage

✓ S: For example: Ethics/Equal opportunity/training/ consumer data protection/whistleblowing policies, CSR committee in place, supply chain management

✓ G: For example: Number of board meetings per year, ratio of independent directors, chairman tenure, ratio of nonexecutive directors in boards

From that raw data, the Management Company has built a proprietary methodology to compute the "E,S,G footprints" of each individual holding in the portfolio and as such determine the overall E,S,G Footprints of each of the asset classes buckets (ACWI Equity, GIG bonds, GHY bonds). The E, S and G footprint aggregates and normalizes (for industry, size and regional biases) the information contained in each of the above mentioned items by E, S and G pillar. The normalization also corrects differences in scale of the different pieces of raw data. The final footprint is an equal weighted measure of the three pillars. The Management Company then adds a constraint into its quantitative portfolio optimization process, to ensure that the E, S and G footprints of the respective portfolio (computed based on the holdings' individual E, S and G footprints) are respectively at least at the same level as the E, S and G footprints of the respective asset class reference index (for the ACWI equity bucket: Bloomberg World Large & Mid Cap Net Return Index, for the GIG Bucket: ICE BoFA Global Corporate Index and for the GHY Bucket: ICE BoFA Global High Yield Index).

- **Carbon Emissions Reduction & Commitment to Science Based Target Initiative**

For all eligible assets, in addition, the Management Company analyses the carbon emissions of each holding in its investment universe, computes the carbon footprint of the portfolio and applies a systematic portfolio carbon footprint reduction of at least 20% for each bucket (ACWI Equity,Global Investment Grade ("GIG") and Global High Yield ("GHY") Corporate Bonds) versus their respective reference index.

The calculation of the carbon footprint is based on the greenhouse gas emissions scope 1 and 2. Data on emissions used is obtained from a number of sources including company reports, CDP questionnaire (Carbon Disclosure Project) or an estimation model.

The Management Company is also monitoring the companies' commitment to the SBTI as a way to monitor best effort toward more incorporation of best practices. This feature is monitored on a yearly basis.

- **Responsible Ownership:** The Management Company applies a responsible voting policy on its equity holdings and has built an ambitious engagement policy to support its commitment to sustainability and address via engagement and dialogues, issues relative to ESG and sustainability.

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

Not applicable.

Good governance practices include sound management structures, employee relations, remuneration of staff and tax compliance.

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

In order to assess good governance practices, the Management Company consider the G scoring of its proprietary ESG footprint methodology, for each asset classes buckets, and ensure that the G scoring of each asset class (ACWI equities, GIG bonds and GHY bonds) is matching each asset classes' reference indexes's G scoring.

What is the asset allocation planned for this financial product?

Asset allocation describes the share of investments in specific assets.

#1: 70% of the assets of this Compartment are aligned (promote) E/S characteristics.

#1A: at least 40% of those eligible assets fall under the sustainable share of investment with non EU Taxonomy aligned environmental objectives.

These sustainable investments contribute to environmental objectives, including climate change mitigation and adaptation (however not in the meaning of the Taxonomy Regulation) or commitment to SBTI.

The model used by TOBAM for the determination of sustainable investments combines the pass or fail approach and the weighted-revenue approach with threshold for the carbon emissions and governance.
To determine the share of sustainable investments, the Management Company considers the environmental objective for companies that have:

Environmental objective determined as :
o Companies that have carbon intensity (carbon emissions normalized by the Enterprise Value Including Cash) below 80% of the average emissions carbon intensity. This is calculated for each bucket (ACWI Equity,Global Investment Grade ("GIG") and Global High Yield ("GHY") Corporate Bonds) versus their respective reference index
Or
o Companies that have made a commitment to the SBTI initiative (this engagement is followed by the Management Company's research team on an annual basis).

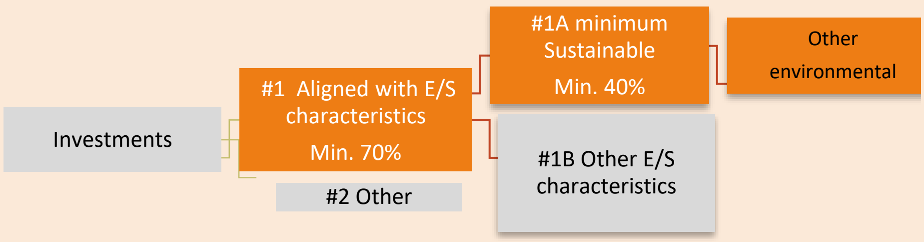
Do Not Significantly Harm characteristics:

o Companies that are not involved in severe breaches or controversies in regard to the labor rights, human rights, environmental or corruption, and that are not part of the following sectors: tobacco, controversial weapons, coal mining and fossil fuels
And
o Companies that have not been targeted by any significant environmental fines over the past years.

Good Governance practices are defined as companies that have a G score (as defined by the Management Company ESG Footprint proprietary methodology) in the top 80% of their respective asset class reference index.

Please note that investments falling under section #1B on the below diagram 'non sustainable investment share of the Compartment', still comply with all of the Compartment ESG policy (exclusions, carbon reduction, ESG footprint, voting & engagement), but did not qualify as a sustainable investment.

2# Other Investments: when investments fall out the 70% minimum limit integrating E/S characteristics, ESG key features and anaysis may not have been performed, and E/S characteristics not considered.



#1 Aligned with E/S characteristics includes the investments of the financial product used to attain the environmental or social characteristics promoted by the financial product.

#2Other includes the remaining investments of the financial product which are neither aligned with the environmental or social characteristics, nor are qualified as sustainable investments.

The category **#1 Aligned with E/S characteristics** covers:
- The sub-category **#1A Sustainable** covers sustainable investments with environmental or social objectives.
- The sub-category **#1B Other E/S characteristics** covers investments aligned with the environmental or social characteristics that do not qualify as sustainable investments.

- ***How does the use of derivatives attain the environmental or social characteristics promoted by the financial product?***

The Compartment may use financial derivative instruments for investment, efficient portfolio management and/or hedging purposes, and this will not impact in any way the exposure to sustainable assets, or the ESG characteristics of the Compartment.

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

Taxonomy-aligned activities are expressed as a share of:
- **turnover** reflecting the share of revenue from green activities of investee companies
- **capital expenditure** (CapEx) showing the green investments made by investee companies, e.g. for a transition to a green economy.
- **operational expenditure** (OpEx) reflecting green operational activities of investee companies.

This Compartment commits to a 0% alignment with the EU Taxonomy.

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

Enabling activities directly enable other activities to make a substantial contribution to an environmental objective.

Transitional activities are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the

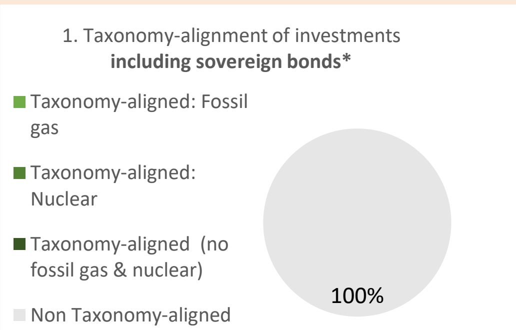
Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy[1]?

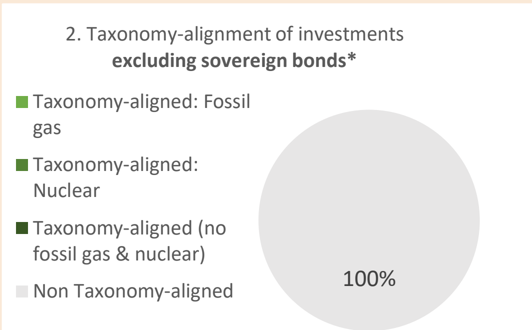
☐ Yes :
☐ In fossil gas ☐ In nuclear energy

☒ No

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

The two graphs below show in green the minimum percentage of investments that are aligned with the EU Taxonomy. As there is no appropriate methodology to determine the Taxonomy-alignment of sovereign bonds*, the first graph shows the Taxonomy alignment in relation to all the investments of the financial product including sovereign bonds, while the second graph shows the Taxonomy alignment only in relation to the investments of the financial product other than sovereign bonds.





This graph represents 100% of the total investments.

*** For the purpose of these graphs, 'sovereign bonds' consist of all sovereign exposures**

What is the minimum share of investments in transitional and enabling activities?

As the Compartment does not have a minimum Taxonomy alignement, there is no minimum share in transitional and enabling activities.

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

The minimum share of sustainable investments with an environmental objective that is not aligned with the EU Taxonomy is 40%.

What is the minimum share of socially sustainable investments?

Not applicable.

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

Investments falling under category "#2 Other", are investments such as derivatives, cash or cash equivalent, not integrating E/S characteristics, where ESG key features and analysis have not been performed, and E/S characteristics not considered.

No minimum environmental or social safeguards apply to the above elements.

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

Is a specific index designated as a reference benchmark to determine whether this financial product is aligned with the environmental and/or social characteristics that it promotes?

No, but the Compartment has designated specific indexes, aligned with the various relevant asset classes. These indexes are used as references to compare the Compartment various buckets ESG characteristics, such as carbon emissions or ESG footprint, with the respective asset classes reference benchmarks:

- ACWI equity bucket: Bloomberg World Large & Mid Cap Net Return Index.
- GIG Bucket: ICE BoFA Global Corporate Index
- GHY Bucket: ICE BoFA Global High Yield Index.

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

How is the reference benchmark continuously aligned with each of the environmental or social characteristics promoted by the financial product?

The reference benchmarks used by the Compartment are not ESG benchmarks and are not consistent with the ESG characteristics promoted by the Compartment. All ESG calculations or comparisons are computed using the Compartment's reference benchmark for each asset classes, as a good proxy of the Compartment various investments investment universe.

- ***How is the alignment of the investment strategy with the methodology of the index ensured on a continuous basis?***

The investment universe of the reference indexes are regularly monitored by the Management Company research team to ensure the consistency with the Compartment's underlying asset classes investment universe, in order to ensure relevance of ESG and performance comparisons.

- ***How does the designated index differ from a relevant broad market index?***

The reference indexes :

- ACWI equity bucket: Bloomberg World Large & Mid Cap Net Return Index
- GIG Bucket: ICE BoFA Global Corporate Index
- GHY Bucket: ICE BoFA Global High Yield Index

are broad market indexes, capturing the Compartment's underlying asset classes investment universe.

- ***Where can the methodology used for the calculation of the designated index be found?***

Details on the reference index can be found on the provider's website:

- https://assets.bbhub.io/professional/sites/27/Global-Equity-Index-Methodology.pdf
- https://www.theice.com market /-data/indices/fixed-income-indices

Where can I find more product specific information online?

More product-specific information can be found on the website:
https://www.tobam.fr/key-documents-policies/

APPENDIX 15. Most Diversified Portfolio SICAV – TOBAM Anti-Benchmark SERENITE 90 Fund

Investment Objective, Benchmark of the Compartment

The objective of the Compartment is to achieve an outperformance over the Daily-capitalized Euro Short-Term Rate ("€STR") in a 5-year investment horizon through dynamic exposure to portfolios of equities and bonds in developed and emerging markets ("the Dynamic Portfolio") while limiting the exposure to risk. The Compartment will aim at providing a protection of 90% of the highest Net Asset Value (the "MaxNAV") achieved by the share of the Compartment on any day from the Initial Issue Date. This objective is not guaranteed.

The Compartment does not use an index-based management strategy, it is actively managed. As a consequence, its performance may differ substantially from the benchmark, which is used determine the global risk profile of the Compartment and which does not imply any investment constraint on the portfolio of the Compartment

Investment strategy of the Compartment

The Compartment seeks to achieve its objective by exposing its assets to portfolios of equities and bonds in developed and emerging markets and at the same time, to provide a protection of 90% of the MaxNAV but does not offer any guarantee on it.

The emerging markets targeted are those covered by the Bloomberg Developed Markets Large & Mid Cap Net Return Index. The list of emerging market countries is available at: www.bloomberg.com/indices

The allocation of the strategy is made between the Dynamic Portfolio and a Money Market Portfolio. The allocation to the Dynamic Portfolio will change depending on market conditions and how close the Compartment price is to 90% of the MaxNav. The Compartment will reduce its allocation to the Dynamic Portfolio when the value of the Dynamic Portfolio is falling, protecting the fund from further falls. It will increase its allocation when the value of Dynamic Portfolio is rising, allowing the Compartment to benefit from future rises.

In case the threshold of the protection level is reached or go below the 90% of the MaxNav, the Compartment will be invested for a period of less than 6 months ("the Period"), as from the date on which the protection level threshold is crossed, in money market instruments (including but not limited to monetary funds). The subsequent performance will be close to the performance of the €STR. In case the €STR is negative, the performance of the Compartment could keep on decreasing below 90% of the MaxNav. Should this threshold be reached, subscriptions will be suspended and the Management Company will determine either:

- to terminate the Compartment, or

- to redefine the investment strategy of the Compartment.

The protection may also be inefficient in case of extreme market conditions when the MaxNAV falls drastically and the level of 90% of the MaxNav cannot be protected.
The securities in which the Compartment invests are selected on the basis of quantitative based models developed by the Management Company.

In order to support its investment objective, the Compartment will invest in different markets or asset classes (for instance: Equities, Bonds) for up to 100% of its assets, mainly through the holding of funds but also directly with a 50% cap on High Yield bonds.

The Compartment may also use deposits in the event that it becomes overdrawn.

The Compartment may also use forward financial instruments (notably including futures contracts), Credit Default Swaps and their indices, iBoxx Standardized Total Return Swaps and Interest Rate Swaps up to a maximum of one time the assets for the purpose of pursuing its investment goal and with a view to making duration adjustments.
In addition, the Compartment may engage in security lending for up to 75% of its assets and also, as ancillary, may make temporary deposits and borrow cash in the event that a debit balance was to appear.

The Compartment qualifies under article 8 of SFDR. The investment strategy does not have a sustainable investment objective but promotes environmental and social characteristics. The strategy notably follows the 4 pillars of TOBAM's SRI policy: exclusion, carbon reduction, ESG integration and responsible stewardship via voting and engagement.

The Management Company considers ESG factors and applies a sustainability approach in its investment process for the Compartment as further detailed in the Appendix 15.1 Environmental and/or Social Characteristics - Pre-contractual disclosures in compliance with SFDR Level II.

Description of the asset classes used to achieve the investment objective

The asset classes included in the portfolio are the following:

a) Equities

To implement the above strategy, the Compartment may invest in equities or closed-ended REITS up to 100% of its net assets;

b) Bonds

The Compartment may invest in bonds for up to 100% of its net assets with a restriction to 50% of its net assets in “High Yield” bonds. The average rating of the portfolio will be above BBB-.
The Compartment may hold distressed Securities which are defined as securities issued by a company that is either in default or in high risk of default.

Defaulted securities or bonds in the midst of a restructuring process shall not exceed 10% of the assets of the Compartment at any point in time. Notwithstanding anything to the contrary, in case of downgrade of assets, the Management Company will manage the investments of the Compartment in Defaulted Securities in order not to exceed 10% of the assets.

c) Money market instruments

In order to achieve its investment objective, for treasury purposes and/or in case of unfourable market conditions, the Compartment may invest up to 100% of its assets in money market instruments, including money market funds and transferable debt securities. If execution of the investment strategy leads the Management Company to opt for CFDs, the portfolio may comprise a significant proportion of instruments (notably certificates of deposit, European commercial paper, treasury bills) with a minimum rating of AA- (S&P) or Aa3 (Moody’s). In case of separation between the two ratings, the Management Company will select the lowest rating.

d) Shares or units of investment funds

The Compartment may invest maximum up to 100% of its assets in shares or units of UCITS which themselves invest maximum 10% of their assets in shares or units of UCITS or investment funds, but no more than 20% maximum of its assets on each. The investment strategies of these funds are compatible with that of the Compartment.

The Compartment may invest up to 100% of its assets in Compartments of the Company.

These investments shall be denominated in any currency and will be made without any restrictions in terms of geographic allocation, market capitalization, sector, rating or time to maturity.

The Compartment’s investment process aims to minimize risk factors and optimize the diversification ratio of constituents in order to achieve an even allocation between their risk factors and generate optimal weightings.

e) Derivatives used to achieve the investment objective

Financial derivative instruments, including futures, forwards, swaps, options, credit derivatives (single issuer Credit Default Swaps and Credit Indices Default Swaps such as “Itraxx” and “CDX”), iBoxx Standardized Total Return Swaps may also be used for hedging, efficient portfolio management, arbitrage and/or to generate exposure and thus expand the exposure of the Compartment to more than the net assets.
The Compartment will invest in regulated, organized markets and over-the-counter.

Credit derivatives, be it CDS indices or TRS on credit cash indices will be used opportunistically in circumstances where the Management Company believes that the objective described below could be achieved.

The Compartment will use TRS for liquidity management purpose in order to keep cash amount to face potential redemption without incurring transaction costs while maintaining the Compartment's overall exposure in line with its mandate.

The Compartment's use of, or investment in, TRS will be as follows:

Type of transaction	Expected proportion	Maximum proportion
Total Return Swaps	0% to 10%	30%

f) Deposits and cash

The Compartment may hold, up to 20% of its net assets, ancillary liquid assets which consists of bank deposits at sight such as cash held in current accounts with a bank accessible at any time.

The Compartment may make use of other deposts in order to achieve its investment objective, for treasury purposes and/or in case of unfavourable market conditions.

g) Cash borrowing

The Compartment may borrow up to the equivalent of 10% of its net assets in cash on a temporary basis and for technical needs only.

h) Temporary purchases and sales of securities

The attention of the Shareholders is drawn to the fact that the below wording, reporting the increased of use of securities lending and the introduction of repurchase transactions, applies as of 29 May 2023.

In addition, the Compartment may engage in security lending and repurchase transactions for up to 75% of its assets. The Compartment may also, as ancillary, make temporary deposits and borrow cash in the event that a debit balance was to appear.

The Compartment will enter into securities lending and repurchase transactions opportunistically in circumstances where the Management Company believes that the objective described below could be achieved.

In the context of investments in specials and general collateral the Compartment will use securities lending and repurchase transactions in order to increase the return of the portfolio.

The expected proportion of the Compartment's assets which may be subject to securities lending and repurchase transactions depends on the demand of market participants for the securities forming part of the Compartment's portfolio at any time.

This demand depends notably on the interest of such securities, the size of the lendable positions, the presence of specials or securities used as general collateral, the potential duration of the loan (the securities being subject to portfolio adjustments or rebalancing, and thus sell trades), and the type of collateral accepted by the Compartment. The Compartment's use of, or investment in, securities lending and repurchase transactions will be as follows:

Type of transaction	Expected proportion	Maximum proportion
Securities lending	0% to 30%	75%
Repurchase transactions	0% to 30%	75%

Reference Currency

The reference currency of the Compartment is EUR.

Profile of the Typical Investor

To determine their level of investment, investors should consider their personal assets, the regulations applicable to them, their current financial needs over a recommended minimum investment horizon of more than five years, and also their willingness to take risks or their preference for a more prudent investment. The recommended minimum investment horizon is more than 5 years.

Form of Shares and Classes

The Share Classes of the Compartment will be issued in registered form

Share Classes	**A*** **Isin Code: LU2158750757**	**C*** **Isin Code: LU2231589438**
Currency	EUR	EUR
Type of Shares	Accumulation	Accumulation
Target Investors	Institutional investors approved by the Management Company	Institutional investors approved by the Management Company
Minimum initial subscription	10 Shares	10 Shares
Minimum holding amount	1 Share	1 Share
Valuation Day	Every Business Day with the exception of public holidays and non-settlement days for exchanges based in the UK, France, Luxembourg and days on which US markets are closed or close early (based on the official US Government Bond Market Calendar)	Every Business Day with the exception of public holidays and non-settlement days for exchanges based in the UK, France, Luxembourg and days on which US markets are closed or close early (based on the official US Government Bond Market Calendar)
Management Company Fee	0.58%**	0.48%**
Administration Fee & Depositary Fee	Up to 0.20%	Up to 0.20%
Subscription Fee paid to the Management Company	None	None
Hedge	100% systematic hedging against foreign exchange risk	100% systematic hedging against foreign exchange risk
Redemption Fee paid to the Management Company	0%	0%
Cut-off	10.00 a.m. CET the Business Day before the relevant Valuation Day	10.00 a.m. CET the Business Day before the relevant Valuation Day
Subscription/Redemption Settlement Day	2 days, according to the official NYSE Euronext calendar, following the Valuation Day	2 days, according to the official NYSE Euronext calendar, following the Valuation Day

** Share Classes A and C offer 100% systematic hedging against foreign exchange risk of all currency exposures held in the portfolio against the currency of the concerned Share Class (EUR) with a 10% tolerance.*

*** Management fee of 0% for any investment in other Compartments of the Company. Administration & Depositary Fees are charged for investments in the Compartments of the Company*

Launch date

Initial Issue Date : The initial issue date will be determined by the Board of Directors.

The following Share Class of this Compartment has been created with the following initial subscription prices:

Class:	Initial subscription prices:
Class A	EUR 100
Class C	EUR 100

Total Expense Ratio

The latest calculated total expense ratio rate can be found in the Company's latest financial report.

Risk Management

The method used to calculate overall exposure is commitment method.

Compartments Specific Risk Factors

The funds will be invested primarily in financial instruments selected by the Management Company. These instruments will be subject to market movements and fluctuations. The Management Company invests according to a systematic, fundamentals-based model: there is a risk that the equities selected may not be the best performing stocks.

1) Capital risk

The Fund does not carry any guarantee or protection, and the capital invested at the outset may not be returned in full.

2) Equity risk

If the equities or indices to which the portfolio is exposed fall, the net asset value of the Compartment may also fall.

Since the volume of small and mid-cap stocks listed on the stock exchange is relatively low, market downturns are more pronounced and more rapid than for large caps. The net asset value of the Compartment may therefore decline more quickly and more significantly.

Investors' attention is drawn to the fact that the small-cap markets are intended to accommodate businesses that, due to their specific characteristics, may pose a risk for investors.

3) Risk associated with the Management Company's investment process

Investors should note that portfolio construction and the selection and weighting of assets are based on a process developed by the Management Company. The Compartment's investment process is based on a systematic model designed to identify signals based on past statistical results.

There is a risk that the model may not be efficient, as there is no guarantee that past market situations will be repeated in the future. Since the aim of the processes developed by the Management Company is to achieve good diversification of the Compartment's portfolio, using these processes may lead the Management Company to not select the top-performing assets.

4) Currency risk

Currency risk is the risk of depreciation in the currencies in which the Compartment invests relative to the reference currency. This currency risk will be managed according to market opportunities and may thus account for a significant proportion of the risk. In the event of depreciation in foreign currencies, investors are thus exposed to a decline in the value of their units.

5) Counterparty risk

The Compartment may incur a loss in the event of default by a counterparty with which certain transactions were carried out which would result in a decline in the Compartment's net asset value.

6) High Yield Bond risk

Investments in High Yield bonds can involve a substantial risk of loss. High Yield bonds are considered to be speculative with respect to the issuer's ability to pay interest and principal. These securities, which are rated below investment grade, have a higher risk of issuer default, are subject to greater price volatility than investment grade securities and may be illiquid.

7) Interest rate risk

This is the risk of depreciation in fixed-income instruments deriving from interest-rate fluctuations. Should interest rates rise, the Compartment's net asset value may decline.

8) Credit risk

This is the risk of a decline in shares issued by a private or public issuer or default by the latter. The value of the debt securities in which the Compartment is invested may decline, leading to a fall in net asset value.

9) Risk associated with emerging markets equities

The equities of emerging countries may be less liquid than equities of developed countries. Consequently, holding these securities may increase the level of portfolio risk. For example, market declines may be greater and faster than in developed countries, so the Compartment's net asset value may decline more sharply and quickly.

10) Distressed securities risk

Distressed Securities Investment in a security issued by a company that is either in default or in high risk of default ("Distressed Securities") involves significant risk. Such investments will only be made when the Management Company believes either that the security trades at a materially different level from the Management company's perception of fair value or that it is reasonably likely that the issuer of the securities will make an exchange offer or will be the subject of a plan of reorganisation; however, there can be no assurance that such an exchange offer will be made or that such a plan of reorganisation will be adopted or that any securities or other assets received in connection with such an exchange offer or plan of reorganisation will not have a lower value or income potential than anticipated when the investment was made. In addition, a significant period of time may pass between the time at which the investment in Distressed Securities is made and the time that any such exchange offer or plan of reorganisation is completed. During this period, it is unlikely that any interest payments on the Distressed Securities will be received, there will be significant uncertainty as to whether fair value will be achieved or not and the exchange offer or plan of reorganisation will be completed, and there may be a requirement to bear certain expenses to protect the investing Fund's interest in the course of negotiations surrounding any potential exchange or plan of reorganisation. Furthermore, constraints on investment decisions and actions with respect to Distressed Securities due to tax considerations may affect the return realised on the Distressed Securities.

11) Risks associated with investments in shares or units of UCITS or other UCIs

Investments made by the Compartment in the units/shares of UCI/UCITS, including investments by the Compartment in units/shares of other Compartments of the Company, expose the Compartment to risks arising from financial instruments which these UCI/UCITS hold in their portfolio. Certain risks are, however, directly linked to the holding by the Compartment of units/shares of UCI/UCITS. Most of these UCI/UCITS also stipulate the option of temporarily suspending redemption under specific circumstances of an exceptional nature. Investments made in the units/shares of UCI/UCITS may accordingly present a liquidity risk which is higher than investing directly in a portfolio of transferable securities. On the other hand, investing in the units of UCI/UCITS allows the Compartment to gain access in a flexible and efficient way to various professional management styles and to diversify its investments. If the Compartment invests primarily through UCI/UCITS it must ensure that its UCI/UCITS portfolio has the appropriate liquidity characteristics to allow it to meet its own redemption obligations.

If the Compartment invests in units/shares of UCI/UCITS that are managed, directly or by delegation, by the Management Company or by any other company with which the Management Company is linked by common management or control, or by a substantial direct or indirect holding, that Management Company or other company may not charge subscription or redemption fees on account of the Compartment's investment in the units/shares of such UCI/UCITS.

Template pre-contractual disclosure for the financial products referred to in Article 8, paragraphs 1, 2 and 2a, of Regulation (EU) 2019/2088 and Article 6, first paragraph, of Regulation (EU) 2020/852

Product name: Most Diversified Portfolio SICAV – TOBAM Anti-Benchmark SERENITE 90 Fund

Legal entity identifier: 549300JD0SHH2ZJFKO97

Sustainable investment means an investment in an economic activity that contributes to an environmental or social objective, provided that the investment does not significantly harm any environmental or social objective and that the investee companies follow good governance practices.

The **EU Taxonomy** is a classification system laid down in Regulation (EU) 2020/852, establishing a list of **environmentally sustainable economic activities**. That Regulation does not lay down a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

Environmental and/or social characteristics

Does this financial product have a sustainable investment objective?

☐ **Yes**	☒ **No**
☐ It will make a minimum of **sustainable investments with an environmental objective:** ___%	☒ It **promotes Environmental/Social (E/S) characteristics** and while it does not have as its objective a sustainable investment, it will have a minimum proportion of 5% of sustainable investments
☐ in economic activities that qualify as environmentally sustainable under the EU Taxonomy	☐ with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy
☐ in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy	☒ with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy
	☐ with a social objective
☐ It will make a minimum of **sustainable investments with a social objective:** ___%	☐ It promotes E/S characteristics, but **will not make any sustainable investments**

What environmental and/or social characteristics are promoted by this financial product?

The Compartment seeks to expose its assets to portfolios of equities and bonds in developed and emerging markets, while at the same time providing a protection of 90% of the highest Net Asset Value (the MaxNAV) but does not offer any guarantee on it.

While the strategy does not have a sustainable investment objective, it does integrate environmental, social and governance (ESG) risks and opportunities to its process. The Management Company will invest a minimum of 50% of its Net Asset Value (NAV) in underlying strategies/ funds that are classified Article 8 or Article 9 under SFDR.

The Compartment aims to promote low carbon approaches, commitment to climate action and companies with good governance via ethical and product related exclusions, carbon emissions reduction targets and considerations of ESG challenges.

In particular, the Compartment aims to promote the following E/S characteristics:

- Low carbon approach by applying a systematic carbon footprint reduction of at least 20% versus the reference investment universe's carbon footprint,
- Promotion of companies with good governance using raw data and their ESG footprint.

No benchmark has been designated for the purpose of attaining the environmental or social characteristics promoted by the financial product.

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

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

In order to achieve the above characteristics promoted by the Compartment, the Management Company has put in place a process to assess underlying funds, SFDR classifications, and an annual ESG assessment to conduct a proper due diligence of the ESG characteristics of the eligible underlying funds.

What are the objectives of the sustainable investments that the financial product partially intends to make and how does the sustainable investment contribute to such objectives?

The Compartment indirectly makes sustainable investments through investments in its in-house funds and strategies that are committed to Environmental objectives including climate change mitigation and adaptation (however not in the meaning of the Taxonomy Regulation) or commitment to science-based emissions reduction targets ("SBTI"). These strategies will have a minimum percentage of sustainable investments at minima 40%. The Compartment also indirectly makes sustainable investments via external providers funds that are classified either article 8 or 9.

How do the sustainable investments that the financial product partially intends to make, not cause significant harm to any environmental or social sustainable investment objective?

The Compartment indirectly makes sustainable investments through investments in its in-house funds and strategies that are applying the Management Company exclusion policy.

The Compartment also indirectly makes sustainable investments via external providers funds that are classified either article 8 or 9 and as such have considerations with the do not significantly harm requirements of Article 8 or 9.

All of the funds and strategies the Compartment invests in, are checked for adherence with the Management Company's considerations for international norms and best practices.

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

The PAI are monitored at the level of the underlying funds invested by the Compartment. The following PAI, as defined in SFDR Level II, have been considered for all investments in TOBAM's in-house funds:

- PAI #7: Activities negatively affecting biodiversity
- PAI #10: Violations of UN Global Compact principles and OECD guidelines
- PAI #14: Exposure to Controversial Weapons

For external underlying funds in monetary or short-term monetary strategies, PAI are monitored via adherence to TOBAM's exclusion policy and Do Not Significantly Harm policies.

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

The Management Company will not invest in any company that has been classified as failing to comply with key international norms (ISS Ethix Norm-based screening) such as for example the UN Global Compact Principles, OECD Guidelines for Multinational Enterprises, Guiding Principles on Business and Human rights.

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

The "do no significant harm" principle applies only to those investments underlying the financial product that take into account the EU criteria for environmentally sustainable economic activities. The investments underlying the remaining portion of this financial product do not take into account the EU criteria for environmentally sustainable economic activities.

Any other sustainable investments must also not significantly harm any environmental or social objectives.

Principal adverse impacts are the most significant negative impacts of investment decisions on sustainability factors relating to environmental, social and employee matters, respect for human rights, anti-corruption and anti-bribery matters.

Does this financial product consider principal adverse impacts on sustainability factors?

✖ Yes, PAI are considered for the underlying funds invested and will be reported in annual report of the Compartement.

☐ No

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

Good governance practices include sound management structures, employee relations, remuneration of staff and tax compliance.

What investment strategy does this financial product follow?

The Compartment seeks to get exposed to portfolios of equities and bonds in developed and emerging markets, while at the same time providing a protection of 90% of the Max NAV but does not offer any guarantee on it.

While the strategy does not have a sustainable investment objective, it does integrate environmental, social and governance (ESG) risks and opportunities to its process. The Management Company will invest a minimum of 50% of its NAV in underlying strategies/ funds that are classified Article 8 or Article 9 under SFDR.

- ***What are the binding elements of the investment strategy used to select the investments to attain each of the environmental or social characteristics promoted by this financial product?***

  The Management Company commits to invest a minimum of 50% of its NAV in underlyings funds / strategies that are classified Article 8 or Article 9 under SFDR.

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

  Not applicable.

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

  In order to assess good governance practices, the Management Company invests in funds that have committed to consider good governance practices , notably in-house equity and corporate bonds strategies, that each consider the G scoring of the Management Company's proprietary ESG footprint methodology, and ensure that the G scoring of the Compartment is matching the reference index of the respective asset classes G scoring. For external funds, good governance is monitored on the selection process of Article 8 or 9 funds.

Asset allocation describes the share of investments in specific assets.

What is the asset allocation planned for this financial product?

#1: 50% of the assets of this Compartment promote E/S characteristics, in line with the binding elements of the strategy as described previously.

#1A: at least 5% of those eligible assets fall under the sustainable share of investment with non EU Taxonomy aligned environmental objectives.

The model used by TOBAM for the determination of the sustainable investments combines the pass or fail approach and the weighted-revenue approach with threshold for the carbon emissions and governance.
Investments under this category are defined as sustainable investment per the below definition:

Environmental objective determined as :

o Companies that have carbon intensity (carbon emissions normalized by the Enterprise Value Including Cash) below 80% of the average emissions carbon intensity of their respective asset class reference index
Or
o Companies that have made a commitment to the SBTI initiative (this engagement is followed by the Management Company's research team on an annual basis).

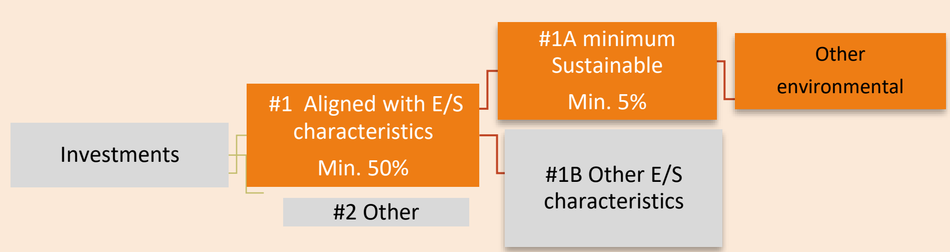
Do Not Significantly Harm characteristics:

o Companies that are not involved in severe breaches or controversies in regard to the labor rights, human rights, environmental or corruption, and that are not part of the following sectors: tobacco, controversial weapons, coal mining and fossil fuels
And
o Companies that have not been targeted by any significant environmental fines over the past years.

Good Governance practices are defined as companies that have a G score (as defined by the Management Company ESG Footprint proprietary methodology) in the top 80% of their respective asset class reference index.

Please note that investments falling under section #1B on the below diagram 'non sustainable investment share of the Compartment', still comply with TOBAM's exclusion policy), but did not qualify as a sustainable investment.

2# Other Investments: when investments fall out the 50% minimum limit integrating E/S characteristics, ESG key features and anaysis may not have been performed, and E/S characteristics not considered.



#1 Aligned with E/S characteristics includes the investments of the financial product used to attain the environmental or social characteristics promoted by the financial product.

#2Other includes the remaining investments of the financial product which are neither aligned with the environmental or social characteristics, nor are qualified as sustainable investments.

The category **#1 Aligned with E/S characteristics** covers:
- The sub-category **#1A Sustainable** covers sustainable investments with environmental or social objectives.
- The sub-category **#1B Other E/S characteristics** covers investments aligned with the environmental or social characteristics that do not qualify as sustainable investments.

How does the use of derivatives attain the environmental or social characteristics promoted by the financial product?

The Compartment may use financial derivative instruments for investment, efficient portfolio management and/or hedging purposes, and this will not impact in any way the exposure to sustainable assets, or the ESG characteristics of the Compartment.

Taxonomy-aligned activities are expressed as a share of:
- **turnover** reflecting the share of revenue from green activities of investee companies
- **capital expenditure** (CapEx) showing the green investments made by investee companies, e.g. for a transition to a green economy.
- **operational expenditure** (OpEx) reflecting green operational activities of investee companies.

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

The Compartment commits to a 0% alignment with the EU Taxonomy.

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

Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy[1]?

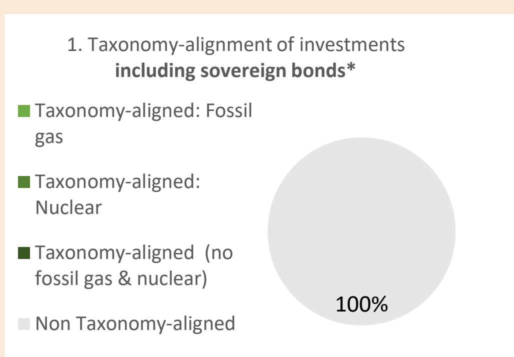
☐ Yes :

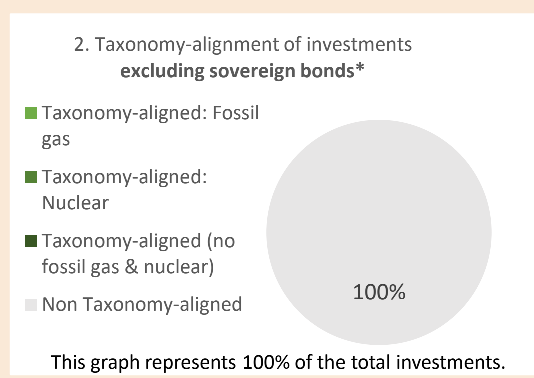
☐ In fossil gas ☐ In nuclear energy

☒ No

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

The two graphs below show in green the minimum percentage of investments that are aligned with the EU Taxonomy. As there is no appropriate methodology to determine the Taxonomy-alignment of sovereign bonds*, the first graph shows the Taxonomy alignment in relation to all the investments of the financial product including sovereign bonds, while the second graph shows the Taxonomy alignment only in relation to the investments of the financial product other than sovereign bonds.





*** For the purpose of these graphs, 'sovereign bonds' consist of all sovereign exposures**

Enabling activities directly enable other activities to make a substantial contribution to an environmental objective.

Transitional activities are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.

What is the minimum share of investments in transitional and enabling activities?

As the Compartment does not have a minimum Taxonomy alignement, there is no minimum share in transitional and enabling activities.

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

The minimum share of sustainable investments with an environmental objective that is not aligned with the EU Taxonomy is 5%.

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

What is the minimum share of socially sustainable investments?

Not applicable.

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

Investments falling under category "#2 Other", are investments such as derivatives, cash or cash equivalent, not integrating E/S characteristics, where ESG key features and analysis have not been performed, and E/S characteristics not considered.

No minimum environmental or social safeguards apply to the above elements.

Is a specific index designated as a reference benchmark to determine whether this financial product is aligned with the environmental and/or social characteristics that it promotes?

No benchmark has been designated for the purpose of attaining the environmental or social characteristics promoted by the financial product.

- ***How is the reference benchmark continuously aligned with each of the environmental or social characteristics promoted by the financial product?***

  Not applicable.

- ***How is the alignment of the investment strategy with the methodology of the index ensured on a continuous basis?***

  Not applicable.

- ***How does the designated index differ from a relevant broad market index?***

  Not applicable.

- ***Where can the methodology used for the calculation of the designated index be found?***

  Not applicable.

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

Where can I find more product specific information online?

More product-specific information can be found on the website:
https://www.tobam.fr/key-documents-policies/

APPENDIX 16. Most Diversified Portfolio SICAV – TOBAM Maximum Diversification World Equity Protected Fund

Investment Objective, Benchmark of the Compartment

The Compartment's primary investment objective is to achieve long-term capital growth by investing in and/or being exposed to a global developed markets equity portfolio that picks from the TOBAM Maximum Diversification World Developed USD NTR index and a systematic hedging strategy by purchasing put options, which can be partly financed by the sale of call options. The Compartment does not carry any guarantee.

Investment strategy of the Compartment

The equities in which the Compartment invests are selected on the basis of quantitative models developed by the Management Company, which enable it to optimize the level of diversification within the investment universe of the TOBAM Maximum Diversification World Developed USD NTR index (the "Investment Universe"). The resulting Compartment, combined with other "long only" investments, is expected to improve the results of the asset allocation by, among other things, improving the Sharpe ratio and reducing volatility. The aim of the management models used is to increase diversification in relation to the Investment Universe. The sector breakdown may be taken into account to limit concentration into a particular sector.

In order to support its investment objective (obtain maximum remuneration of its liquidities), the Compartment can invest directly or via funds on different markets or asset classes (money market instruments or listed index funds) for up to 10% of its assets.

In order to be continually exposed as closely as possible to the results of the model and therefore meet its investment objective, the Compartment may invest in listed index funds. To maintain exposure as close as possible to the results of the model, the Compartment may build or add to its exposure through American Depository Receipt (ADR) and Global Depository Receipt (GDR), for up to 100% of its net assets, and/or through other OTC contracts in order to enhance risk control and minimize transaction costs. Investments in American Depository Receipt (ADR), Global Depository Receipt (GDR), and Real Estate Investment Trusts (REIT) are made in compliance with the restrictions laid down in Article 41 of the Law.

If justified by extreme market conditions and in order to curb the cost of trading on the various markets, the Compartment reserves the right to invest up to 100% of its assets in mono-underlying Contracts for Differences (CFDs). CFDs are futures contracts entered into with a counterparty settled through cash payments rather than through physical delivery of financial instruments. The Compartment may thus take advantage of the (liquidity and pricing) characteristics of these instruments compared with the financial instruments in which it invests directly.

The equities selected in the Compartment will be partially hedged by purchasing put options, potentially partly financed by the sale of call options.

The exercise price of the options varies over time based on a proprietary systematic process. New put options are normally bought at a level of 100% - 80% of the underlying index and a maturity longer or equal to a month at the day of purchase of the option.

The hedges are continuously adjusted following a systematic weekly partial rebalancing schedule. To finance at least partially the protection costs, call options could be sold at a level of 100% -120% of the underlying index at the day of sale of the option.

The amount of the notional that is targeted at each partial weekly rebalancing for the purchase of puts and the sale of calls varies based on a proprietary systematic process between 70%-30% for the purchase of the put options and 70%-10% for the sale of call options with the aim of optimizing the trade-off between hedging efficiency and costs. The corresponding investments may take the form of equity securities, UCITS and/or UCIs, or derivate instruments.

Despite the implementation of the hedging strategy, there is no guarantee that the investment objective of the Compartment will actually be achieved. A loss in value, therefore, cannot be ruled out.

At least 80% of the Compartment's assets are constantly kept exposed to the international small-, mid- and large-cap equity markets. In addition to the portfolio's minimum exposure to international equities.

The Compartment may invest in money market instruments, including money market funds and transferable securities up to 20% of its assets.

It may also invest up to 100% of its assets in forward financial instruments (such as futures contracts) in order to make occasional adjustments to allow for subscriptions and redemptions and/or to hedge currency risk. The Compartment may also build up or supplement its exposure by investing in OTC contracts in order to improve risk management and reduce trading costs.

The Compartment will thus be able to benefit from the flexibility these instruments may offer (particularly in terms of liquidity and price) relative to the financial instruments in which it invests directly.

Subject to the rules set out in Section 4.3 (Investment and Borrowing Restrictions), the Compartment may also use deposits and may borrow cash in the event that it becomes overdrawn.

The Compartment qualifies under article 8 of SFDR. The investment strategy does not have a sustainable investment objective but promotes environmental and social characteristics. The strategy notably follows the 4 pillars of TOBAM's SRI policy: exclusion, carbon reduction, ESG integration and responsible stewardship via voting and engagement.

The Management Company considers ESG factors and applies a sustainability approach in its investment process for the Compartment as further detailed in the Appendix 16.1 Environmental and/or Social Characteristics – Pre-contractual disclosures in compliance with SFDR Level II.

1) Description of the asset classes used to achieve the investment objective

The asset classes included in the portfolio are the following:

a) Equities

To implement the above strategy, the Compartment will invest at least 80% of the value of the Compartment in the international equities market that is depending on the outlook as seen by the Management Company. The Compartment may invest in shares of companies listed in developed countries as defined by the Management Company, irrespective of the companies' size and the sector of the economy to which they belong. At least 80% of the Compartment's net assets will be exposed to international equities. This exposure may be gained either through CFDs, futures or direct securities, depending on market conditions. This exposure will not fall below 80% of the Compartment's assets. The securities could include American Depository Receipt (ADR) and Global Depository Receipt (GDR) excluding embedded derivatives, for up to 100% of its net assets.

The Compartment may invest up to 20% of its net assets in closed-ended Real Estate Investment Trusts (REIT).

b) Money market instruments

In order to achieve its investment objective, for treasury purposes and/or in case of unfavourable market conditions, the Compartment may invest up to 20% of its assets in money market instruments, including money market funds and transferable securities.

c) Shares or units of investment funds

The Compartment may invest maximum 10% of its assets in shares or units of UCITS which themselves invest maximum 10% of their assets in shares or units of UCITS or investment funds.

These funds may be managed by the Management Company or an affiliated company. The investment strategies of these funds are compatible with that of the Compartment.

The Compartment may invest maximum 10% of its assets in one or more Compartments of the Company.

2) Derivatives used to achieve the investment objective

The Compartment may use financial futures, put options, call options up to a maximum of one time its assets. The Compartment's leveraged exposure may not exceed 200%.

The Compartment will invest in regulated, organized markets and over-the-counter.

The Compartment will use derivatives instrument for hedging and exposure purposes, and to achieve the investment objective (including replication of synthetic exposure to baskets of equities or indices).

The hedging derivatives transaction shall aim to mitigate equity risk and foreign exchange risk of the Compartment.

The types of instruments used by the Management Company will mainly be futures, put options, call options on equities or stock market indices, forwards and swaps on currencies or equities and CFDs.

3) Deposits and cash

The Compartment may hold, up to 20% of its net assets, ancillary liquid assets which consists of bank deposits at sight such as cash held in current accounts with a bank accessible at any time.

The Compartment may make limited use of other deposits in order to achieve its investment objective, for treasury purposes and/or in case of unfavourable market conditions.

4) Cash borrowing

The Compartment may borrow up to the equivalent of 10% of its net assets in cash on a temporary basis and for technical needs only.

5) Temporary purchases and sales of securities

The attention of the Shareholders is drawn to the fact that the below wording, reporting the increased use of securities lending, applies as of 29 May 2023.

In addition, the Compartment may engage in security lending for up to 75% of its assets.

The Compartment may also, as ancillary, make temporary deposits and borrow cash in the event that a debit balance was to appear.

The Compartment will enter into securities lending opportunistically in circumstances where the Management Company believes that the objective described below could be achieved.

In the context of investments in specials and general collateral the Compartment will use securities lending in order to increase the return of the portfolio.

The expected proportion of the Compartment's assets which may be subject to securities lending depends on the demand of market participants for the securities forming part of the Compartment's portfolio at any time.

This demand depends notably on the interest of such securities, the size of the lendable positions, the presence of specials or securities used as general collateral, the potential duration of the loan (the securities being subject to portfolio adjustments or rebalancing, and thus sell trades), and the type of collateral accepted by the Compartment. The Compartment's use of securities lending transactions will be as follows:

Type of transaction	**Expected proportion**	**Maximum proportion**
Securities lending	0% to 30%	75%

Reference Currency
The reference currency of the Compartment is USD.

Profile of the Typical Investor

The Compartment is a high-risk vehicle. To determine their level of investment, investors should consider their personal assets, the regulations applicable to them, their current financial needs over a recommended minimum investment horizon of more than five years, and also their willingness to take risks or their preference for a more prudent investment. The recommended minimum investment horizon is more than 5 years.

Form of Shares and Classes

The Share Classes of the Compartment will be issued in registered form.

Share Classes	**A** Isin Code: LU2401605790	**A1*** Isin Code:LU2401605873	**A2** Isin Code: LU2401605956	**A3*** Isin Code: LU2401606095	**A4** Isin Code: LU2401606178	**A5*** Isin Code: LU2401606251	**R** Isin Code: LU2401606335	**R3*** Isin Code: LU2401606418	**B3*** Isin Code: LU2401606509	**Z** Isin Code: LU2401606681	**Z3*** Isin Code: LU2401606764
Currency	USD	USD	EUR	EUR	CHF	CHF	USD	EUR	EUR	USD	EUR
Type of Shares	Accumulation										
Target Investors	Institutional	Institutional	Institutional	Institutional	Institutional	Institutional	All investors	All investors	All investors	Institutional	Institutional
Minimum initial subscription	5 million USD	5 million USD	5 million EUR	5 million EUR	5 million CHF	5 million CHF	1 Share	1 Share	1 Share	10 Shares	10 Shares
Minimum holding amount	1 Share	1 Share	1 Share	1 Share	1 Share	1 Share	1 Share	1 Share	1 Share	1 Share	1 Share
Valuation Day	Every Business Day, with the exception of days on which the American markets are closed (based on the official NYSE Euronext calendar)										
Management Company Fee	0.50 %	0.50 %	0.50 %	0.50 %	0,50 %	0,50 %	0.75 %	0.75%	1.50%	0.00%	0.00%
Administration Fee & Depositary Fee	0,20 %	0,20 %	0,20 %	0,20 %	0,20 %	0,20 %	0,20 %	0,20%	0,20%	0,20%	0,20%
Subscription Fee paid to the	None	None	None	None	None	None	Up to 5%	Up to 5%	Up to 5%	Up to 5%	Up to 5%

Management Company											
Redemption Fee paid to the Management Company	Up to 1%	Up to 1%	Up to 1%	Up to 1%	Up to 1%	Up to 1%	Up to 1%	Up to 1%	Up to 1%	Up to 5%	Up to 5%
Hedge	-	100% systematic hedging against foreign exchange risk	-	100% systematic hedging against foreign exchange risk	_	100% systematic hedging against foreign exchange risk	_	100% systematic hedging against foreign exchange risk	100% systematic hedging against foreign exchange risk	_	100% systematic hedging against foreign exchange risk
Cut-off	12.00 p.m. CET the Business Day before the relevant Valuation Day										
Subscription / Redemption Settlement Day	2 days, according to the official NYSE Euronext calendar, following the Valuation Day										

R units: these units are intended for "all investors" seeking a low initial investment and a "clean fee" structure. The R "clean fee" share class will not carry any fees payable to distributors.

Investors subscribing for Shares denominated in CHF, EUR or GBP are subject to CHF/EUR/GBP currency risk given the conversion of the net asset value.

** Share Classes A1, A3, A5, R3, B3, Z3 offer a 100% systematic hedging against foreign exchange risk with a 10% tolerance.*

Launch date

Initial Issue Date : The initial issue date will be determined by the Board of Directors.

The following Share Classes of this Compartment have been created with the following initial subscription prices:

Class:	Initial subscription prices:
Class A	USD 5 million
Class A1	USD 5 million
Class A2	EUR 5 million
Class A3	EUR 5 million
Class A4	CHF 5 million
Class A5	CHF 5 million
Class R	USD 100
Class R3	EUR 100
Class B3	EUR 100
Class Z	USD 10 000
Class Z3	EUR 10 000

Total Expense Ratio

The latest calculated total expense ratio rate can be found in the Company's latest financial report.

Risk Management

The method used to calculate overall exposure is the commitment method.

Compartments Specific Risk Factors

The funds will be invested primarily in financial instruments selected by the Management Company. These instruments will be subject to market movements and fluctuations. The Management Company invests according to a systematic, fundamentals-based model: there is a risk that the equities selected may not be the best performing stocks.

1) Equity risk

If the equities or indices to which the portfolio is exposed fall, the net asset value of the Compartment may also fall.

Since the volume of small and mid-cap stocks listed on the stock exchange is relatively low, market downturns are more pronounced and more rapid than for large caps. The net asset value of the Compartment may therefore decline more quickly and more significantly.

Investors' attention is drawn to the fact that the small-cap markets are intended to accommodate businesses that, due to their specific characteristics, may pose a risk for investors.

2) Risk associated with the Management Company’s investment process

Investors should note that portfolio construction and the selection and weighting of assets are based on a process developed by the Management Company. The Compartment's investment process is based on a systematic model designed to identify signals based on past statistical results.

There is a risk that the model may not be efficient, as there is no guarantee that past market situations will be repeated in the future. Since the aim of the processes developed by the Management Company is to achieve good diversification of the Compartment’s portfolio, using these processes may lead the Management Company to not select the top-performing assets.

3) Risk associated with the use of financial futures, put options, call options.

The Compartment may use these instruments for up to 100% of its assets. The Compartment may thus be exposed for up to 200% of its assets to the market, assets, index and economic and/or financial instrument or parameter, which can imply a risk of reduction in the net asset value of the Compartment that might be more significant and quicker that the one observed on the markets where the Compartment is invested.

4) Currency risk (up to 100%)

Currency risk is the risk that the investment currencies may weaken in relation to the base currency of the portfolio (US dollar). In the event of depreciation in foreign currencies, investors are thus exposed to a decline in the value of their units. The A1, A3, A5, R3, B3 and Z3 Shares are exposed to currency risk.

5) Counterparty risk

6) The Compartment may incur a loss in the event of default by a counterparty with which certain transactions were conducted, leading to a decline in the Compartment’s net asset value.Interest rate risk

This refers to the risk of a fall in the value of fixed income instruments resulting from changes in interest rates. If interest rates rise, the Compartment’s net asset value may fall. The Compartment has limited exposure to interest rate products.

7) Credit risk

This is the risk of a decline in shares issued by a private or public issuer or default by the latter. The value of the debt securities in which the Compartment is invested may decline, leading to a fall in net asset value.

Template pre-contractual disclosure for the financial products referred to in Article 8, paragraphs 1, 2 and 2a, of Regulation (EU) 2019/2088 and Article 6, first paragraph, of Regulation (EU) 2020/852

Product name: Most Diversified Portfolio SICAV - TOBAM Maximum Diversification World Equity Protected Fund

Legal entity identifier: 549300YJ7MQ07WLVWA24

Sustainable investment means an investment in an economic activity that contributes to an environmental or social objective, provided that the investment does not significantly harm any environmental or social objective and that the investee companies follow good governance practices.

The **EU Taxonomy** is a classification system laid down in Regulation (EU) 2020/852, establishing a list of **environmentally sustainable economic activities**. That Regulation does not lay down a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

Environmental and/or social characteristics

Does this financial product have a sustainable investment objective?

☐ **Yes**	☒ **No**
☐ It will make a minimum of **sustainable investments with an environmental objective:** ___%	☒ It **promotes Environmental/Social (E/S) characteristics** and while it does not have as its objective a sustainable investment, it will have a minimum proportion of 40% of sustainable investments
☐ in economic activities that qualify as environmentally sustainable under the EU Taxonomy	☐ with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy
☐ in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy	☒ with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy
	☐ with a social objective
☐ It will make a minimum of **sustainable investments with a social objective:** ___%	☐ It promotes E/S characteristics, but **will not make any sustainable investments**

What environmental and/or social characteristics are promoted by this financial product?

The Compartment's primary investment objective is to be exposed to global developed equity markets following TOBAM's proprietary index: TOBAM Maximum Diversification World Developed USD NTR index, and a hedging strategy of the equity risk.

The strategy integrates environmental, social and governance (ESG) risks and opportunities to the sustainability of long-term company returns. The Compartment aims to promote low carbon approaches, commitment to climate action and companies with good governance.

In particular, the Compartment aims to promote the following E/S characteristics:

- Low carbon approach by applying a systematic carbon footprint reduction of at least 50% versus the reference investment universe's carbon footprint,
- Promotion of companies with good governance using raw data and their ESG footprint.

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

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

In order to achieve the above characteristics promoted by this Compartment, the Management Company has put in place an ambitious ESG policy made of key pillars and sustainability indicators. This Compartment uses the following sustainability indicators to attain each of the environmental and social characteristics promoted by the Compartment:

- **Carbon Emissions Reduction:** The Management Company applies a systematic carbon footprint reduction of at least 50% versus the reference investment universe's carbon footprint. The calculation of the carbon footprint is based on the greenhouse gas emissions scope 1(i.e. direct emissions from owned or controlled sources), 2 (i.e. indirect emissions from the generation of purchased energy) and 3 (i.e. indirect emissionsresulting from value chain activities) when available, according to GHG Procotol Corporate

Standard. Data on emissions used is obtained from a number of sources including company reports, CDP questionnaire (Carbon Disclosure Project) or an estimation model.

- **ESG Footprint:** The Management Company has put in place a strict E, S and G integration process for all listed companies in its investment universe; using officially published data from Bloomberg.

✓ E: For example: existence of climate change / biodiversity / energy efficiency policies; green building, water and waste usage
✓ S: For example: Ethics/Equal opportunity/training/ consumer data protection/whistleblowing policies, CSR committee in place, supply chain management
✓ G: For example: Number of board meetings per year, ratio of independent directors, chairman tenure, ratio of nonexecutive directors in boards

From that raw data, the Management Company has built a proprietary methodology to compute the "E,S,G footprints" of each individual holding in the portfolio and as such determine the overall E,S,G Footprints of the portfolio. The Management Company has constrained its investment decision-making process to reach E,S,G footprints of the Compartment, at minima at the same level as the E,S,G footprints of the reference investment universe.

- **Optimization constraint of temperature contribution** of each holding to reach a 1.5° C portfolio in line with the latest Intergovernmental Panel on Climate Change (IPCC) climate scenarios.

What are the objectives of the sustainable investments that the financial product partially intends to make and how does the sustainable investment contribute to such objectives?

The sustainable investments within the Compartment contribute to Environmental objectives including climate change mitigation and adaptation (however not in the meaning of the Taxonomy Regulation) or commitment to science-based emissions reduction targets (“SBTI”).

To determine the share of sustainable investments, the Management Company consider the environmental objective for companies that have:

- A carbon intensity (carbon emissions normalized by the Enterprise Value including Cash) below 80% of the average carbon intensity of the reference investment universe

Or

Made a commitment to the SBTI initiative (This engagement is followed by the Management Company’s research team on an annual basis).

- Are not involved in severe breaches or controversies in regard to the labor rights, human rights, environmental or corruption, and that are not part of the following sectors: tobacco, controversial weapons, coal mining and fossil fuels.

And

Have not been targeted by any significant environmental fines over the past years.

- Have a G score (as defined by the Management Company ESG Footprint proprietary methodology) in the top 80% of the reference investment universe.

How do the sustainable investments that the financial product partially intends to make, not cause significant harm to any environmental or social sustainable investment objective?

Companies the Compartment invests in, contribute to achieve the Compartments’ carbon reduction objective, ESG footprint commitment while not significantly harming any environmental or social sustainable investment objectives. Before any investment is made by the Compartment (not only sustainable investments but all investments), the investment has to pass a negative screening, further including the consideration of the principal adverse impacts described in the below section. Hence no companies involved in controversial sectors or activities not aligned with TOBAM’s policy, can be eligible for investments for the Compartment.

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

The following Principal Adverse Impacts ("PAI") indicators as defined in SFDR Level II have been considered:

- PAI #4 : Exposure to companies active in the fossil fuel sector
- PAI #7 : Activities negatively affecting biodiversity
- PAI #10 : Violations of UN Global Compact principles and OECD guidelines
- PAI #14 : Exposure to Controversial Weapons

The principal adverse sustainability indicators have been taken into account through an exclusionary investment policy.

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

The Management Company will not invest in any company that has been classified as failing to comply with key international norms (ISS Ethix Norm-based screening) such as for example the UN Global Compact Principles, OECD Guidelines for Multinational Enterprises, Guiding Principles on Business and Human rights.

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

The "do no significant harm" principle applies only to those investments underlying the financial product that take into account the EU criteria for environmentally sustainable economic activities. The investments underlying the remaining portion of this financial product do not take into account the EU criteria for environmentally sustainable economic activities.

Any other sustainable investments must also not significantly harm any environmental or social objectives.

Does this financial product consider principal adverse impacts on sustainability factors?

Principal adverse impacts are the most significant negative impacts of investment decisions on sustainability factors relating to environmental, social and employee matters, respect for human rights, anti-corruption and anti-bribery matters.

✖ Yes, the Management Company has committed to monitor the 14 mandatory and 2 optional environmental and social indicators to show the impact of the Compartment's investments against these PAI indicators.

Furthermore, this Compartment considers principal adverse impacts on sustainability factors and only the following PAI have been taken into account into the investment process:

- PAI #1: GHG (Greenhouse Gas) emissions - Scope 1 & 2
- PAI #2: Carbon footprint
- PAI #3: GHG intensity of investee companies

The Compartment by targeting an overall carbon reduction of at least 20% compared to the carbon footprint, is looking to invest in a combination of stocks that achieve this overall carbon reduction, by considering carbon emissions scope 1 and 2.

- PAI #4: Exposure to companies active in the fossil fuel sector (Share of investments in companies active in the fossil)

The sector is excluded from the investment universe of this Compartment.

- PAI #7: Activities negatively affecting biodiversity

The Management Company proprietary ESG footprint methodology considers raw data published by companies in order to compute an ESG footprint, by notably looking for example at the existence or not of key policies relevant to the biodiversity (for example: biodiversity policy, water usage policy, waste reduction policy, climate change policy…).

In addition to the previous PAI, the following social sustainability indicators have been considered:

- PAI #10: Violations of UN Global Compact principles and (OECD) Guidelines
- PAI #13: Board Gender Diversity
- PAI #14: Exposure to controversial weapons

PAI reports are available on the Compartment annual report.

No

What investment strategy does this financial product follow?

The Compartment's investment strategy is a global developed equity markets strategy following TOBAM's proprietary index: TOBAM Maximum Diversification World Developed USD NTR index, and an hedging strategy of the equity risk. The strategy integrates environmental, social and governance (ESG) risks and opportunities to the sustainability of long-term company returns.

This Compartment aims to promote low carbon approaches, commitment to climate action and companies with good governance.

The Management Company applies systematically its ESG methodology in the investment decision-making process.

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

What are the binding elements of the investment strategy used to select the investments to attain each of the environmental or social characteristics promoted by this financial product?

The Compartment applies the following binding elements to select investments and attain the environmental and social characteristics described above:

- **Restrictive Exclusion Policy:** the Management Company applies a general exclusion policy, restricting the investment universe and excluding companies based either on their involvement in certain activities (sector or product based) or based on controversies or breaches to key international norms. The key exclusions used by the Management Company are reflected in the below table:

Sector /Product	**Criteria**
Producer and distributors of tobacco	Limit (5% of the revenues)
Coal and coal-based producers and distributors	Limit (10% of the revenues)
Development, production, maintenance or distribution of controversial and prohibited weapons	Exclusion
Breach or violation of International Treaties, Conventions & Standards such as OECD Guidelines for Multinational Enterprises, ILO Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy, UN Global Compact, Guiding Principles on Business and Human Rights	Exclusion

In addition, the Compartment excludes companies with significant involvement in the production, sales or extraction of fossil fuels (including coal, coal power generation, oil and gas) from the investment universe of the Compartment.

Further details on the exclusion policy can be found in the following link: https://www.tobam.fr/our-beliefs/exclusion-policy/.

- **ESG Integration:** The Management Company has put in place a strict E, S and G integration process for all listed companies in its investment universe; using officially published data from Bloomberg.

✓ E: For example: existence of climate change / biodiversity / energy efficiency policies; green building, water and waste usage

✓ S: For example: Ethics/Equal opportunity/training/ consumer data protection/whistleblowing policies, CSR committee in place, supply chain management

✓ G: For example: Number of board meetings per year, ratio of independent directors, chairman tenure, ratio of nonexecutive directors in boards

From that raw data, the Management Company has built a proprietary methodology to compute the "E,S,G footprints" of each individual holding in the portfolio and as such determine the overall E,S,G Footprints of the portfolio. The E, S and G footprint aggregates and normalizes (for industry, size and regional biases) the information contained in each of the above mentioned items by E, S and G pillar. The normalization also corrects differences in scale of the different pieces of raw data. The final footprint is an equal weighted measure of the three pillars. The Management Company then adds a constraint into its quantitative portfolio optimization process, to ensure that the E, S and G footprints of the respective portfolio (computed based on the holdings' individual E, S and G footprints) are respectively at least at the same level as the E, S and G footprints of the reference investment universe.

- **Carbon Emissions Reduction & Commitment to SBTI:**

In addition, the Management Company analyses the carbon emissions of each holding in its investment universe, computes the carbon footprint of the portfolio and applies a systematic portfolio carbon footprint reduction of at least 50% versus the reference investment universe's carbon footprint. The calculation of the carbon footprint is based on the greenhouse gas emissions scope 1, 2 and 3. Data on emissions used is obtained from a number of sources including company reports, CDP questionnaire (Carbon Disclosure Project) or an estimation model.

The Management Company is also monitoring the companies' commitment to the SBTI as a way to monitor best effort toward more incorporation of best practices. This feature is monitored on a yearly basis.

- **Optimization constraint of temperature contribution** of each holding to reach a 1.5° C portfolio in line with the latest Intergovernmental Panel on Climate Change (IPCC) climate scenarios.

- **Responsible Ownership:** The Management Company applies a responsible voting policy and has built an ambitious engagement policy to support its commitment to sustainability and address via engagement and dialogues, issues relative to ESG and sustainability.

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

Not applicable.

Good governance practices include sound management structures, employee relations, remuneration of staff and tax compliance.

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

In order to assess good governance practices, the Management Company consider the G scoring of its proprietary ESG footprint methodology, and ensure that the G scoring of the Compartment is matching the reference investment universe's G score.

What is the asset allocation planned for this financial product?

Asset allocation describes the share of investments in specific assets.

#1: 90% of the assets of this Compartment are aligned (promote) E/S characteristics.

#1A: at least 40% of those assets fall under the sustainable share of investment with non EU Taxonomy aligned environmental objectives.

These sustainable investments contribute to environmental objectives, including climate change mitigation and adaptation (however not in the meaning of the Taxonomy Regulation) or commitment to SBTI.

The model used by TOBAM for the determination of the sustainable investments combines the pass or fail approach and the weighted-revenue approach with threshold for the carbon emissions and governance.

To determine the share of sustainable investments, the Management Company considers the environmental objective for companies that have:

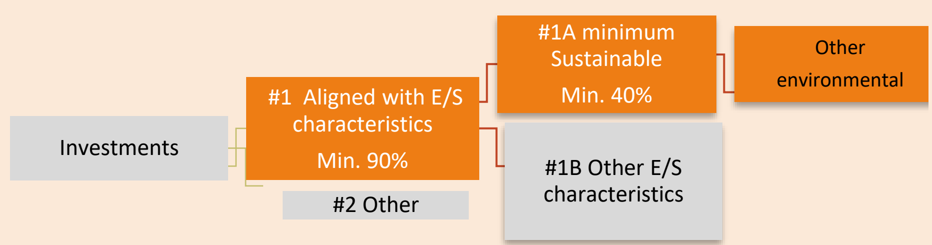
Environmental objective determined as :
o Companies that have carbon emissionintensity (carbon emissions normalized by the Enterprise Value Including Cash) below 80% of the average emissions carbon intensity of the reference investment universe
Or
o Companies that have made a commitment to the SBTI initiative (this engagement is followed by the research team on an annual basis)

Do Not Significantly Harm characteristics:
o Companies that are not involved in severe breaches or controversies in regard to the labor rights, human rights, environmental or corruption, and that are not part of the following sectors: tobacco, controversial weapons, coal mining and fossil fuels.
And
o Companies that have not been targeted by any significant environmental fines over the past years.

Good Governance practices are defined as companies that have a G score (as defined by the Management Company ESG Footprint proprietary methodology) in the top 80% of the reference investment universe.

Please note that investments falling under section #1B on the below diagram 'non sustainable investment share of the Compartment', still comply with all of the Compartment ESG policy (exclusions, carbon reduction, ESG footprint, voting & engagement), but did not qualify as a sustainable investment.

2# Other Investments: when investments fall out the 90% minimum limit integrating E/S characteristics, ESG key features and analysis may not have been performed, and E/S characteristics not considered.



#1 Aligned with E/S characteristics includes the investments of the financial product used to attain the environmental or social characteristics promoted by the financial product.

#2Other includes the remaining investments of the financial product which are neither aligned with the environmental or social characteristics, nor are qualified as sustainable investments.

The category **#1 Aligned with E/S characteristics** covers:
- The sub-category **#1A Sustainable** covers sustainable investments with environmental or social objectives.
- The sub-category **#1B Other E/S characteristics** covers investments aligned with the environmental or social characteristics that do not qualify as sustainable investments.

How does the use of derivatives attain the environmental or social characteristics promoted by the financial product?

The Compartment may use financial derivative instruments, for investment, efficient portfolio management and/or hedging purposes, and this will not impact in any way the exposure to sustainable assets, or the ESG characteristics of the Compartment.

Taxonomy-aligned activities are expressed as a share of:
- **turnover** reflecting the share of revenue from green activities of investee companies
- **capital expenditure** (CapEx) showing the green investments made by investee companies, e.g. for a transition to a green economy.
- **operational expenditure** (OpEx) reflecting green operational activities of investee companies.

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

This Compartment commits to a 0% alignment with the EU Taxonomy.

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

Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy[1]?

☐ Yes :

☐ In fossil gas ☐ In nuclear energy

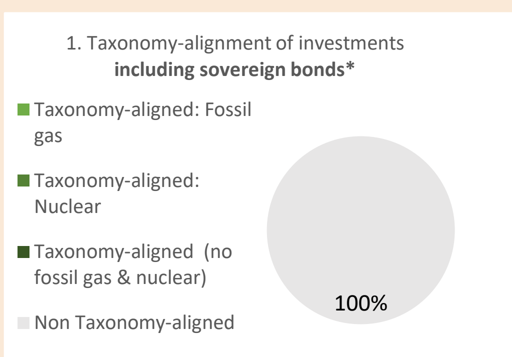
✖ No

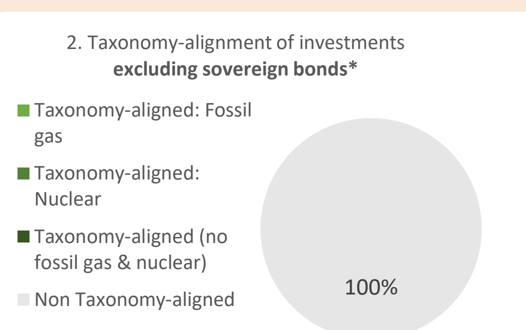
[1]Fossil gas and/or nuclear related activities will only comply with the EU Taxonomy where they contribute to limiting climate change ("climate change mitigation") and do not significantly harm any EU Taxonomy objective - see explanatory note in the left hand margin. The full criteria for fossil gas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

Enabling activities directly enable other activities to make a substantial contribution to an environmental objective.

Transitional activities are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.

The two graphs below show in green the minimum percentage of investments that are aligned with the EU Taxonomy. As there is no appropriate methodology to determine the Taxonomy-alignment of sovereign bonds*, the first graph shows the Taxonomy alignment in relation to all the investments of the financial product including sovereign bonds, while the second graph shows the Taxonomy alignment only in relation to the investments of the financial product other than sovereign bonds.





This graph represents 100% of the total investments.

*** For the purpose of these graphs, 'sovereign bonds' consist of all sovereign exposures**

What is the minimum share of investments in transitional and enabling activities?

As the Compartment does not have a minimum Taxonomy alignement, there is no minimum share in transitional and enabling activities.

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

The minimum share of sustainable investment with an environmental objective that is not aligned with the EU Taxonomy is 40%.

What is the minimum share of socially sustainable investments?

Not applicable.

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

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

Investments falling under category "#2 Other", are investments such as derivatives, cash or cash equivalent, not integrating E/S characteristics, where ESG key features and analysis have not been performed, and E/S characteristics not considered.

No minimum environmental or social safeguards apply to the above elements.

Is a specific index designated as a reference benchmark to determine whether this financial product is aligned with the environmental and/or social characteristics that it promotes?

No benchmark has been designated for the Compartment.

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

- ***How is the reference benchmark continuously aligned with each of the environmental or social characteristics promoted by the financial product?***

Not applicable.

- ***How is the alignment of the investment strategy with the methodology of the index ensured on a continuous basis?***

Not applicable.

- ***How does the designated index differ from a relevant broad market index?***

Not applicable.

- ***Where can the methodology used for the calculation of the designated index be found?***

Not applicable.

Where can I find more product specific information online?

More product-specific information can be found on the website:
https://www.tobam.fr/key-documents-policies/

APPENDIX 17. Most Diversified Portfolio SICAV - TOBAM Anti-Benchmark High Yield Maturity 2027

Investment Objective, Benchmark of the Compartment

The investment objective is to achieve a gross return of between 5% and 6% per annum over the recommended investment horizon, which starts on the launch date of the Compartment and ends on its maturity date, namely the 31st of December 2027.

The Compartment's investment objective is to capture the income provided by corporate bonds from the Global High Yield Credit markets (rated between BB+ and CCC at the time of purchase) and add value by systematically diversifying the Compartment's risk exposure using the Diversification Ratio© as a measure of diversification.

Following the Management Company's investment approach, the strategy aims to maintain a high degree of diversification when selecting securities and their weightings in the investment universe.

Investment strategy of the Compartment

The investment strategy is based on an approach that maximizes the Diversification Ratio© as a measurement of diversification and is reinforced by fundamental analysis. The investment universe is essentially constituted of High Yield bonds during the re-investment phase (before December 2026) after which the investment universe will be comprised of investment grade short term instruments.

The performance objective incorporates the average default rate of the Global High Yield universe estimated by Fitch ratings from 1990 to 2021 and the estimated costs of hedging currency risk.

The investment objective is not guaranteed and does not represent any promise of return or performance of the Compartment.

The bonds that the Compartment invests in are selected in accordance to their contribution to the diversification of the portfolio, their liquidity, the quality of their issuer, their credit rating, their yield and their maturity. At time of purchase, bonds with a minimum credit rating lower than CCC+ across S&P/Moody's and Fitch ratings when available will comprise less than 20% of the Compartment's investments.

The Compartment mainly invests directly or indirectly in interest-bearing securities in global developed markets.

The Compartment can also invest, up to 20% of the net assets of the Compartment, in bonds issued by companies located in Emerging Markets countries.

The Compartment invests in financial instruments labelled in EUR, GBP and USD.

The majority of the bond's maturities in which the Compartment invests in is close to the maturity date of the Compartment itself. In any case none of the bonds in the portfolio will mature later than Dec 31st 2028.

The bonds that reach maturity before the maturity of the Compartment, namely the 31st of December 2027, as well as the none distributed coupons, are reinvested under market conditions or held as liquid assets depending on the time remaining until the maturity date of the Compartment.

In order to reduce credit risk, reimbursements after the 31st of December 2026 will be reinvested in bonds or money market instruments with low credit risk, known as Investment Grade.

The Compartment will be terminated upon its maturity date.

In order to obtain maximum remuneration of its liquidity, the Compartment can invest in money market instruments up to 100% of its assets. The Compartment may also use derivative financial instruments such as Credit Default Swaps and their indices up to a maximum of one time the assets for the purpose of pursuing its investment goal and FX forwards and swaps to hedge the foreign exchange risk.

The Compartment qualifies under article 8 of SFDR. The investment strategy does not have a sustainable investment objective but promotes environmental and social characteristics. The strategy notably follows the 4 pillars of TOBAM's SRI policy: exclusion, carbon reduction, ESG integration and responsible stewardship via voting and engagement.

The Management Company considers ESG factors and applies a sustainability approach in its investment process for the Compartment as further detailed in the Appendix 17.1 Environmental and/or Social Characteristics - Pre-contractual disclosures in compliance with SFDR Level II.

1) Description of the asset classes used to achieve the investment objective

The asset classes included in the portfolio are the following:

a) Fixed Income Securities

The Compartment can invest up to 100% of its net assets in fixed income securities.

The Compartment invests mainly in corporate bonds rated between BB+ and CCC at the time of purchase (according to the rating agencies S&P, Moody's), however, investments in better rated or unrated bonds at the time of purchase are also permitted. Distressed securities – defined as bonds issued by entities involved in a restructuring or bankruptcy proceedings – are not permitted at the time of purchase. Unrated bonds are limited to 10% of the net assets at the time of purchase.

If a bond were to become distressed and the total exposure of the Compartment to such distressed securities would remain below the 20% threshold, portfolio managers in agreement with risk managers would evaluate the best course of action in the best interest of the Compartment. This could involve - but not necessarily imply - selling the bond before maturity and at a discount to par.

As the Compartment approaches maturity, the portfolio will be progressively invested in Investment Grade bonds and money market instruments. Investments in subordinated debt are limited to 20% of the portfolio. Perpetual bonds, contingent convertible bonds and alternative Tier I subordinated debt in the banking or insurance sector are excluded from the investment universe.

b) Money market instruments

For treasury purposes and to obtain an optimal return on it, the Compartment may invest up to 100% of its assets in money market instruments.

c) Shares or units of investment funds

The Compartment may invest a maximum of 10% of its assets in shares or units of UCITS which themselves invest a maximum of 10% of their assets in shares or units of UCITS or investment funds.

These funds may be managed by the Management Company or an affiliated company. The investment strategies of these funds are compatible with that of the Compartment.

The Compartment may invest maximum 20% of its assets in one or more Compartments of the Company.

2) Derivatives used to achieve the investment objective

The Compartment will use derivative instruments for hedging and exposure purposes and to achieve the investment objective.

The types of instruments used by the Management Company will mainly be currency forward and swaps and Credit Default Swaps and their indices.

Credit derivatives, be it CDS indices will be used opportunistically in circumstances where the Management Company believes that the objective described below could be achieved.

3) Deposits and cash

The Compartment may hold, up to 20% of its net assets, liquid assets which consists of bank deposits at sight such as cash held in current accounts with a bank accessible at any time.

The Compartment may make limited use of other deposits in order to achieve its investment objective, for treasury purposes and/or in in case of unfavourable market conditions.

4) Cash borrowing

The Compartment may borrow up to the equivalent of 10% of its net assets in cash on a temporary basis and for technical needs only.

5) Temporary purchases and sales of securities

In addition, the Compartment may engage in repurchase transactions for up to 75% of its assets.
The Compartment may also, as ancillary, make temporary deposits and borrow cash in the event that a debit balance was to appear.

In the context of investments in specials and general collateral the Compartment will use repurchase transactions in order to increase the return of the portfolio.

The expected proportion of the Compartment's assets which may be subject to repurchase transactions depends on the demand of market participants for the securities forming part of the Compartment's portfolio at any time.

This demand depends notably on the interest of such securities, the size of the lendable positions, the presence of specials or securities used as general collateral, the potential duration of the loan (the securities being subject to portfolio adjustments or rebalancing, and thus sell trades, and the type of collateral accepted by the Compartment.

The Compartment's use of, or investment in, repurchase transactions will be as follows:

Type of transaction	Expected proportion	Maximum proportion
Repurchase transactions	0% to 30%	75%

Reference Currency

The reference currency of the Compartment is EUR.

Profile of the Typical Investor

The Compartment is a high-risk vehicle. To determine their level of investment, investors should consider their personal assets, the regulations applicable to them, their current financial needs over a recommended minimum investment horizon of until the 31st of December 2027, and also their willingness to take risks or their preference for a more prudent investment.

Form of Shares and Classes

The Share Classes of the Compartment will be issued in registered form.

Share Classes	A Isin Code: LU2585573285	A1* Isin Code: LU2585573368	A2* Isin Code: LU2585573442	A3 Isin Code: LU2585573525	A4* Isin Code: LU2585573798	A5 Isin Code: LU2585573871	B Isin Code: LU2585573954	B1 Isin Code: LU2585574093	B2* Isin Code: LU2585574176	B3* Isin Code: LU2585574259	B4 Isin Code: LU2585574333	B5 Isin Code: LU2585574416	B6* Isin Code: LU2585574507	B7* Isin Code: LU2585574689
Currency	EUR	EUR	EUR	USD	USD	USD	EUR	EUR	EUR	EUR	USD	USD	USD	USD
Type of Shares	Accumulation	Accumulation	Distribution	Accumulation	Distribution	Accumulation	Accumulation	Distribution	Accumulation	Distribution	Accumulation	Distribution	Accumulation	Distribution
Target Investors	Institutional investors	Institutional investors	Institutional investors	Institutional investors	Institutional investors	Institutional investors	All investors	All investors	All investors	All investors	All investors	All investors	All investors	All investors
Minimum initial subscription	10 shares	10 shares	10 shares	10 shares	10 shares	10 shares	10 shares	10 shares	10 shares	10 shares	10 shares	10 shares	10 shares	10 shares
Minimum holding amount	1 share	1 share	1 share	1 share	1 share	1 share	1 share	1 share	1 share	1 share	1 share	1 share	1 share	1 share
Valuation Day	Every Business Day with the exception of public holidays and non-settlement days for exchanges based in the UK, France, Luxembourg and days when the US market are closed or close early (based on the official US Government Bond Market Calendar)													
Management Company Fee	0.55 %	0.55 %	0.55 %	0.55 %	0.55 %	0.55 %	1.25 %	1.25 %	1.25 %	1.25 %	1.25 %	1.25 %	1.25 %	1.25 %
Administration Fee & Depositary Fee	0.20 %	0.20 %	0.20 %	0.20 %	0.20 %	0.20 %	0.20 %	0.20 %	0.20 %	0.20 %	0.20 %	0.20 %	0.20 %	0.20 %
Hedge	None	Hedge	Hedge	None	Hedge	Hedge	None	None	Hedge	Hedge	None	None	Hedge	Hedge
Subscription Fee paid to the Management Company**	Up to 0.5%	Up to 0.5%	Up to 0.5%	Up to 0.5%	Up to 0.5%	Up to 0.5%	Up to 3%	Up to 3%	Up to 3%	Up to 3%	Up to 3%	Up to 3%	Up to 3%	Up to 3%
Redemption Fee paid to the Management Company	None	None	None	None	None	None	Up to 1%	Up to 1%	Up to 1%	Up to 1%	Up to 1%	Up to 1%	Up to 1%	Up to 1%
Cut-off	2.00 p.m. CET the Business Day before the relevant Valuation Day													

Subscription / Redemption Settlement Day	2 days, according to the official US Government Bond Market Calendar following the Valuation Day

* Share Classes A1, A2, A4, B2, B3, B6 and B7 are hedged against foreign exchange risk with a 10% tolerance.

The Share Classes A1, A2, A4, A5, B2, B3, B6 and B7 do not hedge currency risk against the reference currency of the Compartment (EUR) but hedge the foreign exchange risk of all currency exposures held in the portfolio against the currency of the concerned share class (USD for A4, B6 and B7, EUR for A1, A2, B2, B3).

**For the interest of the Compartment and the investors, if due to low liquidity in the investable universe investing additional funds would lead to a material deterioration of the return and risk profile of the Compartment, the board of Directors may declare a temporary suspension of the subscriptions of shares in the Compartment.

Launch date

The first share classes of the Compartment will be created with the following initial subscription prices:

Class	Initial subscription prices:
Class A	EUR 10 000
Class A1	EUR 10 000
Class A2	EUR 10 000
Class A3	USD 10 000
Class A4	USD 10 000
Class A5	USD 10 000
Class B	EUR 100
Class B1	EUR 100
Class B2	EUR 100
Class B3	EUR 100
Class B4	USD 100
Class B5	USD 100
Classe B6	USD 100
Classe B7	USD 100

Total Expense Ratio

The latest calculated total expense ratio rate will be available in the Company's latest financial report.

Risk Management

The method used to calculate overall exposure is the commitment method.

Compartment Specific Risk Factors

The Compartment will be invested mainly in financial instruments selected by the Management Company. These instruments will be subject to market changes and fluctuations. The risk profile is adapted to an investment horizon of end of December 2027. The risks to which the holder is exposed through the fund are mainly the following:

1) Capital risk

The Fund does not carry any guarantee or protection, and the capital invested at the outset may not be returned in full.

1) Credit risk

This is the risk of depreciation in debt securities issued by a private-sector issuer or default by the latter. The value of the debt securities in which the Compartment is invested may decline, leading to a fall in net asset value.

2) High Yield Bond risk

Investments in High Yield bonds can involve a substantial risk of loss. High Yield bonds are considered to be speculative with respect to the issuer's ability to pay interest and principal. These securities, which are rated below investment grade, have a higher risk of issuer default, are subject to greater price volatility than investment grade securities and may be illiquid.

3) Interest rate risk

This is the risk of depreciation in fixed-income instruments deriving from interest-rate fluctuations. Should interest rates rise, the Compartment's net asset value may decline.

4) Reinvestment risk

Some of the bonds in which the Compartment invests may be reimbursed before maturity. The Compartment may therefore have to reinvest at lower rates than those of the bonds thus redeemed, depending on the market conditions prevailing at that time.

5) Currency risk

Currency risk is the risk that the investment currencies may weaken in relation to the base currency of the portfolio (EUR). In the event of depreciation in foreign currencies, investors are thus exposed to a decline in the value of their units. All the share classes are exposed to currency risk. A1, A2, A4, A5, B2, B3, B6 et B7 share classes are hedged with regard to currency risk back in the currency of the share and are thus minimally exposed to the risk of a depreciation of foreign currencies against the share class currency.

6) Counterparty risk

The Compartment may incur a loss in the event of default by a counterparty with which certain transactions were conducted, leading to a decline in the Compartment's net asset value.

7) Liquidity risk

The Compartment may be exposed to liquidity risk if part of the investments are made in financial instruments which are by nature sufficiently liquid, but which may nevertheless, in certain circumstances, have a low level of liquidity, to the extent that they impact the liquidity risk of the Compartment.

8) Risk associated with the Management Company's investment process

Investors' attention is drawn to the fact that the portfolio is constructed and its assets selected and weighted using processes developed by the Management Company. The Compartment's investment process is based on a model designed to identify signals based on past statistical results.

There is a risk that the model may not be efficient, since there is no guarantee that past market situations will repeat themselves in the future. The aim of the processes developed by TOBAM is to achieve healthy diversification of the Compartment's portfolio, and so use of these processes may lead the Management Company to not select the top-performing assets. Risk associated with the use of derivatives.

The Compartment may use some derivatives for up to one time its assets.

Template pre-contractual disclosure for the financial products referred to in Article 8, paragraphs 1, 2 and 2a, of Regulation (EU) 2019/2088 and Article 6, first paragraph, of Regulation (EU) 2020/852

Product name: Most Diversified Portfolio SICAV - TOBAM Anti-Benchmark High Yield Maturity 2027

Legal entity identifier: 54930003RC0VA4OYRQ97

Sustainable investment means an investment in an economic activity that contributes to an environmental or social objective, provided that the investment does not significantly harm any environmental or social objective and that the investee companies follow good governance practices.

The **EU Taxonomy** is a classification system laid down in Regulation (EU) 2020/852, establishing a list of **environmentally sustainable economic activities**. That Regulation does not lay down a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

Environmental and/or social characteristics

Does this financial product have a sustainable investment objective?

☐ **Yes**	☒ **No**
☐ It will make a minimum of **sustainable investments with an environmental objective:** ___% ☐ in economic activities that qualify as environmentally sustainable under the EU Taxonomy ☐ in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy	☒ It **promotes Environmental/Social (E/S) characteristics** and while it does not have as its objective a sustainable investment, it will have a minimum proportion of 40% of sustainable investments ☐ with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy ☒ with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy ☐ with a social objective
☐ It will make a minimum of **sustainable investments with a social objective:** ___%	☐ It promotes E/S characteristics, but **will not make any sustainable investments**

What environmental and/or social characteristics are promoted by this financial product?

The investment objective is to achieve a gross return of between 5% and 6% per annum over the recommended investment horizon, which starts on the launch date of the Compartment and ends on its maturity date, namely the 31st of December 2027.

The Compartment's investment objective is to capture the income provided by corporate bonds from the Global High Yield Credit markets (rated between BB+ and CCC at the time of purchase) and add value by systematically diversifying the Compartment's risk exposure using the Diversification Ratio© as a measure of diversification.

This process integrates environmental, social and governance (ESG) risks and opportunities to the sustainability of long-term company returns. The Compartment aims to promote low carbon approaches, commitment to climate action and companies with good governance.

In particular, the Compartment aims to promote the following E/S characteristics:

- Low carbon approach by applying a systematic carbon footprint reduction of at least 20% versus the reference investment universe's carbon footprint,
- Promotion of companies with good governance using raw data and their ESG footprint.

The Compartment has designated ICE BofA Global High Yield Index as a reference index to compare its ESG characteristics, such as carbon emissions or ESG footprint.

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

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

In order to achieve the above characteristics promoted by this Compartment, the Management Company has put in place an ambitious ESG policy made of key pillars and sustainability indicators. This Compartment uses the following sustainability indicators to attain each of the environmental and social characteristics promoted by the Compartment:

- **Carbon Emissions Reduction** The Management Company applies a systematic carbon footprint reduction of at least 50% versus the reference index ICE BofA Global High Yield Index's carbon footprint. The calculation of the carbon footprint is based on the greenhouse gas emissions scope 1 (i.e. direct emissions from owned or controlled sources), scope 2 (i.e. indirect emissions from the generation of purchased energy) and scope 3 (i.e. indirect emissions resulting from value chain activities) when possible, according to GHG Protocol Corporate Standard. Data on emissions used is obtained from a number of sources including company reports, CDP questionnaire (Carbon Disclosure Project) or an estimation model.

- **ESG Footprint:** The Management Company has put in place a strict E, S and G integration process for all listed companies in its investment universe; using officially published data from Bloomberg.

✓ E: For example: existence of climate change / biodiversity / energy efficiency policies; green building, water and waste usage

✓ S: For example: Ethics/Equal opportunity/training/ consumer data protection/whistleblowing policies, CSR committee in place, supply chain management

✓ G: For example: Number of board meetings per year, ratio of independent directors, chairman tenure, ratio of non-executive directors in boards

From that raw data, the Management Company has built a proprietary methodology to compute the "E,S,G footprints" of each individual holding in the portfolio and as such determine the overall E,S,G Footprints of the portfolio. The Management Company has constrained its investment decision-making process to reach E,S,G footprints of the Compartment, at minima at the same level as the E,S,G footprints of the reference index ICE BofA Global High Yield Index.

- **Optimization constraint of temperature contribution** of each holding to reach a 1.5° C portfolio in line with the latest Intergovernmental Panel on Climate Change (IPCC) climate scenarios.

What are the objectives of the sustainable investments that the financial product partially intends to make and how does the sustainable investment contribute to such objectives?

The sustainable investments within this Compartment contribute to Environmental objectives including climate change mitigation and adaptation (however not in the meaning of Taxonomy Regulation) or commitment to science-based emissions reduction targets ("SBTI").

To determine the share of sustainable investments, the Management Company consider the environmental objective for companies that have:

- A carbon intensity (carbon emissions normalized by the Enterprise Value including Cash) below 80% of the average carbon intensity of the reference index ICE BofA Global High Yield Index

Or

Made a commitment to the SBTI initiative. (This engagement is followed by the Management Company's research team on an annual basis).

- Are not involved in severe breaches or controversies in regard to the labor rights, human rights, environmental or corruption, and that are not part of the following sectors: tobacco, controversial weapons, coal mining and fossil fuels

And

Have not been targeted by any significant environmental fines over the past years.

- Have a G score for Good Governance practices (as defined by the Management Company ESG Footprint proprietary methodology) in the top 80% of the reference index the ICE BofA Global High Yield Index.

How do the sustainable investments that the financial product partially intends to make, not cause significant harm to any environmental or social sustainable investment objective?

Companies the Compartment invests in, contribute to achieve the Compartments' carbon reduction objective, ESG footprint commitment while not significantly harming any environmental or social sustainable investment objectives. Before any investment is made by the Compartment (not only sustainable investments but all investments), the investment has to pass a negative screening further including the consideration of the principal adverse impacts described in the below section. Hence no companies involved in controversial sectors or activities not aligned with TOBAM's policy, can be eligible for investments for the Compartment.

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

The following Principal Adverse Impacts ("PAI") indicators as defined in SFDR Level II have been considered:

- PAI #4 : Exposure to companies active in the fossil fuel sector
- PAI #7 : Activities negatively affecting biodiversity
- PAI #10 : Violations of UN Global Compact principles and OECD guidelines
- PAI #14 : Exposure to Controversial Weapons

The principal adverse impacts on sustainability indicators have been taken into account through an exclusionary investment policy.

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

The Management Company will not invest in any company that has been classified as failing to comply with key international norms (ISS Ethix Norm-based screening) such as for example the UN Global Compact Principles, OECD Guidelines for Multinational Enterprises, Guiding Principles on Business and Human rights.

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

The "do no significant harm" principle applies only to those investments underlying the financial product that take into account the EU criteria for environmentally sustainable economic activities. The investments underlying the remaining portion of this financial product do not take into account the EU criteria for environmentally sustainable economic activities.

Any other sustainable investments must also not significantly harm any environmental or social objectives.

Does this financial product consider principal adverse impacts on sustainability factors?

Principal adverse impacts are the most significant negative impacts of investment decisions on sustainability factors relating to environmental, social and employee matters, respect for human rights, anti-corruption and anti-bribery matters.

✖ Yes, the Management Company has committed to monitor the 14 mandatory and 2 optional environmental and social indicators to show the impact of the Compartment's investments against these PAI indicators.
Furthermore, this Compartment considers principal adverse impacts on sustainability factors and only the following PAI have been taken into account into the investment process:

- PAI #1: GHG (Greenhouse Gas) emissions - Scope 1 & 2
- PAI #2: Carbon footprint
- PAI #3: GHG intensity of investee companies

The Compartment by targeting an overall carbon reduction of at least 50% compared to the reference index ICE BofA Global High Yield Index's carbon footprint, is looking to invest in a combination of stocks that achieve this overall carbon reduction, by considering carbon emissions scope 1, 2 and 3.

- PAI #4: Exposure to companies active in the fossil fuel sector (Share of investments in companies active in the fossil)

The sector is excluded from the investment universe of this Compartment.

- PAI #7: Activities negatively affecting biodiversity

The Management Company proprietary ESG footprint methodology considers raw data published by companies in order to compute an ESG footprint, by notably looking for example at the existence or not of key policies relevant to the biodiversity (for example: biodiversity policy, water usage policy, waste reduction policy, climate change policy…).

In addition to the previous PAI, the following social sustainability indicators have been considered:
- PAI #10: Violations of UN Global Compact principles and (OECD) Guidelines
- PAI #13: Board Gender Diversity
- PAI #14: Exposure to controversial weapons

PAI reports are available on the Compartment annual report.

☐ No

What investment strategy does this financial product follow?

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

The investment objective is to achieve a gross return of between 5% and 6% per annum over the recommended investment horizon, which starts on the launch date of the Compartment and ends on its maturity date, namely the 31st of December 2027.

The Compartment's investment objective is to capture the income provided by corporate bonds from the Global High Yield Credit markets (rated between BB+ and CCC at the time of purchase) and add value by systematically diversifying the Compartment's risk exposure using the Diversification Ratio© as a measure of diversification.

Following the Management Company's investment approach, the strategy aims to maintain a high degree of diversification when selecting securities and their weightings in the investment universe.

This process integrates environmental, social and governance (ESG) risks and opportunities to the sustainability of long-term company returns.

The Compartment aims to promote low carbon approaches, commitment to climate action and companies with good governance.

The Management Company applies systematically its ESG methodology in the investment decision-making process.

What are the binding elements of the investment strategy used to select the investments to attain each of the environmental or social characteristics promoted by this financial product?

The Compartment applies the following binding elements to select investments and attain the environmental and social characteristics described above:

- **Restrictive Exclusion Policy:** The Management Company applies a general exclusion policy, restricting the investment universe and excluding companies based either on their involvement in certain activities (sector or product based) or based on controversies or breaches to key international norms. The key exclusions used by the Management Company are reflected in the below table:

Sector /Product	**<u>Criteria</u>**
Producer and distributors of tobacco	Limit (5% of the revenues)
Coal and coal-based producers and distributors	Limit (10% of the revenues)
Development, production, maintenance or distribution of controversial and prohibited weapons	Exclusion
Breach or violation of International Treaties,	Exclusion

Conventions & Standards such as OECD Guidelines for Multinational Enterprises, ILO Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy, UN Global Compact, Guiding Principles on Business and Human Rights	

In addition, the Compartment applies a fossil-fuel free approach, which employs the Management Company's proprietary Maximum Diversification® methodology.

Companies with significant involvement in the production, sales or extraction of fossil fuels (including coal, coal power generation, oil and gas) are excluded from the investment universe of the Compartment.

Further details on the exclusion policy can be found in the following link: https://www.tobam.fr/our-beliefs/exclusion-policy/.

- **ESG Integration:** The Management Company has put in place a strict E, S and G integration process for all listed companies in its investment universe; using officially published data from Bloomberg.

✓ E: For example: existence of climate change / biodiversity / energy efficiency policies; green building, water and waste usage

✓ S: For example: Ethics/Equal opportunity/training/ consumer data protection/whistleblowing policies, CSR committee in place, supply chain management

✓ G: For example: Number of board meetings per year, ratio of independent directors, chairman tenure, ratio of nonexecutive directors in boards

From that raw data, the Management Company has built a proprietary methodology to compute the "ESG footprint" of each individual holding in the portfolio and as such determine the overall ESG Footprint of the portfolio.
The E, S and G footprint aggregates and normalizes (for industry, size and regional biases) the information contained in each of the above mentioned items by E, S and G pillar. The normalization also corrects differences in scale of the different pieces of raw data. The final footprint is an equal weighted measure of the three pillars. The Management Company then adds a constraint into its quantitative portfolio optimization process, to ensure that the E, S and G footprints of the respective portfolio (computed based on the holdings' individual E, S and G footprints) are respectively at least at the same level as the E, S and G footprints of the reference index ICE BofA Global High Yield Index.

- **Carbon Emissions Reduction & Commitment to SBTI:**

In addition, the Management Company analyses the carbon emissions of each holding in its investment universe, computes the carbon footprint of the portfolio and applies a systematic portfolio carbon footprint reduction of at least 50% versus the reference index the ICE BofA Global High Yield Index's carbon footprint. The calculation of the carbon footprint is based on the greenhouse gas emissions scope 1, scope 2 and scope 3 when available. Data on emissions used is obtained from a number of sources including company reports, CDP questionnaire (Carbon Disclosure Project) or an estimation model.

The Management Company is also monitoring the companies' commitment to the SBTI as a way to monitor best effort toward more incorporation of best practices. This feature is monitored on a yearly basis.

- **Optimization constraint of temperature contribution** of each holding to reach a 1.5° C portfolio in line with the latest Intergovernmental Panel on Climate Change (IPCC) climate scenarios.

- **Responsible Ownership:** The Management Company has built an ambitious engagement policy to support its commitment to sustainability and address via engagement and dialogues, issues relative to ESG and sustainability.

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

Not applicable.

Good governance practices include sound management structures, employee relations, remuneration of staff and tax compliance.

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

In order to assess good governance practices, the Management Company consider the G scoring of its proprietary ESG footprint methodology, and ensure that the G scoring of the Compartment is matching the reference index ICE BofA Global High Yield Index's G scoring.

Asset allocation describes the share of investments in specific assets.

What is the asset allocation planned for this financial product?

#1: 90% of the assets of this Compartment are aligned (promote) E/S characteristics.

#1A: at least 40% of those assets fall under the sustainable share of investment with non EU-Taxonomy aligned environmental objectives.

However please note that the Compartment will be subject to several maturities toward the end of the life of it, which inherently will change the profile and the sustainable figures communicated in this Appendix. This is due to the natural structure of the Fund, as those several maturities will be needed to reimburse the investors at the maturity date.

These sustainable investments contribute to environmental objectives, including climate change mitigation and adaptation (however not in the meaning of the Taxonomy Regulation) or commitment to SBTI.

The model used by TOBAM for the determination of the sustainable investments combines the pass or fail approach and the weighted-revenue approach with threshold for the carbon emissions and governance.

To determine the share of sustainable investments, the Management Company considers the environmental objective for companies that have:

Environmental objective determined as:

o Companies that have carbon emission intensity (carbon emissions normalized by the Enterprise Value Including Cash) below 80% of the average emissions carbon intensity of the reference index the ICE BofA Global High Yield Index

Or

o Companies that have made a commitment to the SBTI initiative (this engagement is followed by the Management Company's research team on an annual basis).

Do Not Significantly Harm characteristics:

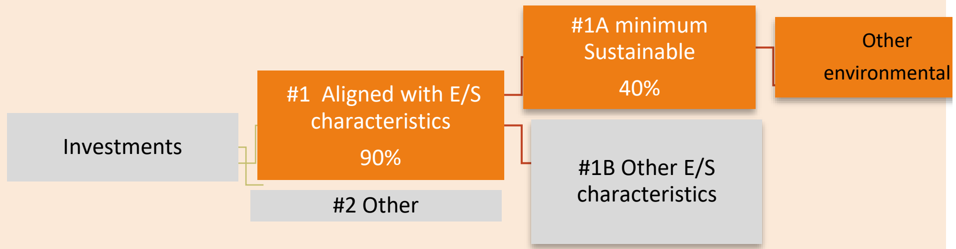
o Companies that are not involved in severe breaches or controversies in regard to the labor rights, human rights, environmental or corruption, and that are not part of the following sectors: tobacco, controversial weapons, coal mining and fossil fuels

And

o Companies that have not been targeted by any significant environmental fines over the past years.

Good Governance practices are defined as companies that have a G score (as defined by the Management Company ESG Footprint proprietary methodology) in the top 80% of the reference index the ICE BofA Global High Yield Index.

Please note that investments falling under section #1B on the below diagram 'non sustainable investment share of the Compartment', still comply with all of the Compartment ESG policy (exclusions, carbon reduction, ESG footprint, voting & engagement), but did not qualify as a sustainable investment.



#1 Aligned with E/S characteristics includes the investments of the financial product used to attain the environmental or social characteristics promoted by the financial product.

#2Other includes the remaining investments of the financial product which are neither aligned with the environmental or social characteristics, nor are qualified as sustainable investments.

The category **#1 Aligned with E/S characteristics** covers:
- The sub-category **#1A Sustainable** covers sustainable investments with environmental or social objectives.
- The sub-category **#1B Other E/S characteristics** covers investments aligned with the environmental or social characteristics that do not qualify as sustainable investments.

How does the use of derivatives attain the environmental or social characteristics promoted by the financial product?

The Compartment may use financial derivative instruments for investment, efficient portfolio management and/or hedging purposes, and this will not impact in any way the exposure to sustainable assets, or the ESG characteristics of the Compartment.

Taxonomy-aligned activities are expressed as a share of:
- **turnover** reflecting the share of revenue from green activities of investee companies
- **capital expenditure** (CapEx) showing the green investments made by investee companies, e.g. for a transition to a green economy.
- **operational expenditure** (OpEx) reflecting green operational activities of investee companies.

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

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

This Compartment commits to a 0% alignment with the EU Taxonomy.

Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy[1]?

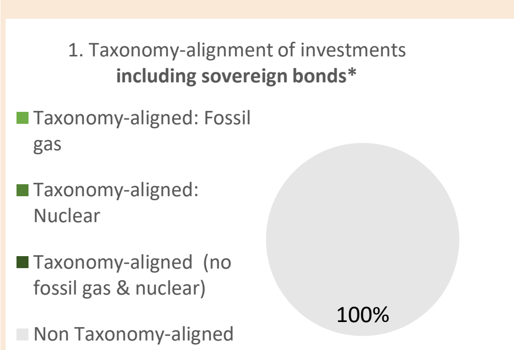
☐ Yes :

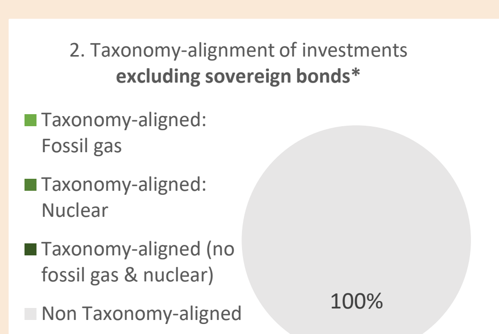
☐ In fossil gas ☐ In nuclear energy

☒ No

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

The two graphs below show in green the minimum percentage of investments that are aligned with the EU Taxonomy. As there is no appropriate methodology to determine the Taxonomy-alignment of sovereign bonds*, the first graph shows the Taxonomy alignment in relation to all the investments of the financial product including sovereign bonds, while the second graph shows the Taxonomy alignment only in relation to the investments of the financial product other than sovereign bonds.





This graph represents 100% of the total investments.

*** For the purpose of these graphs, 'sovereign bonds' consist of all sovereign exposures**

Enabling activities directly enable other activities to make a substantial contribution to an environmental objective.

Transitional activities are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.

What is the minimum share of investments in transitional and enabling activities?

As the Compartment does not have a minimum Taxonomy alignement, there is no minimum share in transitional and enabling activities.

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

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

The minimum share of sustainable investments with an environmental objective that is not aligned with the EU Taxonomy is 40%.

What is the minimum share of socially sustainable investments?

Not applicable.

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

Investments falling under category "#2 Other", are investments such as derivatives, cash or cash equivalent, not integrating E/S characteristics, where ESG key features and analysis have not been performed, and E/S characteristics not considered.

No minimum environmental or social safeguards apply to the above elements.

Is a specific index designated as a reference benchmark to determine whether this financial product is aligned with the environmental and/or social characteristics that it promotes?

No, but the Compartment has designated a reference benchmark (ICE BofA Global High Yield Index). This index is used as a reference to compare the Compartment ESG characteristics, such as carbon emissions or ESG footprint, with the reference benchmark.

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

How is the reference benchmark continuously aligned with each of the environmental or social characteristics promoted by the financial product?

The reference index used by the Compartment is not an ESG benchmark and is not consistent with the ESG characteristics promoted by the Compartment. All ESG calculations or comparisons are computed using the Compartment's benchmark, as a good proxy of the Compartment investment universe.

How is the alignment of the investment strategy with the methodology of the index ensured on a continuous basis?

The reference index the ICE BofA Global High Yield Index is a broad market indexes, capturing global high yield markets securities, which is in line with the Compartment investment universe.

The investment universe of the reference index is regularly monitored by the Management Company research team to ensure the consistency with the Compartment's investment universe, in order to ensure relevance of ESG and performance comparisons.

- ***How does the designated index differ from a relevant broad market index?***

  The reference index the ICE BofA Global High Yield Index is a broad market indexes, capturing global high yield markets securities, which is in line with the Compartment investment universe.

- ***Where can the methodology used for the calculation of the designated index be found?***

https://indices.theice.com/

Where can I find more product specific information online?

More product-specific information can be found on the website:

https://www.tobam.fr/key-documents-policies/

APPENDIX 18. Most Diversified Portfolio SICAV - TOBAM Anti-Benchmark Civil Liberty and Democracy - All Countries World Equity Fund

Investment Objective, Benchmark of the Compartment

The Compartment's primary investment objective is to provide investors with a highly diversified equity portfolio on a global developed and emerging market equities investment universe in favoring or penalising stocks and countries depending on the good respect of civil liberty and democracy.

Changes in the net asset value can be compared to the Bloomberg World Large & Mid Cap Net Return Index. The Bloomberg World Large & Mid Cap Net Return Index is a capitalization-weighted index designed to measure global developed and emerging equity market performance of stocks. This series approximates the minimum possible dividend reinvestment. The dividend is reinvested after deduction of withholding tax by applying the maximum rate of the company's country of incorporation applicable to institutional investors. The index is available at www.bloomberg.com/indices

The Compartment does not use an index-based management strategy, it is actively managed. As a consequence, its performance may differ substantially from the benchmark, which is used to determine the global risk profile of the Compartment, and which does not imply any investment constraint on the portfolio of the Compartment.

Investment strategy of the Compartment

At least 90% of the Compartment's assets are thus constantly kept exposed to global developed and emerging equity markets, including the small-and mid-cap stocks.

The stocks to which the Compartment is exposed are selected based on methodology developed by the Management Company, which help to invest in democratic countries and to penalise companies with significant exposure to countries classified as non-democratic.

In order to obtain maximum remuneration of its liquidities, the Compartment can invest in money market instruments for up to 10% of its assets.

In addition, the Compartment may as ancillary borrow cash in the event that a debit balance were to appear.

The Compartment qualifies under article 9 of SFDR. The investment strategy has a sustainable investment objective and promotes environmental and social characteristics. The strategy notably follows the 4 pillars of TOBAM's SRI policy: exclusion, carbon reduction, ESG integration and responsible stewardship via voting and engagement.

The Management Company considers ESG factors and applies a sustainability approach in its investment process for the Compartment as further detailed in the Appendix 18.1 Environmental and/or Social Characteristics - Pre-contractual disclosures in compliance with SFDR Level II.

1) Description of the asset classes used to achieve the investment objective

The asset classes included in the portfolio are the following:

a) Equities

In pursuit of the strategy presented above, the Compartment will invest in the global developed and emerging markets that are depending on the outlook as seen by the Management Company. The Compartment may invest in shares of companies listed in the developed and emerging countries, irrespective of the companies' size and the sector of the economy to which they belong. This exposure will not fall below 90% of the Compartment's assets.

The Compartment may invest up to 20% of its assets in closed-ended Real Estate Investment Trust (REIT).

b) Money market instruments

For treasury purposes, the Compartment may trade, up to 10% of its assets, in money-market instruments (government bonds for OECD states, money-market funds).

c) Shares or units of investment funds

The Compartment may invest maximum 10% of its assets in shares or units of UCITS which themselves invest maximum 10% of their assets in shares or units of UCITS or investment funds.

These funds may be managed by the Management Company or an affiliated company. The investment strategies of these funds are compatible with that of the Compartment.

The Compartment may invest maximum 10% of its assets in one or more Compartments of the Company.

2) Derivatives used to achieve the investment objective

The Compartment may use financial futures up to a maximum of one time its assets. The Compartment's leveraged exposure may not exceed 110%. The Compartment will invest in regulated, organized markets and over-the-counter. The Compartment will use derivatives instrument for hedging and exposure purposes and to achieve the investment objective. The hedging derivatives transaction shall aim to cover equity risk and currency risk of the Compartment. The types of instruments used by the Management Company will mainly be futures on equities or stock market indices, swaps on currencies or equities.

3) Deposits and cash

The Compartment may hold, up to 10% of its net assets, ancillary liquid assets which consists of bank deposits at sight such as cash held in current accounts with a bank accessible at any time.

The Compartment may make limited use of other deposits in order to achieve its investment objective, for treasury purposes and/or in in case of unfavourable market conditions.

4) Cash borrowing

The Compartment may borrow up to the equivalent of 10% of its net assets in cash on a temporary basis and for technical needs only.

5) Temporary purchases and sales of securities

In addition, the Compartment may engage in security lending for up to 75% of its assets.
The Compartment may also, as ancillary, make temporary deposits and borrow cash in the event that a debit balance was to appear.

The Compartment will enter into securities lending transactions opportunistically in circumstances where the Management Company believes that the objective described below could be achieved.

In the context of investments in specials and general collateral the Compartment will use securities lending in order to increase the return of the portfolio.

The expected proportion of the Compartment's assets which may be subject to securities lending depends on the demand of market participants for the securities forming part of the Compartment's portfolio at any time.

This demand depends notably on the interest of such securities, the size of the lendable positions, the presence of specials or securities used as general collateral, the potential duration of the loan (the securities being subject to portfolio adjustments or rebalancing, and thus sell trades), and the type of collateral accepted by the Compartment.

The Compartment's use of, or investment in, securities lending transactions will be as follows:

Type of transaction	Expected proportion	Maximum proportion
Securities lending	0% to 30%	75%

Reference Currency

The reference currency of the Compartment is USD.

Profile of the Typical Investor

The Compartment is a high-risk vehicle. To determine their level of investment, investors should consider their personal assets, the regulations applicable to them, their current financial needs over a recommended minimum investment horizon of more than five years, and also their willingness to take risks or their preference for a more prudent investment. The recommended minimum investment horizon is more than 5 years.

Form of Shares and Classes

The Share Classes of the Compartment will be issued in registered form

Share Classes	**A** **Isin Code:** **LU2597961213**	**A1** **Isin Code:** **LU2597961304**	**A2** **Isin Code:** **LU2597961486**	**B** **Isin Code:** **LU2597961569**	**B1** **Isin Code:** **LU2597961643**	**B2** **Isin Code:** **LU2597961726**	**R** **Isin Code:** **LU2597961999**	**R1** **Isin Code:** **LU2597962294**	**R2** **Isin Code:** **LU2597962021**	**Z** **Isin Code:** **LU2597962377**	**Z1** **Isin Code:** **LU2597962534**
Currency	EUR	EUR	USD	EUR	EUR	USD	EUR	EUR	USD	EUR	USD
Type of Shares	Accumulation										
Target Investors	Institutional investors	Institutional investors	Institutional investors	All investors	All investors	All investors	All investors	All investors	All investors	Institutional investors	Institutional investors

Minimum initial Subscription	10 Shares	10 Shares	10 Shares	1,500 Shares	10 Shares	10 Shares	1 Share	1 Share	1 Share	1 Share	1 Share
Minimum holding amount	1 Share	1 Share	1 Share	1 Share	1 Share	1 Share	1 Share	1 Share	1 Share	1 Share	1 Share
Valuation Day	Every Business Day, with the exception of days on which the American markets are closed (based on the official NYSE Euronext calendar)										
Management Company Fee	0.50%	0.50%	0.50%	1.50%	1.50%	1.50%	0.75%	0.75%	0.75%	0.00%	0.00%
Administration Fee & Depositary Fee	0.22%	0.22%	0.22%	0.22%	0.22%	0.22%	0.22%	0.22%	0.22%	0.22%	0.22%
Hedge	No	Hedge	No	No	Hedge	No	No	Hedge	No	No	No
Subscription Fee paid to the Management Company	none	none	none	Up to 3%	Up to 3%	Up to 3%	Up to 5%	Up to 5%	Up to 5%	Up to 5%	Up to 5%
Redemption Fee paid to the Management Company	Up to 1%	Up to 1%	Up to 1%	Up to 1%	Up to 1%	Up to 1%	Up to 1%	Up to 1%	Up to 5%	Up to 5%	Up to 5%
Cut off	12.00 p.m. CET the Business Day before the relevant Valuation Day										
Subscription/ Redemption Settlement Day	2 days, according to the official NYSE Euronext calendar, following the Valuation Day										

R units: these units are intended for "all investors" seeking a low initial investment and a "clean fee" structure. The R "clean fee" share class will not carry any fees payable to distributors.

Launch date

The following Share Classes of this Compartment will be created with the following initial subscription prices:

Class:	Initial subscription prices:
Class A	EUR 10 000
Class A1	EUR 10 000
Class A2	USD 10 000
Class B	EUR 100
Class B1	EUR 100
Class B2	USD 100
Class R	EUR 100
Class R1	EUR 100
Class R2	USD 100
Class Z	EUR 10 000
Class Z1	USD 10 000

Total Expense Ratio

The latest calculated total expense ratio rate can be found in the Company's latest financial report.

Risk Management

The method used to calculate overall exposure is the commitment method.

Compartment Specific Risk Factors

The Compartment will be invested primarily in financial instruments selected by the Management Company. These instruments will be subject to market movements and fluctuations. The Management Company invests according to a systematic, fundamentals-based model: there is a risk that the equities selected may not be the best performing stocks.

1) Equity risk

If the equities or indices to which the portfolio is exposed decline, the Compartment's net asset value will fall.

In the small- and mid-cap markets, the trading volume of listed shares is limited, and so market movements tend to be larger on the downside and also more rapid than for large-cap stocks. The Compartment's net asset value may thus decline more rapidly and more strongly.

Investors' attention is drawn to the fact that small-cap markets are intended to host businesses that, owing to their specific characteristics, may carry risks for investors.

2) Risk associated with the Management Company's investment process

Investors' attention is drawn to the fact that the portfolio is constructed and its assets selected and weighted using processes developed by the Management Company. The Compartment's investment process is based on a systematic model designed to identify signals based on past statistical results.

There is a risk that the model may not be efficient, since there is no guarantee that past market situations will repeat themselves in the future. The aim of the processes developed by TOBAM is to achieve healthy diversification of the Compartment's portfolio, and so use of these processes may lead the Management Company to not select the top-performing assets.

3) Risk associated with the emerging market equities

The equities of emerging countries provide a more limited liquidity than equities of developed countries. Consequently, the possession of these securities may increase the level of portfolio risk. The movements of market decline may be greater and faster than in developed countries, the net asset value may decline more sharply and quickly.

4) Risk associated with the use of financial futures

The Compartment may use some financial futures for up to one times its assets. The Compartment may thus be exposed for up to 110% of its assets to the market, assets, index and economic and/or financial instrument or parameter, which can imply a risk of reduction in the net asset value of the Compartment that might be more significant and quicker that the one observed on the markets where the Compartment is invested.

5) Currency risk

Currency risk is the risk of depreciation in the currencies in which the Compartment invests relative to the reference currency. This currency risk will be managed according to market opportunities and may thus account for a significant proportion of the risk. In the event of depreciation in foreign currencies, investors are thus exposed to a decline in the value of their units.

6) Counterparty risk

The Compartment may incur a loss in the event of default by a counterparty with which certain transactions were conducted, leading to a decline in the Compartment's net asset value.

7) Interest rate risk

This is the risk of depreciation in fixed-income instruments deriving from interest-rate fluctuations. Should interest rates rise, the Compartment's net asset value may decline. The Compartment's exposure to fixed-income products is secondary.

8) Credit risk

This is the risk of depreciation in shares issued by a private-sector issuer or default by the latter. The value of the debt securities in which the Compartment is invested may decline, leading to a fall in net asset value.

Template pre-contractual disclosure for the financial products referred to in Article 9, paragraphs 1 to 4a, of Regulation (EU) 2019/2088 and Article 5, first paragraph, of Regulation (EU) 2020/852

Sustainable investment means an investment in an economic activity that contributes to an environmental or social objective, provided that the investment does not significantly harm any environmental or social objective and that the investee companies follow good governance practices.

The **EU Taxonomy** is a classification system laid down in Regulation (EU) 2020/852, establishing a list of **environmentally sustainable economic activities**. That Regulation does not include a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

Product name: Most Diversified Portfolio SICAV - TOBAM Civil Liberty and Democracy – All Countries World Equity Fund

Legal entity identifier: 54930003PNTY5FXY7Q20

Sustainable investment objective

Does this financial product have a sustainable investment objective?

[x] **Yes**

- [ ] It will make a minimum of **sustainable investments with an environmental objective:** ___%
  - [ ] in economic activities that qualify as environmentally sustainable under the EU Taxonomy
  - [ ] in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy
- [x] It will make a minimum of **sustainable investments with a social objective:** 90%

[ ] **No**

- [ ] It **promotes Environmental/Social (E/S) characteristics** and while it does not have as its objective a sustainable investment, it will have a minimum proportion of ___% of sustainable investments
  - [ ] with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy
  - [ ] with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy
  - [ ] with a social objective
- [ ] It promotes E/S characteristics, but **will not make any sustainable investments**

What is the sustainable investment objective of this financial product?

Sustainability indicators measure how the sustainable objectives of this financial product are attained.

Sustainable investment means an investment in an economic activity that contributes to an environmental or social objective, provided that the investment does not significantly harm any environmental or social objective and that the investee companies follow good governance practices.

The Compartment's primary investment objective is to provide investors with a highly diversified equity portfolio on an global developed and emerging market equities investment universe in favoring or penalising stocks and countries depending on the good respect of civil liberty and democracy.
This Compartment aims to promote low carbon approaches, commitment to climate action and companies with good governance.

The Compartment aims to promote the following sustainable objectives :

- o Good respect of civil liberty and democracy by excluding countries that achieve a insufficient level of democracy and civil liberty from the investment universe.
- o Commitment to climate action by applying a systematic carbon footprint reduction of at least 20% versus the reference investment universe's carbon footprint,
- o Promotion of companies with good governance using raw data and their ESG footprint.

The Compartment has designated the Bloomberg World Large & Mid Cap Net Return Index to compare its ESG characteristics, such as carbon emissions or ESG footprint.

What sustainability indicators are used to measure the attainment of the sustainable investment objective of this financial product?

In order to achieve the above characteristics promoted by the Compartment, the Management Company has put in place an ambitious ESG policy made of key pillars and sustainability indicators. The Compartment uses the following sustainability indicators to attain each of the social and environmental characteristics promoted by the Compartment:

- **Country Rating:** The Management Company has built a country rating based on public data in order to assess the level of civil and democratic rights. This country rating is used to exclude countries from the investment universe that fail to achieve a sufficient level of democracy and civil liberty assessment.

- **A Civil and Democratic rights ("CD") score:** The Management Company has built a proprietary scoring, the Civil and democratic rights score, which aims at highlighting the exposure of companies in the eligible universe, to countries identified as below the acceptable threshold in terms of Country Rating and as such excluded from the universe. The Management Company has constrained the optimization to ensure that the Compartment has a higher CD score than the average CD score of the reference index the Bloomberg World Large & Mid Cap Net Return Index.

- **Carbon Emissions & Intensity:** The Management Company applies a systematic carbon footprint reduction of at least 20% versus the reference index the Bloomberg World Large & Mid Cap Net Return Index's carbon footprint. The calculation of the carbon footprint is based on the greenhouse gas emissions scope 1 (i.e. direct emissions from owned or controlled sources) and scope 2 (i.e. indirect emissions from the generation of purchased energy) and scope 3 when available, according to GHG Protocol Corporate Standard. Data on emissions used is obtained from a number of sources including company reports, CDP questionnaire (Carbon Disclosure Project) or an estimation model. In addition, the Management Company excludes from its investment universe, companies that have sector normalized carbon emission intensity (carbon emissions normalized by the Enterprise Value Including Cash) above the intensity of the benchmark (the Bloomberg World Large & Mid Cap Net Return Index).

- **ESG Footprint:**
  The Management Company has put in place a strict E, S and G integration process for all listed companies in its investment universe; using officially published data from Bloomberg.

  ✓ E: For example: existence of climate change / biodiversity / energy efficiency policies; green building, water and waste usage

  ✓ S: For example: Ethics/Equal opportunity/training/ consumer data protection/whistleblowing policies, CSR committee in place, supply chain management

  ✓ G: For example: Number of board meetings per year, ratio of independent directors, chairman tenure, ratio of nonexecutive directors in boards

  From that raw data, the Management Company has built a proprietary methodology to compute the "E,S,G footprints" of each individual holding in the portfolio and as such determine the overall E,S,G Footprints of the portfolio. The Management Company has constrained its investment decision-making process to ensure that the E,S,G footprints of the Compartment, are at minima at the same level as the E,S,G footprints of the reference index the Bloomberg World Large & Mid Cap Net Return Index.

  Also using the G score, and in order to assess good governance practices, the Management Company will exclude from its investment universe, companies that fail to reach a G score (as defined by the Management Company ESG Footprint proprietary methodology) in the top 80% of the reference index the Bloomberg World Large & Mid Cap Net Return Index.

How do sustainable investments not cause significant harm to any environmental or social sustainable investment objective?

Companies the Compartment invests in, contribute to achieve the Compartment's sustainable objective: respect civil rights and democracy, carbon reduction, ESG footprint commitment while not significantly harming any environmental or social

Principal adverse impacts are the most significant negative impacts of investment decisions on sustainability factors relating to environmental, social and employee matters, respect for human rights, anti‐corruption and anti‐bribery matters.

sustainable investment objectives. Before any investment is made by the Compartment (not only sustainable investments but all investments), the investment has to pass a negative screening, further including the consideration of the principal adverse impacts described in the below section. Hence no companies involved in controversial sectors or activities not aligned with TOBAM's policy, can be eligible for investments for the Compartment.

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

The indicators for adverse impacts on sustainability factors are monitored, and a quarterly dedicated committee is in charge of assessing the portfolios holdings in regard to each of the PAI. The committee is notably in charge of identifying if any company in the portfolio is likely to represent a risk or to significantly harm any of the sustainable objectives of the Compartment.

The below Principal Adverse Impacts ("PAI") indicators as defined in SFDR Level II have been integrated into the investment process of the Compartment via an exclusionary investment approach as per the features described earlier:

- PAI #1: GHG emissions (scope 1, 2 and 3 when available)
- PAI #2: Carbon Footprint
- PAI #3: GHG Intensity of investee companies
- PAI #4: Exposure to companies active in the fossil fuel sector
- PAI #7: Activities negatively affecting biodiversity
- PAI #10: Violations of UN Global Compact principles and OECD guidelines
- PAI #14: Exposure to Controversial Weapons

The remaining indicators for adverse impacts on sustainability factors:

PAI #5: share of non-renewable energy consumption and production
PAI #6: energy consumption intensity per high impact climate sector
PAI #8: emissions to water
PAI #9: hazardous waste ratio
PAI #11: Lack of processes and compliance mechanisms to monitor compliance with UN GC and OECD principles
PAI #12: Gender Pay Gap
PAI #13: Board Gender Diversity

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

The Management Company will not invest in any company that has been classified as failing to comply with key international norms (ISS Ethix Norm-based screening) such as for example the UN Global Compact Principles, OECD Guidelines for Multinational Enterprises, Guiding Principles on Business and Human rights.

Does this financial product consider principal adverse impacts on sustainability factors?

✖ Yes, the Management Company has committed to monitor the 14 mandatory and 2 optional environmental and social indicators to show the impact of the Compartment's investments against these PAI indicators.

Furthermore, this Compartment considers principal adverse impacts on sustainability factors and only the following PAI have been taken into account into the investment process:

- PAI #1: GHG (Greenhouse Gas) emissions - Scope 1 & 2 & 3 when available
- PAI #2: Carbon footprint
- PAI #3: GHG intensity of investee companies

The Compartment by targeting an overall carbon reduction of at least 20% compared to the reference index Bloomberg World Large & Mid Cap Net Return Index's carbon footprint, is looking to invest in a combination of stocks that achieve this overall carbon reduction, by considering carbon emissions scope 1 and 2, and 3 when available. In addition, the Management Company excludes from its investment universe, companies that have carbon emission intensity (carbon emissions normalized by the Enterprise Value Including Cash) above the intensity of the benchmark (the Bloomberg World Large & Mid Cap Net Return Index).

- PAI #7: Activities negatively affecting biodiversity

The Management Company proprietary ESG footprint methodology considers raw data published by companies in order to compute an ESG footprint, by notably looking for example at the existence or not of key policies relevant to the biodiversity (for example: biodiversity policy, water usage policy, waste reduction policy, climate change policy…).
In addition to the previous PAI, the following social sustainability indicators have been considered:

- PAI #10: Violations of UN Global Compact principles and (OECD) Guidelines
- PAI #13: Board Gender Diversity
- PAI #14: Exposure to controversial weapons

PAI reports are available on the Compartment annual report.

☐ No

What investment strategy does this financial product follow?

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

The Compartment's primary investment objective is to provide investors with a highly diversified equity portfolio on a global developed and emerging market equities investment universe in favoring or penalising stocks and countries depending on the good respect of civil liberty and democracy. These constraints are taken into account when producing the new allocation of a highly diversified portfolio.
The Compartment also aims to promote low carbon approaches, commitment to climate action and companies with good governance.

What are the binding elements of the investment strategy used to select the investments to attain the sustainable investment objective?

The Compartment applies the following binding elements to select investments and attain the environmental and social characteristics described above:

- **Exclusion of countries with a bad rating regarding democracy implementation:** The Management Company excludes countries that fail to achieve a sufficient level of democracy and civil liberty assessment.

- **A Civil and Democratic rights ("CD") score:** The Management Company has built a proprietary scoring, the Civil and democratic rights score, which aims at highlighting the exposure of companies in the eligible universe, to countries identified as below the acceptable threshold in terms of country rating, and as such excluded from the universe. The Management Company has constrained the optimization to ensure that the Compartment has a higher CD score than the average CD score of the reference index the Bloomberg World Large & Mid Cap Net Return Index.

- **Exclusion policy:** the Management Company applies a general exclusion policy, restricting the investment universe and excluding companies based either on their involvement in certain activities (sector or product based) or based on controversies or breaches to key international norms. The key exclusions used by the Management Company are reflected in the below table :

Sector /Product	Criteria
Producer and distributors of tobacco	Limit (5% of the revenues)
Coal and coal-based producers and distributors	Limit (10% of the revenues)
Development, production, maintenance or distribution of controversial and prohibited weapons	Exclusion
Breach or violation of International Treaties, Conventions & Standards such as OECD Guidelines for Multinational Enterprises, ILO Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy, UN Global Compact, Guiding Principles on Business and Human Rights	Exclusion

The Compartment applies a fossil fuel free approach on emerging markets and wishes to engage with companies that can improve their fossil fuel consumption in developed markets.
Companies within emerging markets with significant involvement in the production, sales or extraction of fossil fuels (including coal, coal power generation, oil and gas) are excluded from the investment universe of the Compartment.
Further details on the exclusion policy can be found in the following link: https://www.tobam.fr/our-beliefs/exclusion-policy/.

- **ESG Integration:** The Management Company has put in place a strict E, S and G integration process for all listed companies in its investment universe; using officially published data from Bloomberg.

  ✓ E: For example: existence of climate change / biodiversity / energy efficiency policies; green building, water and waste usage

  ✓ S: For example: Ethics/Equal opportunity/training/ consumer data protection/whistleblowing policies, CSR committee in place, supply chain management

  ✓ G: For example: Number of board meetings per year, ratio of independent directors, chairman tenure, ratio of nonexecutive directors in boards

  From that raw data, the Management Company has built a proprietary methodology to compute the "E,S, and G footprints" of each individual holding in the portfolio and as such determine the overall E,S, and G Footprints of the portfolio.

  The Management Company has constrained its investment decision process, to ensure that the E, S and G footprints of the Compartment are at minima, at the same level as the E, S and G footprints of the reference index Bloomberg World Large & Mid Cap Net Return Index.

  Also using the G score, and in order to assess good governance practices, the Management Company will exclude from its investment universe, companies that fail to reach a G score (as defined by the Management Company ESG Footprint proprietary methodology) in the top 80% of the reference index the Bloomberg World Large & Mid Cap Net Return Index.

- **Carbon Emissions Reduction**

The Management Company applies a systematic carbon footprint reduction of at least 20% versus the reference index the Bloomberg World Large & Mid Cap Net Return Index's carbon footprint. The calculation of the carbon footprint is based on the greenhouse gas emissions scope 1, scope 2 and scope 3 when available. Data on emissions used is obtained from a number of sources including company reports, CDP questionnaire (Carbon Disclosure Project) or an estimation model.

- **Responsible Ownership:** The Management Company has built an ambitious engagement policy to support its commitment to sustainability and address via engagement and dialogues, issues relative to ESG and sustainability.

Good governance practices include sound management structures, employee relations, remuneration of staff ad tax compliance.

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

Using the **G score**, and in order to assess good governance practices, the Management Company will exclude from its investment universe, companies that fail to reach a G score (as defined by the Management Company ESG Footprint proprietary methodology) in the top 80% of the reference index the Bloomberg World Large & Mid Cap Net Return Index.

What is the asset allocation and the minimum share of sustainable investments?

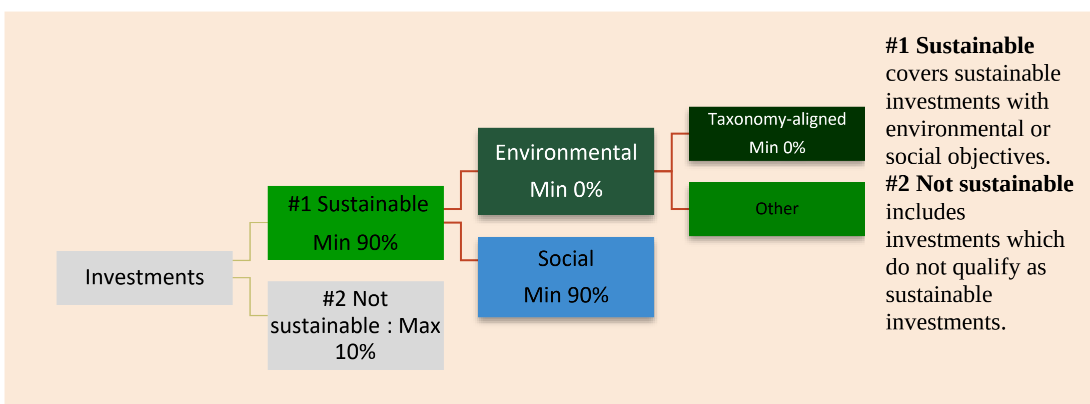
Asset allocation describes the share of investments in specific assets.

The model used by TOBAM for the determination of sustainable investments combines the pass or fail approach and the weighted-revenue approach with threshold for the carbon emissions and governance.

#1: 90% of the assets of this Compartment are aligned with S objectives:

- sustainable: 90% of those assets are sustainable investments with S objectives.
- other: 10% of those assets are investments aligned with E and S characteristics that do not qualify as sustainable investments.

Taxonomy-aligned activities are expressed as a share of:
- **turnover** reflecting the share of revenue from green activities of investee companies
- **capital expenditure** (CapEx) showing the green investments made by investee companies, e.g. for a transition to a green economy.
- **operational expenditure** (OpEx) reflecting green operational activities of investee companies.



How does the use of derivatives attain the sustainable investment objective?

The Compartment may use financial derivative instruments for investment, efficient portfolio management and/or hedging purposes, and this will not impact in any way the exposure to sustainable assets, or the ESG characteristics of the Compartment.

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

This Compartment commits to a 0% alignment with the EU Taxonomy.

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

Enabling activities directly enable other activities to make a substantial contribution to an environmental objective.
Transitional activities are activities for which low-carbon alternatives are not yet available ad among others have greenhouse gas emission levels corresponding to the best performance.

- ***Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy[1]?***

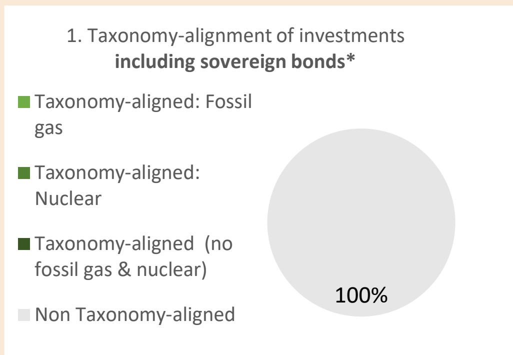
☐ Yes :

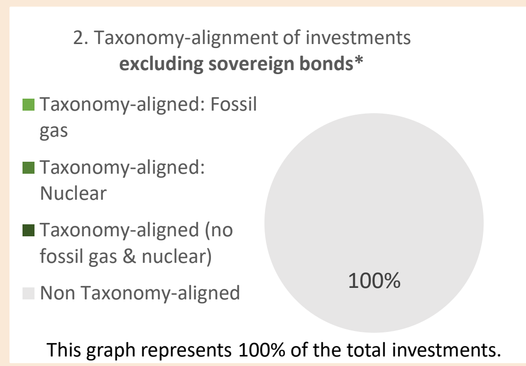
☐ In fossil gas ☐ In nuclear energy

☒ No

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

The two graphs below show in green the minimum percentage of investments that are aligned with the EU Taxonomy. As there is no appropriate methodology to determine the Taxonomy-alignment of sovereign bonds*, the first graph shows the Taxonomy alignment in relation to all the investments of the financial product including sovereign bonds, while the second graph shows the Taxonomy alignment only in relation to the investments of the financial product other than sovereign bonds.





* **For the purpose of these graphs, 'sovereign bonds' consist of all sovereign exposures**

are **environmentally sustainable** investments that **do not take into account the criteria** for environmentally sustainable economic activities under the EU Taxonomy.

What is the minimum share of investments in transitional and enabling activities?

As the Compartment does not have a minimum Taxonomy alignment, there is no minimum share in transitional and enabling activities.

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

The minimum share of sustainable investments with an environmental objective that is not aligned with the EU Taxonomy is 0%.

What is the minimum share of sustainable investments with a social objective?

The Compartment allocates 90% of its net assets to sustainable investments. Out of the latter, the minimum share of sustainable investments with a social objective is 90%.

What investments are included under "#2 Not sustainable", what is their purpose and are there any minimum environmental or social safeguards?

Investments falling under category "#2 Not sustainable", are investments such as derivatives used for hedging purposes, cash or cash equivalent for liquidity purposes
No minimum environmental or social safeguards apply to the above elements.

Is a specific index designated as a reference benchmark to meet the sustainable investment objective?

No, but the Compartment has designated a reference benchmark (Bloomberg World Large & Mid Cap Net Return Index). This index is used as a reference to compare the Compartment ESG characteristics, such as carbon emissions, ESG footprint or Civil and Democratic Rights score, with the reference benchmark.

How does the reference benchmark take into account sustainability factors in a way that is continuously aligned with the sustainable investment objective?

The reference index used by the Compartment is not an ESG benchmark and is not consistent with the ESG characteristics promoted by the Compartment. All ESG calculations or comparisons are computed using Bloomberg World Large & Mid Cap Net Return Index, as a good proxy of the Compartment investment universe.

Reference benchmarks are indexes to measure whether the financial product attains the sustainable investment objective.

How is the alignment of the investment strategy with the methodology of the index ensured on a continuous basis?

The reference index the Bloomberg World Large & Mid Cap Net Return Index is a broad market index, capturing developed and emerging markets equities, which is in line with the Compartment investment universe.
The investment universe of the reference index is regularly monitored by the Management Company research team to ensure the consistency with the compartment's investment universe, in order to ensure relevance of ESG and performance comparisons.

How does the designated index differ from a relevant broad market index?

The reference index didn't differ.

Where can the methodology used for the calculation of the designated index be found?

https://assets.bbhub.io/professional/sites/27/Global-Equity-Index-Methodology.pdf

Where can I find more product specific information online?

More product-specific information can be found on the website:

https://www.tobam.fr/key-documents-policies/

APPENDIX 19. Most Diversified Portfolio SICAV - TOBAM Anti-Benchmark Civil Liberty and Democracy – All Countries World Equity Fund Ex-USA

Investment Objective, Benchmark of the Compartment

The Compartment's primary investment objective is to provide investors with a highly diversified equity portfolio on a global developed and emerging market Ex USA equities investment universe in favoring or penalising stocks and countries depending on the good respect of civil liberty and democracy.

Changes in the net asset value can be compared to Bloomberg World ex US Large & Mid Cap Net Return Index. The Bloomberg World ex US Large & Mid Cap Net Return Index is a capitalization-weighted index designed to measure global developed and emerging Ex-USA equity market performance of stocks. This series approximates the minimum possible dividend reinvestment. The dividend is reinvested after deduction of withholding tax by applying the maximum rate of the company's country of incorporation applicable to institutional investors.The index is available at www.bloomberg.com/indices

The Compartment does not use an index-based management strategy, it is actively managed. As a consequence, its performance may differ substantially from the benchmark, which is used to determine the global risk profile of the Compartment, and which does not imply any investment constraint on the portfolio of the Compartment

Investment strategy of the Compartment

At least 90% of the Compartment's assets are thus constantly kept exposed to global developed and emerging Ex-USA equity markets, including the small-and mid-cap stocks.

The stocks to which the Compartment is exposed are selected based on methodology developed by the Management Company, which help to invest in democratic countries and to penalise companies with significant exposure to countries classified as non-democratic.

In order to obtain maximum remuneration of its liquidities, the Compartment can invest in money market instruments for up to 10% of its assets.

In addition, the Compartment may as ancillary borrow cash in the event that a debit balance were to appear.

The Compartment qualifies under article 9 of SFDR. The investment strategy has a sustainable investment objective and promotes environmental and social characteristics. The strategy notably follows the 4 pillars of TOBAM's SRI policy: exclusion, carbon reduction, ESG integration and responsible stewardship via voting and engagement.

The Management Company considers ESG factors and applies a sustainability approach in its investment process for the Compartment as further detailed in the Appendix 19.1 Environmental and/or Social Characteristics - Pre-contractual disclosures in compliance with SFDR Level II.

1) Description of the asset classes used to achieve the investment objective

The asset classes included in the portfolio are the following:

a) Equities

In pursuit of the strategy presented above, the Compartment will invest in the global developed and emerging Ex-USA markets that are depending on the outlook as seen by the Management Company. The Compartment may invest in shares of companies listed in the developed and emerging countries, irrespective of the companies' size and the sector of the economy to which they belong. This exposure will not fall below 90% of the Compartment's assets.

The Compartment may invest up to 20% of its assets in closed-ended Real Estate Investment Trust (REIT).

b) Money market instruments

For treasury purposes, the Compartment may trade, up to 10% of its assets, in money-market instruments (government bonds for OECD states, money-market funds).

c) Shares or units of investment funds

The Compartment may invest maximum 10% of its assets in shares or units of UCITS which themselves invest maximum 10% of their assets in shares or units of UCITS or investment funds.

These funds may be managed by the Management Company or an affiliated company. The investment strategies of these funds are compatible with that of the Compartment.

The Compartment may invest maximum 10% of its assets in one or more Compartments of the Company.

2) Derivatives used to achieve the investment objective

The Compartment may use financial futures up to a maximum of one time its assets. The Compartment's leveraged exposure may not exceed 110%. The Compartment will invest in regulated, organized markets and over-the-counter. The Compartment will use derivatives instrument for hedging and exposure purposes and to achieve the investment objective. The hedging derivatives transaction shall aim to cover equity risk and currency risk of the Compartment. The types of instruments used by the Management Company will mainly be futures on equities or stock market indices, swaps on currencies or equities.

3) Deposits and cash

The Compartment may hold, up to 10% of its net assets, ancillary liquid assets which consists of bank deposits at sight such as cash held in current accounts with a bank accessible at any time.

The Compartment may make limited use of other deposits in order to achieve its investment objective, for treasury purposes and/or in in case of unfavourable market conditions.

4) Cash borrowing

The Compartment may borrow up to the equivalent of 10% of its net assets in cash on a temporary basis and for technical needs only.

5) Temporary purchases and sales of securities

In addition, the Compartment may engage in security lending for up to 75% of its assets.
The Compartment may also, as ancillary, make temporary deposits and borrow cash in the event that a debit balance was to appear.

The Compartment will enter into securities lending transactions opportunistically in circumstances where the Management Company believes that the objective described below could be achieved.

In the context of investments in specials and general collateral the Compartment will use securities lending in order to increase the return of the portfolio.

The expected proportion of the Compartment's assets which may be subject to securities lending depends on the demand of market participants for the securities forming part of the Compartment's portfolio at any time.

This demand depends notably on the interest of such securities, the size of the lendable positions, the presence of specials or securities used as general collateral, the potential duration of the loan (the securities being subject to portfolio adjustments or rebalancing, and thus sell trades), and the type of collateral accepted by the Compartment.

The Compartment's use of, or investment in, securities lending transactions will be as follows:

Type of transaction	**Expected proportion**	**Maximum proportion**
Securities lending	0% to 30%	75%

Reference Currency

The reference currency of the Compartment is USD.

Profile of the Typical Investor

The Compartment is a high risk vehicle. To determine their level of investment, investors should consider their personal assets, the regulations applicable to them, their current financial needs over a recommended minimum investment horizon of more than five years, and also their willingness to take risks or their preference for a more prudent investment. The recommended minimum investment horizon is more than 5 years.

Form of Shares and Classes

The Share Classes of the Compartment will be issued in registered form

Share Classes	**A** **Isin Code:** **LU2598622483**	**A1** **Isin Code:** **LU2598622566**	**A2** **Isin Code:** **LU2598622640**	**B** **Isin Code:** **LU2598622723**	**B1** **Isin Code:** **LU2598622996**	**B2** **Isin Code:** **LU2598623028**	**R** **Isin Code:** **LU2598623291**	**R1** **Isin Code:** **LU2598623374**	**R2** **Isin Code:** **LU2598623457**	**Z** **Isin Code:** **LU2598623531**	**Z1** **Isin Code:** **LU2598623614**
Currency	EUR	EUR	USD	EUR	EUR	USD	EUR	EUR	USD	EUR	USD
Type of Shares	Accumulation										
Target Investors	Institutional investors	Institutional investors	Institutional investors	All investors	All investors	All investors	All investors	All investors	All investors	Institutional investors	Institutional investors

Minimum initial Subscription	10 Shares	10 Shares	10 Shares	1,500 Shares	10 Shares	10 Shares	1 Share	1 Share	1 Share	1 Share	1 Share
Minimum holding amount	1 Share	1 Share	1 Share	1 Share	1 Share	1 Share	1 Share	1 Share	1 Share	1 Share	1 Share
Valuation Day	Every Business Day, with the exception of days on which the American markets are closed (based on the official NYSE Euronext calendar)										
Management Company Fee	0.50%	0.50%	0.50%	1.50%	1.50%	1.50%	0.75%	0.75%	0.75%	0.00%	0.00%
Administration Fee & Depositary Fee	0.22%	0.22%	0.22%	0.22%	0.22%	0.22%	0.22%	0.22%	0.22%	0.22%	0.22%
Hedge	No	Hedge	No	No	Hedge	No	No	Hedge	No	No	No
Subscription Fee paid to the Management Company	none	none	none	Up to 3%	Up to 3%	Up to 3%	Up to 5%	Up to 5%	Up to 5%	Up to 5%	Up to 5%
Redemption Fee paid to the Management Company	Up to 1%	Up to 1%	Up to 1%	Up to 1%	Up to 1%	Up to 1%	Up to 1%	Up to 1%	Up to 5%	Up to 5%	Up to 5%
Cut off	12.00 p.m. CET the Business Day before the relevant Valuation Day										
Subscription/ Redemption Settlement Day	2 days, according to the official NYSE Euronext calendar, following the Valuation Day										

R units: these units are intended for "all investors" seeking a low initial investment and a "clean fee" structure. The R "clean fee" share class will not carry any fees payable to distributors.

Launch date

The following Share Classes of this Compartment will be created with the following initial subscription prices:

Class:	Initial subscription prices:
Class A	EUR 10 000
Class A1	EUR 10 000
Class A2	USD 10 000
Class B	EUR 100
Class B1	EUR 100
Class B2	USD 100
Class R	EUR 100
Class R1	EUR 100
Class R2	USD 100
Class Z	EUR 10 000
Class Z1	USD 10 000

Total Expense Ratio

The latest calculated total expense ratio rate can be found in the Company's latest financial report.

Risk Management

The method used to calculate overall exposure is the commitment method.

Compartment Specific Risk Factors

The Compartment will be invested primarily in financial instruments selected by the Management Company. These instruments will be subject to market movements and fluctuations. The Management Company invests according to a systematic, fundamentals-based model: there is a risk that the equities selected may not be the best performing stocks.

4) Equity risk

If the equities or indices to which the portfolio is exposed decline, the Compartment's net asset value will fall.

In the small- and mid-cap markets, the trading volume of listed shares is limited, and so market movements tend to be larger on the downside and also more rapid than for large-cap stocks. The Compartment's net asset value may thus decline more rapidly and more strongly.

Investors' attention is drawn to the fact that small-cap markets are intended to host businesses that, owing to their specific characteristics, may carry risks for investors.

5) Risk associated with the Management Company's investment process

Investors' attention is drawn to the fact that the portfolio is constructed and its assets selected and weighted using processes developed by the Management Company. The Compartment's investment process is based on a systematic model designed to identify signals based on past statistical results.

There is a risk that the model may not be efficient, since there is no guarantee that past market situations will repeat themselves in the future. The aim of the processes developed by TOBAM is to achieve healthy diversification of the Compartment's portfolio, and so use of these processes may lead the Management Company to not select the top-performing assets.

6) Risk associated with the emerging market equities

The equities of emerging countries provide a more limited liquidity than equities of developed countries. Consequently, the possession of these securities may increase the level of portfolio risk. The movements of market decline may be greater and faster than in developed countries, the net asset value may decline more sharply and quickly.

9) Risk associated with the use of financial futures

The Compartment may use some financial futures for up to one times its assets. The Compartment may thus be exposed for up to 110% of its assets to the market, assets, index and economic and/or financial instrument or parameter, which can imply a risk of reduction in the net asset value of the Compartment that might be more significant and quicker that the one observed on the markets where the Compartment is invested.

10) Currency risk

Currency risk is the risk of depreciation in the currencies in which the Compartment invests relative to the reference currency. This currency risk will be managed according to market opportunities and may thus account for a significant proportion of the risk. In the event of depreciation in foreign currencies, investors are thus exposed to a decline in the value of their units.

11) Counterparty risk

The Compartment may incur a loss in the event of default by a counterparty with which certain transactions were conducted, leading to a decline in the Compartment's net asset value.

12) Interest rate risk

This is the risk of depreciation in fixed-income instruments deriving from interest-rate fluctuations. Should interest rates rise, the Compartment's net asset value may decline. The Compartment's exposure to fixed-income products is secondary.

13) Credit risk

This is the risk of depreciation in shares issued by a private-sector issuer or default by the latter. The value of the debt securities in which the Compartment is invested may decline, leading to a fall in net asset value

Appendix 19.1

Template pre-contractual disclosure for the financial products referred to in Article 9, paragraphs 1 to 4a, of Regulation (EU) 2019/2088 and Article 5, first paragraph, of Regulation (EU) 2020/852

Sustainable investment means an investment in an economic activity that contributes to an environmental or social objective, provided that the investment does not significantly harm any environmental or social objective and that the investee companies follow good governance practices.

The **EU Taxonomy** is a classification system laid down in Regulation (EU) 2020/852, establishing a list of **environmentally sustainable economic activities**. That Regulation does not include a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

Product name: Most Diversified Portfolio SICAV – TOBAM Anti-Benchmark Civil Liberty and Democracy – All Countries World Equity Fund Ex-USA

Legal entity identifier: 54930003OV0MWO2BX578

Sustainable investment objective

Does this financial product have a sustainable investment objective?

☒ **Yes**	☐ **No**
☐ It will make a minimum of **sustainable investments with an environmental objective:** ___% ☐ in economic activities that qualify as environmentally sustainable under the EU Taxonomy ☐ in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy	☐ It **promotes Environmental/Social (E/S) characteristics** and while it does not have as its objective a sustainable investment, it will have a minimum proportion of ___% of sustainable investments ☐ with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy ☐ with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy ☐ with a social objective
☒ It will make a minimum of **sustainable investments with a social objective:** 90%	☐ It promotes E/S characteristics, but **will not make any sustainable investments**

What is the sustainable investment objective of this financial product?

Sustainable investment means an investment in an economic activity that contributes to an environmental or social objective, provided that the investment does not significantly harm any environmental or social objective and that the investee companies follow good governance practices.

The Compartment's primary investment objective is to provide investors with a highly diversified equity portfolio on an global developed and emerging market Ex-USA equities investment universe in favoring or penalising stocks and countries depending on the good respect of civil liberty and democracy.

This Compartment aims to promote low carbon approaches, commitment to climate action and companies with good governance.

The Compartment aims to promote the following sustainable objectives :

- Good respect of civil liberty and democracy by excluding countries that achieve a insufficient level of democracy and civil liberty from the investment universe.
- Commitment to climate action by applying a systematic carbon footprint reduction of at least 20% versus the reference investment universe's carbon footprint,
- Promotion of companies with good governance using raw data and their ESG footprint.

The Compartment has designated the Bloomberg World ex-US Large & Mid Cap Net Return Index to compare its ESG characteristics, such as carbon emissions or ESG footprint.

Sustainability indicators measure how the sustainable objectives of this financial product are attained.

What sustainability indicators are used to measure the attainment of the sustainable investment objective of this financial product?

In order to achieve the above characteristics promoted by the Compartment, the Management Company has put in place an ambitious ESG policy made of key pillars and sustainability indicators. The Compartment uses the following sustainability indicators to attain each of the social and environmental characteristics promoted by the Compartment:

- **Country Rating:** The Management Company has built a country rating based on public data in order to assess the level of civil and democratic rights. This country rating is used to exclude countries from the investment universe that fail to achieve a sufficient level of democracy and civil liberty assessment.

- **A Civil and Democratic rights ("CD") score:** The Management Company has built a proprietary scoring, the Civil and democratic rights score, which aims at highlighting the exposure of companies in the eligible universe, to countries identified as below the acceptable threshold in terms of Country Rating and as such excluded from the universe. The Management Company has constrained the optimization to ensure that the Compartment has a higher CD score than the average CD score of the reference index the Bloomberg World ex US Large & Mid Cap Net Return Index.

- **Carbon Emissions & Intensity:** The Management Company applies a systematic carbon footprint reduction of at least 20% versus the reference index the Bloomberg World Large & Mid Cap Net Return Index's carbon footprint. The calculation of the carbon footprint is based on the greenhouse gas emissions scope 1 (i.e. direct emissions from owned or controlled sources) and scope 2 (i.e. indirect emissions from the generation of purchased energy) and scope 3 when available, according to GHG Protocol Corporate Standard. Data on emissions used is obtained from a number of sources including company reports, CDP questionnaire (Carbon Disclosure Project) or an estimation model. In addition, the Management Company excludes from its investment universe, companies that have sector normalized carbon emission intensity (carbon emissions normalized by the Enterprise Value Including Cash) above the intensity of the benchmark (the Bloomberg World ex US Large & Mid Cap Net Return Index).

- **ESG Footprint:**
  The Management Company has put in place a strict E, S and G integration process for all listed companies in its investment universe; using officially published data from Bloomberg.

  ✓ E: For example: existence of climate change / biodiversity / energy efficiency policies; green building, water and waste usage
  ✓ S: For example: Ethics/Equal opportunity/training/ consumer data protection/whistleblowing policies, CSR committee in place, supply chain management
  ✓ G: For example: Number of board meetings per year, ratio of independent directors, chairman tenure, ratio of nonexecutive directors in boards

  From that raw data, the Management Company has built a proprietary methodology to compute the "E,S,G footprints" of each individual holding in the portfolio and as such determine the overall E,S,G Footprints of the portfolio.

  The Management Company has constrained its investment decision-making process to ensure that the E,S,G footprints of the Compartment, are at minima at the same level as the E,S,G footprints of the reference index the Bloomberg World ex US Large & Mid Cap Net Return Index.

  Also using the **G score**, and in order to assess good governance practices, the Management Company will exclude from its investment universe, companies that fail to reach a G score (as defined by the Management Company ESG Footprint proprietary methodology) in the top 80% of the reference index the Bloomberg World ex US Large & Mid Cap Net Return Index.

Principal adverse impacts are the most significant negative impacts of investment decisions on sustainability factors relating to environmental, social and employee matters, respect for human rights, anti-corruption and anti-bribery matters.

How do sustainable investments not cause significant harm to any environmental or social sustainable investment objective?

Companies the Compartment invests in, contribute to achieve the Compartment's sustainable objective: respect civil rights and democracy, carbon reduction, ESG footprint commitment while not significantly harming any environmental or social sustainable investment objectives. Before any investment is made by the Compartment (not only sustainable investments but all investments), the investment has to pass a negative screening, further including the consideration of the principal adverse impacts described in the below section. Hence no companies involved in controversial sectors or activities not aligned with TOBAM's policy, can be eligible for investments for the Compartment.

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

The indicators for adverse impacts on sustainability factors are monitored, and a quarterly dedicated committee is charge of assessing the portfolios holdings in regard to each of the PAI. The committee is notably in charge of identifying if any company in the portfolio is likely to represent a risk or to significantly harm any of the sustainable objectives of the Compartment.

Furthermore, the Compartment considers principal adverse impacts on sustainability factors and only the following PAI have been taken into account into the investment process.

The below Principal Adverse Impacts ("PAI") indicators as defined in SFDR Level II have been integrated into the investment process of the Compartment via an exclusionary investment approach as per the features described earlier:

- PAI #1: GHG emissions (scope 1, 2 and 3 when available)
- PAI #2: Carbon Footprint
- PAI #3: GHG Intensity of investee companies
- PAI #4: Exposure to companies active in the fossil fuel sector
- PAI #7: Activities negatively affecting biodiversity
- PAI #10: Violations of UN Global Compact principles and OECD guidelines
- PAI #14: Exposure to Controversial Weapons

The remaining indicators for adverse impacts on sustainability factors:
PAI #5: share of non-renewable energy consumption and production
PAI #6: energy consumption intensity per high impact climate sector
PAI #8: emissions to water
PAI #9: hazardous waste ratio
PAI #11: Lack of processes and compliance mechanisms to monitor compliance with UN GC and OECD principles
PAI #12: Gender Pay Gap
PAI #13: Board Gender Diversity

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

The Management Company will not invest in any company that has been classified as failing to comply with key international norms (ISS Ethix Norm-based screening) such as for example the UN Global Compact Principles, OECD Guidelines for Multinational Enterprises, Guiding Principles on Business and Human rights.

Does this financial product consider principal adverse impacts on sustainability factors?

✖ Yes, the Management Company has committed to monitor the 14 mandatory and 2 optional environmental and social indicators to show the impact of the Compartment's investments against these PAI indicators.

- PAI #1: GHG (Greenhouse Gas) emissions - Scope 1 & 2 & 3 when available
- PAI #2: Carbon footprint
- PAI #3: GHG intensity of investee companies

The Compartment by targeting an overall carbon reduction of at least 20% compared to the reference index Bloomberg World ex US Large & Mid Cap Net Return Index carbon footprint, is looking to invest in a combination of stocks that achieve this overall carbon reduction, by considering carbon emissions scope 1 and 2, and 3 when available. In addition, the Management Company excludes from its investment universe, companies that have carbon emission intensity (carbon emissions normalized by the Enterprise Value Including Cash) above the intensity of the benchmark (the Bloomberg World ex US Large & Mid Cap Net Return Index).

- PAI #7: Activities negatively affecting biodiversity

The Management Company proprietary ESG footprint methodology considers raw data published by companies in order to compute an ESG footprint, by notably looking for example at the existence or not of key policies relevant to the biodiversity (for example: biodiversity policy, water usage policy, waste reduction policy, climate change policy…).

In addition to the previous PAI, the following social sustainability indicators have been considered:

- PAI #10: Violations of UN Global Compact principles and (OECD) Guidelines
- PAI #13: Board Gender Diversity
- PAI #14: Exposure to controversial weapons

PAI reports are available on the Compartment annual report.

☐ No

What investment strategy does this financial product follow?

The Compartment's primary investment objective is to provide investors with a highly diversified equity portfolio on an global developed and emerging market Ex-USA equities investment universe in favoring or penalising stocks and countries depending on the good respect of civil liberty and democracy. These constraints are taken into account when producing the new allocation of a highly diversified portfolio.
The Compartment also aims to promote low carbon approaches, commitment to climate action and companies with good governance.

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

What are the binding elements of the investment strategy used to select the investments to attain the sustainable investment objective?

The Compartment applies the following binding elements to select investments and attain the environmental and social characteristics described above:

- **Exclusion of countries with a bad rating regarding democracy implementation:** The Management Company excludes countries that fail to achieve a sufficient level of democracy and civil liberty assessment.

- **A Civil and Democratic rights (“CD”) score:** The Management Company has built a proprietary scoring, the Civil and democratic rights score, which aims at highlighting the exposure of companies in the eligible universe, to countries identified as below the acceptable threshold in terms of country rating, and as such excluded from the universe. The Management Company has constrained the optimization to ensure that the Compartment has a higher CD score than the average CD score of the reference index the Bloomberg World ex US Large & Mid Cap Net Return Index.

- **Exclusion policy:** the Management Company applies a general exclusion policy, restricting the investment universe and excluding companies based either on their involvement in certain activities (sector or product based) or based on controversies or breaches to key international norms. The key exclusions used by the Management Company are reflected in the below table:

Sector /Product	**Criteria**
Producer and distributors of tobacco	Limit (5% of the revenues)
Coal and coal-based producers and distributors	Limit (10% of the revenues)
Development, production, maintenance or distribution of controversial and prohibited weapons	Exclusion
Breach or violation of International Treaties, Conventions & Standards such as OECD Guidelines for Multinational Enterprises, ILO Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy, UN Global Compact, Guiding Principles on Business and Human Rights	Exclusion

The Compartment applies a fossil fuel free approach on emerging markets and wishes to engage with companies that can improve their fossil fuel consumption in developed markets.
Companies within emerging markets with significant involvement in the production, sales or extraction of fossil fuels (including coal, coal power generation, oil and gas) are excluded from the investment universe of the Compartment.

Further details on the exclusion policy can be found in the following link: https://www.tobam.fr/our-beliefs/exclusion-policy/

- **ESG Integration:** The Management Company has put in place a strict E, S and G integration process for all listed companies in its investment universe; using officially published data from Bloomberg.

✓ E: For example: existence of climate change / biodiversity / energy efficiency policies; green building, water and waste usage

✓ S: For example: Ethics/Equal opportunity/training/ consumer data protection/whistleblowing policies, CSR committee in place, supply chain management

- ✓ G: For example: Number of board meetings per year, ratio of independent directors, chairman tenure, ratio of nonexecutive directors in boards

  From that raw data, the Management Company has built a proprietary methodology to compute the "E,S, and G footprints" of each individual holding in the portfolio and as such determine the overall E,S, and G Footprints of the portfolio.

  The Management Company has constrained its investment decision process, to ensure that the E, S and G footprints of the Compartment are at minima, at the same level as the E, S and G footprints of the reference index Bloomberg World ex US Large & Mid Cap Net Return Index.

  Also using the G score, and in order to assess good governance practices, the Management Company will exclude from its investment universe, companies that fail to reach a G score (as defined by the Management Company ESG Footprint proprietary methodology) in the top 80% of the reference index Bloomberg World ex US Large & Mid Cap Net Return Index.

- **Carbon Emissions Reduction :**
  The Management Company applies a systematic carbon footprint reduction of at least 20% versus the reference index the Bloomberg World ex US Large & Mid Cap Net Return Index’s carbon footprint. The calculation of the carbon footprint is based on the greenhouse gas emissions scope 1 , scope 2 and scope 3 when available. Data on emissions used is obtained from a number of sources including company reports, CDP questionnaire (Carbon Disclosure Project) or an estimation model.

- **Responsible Ownership:** The Management Company has built an ambitious engagement policy to support its commitment to sustainability and address via engagement and dialogues, issues relative to ESG and sustainability.

Good governance practices include sound management structures, employee relations, remuneration of staff ad tax compliance.

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

Using the **G score**, and in order to assess good governance practices, the Management Company will exclude from its investment universe, companies that fail to reach a G score (as defined by the Management Company ESG Footprint proprietary methodology) in the top 80% of the reference index the Bloomberg World ex US Large & Mid Cap Net Return Index.

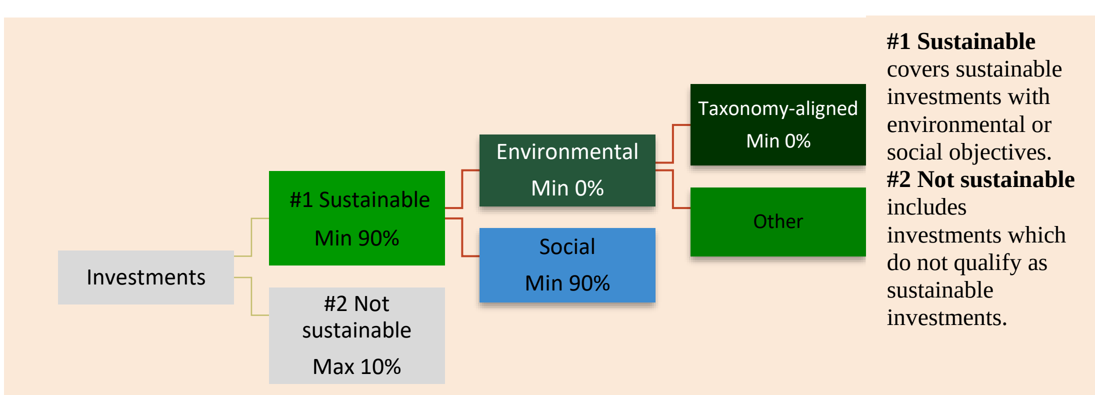
What is the asset allocation and the minimum share of sustainable investments?

Asset allocation describes the share of investments in specific assets.

Taxonomy-aligned activities are expressed as a share of:
- **turnover** reflecting the share of revenue from green activities of investee companies
- **capital expenditure** (CapEx) showing the green investments made by investee companies, e.g. for a transition to a green economy.
- **operational expenditure** (OpEx) reflecting green operational activities of investee companies.

The model used by TOBAM for the determination of sustainable investments combines the pass or fail approach and the weighted-revenue approach with threshold for the carbon emissions and governance.

#1: 90% of the assets of this Compartment are aligned with S objectives:
- sustainable: 90% of those assets are sustainable investments with S objectives.
- other: 10% of those assets are investments aligned with E and S characteristics that do not qualify as sustainable investments.



How does the use of derivatives attain the sustainable investment objective?

The Compartment may use financial derivative instruments for investment, efficient portfolio management and/or hedging purposes, and this will not impact in any way the exposure to sustainable assets, or the ESG characteristics of the Compartment.

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

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

Enabling activities directly enable other activities to make a substantial contribution to an environmental objective.
Transitional activities are activities for which low-carbon alternatives are not yet available ad among others have greenhouse gas emission levels corresponding to the best performance.

This Compartment commits to a 0% alignment with the EU Taxonomy.

- ***Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy[1]?***

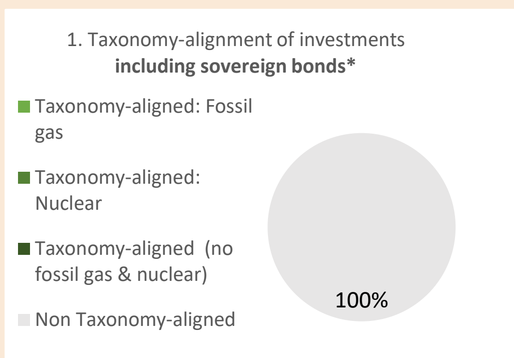
☐ Yes :

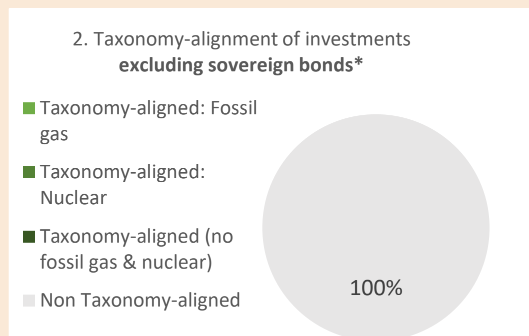
☐ In fossil gas ☐ In nuclear energy

☒ No

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

The two graphs below show in green the minimum percentage of investments that are aligned with the EU Taxonomy. As there is no appropriate methodology to determine the Taxonomy-alignment of sovereign bonds*, the first graph shows the Taxonomy alignment in relation to all the investments of the financial product including sovereign bonds, while the second graph shows the Taxonomy alignment only in relation to the investments of the financial product other than sovereign bonds.





This graph represents 100% of the total investments.

*** For the purpose of these graphs, 'sovereign bonds' consist of all sovereign exposures**

are environmentally sustainable investments that **do not take into account the criteria** for environmentally sustainable economic activities under the EU Taxonomy.

What is the minimum share of investments in transitional and enabling activities?

As the Compartment does not have a minimum Taxonomy alignement, there is no minimum share in transitional and enabling activities.

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

The minimum share of sustainable investments with an environmental objective that is not aligned with the EU Taxonomy is 0%.

What is the minimum share of sustainable investments with a social objective?

The Compartment allocates 90% of its net assets to sustainable investments. Out of the latter, the minimum share of sustainable investments with a social objective is 90%.

What investments are included under "#2 Not sustainable", what is their purpose and are there any minimum environmental or social safeguards?

Investments falling under category "#2 Not sustainable", are investments such as derivatives used for hedging purposes and cash or cash equivalent for liquidity purposes.
No minimum environmental or social safeguards apply to the above elements.

Is a specific index designated as a reference benchmark to meet the sustainable investment objective?

No, but the Compartment has designated a reference benchmark (Bloomberg World ex US Large & Mid Cap Net Return Index). This index is used as a reference to compare the Compartment ESG characteristics, such as carbon emissions, ESG footprint or Civil and Democratic Rights score, with the reference benchmark.

How does the reference benchmark take into account sustainability factors in a way that is continuously aligned with the sustainable investment objective?

The reference index used by the Compartment is not an ESG benchmark and is not consistent with the ESG characteristics promoted by the Compartment. All ESG calculations or comparisons are computed using Bloomberg World ex US Large & Mid Cap Net Return Index, as a good proxy of the Compartment investment universe.

Reference benchmarks are indexes to measure whether the financial product attains the sustainable investment objective.

How is the alignment of the investment strategy with the methodology of the index ensured on a continuous basis?

The reference index the Bloomberg World ex US Large & Mid Cap Net Return Index is a broad market index, capturing developed and emerging markets equities, which is in line with the Compartment investment universe.
The investment universe of the reference index is regularly monitored by the Management Company research team to ensure the consistency with the Compartment's investment universe, in order to ensure relevance of ESG and performance comparisons.

How does the designated index differ from a relevant broad market index?

The reference index didn't differ.

Where can the methodology used for the calculation of the designated index be found?

https://assets.bbhub.io/professional/sites/27/Global-Equity-Index-Methodology.pdf

Where can I find more product specific information online?

More product-specific information can be found on the website:

https://www.tobam.fr/key-documents-policies/

APPENDIX 20. Most Diversified Portfolio SICAV - TOBAM Anti-Benchmark Civil Liberty and Democracy – Emerging Market

Investment Objective, Benchmark of the Compartment

The Compartment's primary investment objective is to provide investors with a highly diversified emerging market equities investment universe in favoring or penalising stocks and countries depending on the good respect of civil liberty and democracy.

Changes in the net asset value can be compared to the Bloomberg Emerging Markets Large & Mid Cap Net Return Index.

The Bloomberg Emerging Markets Large & Mid Cap Net Return Index is a free float-adjusted market capitalization index that is designed to measure equity market performance of emerging markets. The shares that make up the index are selected on the basis of size, liquidity and free-float capital freely available for trading on a regulated market. Index levels include the minimum possible reinvestments linked to dividends paid out on the shares in the index. A dividend is considered to be reinvested after deduction of withholding taxes by applying the maximum rate of the company's country of incorporation applicable to institutional investors.

The Bloomberg Emerging Markets Large & Mid Cap Net Return Index is published on www.bloomberg.com/indices.

Investment strategy of the Compartment

At least 90% of the Compartment's portfolio is exposed to emerging equity markets, including small, mid and large-cap emerging markets stocks.

The stocks to which the Compartment is exposed are selected based on methodology developed by the Management Company, which help to invest in democratic countries and to penalise companies with significant exposure to countries classified as non-democratic.

In order to obtain maximum remuneration of its liquidities, the Compartment can invest in money market instruments for up to 10% of its assets.

In addition, the Compartment may as ancillary borrow cash in the event that a debit balance were to appear.

The Compartment qualifies under article 9 of SFDR. The investment strategy has a sustainable investment objective and promotes environmental and social characteristics. The strategy notably follows the 4 pillars of TOBAM's SRI policy: exclusion, carbon reduction, ESG integration and responsible stewardship via voting and engagement.

The Management Company considers ESG factors and applies a sustainability approach in its investment process for the Compartment as further detailed in the Appendix 20.1 Environmental and/or Social Characteristics - Pre-contractual disclosures in compliance with SFDR Level II.

1) Description of the asset classes used to achieve the investment objective

The asset classes included in the portfolio are the following:

a) Equities

In pursuit of the strategy presented above, the Compartment will invest in the emerging equities market that is depending on the outlook as seen by the Management Company, the Compartment may invest in shares of companies listed in the emerging countries, irrespective of the companies' size and the sector of the economy to which they belong. This exposure will not fall below 90% of the Compartment's assets.

The Compartment may invest up to 20% of its assets in closed-ended Real Estate Investment Trust (REIT).

b) Money market instruments

For treasury purposes, the Compartment may trade, up to 10% of its assets, in money-market instruments (government bonds for OECD states, money-market funds).

c) Shares or units of investment funds:

The Compartment may invest maximum 10% of its assets in shares or units of UCITS which themselves invest maximum 10% of their assets in shares or units of UCITS or investment funds.

These funds may be managed by the Management Company or an affiliated company. The investment strategies of these funds are compatible with that of the Compartment.

The Compartment may invest maximum 10% of its assets in one or more Compartments of the Company.

2) Derivatives used to achieve the investment objective

The Compartment may use financial futures up to a maximum of one time its assets. The Compartment's leveraged exposure may not exceed 110%.

The Compartment will invest in regulated, organized markets and over-the-counter.

The Compartment will use derivatives instrument for hedging and exposure purposes, and to achieve the investment objective (including replication of synthetic exposure to baskets of equities or indices).

The hedging derivatives transaction shall aim to cover equity risk and currency risk of the Compartment.

3) Deposits and cash

The Compartment may hold, up to 10% of its net assets, ancillary liquid assets which consists of bank deposits at sight such as cash held in current accounts with a bank accessible at any time.

The Compartment may make limited use of other deposits in order to achieve its investment objective, for treasury purposes and/or in in case of unfavourable market conditions.

4) Cash borrowing

The Compartment may borrow up to the equivalent of 10% of its net assets in cash on a temporary basis and for technical needs only.

5) Temporary purchases and sales of securities

In addition, the Compartment may engage in security lending for up to 75% of its assets.
The Compartment may also, as ancillary, make temporary deposits and borrow cash in the event that a debit balance was to appear.

The Compartment will enter into securities lending transactions opportunistically in circumstances where the Management Company believes that the objective described below could be achieved.

In the context of investments in specials and general collateral the Compartment will use securities lending in order to increase the return of the portfolio.

The expected proportion of the Compartment’s assets which may be subject to securities lending depends on the demand of market participants for the securities forming part of the Compartment’s portfolio at any time.

This demand depends notably on the interest of such securities, the size of the lendable positions, the presence of specials or securities used as general collateral, the potential duration of the loan (the securities being subject to portfolio adjustments or rebalancing, and thus sell trades), and the type of collateral accepted by the Compartment.

The Compartment’s use of, or investment in, securities lending transactions will be as follows:

Type of transaction	Expected proportion	Maximum proportion
Securities lending	0% to 30%	75%

Reference Currency

The reference currency of the Compartment is USD.

Profile of the Typical Investor

The Compartment is a high-risk vehicle. The Compartment is intended for investors seeking to gain exposure to emerging markets. To determine their level of investment, investors should consider their personal assets, the regulations applicable to them, their current financial needs over a recommended minimum investment horizon of more than five years, and also their willingness to take risks or their preference for a more prudent investment. The recommended minimum investment horizon is more than 5 years.

Form of Shares and Classes

The Share Classes of the Compartment will be issued in registered form

Share Classes	**A** **Isin Code:** **LU2598066400**	**A1** **Isin Code:** **LU2598066582**	**A2** **Isin Code:** **LU2598066665**	**B** **Isin Code:** **LU2598066749**	**B1** **Isin Code:** **LU2598066822**	**B2** **Isin Code:** **LU2598067044**	**R** **Isin Code:** **LU2598067127**	**R1** **Isin Code:** **LU2598067390**	**R2** **Isin Code:** **LU2598067473**	**Z** **Isin Code:** **LU2598067556**	**Z1** **Isin Code:** **LU2598067630**
Currency	EUR	EUR	USD	EUR	EUR	USD	EUR	EUR	USD	EUR	USD
Type of Shares	Accumulation										
Target Investors	Institutional investors	Institutional investors	Institutional investors	All investors	All investors	All investors	All investors	All investors	All investors	Institutional investors	Institutional investors
Minimum initial Subscription	10 Shares	10 Shares	10 Shares	1,500 Shares	10 Shares	10 Shares	1 Share	1 Share	1 Share	1 Share	1 Share
Minimum holding amount	1 Share	1 Share	1 Share	1 Share	1 Share	1 Share	1 Share	1 Share	1 Share	1 Share	1 Share
Valuation Day	Every Business Day, with the exception of days on which the American markets are closed (based on the official NYSE Euronext calendar)										
Management Company Fee	0.50%	0.50%	0.50%	1.50%	1.50%	1.50%	0.75%	0.75%	0.75%	0.00%	0.00%
Administration Fee & Depositary Fee	0.25%	0.25%	0.25%	0.25%	0.25%	0.25%	0.25%	0.25%	0.25%	0.25%	0.25%
Hedge	No	Hedge	No	No	Hedge	No	No	Hedge	No	No	No
Subscription Fee paid to the Management Company	none	none	none	Up to 3%	Up to 3%	Up to 3%	Up to 5%	Up to 5%	Up to 5%	Up to 5%	Up to 5%
Redemption Fee paid to the Management Company	Up to 1%	Up to 1%	Up to 1%	Up to 1%	Up to 1%	Up to 1%	Up to 1%	Up to 1%	Up to 5%	Up to 5%	Up to 5%
Cut-off	12.00 p.m. CET the Business Day before the relevant Valuation Day										
Subscription/ Redemption Settlement Day	2 days, according to the official NYSE Euronext calendar, following the Valuation Day										

R units: these units are intended for "all investors” seeking a low initial investment and a “clean fee” structure. The R “clean fee” share class will not carry any fees payable to distributors.

Investors subscribing for shares denomminated in EUR/GBP are subject to EUR/ GBP currency risk given the conversion of the net asset value.

Launch date

Initial Issue Date : The initial issue date will be determined by the Board of Directors.

The following Share Classes of this Compartment will be created with the following initial subscription prices:

Class:	Initial subscription prices:
Class A	EUR 10 000
Class A1	EUR 10 000
Class A2	USD 10 000
Class B	EUR 100
Class B1	EUR 100
Class B2	USD 100
Class R	EUR 100
Class R1	EUR 100
Class R2	USD 100
Class Z	EUR 10 000
Class Z1	USD 10 000

Total Expense Ratio

The latest calculated total expense ratio rate can be found in the Company's latest financial report.

Risk Management

The method used to calculate overall exposure is commitment method.

Compartments Specific Risk Factors

The funds will be invested primarily in financial instruments selected by the Management Company. These instruments will be subject to market movements and fluctuations. The Management Company invests according to a systematic, fundamentals-based model: there is a risk that the equities selected may not be the best performing stocks.

1) Equity risk

If the equities or indices to which the portfolio is exposed fall, the net asset value of the Compartment may also fall.

Since the volume of small and mid-cap stocks listed on the stock exchange is relatively low, market downturns are more pronounced and more rapid than for large caps. The net asset value of the Compartment may therefore decline more quickly and more significantly.

Investors' attention is drawn to the fact that the small-cap markets and emerging markets are intended to accommodate businesses that, due to their specific characteristics, may pose a risk for investors.

2) Risk associated with the Management Company's investment process

Investors should note that portfolio construction and the selection and weighting of assets are based on a process developed by the Management Company. The Compartment's investment process is based on a systematic model designed to identify signals based on past statistical results.

There is a risk that the model may not be efficient, as there is no guarantee that past market situations will be repeated in the future. Since the aim of the processes developed by the Management Company is to achieve good diversification of the Compartment's portfolio, using these processes may lead the Management Company to not select the top-performing assets.

3) Risk associated with emerging markets equities

The equities of emerging countries may be less liquid than equities of developed countries. Consequently, holding these securities may increase the level of portfolio risk. For example, market declines may be greater and faster than in developed countries, so the Compartment's net asset value may decline more sharply and quickly.

4) Risk associated with the use of financial futures

The Compartment may use some financial futures. The Compartment may thus be exposed for up to 110% of its assets to the market, assets, index and economic and/or financial instrument or parameter, which can imply a risk of reduction in the net asset value of the Compartment that might be more significant and quicker that the one observed on the markets where the Compartment is invested.

5) Currency risk

Currency risk is the risk of depreciation in the currencies in which the Compartment invests relative to the reference currency. This currency risk will be managed according to market opportunities and may thus account for a significant proportion of the risk. In the event of depreciation in foreign currencies, investors are thus exposed to a decline in the value of their units.

6) Counterparty risk

The Compartment may incur a loss in the event of default by a counterparty with which certain transactions were conducted, leading to a decline in the Compartment's net asset value.

7) Interest rate risk

This refers to the risk of a fall in the value of fixed income instruments resulting from changes in interest rates. If interest rates rise, the Compartment's net asset value may fall. The Compartment has limited exposure to fixed income products.

8) Credit risk

This is the risk of a decline in bonds or debt securities issued by a private or public issuer or default by the latter. The value of the debt securities in which the Compartment is invested may decline, leading to a fall in net asset value.

Template pre-contractual disclosure for the financial products referred to in Article 9, paragraphs 1 to 4a, of Regulation (EU) 2019/2088 and Article 5, first paragraph, of Regulation (EU) 2020/852

Sustainable investment means an investment in an economic activity that contributes to an environmental or social objective, provided that the investment does not significantly harm any environmental or social objective and that the investee companies follow good governance practices.

The **EU Taxonomy** is a classification system laid down in Regulation (EU) 2020/852, establishing a list of **environmentally sustainable economic activities**. That Regulation does not include a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

Product name: Most Diversified Portfolio SICAV – TOBAM Anti-Benchmark Civil Liberty and Democracy – Emerging Fund

Legal entity identifier: the LEI code of this Compartment was not available at the time of the issuance of this prospectus.

Sustainable investment objective

Does this financial product have a sustainable investment objective?

☒ **Yes**	☐ **No**
☐ It will make a minimum of **sustainable investments with an environmental objective:** ___% ☐ in economic activities that qualify as environmentally sustainable under the EU Taxonomy ☐ in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy	☐ It **promotes Environmental/Social (E/S) characteristics** and while it does not have as its objective a sustainable investment, it will have a minimum proportion of ___% of sustainable investments ☐ with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy ☐ with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy ☐ with a social objective
☒ It will make a minimum of **sustainable investments with a social objective:** 90%	☐ It promotes E/S characteristics, but **will not make any sustainable investments**

Sustainability indicators measure how the sustainable objectives of this financial product are attained.

What is the sustainable investment objective of this financial product?

Sustainable investment means an investment in an economic activity that contributes to an environmental or social objective, provided that the investment does not significantly harm any environmental or social objective and that the investee companies follow good governance practices.

The Compartment's primary investment objective is to provide investors with a highly diversified equity portfolio on an emerging market equities investment universe in favoring or penalising stocks and countries depending on the good respect of civil liberty and democracy.

This Fund aims to promote low carbon approaches, commitment to climate action and companies with good governance. The Compartment aims to promote the following sustainable objectives :

- Good respect of civil liberty and democracy by excluding countries that achieve a insufficient level of democracy and civil liberty from the investment universe.
- Commitment to climate action by applying a systematic carbon footprint reduction of at least 20% versus the reference investment universe's carbon footprint,
- Promotion of companies with good governance using raw data and their ESG footprint.

The Compartment has designated the Bloomberg Emerging Markets Large & Mid Cap Net Return Index to compare its ESG characteristics, such as carbon emissions or ESG footprint.

What sustainability indicators are used to measure the attainment of the sustainable investment objective of this financial product?

In order to achieve the above characteristics promoted by the Compartment, the Management Company has put in place an ambitious ESG policy made of key pillars and sustainability indicators. The Compartment uses the following sustainability indicators to attain each of the social and environmental characteristics promoted by the Compartment:

- **Country Rating:** The Management Company has built a country rating based on public data in order to assess the level of civil and democratic rights. This country rating is used to exclude countries from the investment universe that fail to achieve a sufficient level of democracy and civil liberty assessment.

- **A Civil and Democratic rights ("CD") score:** The Management Company has built a proprietary scoring, the Civil and democratic rights score, which aims at highlighting the exposure of companies in the eligible universe, to countries identified as below the acceptable threshold in terms of Country Rating and as such excluded from the universe. The Management Company has constrained the optimization to ensure that the Compartment has a higher CD score than the average CD score of the reference index the Bloomberg Emerging Markets Large & Mid Cap Net Return Index.

- **Carbon Emissions & Intensity:** The Management Company applies a systematic carbon footprint reduction of at least 20% versus the reference index Bloomberg Emerging Markets Large & Mid Cap Net Return Index's carbon footprint. The calculation of the carbon footprint is based on the greenhouse gas emissions scope 1 (i.e. direct emissions from owned or controlled sources) and scope 2 (i.e. indirect emissions from the generation of purchased energy) and scope 3 when available, according to GHG Protocol Corporate Standard. Data on emissions used is obtained from a number of sources including company reports, CDP questionnaire (Carbon Disclosure Project) or an estimation model. In addition, the Management Company excludes from its investment universe, companies that have sector normalized carbon emission intensity (carbon emissions normalized by the Enterprise Value Including Cash) above the intensity of the benchmark (the Bloomberg Emerging Markets Large & Mid Cap Net Return Index).

- **ESG Footprint:** The Management Company has put in place a strict E, S and G integration process for all listed companies in its investment universe; using officially published data from Bloomberg.
  - ✓ E: For example: existence of climate change / biodiversity / energy efficiency policies; green building, water and waste usage
  - ✓ S: For example: Ethics/Equal opportunity/training/ consumer data protection/whistleblowing policies, CSR committee in place, supply chain management

- ✓ G: For example: Number of board meetings per year, ratio of independent directors, chairman tenure, ratio of nonexecutive directors in boards

From that raw data, the Management Company has built a proprietary methodology to compute the "E,S,G footprints" of each individual holding in the portfolio and as such determine the overall E,S,G Footprints of the portfolio.
The Management Company has constrained its investment decision-making process to ensure that the E,S,G footprints of the Compartment, are at minima at the same level as the E,S,G footprints of the reference index the Bloomberg Emerging Markets Large & Mid Cap Net Return Index.

Also using the **G score**, and in order to assess good governance practices, the Management Company will exclude from its investment universe, companies that fail to reach a G score (as defined by the Management Company ESG Footprint proprietary methodology) in the top 80% of the reference index the Bloomberg Emerging Markets Large & Mid Cap Net Return Index.

Principal adverse impacts are the most significant negative impacts of investment decisions on sustainability factors relating to environmental, social and employee matters, respect for human rights, anti‐corruption and anti‐bribery matters.

How do sustainable investments not cause significant harm to any environmental or social sustainable investment objective?

Companies the Compartment invests in, contribute to achieve the Compartment’s sustainable objective: respect civil rights and democracy, carbon reduction, ESG footprint commitment while not significantly harming any environmental or social sustainable investment objectives. Before any investment is made by the Compartment (not only sustainable investments but all investments), the investment has to pass a negative screening, further including the consideration of the principal adverse impacts described in the below section. Hence no companies involved in controversial sectors or activities not aligned with TOBAM’s policy, can be eligible for investments for the Compartment.

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

The indicators for adverse impacts on sustainability factors are monitored, and a quarterly dedicated committee is charge of assessing the portfolios holdings in regard to each of the PAI. The committee is notably in charge of identifying if any company in the portfolio is likely to represent a risk or to significantly harm any of the sustainable objectives of the Compartment.

The below Principal Adverse Impacts (”PAI”) indicators as defined in SFDR Level II have been integrated into the investment process of the Compartment via an exclusionary investment approach as per the features described earlier:

- PAI #1: GHG emissions (scope 1, 2 and 3 when available)
- PAI #2: Carbon Footprint
- PAI #3: GHG Intensity of investee companies
- PAI #4: Exposure to companies active in the fossil fuel sector
- PAI #7: Activities negatively affecting biodiversity
- PAI #10: Violations of UN Global Compact principles and OECD guidelines
- PAI #14: Exposure to Controversial Weapons

The remaining indicators for adverse impacts on sustainability factors:

PAI #5: share of non-renewable energy consumption and production
PAI #6: energy consumption intensity per high impact climate sector
PAI #8: emissions to water
PAI #9: hazardous waste ratio
PAI #11: Lack of processes and compliance mechanisms to monitor compliance with UN GC and OECD principles
PAI #12: Gender Pay Gap
PAI #13: Board Gender Diversity

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

The Management Company will not invest in any company that has been classified as failing to comply with key international norms (ISS Ethix Norm-based screening) such as for example the UN Global Compact Principles, OECD Guidelines for Multinational Enterprises, Guiding Principles on Business and Human rights.

Does this financial product consider principal adverse impacts on sustainability factors?

✖ Yes, the Management Company has committed to monitor the 14 mandatory and 2 optional environmental and social indicators to show the impact of the Compartment's investments against these PAI indicators.

Furthermore, this Compartment considers principal adverse impacts on sustainability factors and only the following PAI have been taken into account into the investment process:

- PAI #1: GHG (Greenhouse Gas) emissions - Scope 1 & 2 & 3 when available
- PAI #2: Carbon footprint
- PAI #3: GHG intensity of investee companies

The Compartment by targeting an overall carbon reduction of at least 20% compared to the reference index Bloomberg World Large & Mid Cap Net Return Index's carbon footprint, is looking to invest in a combination of stocks that achieve this overall carbon reduction, by considering carbon emissions scope 1 and 2, and 3 when available. In addition, the Management Company excludes from its investment universe, companies that have carbon emission intensity (carbon emissions normalized by the Enterprise Value Including Cash) above the intensity of the benchmark (the Bloomberg Emerging Markets Large & Mid Cap Net Return Index).

- PAI #7: Activities negatively affecting biodiversity

The Management Company proprietary ESG footprint methodology considers raw data published by companies in order to compute an ESG footprint, by notably looking for example at the existence or not of key policies relevant to the biodiversity (for example: biodiversity policy, water usage policy, waste reduction policy, climate change policy…).

In addition to the previous PAI, the following social sustainability indicators have been considered:

- PAI #10: Violations of UN Global Compact principles and (OECD) Guidelines
- PAI #13: Board Gender Diversity
- PAI #14: Exposure to controversial weapons

PAI reports are available on the Compartment annual report.

☐ No

What investment strategy does this financial product follow?

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

The Compartment's primary investment objective is to provide investors with a highly diversified equity portfolio on emerging market equities investment universe in favoring or penalising stocks and countries depending on the good respect of civil liberty and democracy. These constraints are taken into account when producing the new allocation of a highly diversified portfolio.

The Compartment also aims to promote low carbon approaches, commitment to climate action and companies with good governance.

- ***What are the binding elements of the investment strategy used to select the investments to attain the sustainable investment objective?***

  The Compartment applies the following binding elements to select investments and attain the environmental and social characteristics described above:

- **Exclusion of countries with a bad rating regarding democracy implementation:** The Management Company excludes countries that fail to achieve a sufficient level of democracy and civil liberty assessment.

- **A Civil and Democratic rights ("CD") score:** The Management Company has built a proprietary scoring, the Civil and democratic rights score, which aims at highlighting the exposure of companies in the eligible universe, to countries identified as below the acceptable threshold in terms of country rating, and as such excluded from the universe. The Management Company has constrained the optimization to ensure that the Compartment has a higher CD score than the average CD score of the reference index the Bloomberg Emerging Markets Large & Mid Cap Net Return Index.

- **Exclusion policy:** the Management Company applies a general exclusion policy, restricting the investment universe and excluding companies based either on their involvement in certain activities (sector or product based) or based on controversies or breaches to key international norms. The key exclusions used by the Management Company are reflected in the below table:

Sector /Product	Criteria
Producer and distributors of tobacco	Limit (5% of the revenues)
Coal and coal-based producers and distributors	Limit (10% of the revenues)
Development, production, maintenance or distribution of controversial and prohibited weapons	Exclusion
Breach or violation of International Treaties, Conventions & Standards such as OECD Guidelines for Multinational Enterprises, ILO Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy, UN Global Compact, Guiding Principles on Business and Human Rights	Exclusion

In addition, the Compartment applies a fossil-fuel free approach.
Companies with significant involvement in the production, sales or extraction of fossil fuels (including coal, coal power generation, oil and gas) are excluded from the investment universe of the Compartment.

Further details on the exclusion policy can be found in the following link: https://www.tobam.fr/our-beliefs/exclusion-policy/

- **ESG Integration:** The Management Company has put in place a strict E, S and G integration process for all listed companies in its investment universe; using officially published data from Bloomberg.

  ✓ E: For example: existence of climate change / biodiversity / energy efficiency policies; green building, water and waste usage

  ✓ S: For example: Ethics/Equal opportunity/training/ consumer data protection/whistleblowing policies, CSR committee in place, supply chain management

  ✓ G: For example: Number of board meetings per year, ratio of independent directors, chairman tenure, ratio of nonexecutive directors in boards

From that raw data, the Management Company has built a proprietary methodology to compute the "E,S, and G footprints" of each individual holding in the portfolio and as such determine the overall E,S, and G Footprints of the portfolio.

The Management Company has constrained its investment decision process, to ensure that the E, S and G footprints of the Compartment are at minima, at the same level as the E, S and G footprints of the reference index Bloomberg Emerging Markets Large & Mid Cap Net Return Index.

Also using the G score, and in order to assess good governance practices, the Management Company will exclude from its investment universe, companies that fail to reach a G score (as defined by the Management Company ESG Footprint proprietary methodology) in the top 80% of the reference index the Bloomberg Emerging Markets Large & Mid Cap Net Return Index.

- **Carbon Emissions Reduction :**
  The Management Company applies a systematic carbon footprint reduction of at least 20% versus the reference the Bloomberg Emerging Markets Large & Mid Cap Net Return Index's carbon footprint. The calculation of the carbon footprint is based on the greenhouse gas emissions scope 1 , scope 2 and scope 3 when available. Data on emissions used is obtained from a number of sources including company reports, CDP questionnaire (Carbon Disclosure Project) or an estimation model.

- **Responsible Ownership:** The Management Company has built an ambitious engagement policy to support its commitment to sustainability and address via engagement and dialogues, issues relative to ESG and sustainability.

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

Good governance practices include sound management structures, employee relations, remuneration of staff ad tax compliance.

Using the **G score**, and in order to assess good governance practices, the Management Company will exclude from its investment universe, companies that fail to reach a G score (as defined by the Management Company ESG Footprint proprietary methodology) in the top 80% of the reference index the Bloomberg Emerging Markets Large & Mid Cap Net Return Index.

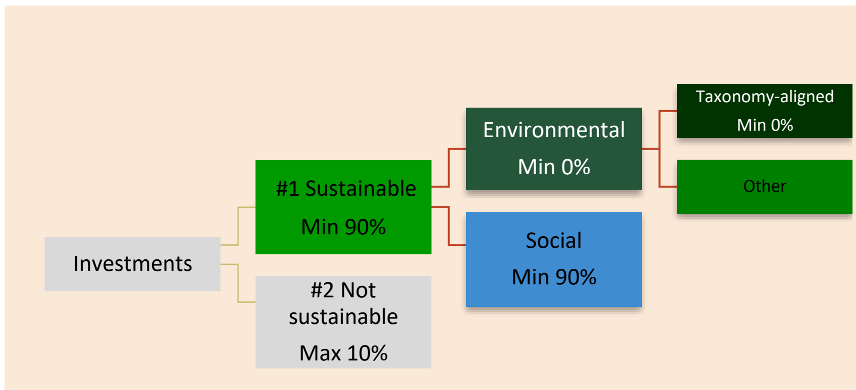
What is the asset allocation and the minimum share of sustainable investments?

The model used by TOBAM for the determination of sustainable investments combines the pass or fail approach and the weighted-revenue approach with threshold for the carbon emissions and governance.

Asset allocation describes the share of investments in specific assets.

#1: 90% of the assets of this Compartment are aligned with S objectives:

- sustainable: 90% of those assets are sustainable investments with S objectives.
- other: 10% of those assets are investments aligned with E and S characteristics that do not qualify as sustainable investments.



#1 Sustainable covers sustainable investments with environmental or social objectives.
#2 Not sustainable includes investments which do not qualify as sustainable investments.

Taxonomy-aligned activities are expressed as a share of:
- **turnover** reflecting the share of revenue from green activities of investee companies
- **capital expenditure** (CapEx) showing the green investments made by investee companies, e.g. for a transition to a green economy.
- **operational expenditure** (OpEx) reflecting green operational activities of investee companies.

How does the use of derivatives attain the sustainable investment objective?

The Compartment may use financial derivative instruments for investment, efficient portfolio management and/or hedging purposes, and this will not impact in any way the exposure to sustainable assets, or the ESG characteristics of the Compartment.

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

This Compartment commits to a 0% alignment with the EU Taxonomy.

Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy[1]?

☐ Yes :

☐ In fossil gas ☐ In nuclear energy

☒ No

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

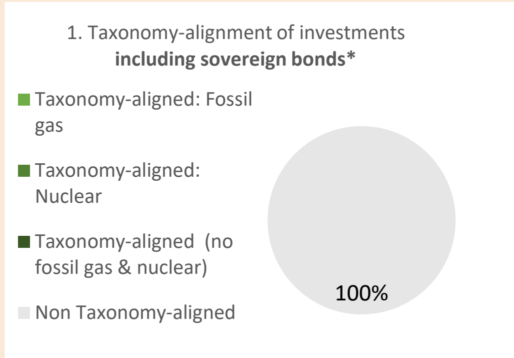
To comply with the EU Taxonomy, the criteria for **fossil gas** include limitations on emissions and switching to fully renewable power or low-carbon fuels by the end of 2035. For **nuclear energy**, the criteria include comprehensive safety and waste management rules.

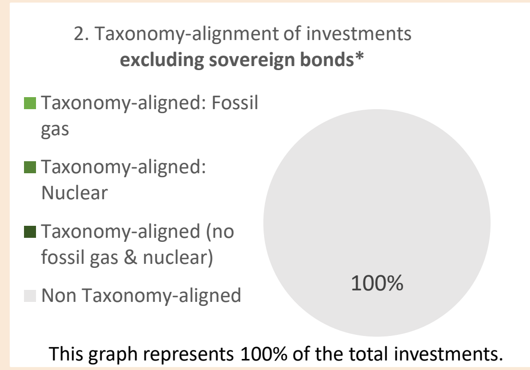
Enabling activities directly enable other activities to make a substantial contribution to an environmental objective.

Transitional activities are activities for which low-carbon alternatives are not yet available ad among others have greenhouse gas emission levels corresponding to the best performance.

are environmentally sustainable investments that **do not take into account the criteria** for environmentally sustainable economic activities under the EU Taxonomy.

The two graphs below show in green the minimum percentage of investments that are aligned with the EU Taxonomy. As there is no appropriate methodology to determine the Taxonomy-alignment of sovereign bonds*, the first graph shows the Taxonomy alignment in relation to all the investments of the financial product including sovereign bonds, while the second graph shows the Taxonomy alignment only in relation to the investments of the financial product other than sovereign bonds.





*** For the purpose of these graphs, 'sovereign bonds' consist of all sovereign exposures**

What is the minimum share of investments in transitional and enabling activities?

As the Compartment does not have a minimum Taxonomy alignement, there is no minimum share in transitional and enabling activities.

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

The minimum share of sustainable investments with an environmental objective that is not aligned with the EU Taxonomy is 0%.

What is the minimum share of sustainable investments with a social objective?

The Compartment allocates 90% of its net assets to sustainable investments. Out of the latter, the minimum share of sustainable investments with a social objective is 90%.

What investments are included under "#2 Not sustainable", what is their purpose and are there any minimum environmental or social safeguards?

Investments falling under category "#2 Not sustainable", are investments such as derivatives for hedging purposes and cash or cash equivalent for liquidity purposes.
No minimum environmental or social safeguards apply to the above elements.

Is a specific index designated as a reference benchmark to meet the sustainable investment objective?

No, but the Compartment has designated a reference benchmark (Bloomberg Emerging Markets Large & Mid Cap Net Return Index). This index is used as a reference to compare the Compartment ESG characteristics, such as carbon emissions, ESG footprint or Civil and Democratic Rights score, with the reference benchmark.

How does the reference benchmark take into account sustainability factors in a way that is continuously aligned with the sustainable investment objective?

The reference index used by the Compartment is not an ESG benchmark and is not consistent with the ESG characteristics promoted by the Compartment. All ESG calculations or comparisons are computed using Bloomberg Emerging Markets Large & Mid Cap Net Return Index, as a good proxy of the Compartment investment universe.

How is the alignment of the investment strategy with the methodology of the index ensured on a continuous basis?

The reference index the Bloomberg Emerging Markets Large & Mid Cap Net Return Index is a broad market index, capturing developed and emerging markets equities, which is in line with the Compartment investment universe.

The investment universe of the reference index is regularly monitored by the Management Company research team to ensure the consistency with the Compartment's investment universe, in order to ensure relevance of ESG and performance comparisons.

Reference benchmarks are indexes to measure whether the financial product attains the sustainable investment objective.

- ***How does the designated index differ from a relevant broad market index?***

  The reference index didn't differ.

- ***Where can the methodology used for the calculation of the designated index be found?***

  https://assets.bbhub.io/professional/sites/27/Global-Equity-Index-Methodology.pdf

Where can I find more product specific information online?

More product-specific information can be found on the website:

https://www.tobam.fr/key-documents-policies/