

## Responsible Investing and Engagement policy



FundPartner Solutions (Europe) SA (“FPSESA”), responsible policy has been written in accordance with:

- Directive 2007/36/EC on the exercise of certain rights of shareholders in listed companies, as amended by Directive (EU) 2017/828 (“SRD2”) encouraging medium- to long-term shareholder engagement and to enhance communication between companies and investors, was implemented in Luxembourg under the law dated 1 August 2019, amending the law of 24 May 2011 on certain rights of shareholders at general meetings of listed companies (the “Shareholders’ Rights Law”);
- Regulation (EU) 2019/2088 on sustainability-related disclosures in the financial services sector (“SFDR”), which is part of a broader legislative package under the European Commission’s Sustainable Action Plan, came into effect on 10 March 2021.

FundPartner Solutions (Europe) SA (“FPSESA”), is a company belonging to the Pictet Group and is licensed by the *Commission de Surveillance du Secteur Financier* as a management company under the regime set out in Chapter 15 of the law of 17 December 2010 on undertakings for collective investment and as an alternative investment fund manager as per the provisions of the law of 12 July 2013 on alternative investment fund managers.

The Pictet Group believes in responsible capitalism and takes an enlarged view of the economy and its interactions with civil society and the natural environment.

FPSESA has delegated the asset management of the funds to carefully selected third-party asset managers (hereafter the “Delegates”), whose names are disclosed in the prospectus of each fund.

This document explains how FPSESA monitors the Delegates. In the investment process, FPSESA expects Delegates integrate material Environmental, Social and Governance criteria enabling long-term investment decisions for clients.

Pursuant to the Shareholders’ Rights Law, asset managers must develop and publicly disclose an engagement policy describing how they integrate shareholder engagement in their investment strategy and regularly report on the implementation of such activities. Nevertheless, asset managers may choose not to comply with the requirement of disclosing an engagement policy. In this case they must

provide and publicly disclose a clear and reasoned explanation why they have chosen not to do so.

This statement applies when a fund invests in companies that have their registered office in a Member State and which shares are admitted to trading on a regulated market situated or operating within a Member State.

FPSESA applies a high standard of diligence in the selection and ongoing monitoring of Delegates.

The investment decision-making, the engagement, if any, with European companies whose shares are traded in a regulated European stock exchange and the policy on voting are thus undertaken by such Delegates.

You may find further information on how voting rights are exercised in our “Voting Right Policy” available on our website.

## SFDR

This Regulation lays down harmonised rules for financial market participants and financial advisers on transparency with regard to the integration of sustainability risks and the consideration of adverse sustainability impacts in their processes and the provision of sustainability-related information with respect to financial product.

To meet the SFDR disclosure requirements, FPSESA identifies and analyses sustainability risk (i.e. an environmental, social, or governance event or condition that, if it occurs, could potentially or actually cause a material negative impact on the value of an investment) as part of its risk management process.

For Delegates selection, FPSESA systematically addresses ESG issues with its investment partners and encourages improvements of current practices, if necessary. FPSESA has developed a dedicated ESG questionnaire that covers its investment partners’ engagement to ESG, the level of ESG integration in their processes or operations as well as reporting and transparency issues.

## Final provisions

Last review

March 2021