

Website Product Disclosures further to art. 10(1) of the Sustainable Finance Disclosure Regulation for art. 8 sub-funds

Product name: FCH Loomis Sayles US Growth Equity **Legal entity identifier:** 21380013OTF3QMZ1I772

(the “Financial Product”)

No sustainable investment objective

This Financial Product promotes environmental or social characteristics but does not have as its objective sustainable investment.

It is not currently expected that the Financial Product will make any ‘sustainable investments’ within the meaning of Article 2(17) of Regulation (EU) 2019/2088 of the European Parliament and of the Council of 27 November 2019 or Regulation (EU) 2020/852 of the European Parliament and of the Council of 18 June 2020.

Environmental or social characteristics of the financial product

The Financial Product seeks to promote the environmental characteristic of climate change impact reduction (the “**E/S Characteristic**”) through investing a proportion of its assets in the equity securities (or financial instruments which give the same economic exposure to the issuer as equity interests) of issuers whose economic activities promote the reduction of greenhouse gas emissions and the production of green energy.

The Investment Manager will assess the extent to which an investment promotes the E/S Characteristic by reference to certain specified sustainability indicators, which are described in more detail under “Methodologies” below.

Investment strategy

The Investment Manager seeks to promote the E/S Characteristic by identifying investments which meet the investment objective, strategy and restrictions set out in the Supplement to the Prospectus relating to the Financial Product.

The Investment Manager takes a long-term, private-equity approach to investing and utilises a proprietary fundamental, bottom-up research framework structured around three key criteria: Quality, Growth and Valuation to assess potential investments.

Step 1: Fundamental Bottom-Up Analysis

The Investment Manager follows seven-steps in its research framework, which includes financial analysis, qualitative non-financial; and qualitative and quantitative environmental, social and governance (“**ESG**”), to develop forward-looking valuation models. The application of the framework reduces the Financial Product’s investment universe by more than 75%, including 20% based on non-financial and ESG considerations. The Investment Manager’s seven-step bottom-up fundamental research yields a select list of investable companies from which the portfolio is constructed.

The seven steps are as follows:

Quality Analysis

- (i) Durable Competitive Advantages
- (ii) Competitive Analysis
- (iii) Financial Analysis
- (iv) Management

Growth Analysis

- (v) Growth Drivers

Valuation Analysis

- (vi) Intrinsic Value Ranges
- (vii) Expectations Analysis

Opportunities and risks associated with ESG matters are linked to an issuer’s business activities, which include management’s long-term strategic focus, the business model structure, and the productive allocation of capital.

Therefore, ESG considerations are integrated into each step of the Investment Manager's seven-step research framework and are integral to the analysis of business models, competitive advantages, operating efficiency, corporate management integrity, profitable growth and valuation. The majority of material ESG considerations, including ESG risks and opportunities, are embedded in the analysis of Quality criteria.

During the Quality Analysis steps, the Investment Manager assesses, monitors and measures, amongst other things, ESG considerations integrated into a company's decision-making, such as, but not limited to:

- **Environmental criteria:** Investments in R&D to innovate products and solutions that drive better environmental or social outcomes, such as reduction of carbon emissions; developing sustainable manufacturing techniques, inputs and sourcing that drive better environmental or social outcomes, such as the reduction of carbon emissions;
- **Social criteria:** Advancing sustainable supply chains by stewarding local resources, production and communities; fostering a corporate culture and values, including diversity, to attract and retain talent; and
- **Governance criteria:** Linking management compensation to long-term drivers of shareholder value creation, including ESG outcomes; establishing policies for and complying with high business ethics standards; aligning its business to enable it to meet or exceed the 2015 Paris Agreement.

Any company failing to meet the Quality criteria will be eliminated from the Financial Product's investment universe, regardless of the Growth or Valuation profile of the company.

The assessment of good governance is a component of the Quality analysis conducted in the Investment Manager's seven-step research framework. Because meeting ESG challenges is a key component of company management's long-term strategic decision-making, the Manager seeks to invest with management teams with a long-term perspective. Company management teams focused on short-term objectives cannot realise long-term results. The Investment Manager deems an issuer that demonstrates the following governance practices to have good governance:

- incentive structures with a 3-year or longer measurement period based on metrics such as free cash flow growth and ESG goals;
- policies for and complying with high business ethics standards;
- financial and sustainability reporting transparency; and
- fostering of corporate cultures that help attract and retain talent.

In addition, as a minimum safeguard, each issuer is reviewed with respect to the UN Global Compact Principles ("UN GCP") before investment and any stock held in the Financial Product is reviewed on a quarterly basis. Should the stock be flagged as breaching the UN GCP, the Investment Manager will either engage with the issuer in relation to the breach or exclude the issuer from the investment universe of the Financial Product.

Strong governance encompasses a long-term perspective as well as vision and integrity, reporting and transparency, incentive structures aligned with long-term shareholder value creation, ownership structure, and business ethics.

Step 2: Screening

The Investment Manager applies certain set exclusion criteria to the investment universe of the Financial Product, which means that the Financial Product is not permitted to make direct investments in:

- issuers deriving any portion of their total revenue from the production or distribution of thermal coal, cluster munitions, biological weapons, or chemical weapons; and
- issuers deriving any portion of their total revenue from the production of, or more than 20% of their total revenue from, the distribution of tobacco products and civilian firearms.

In addition, as a minimum safeguard, each issuer is reviewed with respect to the UN GCP, as described under "Good governance assessment" above.

Step 3: Portfolio Construction

The Investment Manager's research process yields a select list of investable companies. For portfolio construction, valuation drives the timing of investment decisions. The Investment Manager's conviction in the opportunity, measured by the reward-to-risk ratio, drives the position weights taken in the portfolio. The Investment Manager also constructs the portfolio so as to ensure that the Financial Product promotes the E/S Characteristic by selecting a proportion of investments which meet the sustainability indicators described under the heading "Methodologies".

Step 4: Ongoing Monitoring

The Investment Manager monitors the Financial Product's holdings on at least a quarterly basis to ensure the investment thesis for all portfolio holdings remains intact and for ongoing compliance of the Financial Product's investments with the investment philosophy and process, and the sustainability indicators.

To the extent that there have been changes to any of the Financial Product's holdings such that the investment thesis, binding elements, or sustainability indicators are no longer met by a Financial Product's holdings, the Investment Manager will review the portfolio construction and take any measures it deems necessary.

In addition, the Investment Manager conducts non-financial analysis (including ESG analysis) on at least 90% of the Financial Product's net assets on an ongoing basis. Further detail is set out under the heading "Monitoring of Environmental or Social Characteristics", below.

Proportion of investments

The Financial Product will invest a minimum of 50% of its NAV in investments which meet the sustainability indicators (as described under "Methodologies" below).

The remaining 50% of Financial Product's NAV will be in a combination of one or more of the following: (i) securities which do not meet the sustainability indicators; (ii) derivatives entered into for the purposes of hedging and liquidity management; and (iii) other liquidity management tools, such as money market instruments, cash and cash equivalents.

In relation to the equity securities of companies which do not meet the sustainability indicators, such investments will still be subject to the investment process which the Investment Manager follows for the Financial Product, meaning that the principal adverse impacts ("PAI") of such investments will be considered by the Investment Manager and that such investments will have to meet the other minimum standards outlined in the "Investment Strategy" section, above.

The Financial Product does not use derivatives or other synthetic or indirect exposure to underlying issuers in order to promote the E/S Characteristic.

Monitoring of environmental or social characteristics

The Investment Manager has controls in place to make sure that the Financial Product retains at least 50% of its NAV in investments which promote one or more of the E/S Characteristics on an ongoing basis. Currently those controls are a mixture of automated and manual checks carried out by members of the Financial Product's investment team and the Investment Manager's compliance team.

The Investment Manager has integrated ESG considerations into various processes, systems and tools to assist with the interrogation and monitoring of ESG characteristics. The Investment Manager's compliance team monitors the Financial Product's compliance with its ESG screening criteria on a daily basis via the Order Management System ("OMS"). Certain specified ESG data, including the ESG screening criteria that the Investment Manager applies to the Financial Product's investment universe, is integrated into the OMS so that alerts are provided on a daily basis to the Financial Product's investment team and the trading desk, as applicable.

The Investment Manager's compliance team also performs a quarterly review of requirements/guidelines with the Financial Product's investment team.

The Investment Manager also benefits from a robust ESG technology infrastructure designed to provide the tools and resources necessary to address and tailor requirements specific to its strategies. The Investment Manager's firmwide, custom-built ESG Center provides daily access to the Financial Product's ESG characteristics and profile. Additionally, the Investment Manager's dedicated technology support team prepares custom reporting to track the Financial Product's investments against the sustainability indicators (and therefore the promotion of the E/S Characteristic) on a quarterly basis, as well as historical trend of metrics.

A summary of the Investment Manager's monitoring processes, including monitoring the Financial Product's adherence to the minimum threshold of 50% of the NAV for promoting the E/S Characteristic is given below:

1. Compliance team carries out daily monitoring of the ESG screening criteria via the OMS.
2. Compliance team performs a quarterly review of requirements/guidelines with the investment team.
3. Quarterly investment team monitoring of the minimum threshold of 50% of the NAV for promoting the E/S Characteristic.
4. Quarterly monitoring by the Financial Product's investment team of climate change mitigation trajectory below 2°C via the ISS platform.
5. Quarterly monitoring by the Financial Product's investment team of carbon footprint and GHG intensity via the ESG Center and custom reporting.
6. Development of custom ESG reporting tailored to the Financial Product's investment team's investment process and PAIs.

The Investment Manager also continuously assesses improvement in carbon emissions reduction in scope 1 and 2 measurements, and a company's transparency of reporting on and auditing of GHG reduction targets.

As part of its process the Investment Manager also monitors the following metrics on a company-by-company basis and aggregates the data at the Financial Product level:

- the number and percentage of portfolio companies which have made a commitment to SBTi GHG emissions targets. (SBTi¹ GHG emission reduction targets are specifically determined in order to meet or exceed the Paris Agreement to limit global warming to well below 2° Celsius, preferably to 1.5° Celsius, compared to pre-industrial levels); and
- the number and percentage of issuers that report their GHG emissions to CDP Worldwide².

In addition to the above, the Investment Manager considers the PAI of the Financial Product's investments on sustainability factors by monitoring and analysing the Financial Product's portfolio holdings against the following mandatory indicators set out in Table 1 of Annex 1 of Commission Delegated Regulation (EU) 2022/1288 (the "SFDR RTS") when managing the Financial Product:

- GHG Emissions;
- Carbon footprint; and
- GHG intensity of investee companies.

The above listed PAI indicators are taken into consideration by the Investment Manager in various ways as part of its ongoing management of the Financial Product, including through the Investment Manager's ongoing engagement with the issuers, the assessment of issuers in which the Financial Product invests against the sustainability indicators outlined above, and the application of exclusions.

The Investment Manager considers the results of its PAI monitoring as part of its ongoing management of the Financial Product, with the hope to reduce these over the life of the Financial Product.

Information on the PAI of the portfolio holdings of the Financial Product will be contained in the Financial Product's annual reports.

¹ <https://sciencebasedtargets.org/>

² <https://www.cdp.net/>

Methodologies

The Investment Manager has identified the following sustainability indicators against which it will measure the extent to which the Financial Product's active investment management promotes the E/S Characteristic:

- Alignment with a Climate Change Mitigation Trajectory below 2°C as defined in the 2015 Paris Agreement.
At least 50% of the Financial Product's investments by weight will be in issuers aligned with the Sustainable Development Scenario ("SDS") carbon budgets (as established by the International Energy Agency ("IEA")) budget by 2050. The measurement is based on data provided by ISS ESG Climate Impact Assessment tool.
- Carbon Intensity (Scope 1 & 2 Greenhouse Gas (GHG) Protocol Standard).
At least 25% of the Financial Product's investments by weight will be in issuers that rank in the top quartile of their respective Global Industry Class Standards (GICS) sector for GHG emissions (in terms of tons of CO₂e/€M sales).

Data sources and processing

The Investment Manager's proprietary investment process relies wholly on private equity-style bottom-up, fundamental research. The Investment Manager does not rely on quantitative models, market technicals, or top-down macro information factors in its idea generation, analysis or security selection process.

Information gathered as part of the research process comes from many sources, such as company annual reports and other audited disclosures. Importantly, the Investment Manager meets with company management and conducts on-site company visits regularly. To develop an independent assessment of each company's global competitive positioning, the Investment Manager also analyses and meets with competitors, customers and suppliers. All of the value-added and forward-looking, fundamental analysis is performed by the Financial Product's portfolio manager and dedicated research team.

External research may be used for historical and factual information such as market size, market share, and carbon and climate data. The Investment Manager also uses Bloomberg, FactSet and HOLT for financial data and company-specific information, MSCI screening tools, MSCI carbon footprint analysis and ISS climate impact assessment tools and databases.

The main sources reviewed by the Investment Manager to assess whether an issuer is aligned with the sustainability indicators are:

- ISS ESG Climate Impact Assessment;
The Investment Manager measures the estimated impact on global average increase of temperature (in degrees Celsius) of each of the Financial Product's holdings in terms of carbon budgets for the SDS as established by the IEA to determine that at least 50% of the Financial Product by weight is comprised of companies aligned with the SDS budget by 2050. The measurement is based on data provided by ISS ESG Climate Impact Assessment tool.
- MSCI Carbon Footprint Analysis;
The Investment Manager measures and ranks the carbon intensity (Scope 1 & 2 Greenhouse Gas (GHG) Protocol Standard) of each Financial Product holding in terms of tons of CO₂e/€M sales to determine that at least 25% of the Financial Product by weight is comprised of companies that rank in the top quartile of their respective Global Industry Class Standards (GICS) sector for GHG emissions
- MSCI Screening Tools
Data from all sources is compiled into a single database which feeds into the Investment Manager's portfolio monitoring software, enabling the Investment Manager to monitor the portfolio positioning with respect to the promotion of the E/S Characteristic.

The Investment Manager notes that the data from ISS which it uses as the basis for making a determination as to whether an issuer is operating so as to be in alignment with the SDS budget by 2050 is necessarily estimated, given the forward looking nature of that assessment.

Limitations to methodologies and data

The Investment Manager acknowledges that alternative methodologies and related qualitative data to those selected could be used to determine whether investments promote the E/S Characteristic.

The Investment Manager also acknowledges that its determination as to whether an investment meets the sustainability indicators is reliant to a large extent on data provided by third parties.

In addition, the Investment Manager acknowledges that the data provided by ISS which it uses as the basis for making a determination as to whether an issuer is operating so as to be in alignment with the SDS budget by 2050 is estimated and, therefore, an issuer currently estimated by ISS to be operating in alignment with the SDS 2050 budget may not end up meeting that target.

As the ESG data received from third parties as well as issuers may be incomplete, inaccurate or unavailable from time to time there is a risk that the Investment Manager may incorrectly assess a security or issuer, resulting in the incorrect direct or indirect inclusion or exclusion of a security in the portfolio of the Financial Product.

As the ESG data received from third-parties as well as issuers may be incomplete, inaccurate or unavailable from time to time, there is a risk that the Investment Manager may incorrectly assess the extent to which a security or issuer meets a sustainability indicator and/or promotes the E/S Characteristic, resulting in the incorrect direct or indirect inclusion or exclusion of a security in the portfolio of the Financial Product and an incorrect indication as to the percentage of the NAV of the Financial Product which is promoting the E/S Characteristic.

Using multiple data sources reduces this risk but does not eliminate it. In addition, to further mitigate against this risk, the Investment Manager uses using fundamental internal analysis and engagement to question data directly with issuers.

Due diligence

As further detailed under “Investment Strategy” above, the Investment Manager carries out bottom-up fundamental analysis on each individual issuer that is selected for investment.

The Investment Manager’s due diligence includes an assessment whether an issuer meets either of the sustainability indicators and therefore promotes the E/S Characteristics.

The Investment Manager devotes four to six weeks preparing the in-depth research report on a given issuer. A disciplined, consistent approach to its proprietary, seven-step research process is taken to ensure consistent quality of the research reports generated. The research report for each issuer is vetted through internal peer review discussions. One objective of this peer review process is to attempt to disprove the investment thesis as a way to test its validity.

The peer review takes place during weekly research and portfolio review meetings during which the Investment Manager systematically reviews portfolio holdings, discusses new investment ideas and establishes its research agenda and priorities. These discussions will also cover the extent to which the Financial Product promotes the Characteristic and the extent to which existing investments continue to meet the sustainability indicators.

Engagement policies

The Investment Manager develops long-term constructive relationships with the management of the investee companies of the Financial Product through regular and recurring dialogue regarding key decision-making criteria, which includes ESG topics. The Investment Manager believes a long-term orientation is fundamental to a strategic decision-making framework. Therefore, the Investment Manager seeks to invest in in issuers with management teams that share its long-term perspective and that view ESG integration as a launch pad for innovation, competitive differentiation, and continuous improvement.

As part of its engagement process, the Investment Manager assesses sustainable ESG considerations integral to a company's decision-making, such as:

- linking management compensation to long-term drivers of shareholder value creation, including ESG outcomes (Governance);
- establishing policies for and complying with high business ethics standards (Governance);
- investing in R&D to innovate products and solutions that drive better environmental or social outcomes (Environmental, Social);
- aligning its business to enable it to meet or exceed the 2050 Paris Agreement (Governance, Environmental);
- developing sustainable manufacturing techniques, inputs, and sourcing (Environmental);
- advancing sustainable supply chains by stewarding local resources, production, and communities (Environmental, Social); and
- fostering a corporate culture and values, including diversity, to attract and retain talent (Social).

During the engagement process, the Investment Manager promotes alignment of the business to meet the Paris Agreement climate objective. The Investment Manager continuously assesses improvement in carbon emissions reduction in scope 1 and 2 measurements and a company's transparency of reporting on and auditing of GHG reduction targets. Additionally, the Investment Manager engages on corporate culture values that demonstrate responsibility toward workers and that help attract and retain talent. Through its engagement, the Investment Manager also seeks to promote a long-term perspective by advocating, for example, for management incentive plans with longer-term vesting periods, metrics such as free cash flow and ESG goals. Where risks and opportunities are identified, the Investment Manager proactively engages with company management to raise awareness, encourage change, and escalate concerns when certain management decisions – financial, non-financial and/or ESG matters – could affect the company's ability to generate long-term shareholder value. Progress is tracked through regular data analysis and direct interactions with company management. The Investment Manager may choose to divest if risks (including ESG risks) are not adequately addressed to the Investment Manager's expectations. In addition, the Investment Manager practices active ownership and may also express concerns or support for management decisions through proxy votes.

Designated reference benchmark

The Investment Manager does not utilise a reference benchmark to determine whether the Financial Product is aligned with the environmental and/or social characteristics that it promotes.