ANNEX

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

EDMOND DE ROTHSCHILD FUND - BIG DATA

Product name: Edmond de Rothschild Fund Big Data

Legal entity identifier: 549300IWBX1JC2L8IP43

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 20% 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 include 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 Sub-Fund promotes Environmental and Social characteristics identified by our ESG framework, such as:

– Environmental: environmental strategy, energy consumption, greenhouse gas emissions, water, waste, pollution, green impact

– Social: working conditions, human resources management, social impact, relationship with stakeholders, health and safety.

No reference benchmark has been designated for the purpose of attaining the environmental or social characteristics.

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?***

  Managers have access to portfolio monitoring tools, providing climate and ESG indicators, such as the portfolio's CO2 footprint or temperature, exposure to the various United Nations Sustainable Development Goals (ODD), as well as the environmental and social ratings of investments. Our tools provide a consolidated view of the portfolio as well as an issuer-by-issuer analysis. Our proprietary and/or externally sourced ESG analysis also assigns a score to each of the environmental and social characteristics promoted by the Sub-fund and available to managers.

- ***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 of the fund aim to contribute positively to one or more sustainable development goals of the United Nations (SDGs), in the environmental, social or societal space, while not causing significant harm and respecting minimum governance standards.

  The description of the sustainable investment methodology defined by Edmond de Rothschild Asset Management (France) is available on the asset management company's website: https://www.edmond-de-rothschild.com/SiteCollectionDocuments/Responsible-investment/OUR%20ENGAGEMENT/FR/EdRAM-Definition-et-methodologie-Investissement-durable.pdf

- ***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 made by the Sub-fund ensure that they do not cause significant harm to a sustainable investment objective, in particular:

  – by applying the Edmond de Rothschild Asset Management (France) exclusion policy which includes the sale and/or the production of prohibited weapons, tobacco, palm oil, thermal coal and unconventional fossil fuels,

  – by ensuring that it does not invest in companies that violate international standards (OECD, International Labour Organisation (ILO) and one or more of the 10 principles of the United Nation Global Compact (UNGC)).

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

Adverse impact indicators are integrated in the fund's investment process, and are also part of our ESG rating model and in our definition of sustainable investment (see the description of the sustainable investment methodology available on the website). They are integrated into portfolio monitoring tools and monitored by the Investment team and the Risk Department.

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 managers select sustainable investments in accordance with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights by excluding any company that violates the ILO and the UNGC principles.

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?

☒ Yes,

The Sub-fund takes into account the main negative impacts on sustainability factors by first applying Edmond de Rothschild Asset Management's (France) exclusion policy, notably concerning thermal coal and prohibited weapons. The main negative impacts are also taken into consideration in the framework of the proprietary or external ESG analysis of issuers and impact the Environmental and Social scores as well as the overall ESG rating.

The Sub-fund's periodic reports presenting, in accordance with Article 11 of Regulation (EU) 2019/2088, the so-called SFDR Regulation, in particular the extent to which environmental or social characteristics are respected, are available on the website www.edmond-de-rothschild.com under the "Fund Center" tab.

☐ No



What investment strategy does this financial product follow?

The objective of the ESG strategy of the sub-fund is to identify investment opportunities by identifying companies with a positive environmental or social impact and good extra-financial performance. It also aims to detect extra-financial risks that could materialize from a financial point of view.

To this end, the sub-fund relies on an internal ESG rating or one provided by an external rating agency, combined with a negative filtering based on an exclusion list defined by the management company, available on its website.

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?***

  At least 90% of the companies in the portfolio will have an ESG rating. This will be either a proprietary ESG rating or a rating provided by an external non-financial rating agency. At the end of this process, the Sub-Fund will have an ESG rating that is greater than that of its investment universe.

  The security selection process includes negative screening, whereby the Investment Manager has established a formal exclusion policy that integrates the exclusion of companies related to the sale and/or production of prohibited weapons, coal, tobacco, palm oil and unconventional fossil fuels as well as companies that violate international standards (OECD, ILO and one or more of the 10 UNGC principles).

  Further details on the Investment Manager website: https://www.edmond-de-rothschild.com/en/Pages/Responsible-investment.aspx

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

  The Sub-fund does not commit to a minimum commitment rate to reduce the scope of investments contemplated prior to the implementation of the investment strategy.

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

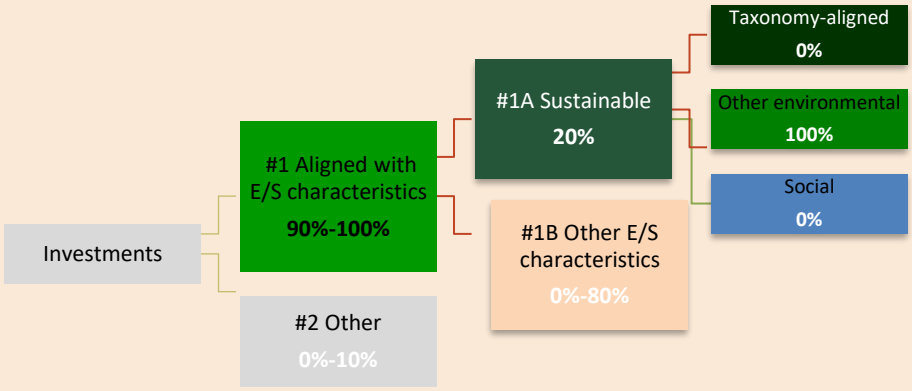
- ***What is the policy to assess good governance practices of the investee companies?***

  Good governance practices are assessed through a comprehensive analysis of the governance pillar in the issuer's ESG analysis as well as through the consideration of controversies affecting the issuer. A minimum governance score, provided by our internal ESG analysis or by an external provider, is applied to the Sub-fund's 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.

What is the asset allocation planned for this financial product?



#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?***

  Single-name derivatives with long exposure only (including options, futures, CDS, CFDs, etc.) are included for the purposes of proprietary ESG analysis methodologies and the calculation of the Sub-fund's sustainable investment portion according to the SFDR regulation.

  The effects of exposure and hedging to the same underlying from single-name derivatives will be offset.

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

As it is currently unable to provide reliable data for evaluating the share of its investments that are eligible for or aligned with the EU Taxonomy Regulation, at this stage, the Sub-fund is not able to fully and accurately calculate the underlying investments that qualify as environmentally sustainable in the form of a minimum alignment percentage in accordance with a strict interpretation of Article 3 of the EU Taxonomy Regulation. Currently, the Sub-fund does not aim at making investments that contribute to environmental objectives focused on mitigating climate change and/or adapting to climate change, or any other environmental objectives within the meaning of the EU Taxonomy Regulation. Therefore, the percentage of investments aligned with the EU Taxonomy is currently 0%.

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.

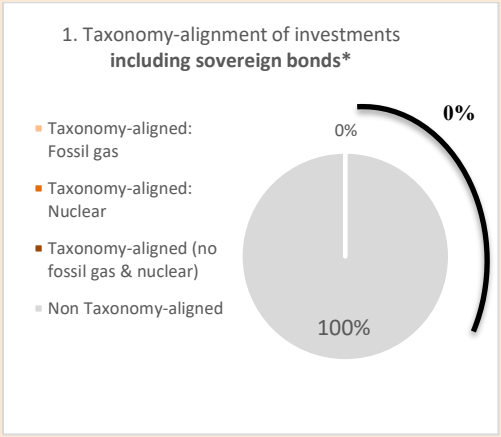
- **Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy[11]?**

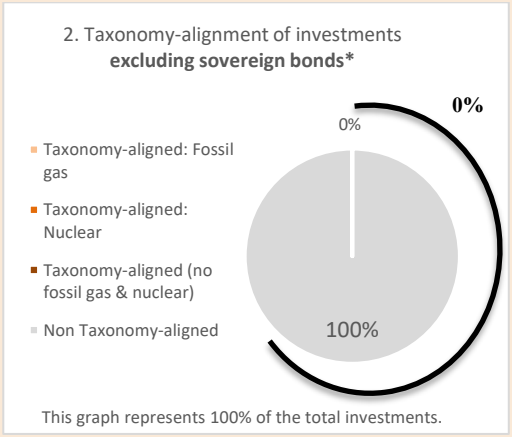
☐ Yes:

☐ In fossil gas ☐ In nuclear energy

☒ No

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?***

0%

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

The minimum threshold for the share of sustainable investments with an environmental objective that are not aligned with the EU taxonomy is 20%.

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

[11] 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.

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?

The "#2 Other" category includes: Investments for hedging purposes and cash held as ancillary liquidity.

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 reference benchmark has been designated for the purpose of attaining the environmental or social characteristics.

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.edmond-de-rothschild.com/fr/asset-management/sustainability-in-action

http://funds.edram.com