



**Supplement**

**GIB AM European Focus Fund**

**A sub-fund of AFP UCITS ICAV**

**An open-ended umbrella Irish collective asset- management vehicle with segregated liability between sub-funds formed in Ireland under the Irish Collective asset-management Vehicles Act 2015 and authorised by the Central Bank as a UCITS pursuant to the Regulations**

**Dated 12 June 2023**

## **Important Information**

This Supplement contains information relating specifically to the GIB AM European Focus Fund (the "**Sub-Fund**"), a sub-fund of AFP UCITS ICAV (the "**ICAV**"), an open-ended umbrella fund with segregated liability between sub-funds authorised by the Central Bank as a UCITS pursuant to the Regulations.

**This Supplement forms part of and should be read in the context of and in conjunction with the Prospectus for the ICAV dated 12 June 2023 (the "Prospectus").**

As the price of Shares in the Sub-Fund may fall as well as rise, the ICAV shall not be a suitable investment for an investor who cannot sustain a loss on their investment. Investors may also refer to the KIID for the most up-to-date SRRRI measurement.

**An investment in the Sub-Fund should not constitute a substantial proportion of an investment portfolio and may not be appropriate for all investors.**

Investors should read and consider Appendix III to the Prospectus (entitled "**Risk Factors**") before investing in the Sub-Fund.

## Definitions

<b>Business Day</b>	means any day on which commercial banks are open for business in Dublin and London, or such other day or days as the Directors may determine;
<b>Dealing Day</b>	means each Business Day and/or such other day or days as the Directors may in their absolute discretion determine and notify in advance to Shareholders provided that there shall be at least two Dealing Days in each Month occurring at regular intervals;
<b>Dealing Deadline</b>	has the meaning given to it in the section "Timing of transactions";
<b>Emerging Markets</b>	means those countries defined as such by the MSCI World Index;
<b>Equity Related Securities</b>	securities or instruments such as common stock, depositary receipts (including but not limited to American Depositary Receipts and Global Depositary Receipts), preferred shares, equity linked notes (unleveraged debt securities linked to the performance of equities), warrants and convertible securities (such as convertible preference shares);
<b>Europe</b>	means countries within the European Economic Area, the United Kingdom and Switzerland;
<b>European Economic Area</b>	means member countries of the European Union and also Iceland, Liechtenstein and Norway;
<b>Initial Offer Period</b>	means the period starting at 9 a.m. (Irish time) on 13 June 2023 and will finish at 5 p.m. (Irish time) on 12 December 2023 as may be shortened or extended by the Directors in accordance with the requirements of the Central Bank;
<b>Investment Grade</b>	means a rating of at least Baa3 by Moody's Investor Services or BBB- by Fitch or Standard & Poor's or determined by the Investment Manager to be of equivalent quality;
<b>Issued Classes</b>	means the following Classes that have issued at the date of this Supplement: I2 EUR (C)    Non-Distributing
<b>Minimum Fund Size</b>	means \$10,000,000 (or the currency equivalent thereof) or such other amount as the Directors may in their absolute discretion determine;
<b>Minimum Share Class Size</b>	means \$50,000 (or the currency equivalent thereof) or such other amount as the Directors may in their absolute discretion determine;
<b>Redemption Settlement Date</b>	means three (3) Business Days after the relevant Dealing Day;
<b>Subscription Settlement Date</b>	means three (3) Business Days after the relevant Dealing Day; and

**Valuation Point** means 10 p.m. (Irish time).

All other defined terms used in this Supplement shall have the same meaning as in the Prospectus.

## Objective and Investment Policy

### Objective

The investment objective is to achieve capital growth.

Investors should be aware there is no guarantee that the Sub-Fund will achieve its investment objective.

### Investments

The Sub-Fund will seek to achieve its investment objective by investing primarily in equities and Equity Related Securities of companies that are incorporated under the laws of, and have their registered office in, Europe, or manage a predominant part of their economic activity from Europe.

A maximum of 10% of Net Asset Value of the Sub-Fund may be invested in the equities of companies that are domiciled, listed or traded in an Emerging Market country.

The Sub-Fund may invest up to 10% of Net Asset Value in UCITS eligible collective investment schemes and in AIFs that satisfy the conditions applied by the Central Bank, including the Central Bank's Guidance in relation to UCITS Acceptable Investments in other Investment Funds.

The Sub-Fund may hold cash and instruments that may be readily converted to cash (including cash deposits, treasury bills, Investment Grade government bonds and short-term corporate bonds (fixed or floating rate), commercial paper, short term money market instruments and certificates of deposit). In normal market conditions, such investment shall not exceed 20% of the Net Asset Value of the Sub-Fund.

The Investment Manager will target a relatively concentrated portfolio of between 25 and 50 securities under normal market conditions. As a consequence, the Sub-Fund may have a higher level of annualised volatility than a more diversified portfolio.

### Benchmark

The Sub-Fund is actively managed. The MSCI Europe Index serves only as an indicator for assessing the Sub-Fund's performance. The Investment Manager's discretion in constructing the portfolio is not limited to, or

constrained by, the constituents of the MSCI Europe Index.

The Sub-Fund has not designated the MSCI Europe Index as a reference benchmark for the purpose of the Disclosure Regulation as it is a broad market index, which does not assess or include its constituents on the basis of ESG (as defined below) factors. Therefore, the MSCI Europe Index is not aligned with the environmental and social characteristics that are promoted by the Sub-Fund.

### Derivatives

The Sub-Fund may use derivatives for efficient portfolio management purposes only (as described under the sections of the Prospectus entitled "**Efficient Portfolio Management**" and "**Use of FDI**").

In particular, the Sub-Fund may make use of derivatives (including derivatives that focus on equities and foreign exchange) to reduce risk (e.g. hedge equities and foreign exchange risk) and as a way to reduce the cost of gaining exposure to equities and Equity Related Securities.

The types of FDI in which the Sub-Fund may invest in are limited to (i) futures; (ii) forwards; and (iii) options.

### Base currency EUR

## Management Process

The Investment Manager aims to achieve the Sub-Fund's investment objective by taking a predominately bottom-up investment approach that seeks to integrate fundamental environmental, social and governance ("**ESG**") factors, with an emphasis on social and governance matters which, in the opinion of the Investment Manager, increases an issuer's potential to generate compounded earnings and create value over the long term.

### *Screening and Analysis*

To establish the investment universe, the Investment Manager first screens and excludes certain companies in accordance with its Responsible Investment Policy, as described under "**Excluded Entities**" below.

The Investment Manager next undertakes an analysis which reviews a range of social and

governance issues, which it believes will contribute to an issuer's overall long term value creation. The assessment incorporates the Investment Manager's philosophy that a key source of a company's competitive advantage is its corporate culture.

This assessment includes evaluating a company's employee engagement and motivation, its customer focus, and its relationships with broader stakeholders, and information transparency to the public. The Investment Manager targets companies that demonstrate strong corporate governance characteristics such as a balanced and engaged board of directors, that oversees a management team focused on driving continuous improvement through organisational efficiency and innovation.

The Investment Manager feels that these factors are integral to fostering collaboration and trust, which in its opinion materially improves the likelihood of a company generating long-term value for shareholders and sustainable benefits for stakeholders and communities alike.

As part of its research process, the Investment Manager will also evaluate a company's financial position and capital allocation process, including the durability of an issuer's competitive advantage and potential growth prospects. The Investment Manager aims to build the portfolio from companies that demonstrate the strongest risk/reward profiles, indicating the potential to achieve consistently above-average returns on capital, a high conversion ratio of profits to cash flow and disciplined capital allocation.

#### *Excluded Entities*

The excluded entities specified in the Responsible Investment Policy (as further detailed in the section of the Prospectus entitled "**Overview of Responsible Investment Policy**") will be excluded from the investible universe. In addition, companies whose operations have, in the Investment Manager's opinion, a negative impact on sustainability or that contravene the Investment Manager's responsible investment policy, will also be excluded. This currently includes, but is not limited to, companies that derive more than a

*de minimis* proportion of their revenues from operations relating to:

- weapons;
- fossil fuels;
- adult entertainment;
- tobacco production;
- alcohol production;
- gambling; and
- any other products and services determined by the Investment Manager to negatively impact sustainability.

The Investment Manager will also exclude from the eligible investment universe companies that are subject to United Nations, European Union, United Kingdom or United States sanctions due to their systematic breach of standards.

Details of the Investment Manager's responsible investment policy can be found at <https://qibam.com/disclaimer>.

#### **Disclosures Regulation**

The Manager, in conjunction with the Investment Manager, has categorised the Sub-Fund as meeting the provisions set out in Article 8 of the Disclosures Regulation for products that promote environmental and social characteristics. Additional information on the promoted characteristics can be found in the pre-contractual disclosure document appended to this Supplement.

#### **Taxonomy Regulation**

The Sub-Fund promotes environmental and social characteristics as described in the Article 8 of the Disclosure Regulation. It is therefore required to disclose, according to Article 6 of the Taxonomy Regulation, information about the environmentally sustainable investments made.

For the purpose of the Taxonomy Regulation, the Sub-Fund does not presently intend to be invested in investments that take into account the EU criteria for environmental sustainable economic activities. Therefore, as at the date of this Supplement, 0% of the Sub-Fund's investments are invested in economic activities that qualify as environmentally sustainable under the Taxonomy Regulation.

In circumstances where certain of the Sub-Fund's assets are invested in economic activities that

contribute to environmental and social objectives, the “do no significant harm” principle applies only to those investments. The EU’s criteria for environmentally sustainable economic activities will not be applied to the remainder of the Sub-Fund’s portfolio.

## Main Risks

Investors should consider the risk factors in Appendix III to the Prospectus entitled “Risk Factors”. In addition, investors should be aware of the following risks applicable to the Sub-Fund:

- Equity Risks
- Efficient Portfolio Management Risk
- Financial Markets and Regulatory Change
- Sustainable Investment Risk
- Investment Fund Risk
- Volatility Risk
- Concentration Risk
- Depositary Risk
- Emerging Market Risk

Investors should also note that the Sub-Fund may perform differently or underperform relative to other comparable funds that do not integrate Sustainability Risks into their investment decisions.

## Techniques and instruments

The Sub-Fund will not use securities financing transactions and total return swaps, which are subject to the requirements of SFTR.

## Risk management method

Commitment Approach.

## Investment Manager

### Gulf International Bank (UK) Limited

Gulf International Bank (UK) Limited was established in the United Kingdom as a limited company (Registration No: 1223938) and is regulated by the Financial Conduct Authority and authorised and regulated by Prudential Regulation Authority and has been cleared by the Central Bank of Ireland to provide investment management services to Irish collective investment schemes.

The fees and expenses of the Investment Manager shall be discharged out of the Sub-Fund’s assets for each respective Class.

## Planning Your Investment

See the section entitled “**Share Dealings – Classes**” in the Prospectus for further information.

## Profile of a Typical Investor

Suitable for investors:

- With a broad knowledge of investing in funds;
- Who understand the risk of losing some or all of the capital invested; and
- Seeking to increase the value of their investment over the recommended holding period of five years.

Investment in the Sub-Fund should be considered long-term and may not be suitable for a short-term investment.

## Initial Offer Period

During the Initial Offer Period, Shares will be issued at the Initial Issue Price set out below, except for the Issued Classes. After the Initial Offer Period, Shares in each Class will be available for subscription on each Dealing Day at the then prevailing Net Asset Value per Share.

## Timing of Transactions

Applications for subscriptions and redemptions must be received before 11 am (Irish time) on the relevant Dealing Day (the “**Dealing Deadline**”).

Subscription monies should be paid to the Subscriptions/Redemptions Account so as to be received in cleared funds by no later than the Subscription Settlement Date.

Payment of Redemption Proceeds will normally be made by electronic transfer to the account of the redeeming Shareholder at the risk and expense of the Shareholder by the Redemption Settlement Date, provided that all the required documentation has been furnished to and received by the Administrator.

## Switching in/out

Not permitted.

## Share Classes and Fees

Class Label <sup>***</sup> *	Minimum initial investment	Initial Issue Price <sup>1</sup>	Investment Management Fee (Max)	Administration Fee (Max) <sup>2</sup>	Entry Charge (Max)	Exit Charge (Max)	CDSC (Max)	Distribution Fee (Max)
A2	€1,000	€10	1.50%	0.20%	None	None	None	None
I2	€500,000	€100	0.75%	0.20%	None	None	None	None
J2	€500,000	€100	0.75%	0.20%	None	None	None	None
R2	€1,000	€10	1.50%	0.20%	None	None	None	None
P2	€1,000,000	€100	0.90%	0.17%	None	None	None	None
SE <sup>3</sup>	€500,000	€100	0.60%	0.20%	None	None	None	None
X2 <sup>4</sup>	€10,000,000	€100	0%	0.20%	None	None	None	None

<sup>1</sup>The minimum initial investment and initial issue price will be in the designated currency of the relevant Class as listed in Appendix I.

<sup>2</sup>This fee is subject to a minimum fee of \$62,500 per annum for the first year following the close of the Initial Offer Period for the Class that closes first and a minimum fee of \$125,000 per annum thereafter, payable to the Manager monthly in arrears in respect of its role in managing the assets of the Sub-Fund and administrative and operational support, which involves, procuring the provision of administration and depositary services as well as a range of other services as set out in further detail in the section "Administrative Fee" of the Prospectus.

<sup>3</sup>The Class SE Shares in the Sub-Fund are available for subscription by eligible investors as set out in the section of the Prospectus entitled "Share Dealings" for a period of 12 months from the Fund's launch date, or on reaching assets of USD \$100,000,000, whichever occurs first, after which will be closed for subscription.

<sup>4</sup>The Class X2 Shares in the Sub-Fund shall only be made available for subscription to employees of the Investment Manager and its affiliates, or as the Manager may determine from time to time in its absolute discretion.

Please note that the characteristics and investor eligibility requirements for Class labels A, I, J, R, P and X, as set out in the section of the Prospectus entitled "Share Dealings", are not applicable to the Classes in the Sub-Fund.

The foregoing Classes may be made available in the Sub-Fund. Please refer to Appendix I for further details of the classes that are currently available in the Sub-Fund.

The Net Asset Value per Share in each Class will be calculated in the relevant Class currency. In addition, all subscriptions and redemptions will be effected in that currency.

The fees and expenses set out in the above table, expressed as a percentage of the Net Asset Value per Share may be incurred by a Shareholder as a result of its investment in a particular Class.

The Sub-Fund's establishment and organisation expenses, which are estimated not to exceed USD\$54,000, shall be borne out of the assets of the Sub-Fund and shall be amortised over the first three accounting periods following Central Bank approval of the Sub-Fund.



For further detail in respect of the fees and expenses applicable to the ICAV and the Sub-Fund see the section entitled "**Fees and Expenses**" in the Prospectus.

### **Swing Pricing**

The Directors intend to adopt a swing pricing mechanism in respect of the Sub-Fund. Please refer to the section entitled "**Swing Pricing Mechanism**" in the Prospectus for further detail.

### **Material Contracts**

The Investment Management Agreement may be terminated by a party on giving not less than 90 days' prior written notice to the other parties. The Investment Management Agreement may also be terminated forthwith by a party giving notice in writing to the other parties upon certain breaches as outlined in the Investment Management Agreement or upon the insolvency of a party (or upon the happening of a like event).

The Investment Manager accepts responsibility for and shall indemnify the Manager and the ICAV and any of their respective directors, officers or employees against all Losses (as defined therein) suffered or incurred by the Manager or the ICAV to the extent that Losses are due to the negligence, fraud, bad faith, or wilful default in the performance of its obligations or duties under the Investment Management Agreement and the Investment Manager will not otherwise be liable for Losses suffered or incurred by the ICAV.

The ICAV, out of the assets of the Sub-Fund, shall indemnify the Investment Manager, its employees, delegates and agents from and against all Losses which may be brought against, suffered or incurred by the Investment Manager, its employees, delegates or agents in the performance of its duties under other than due to the negligence, fraud, bad faith or wilful default of the Investment Manager, its employees, delegates or agents in the performance of its obligations hereunder.

No party shall be responsible for the loss of, or damage to, any property of another party or for any failure to fulfil its obligations hereunder if such loss, damage or failure shall be caused by a Force Majeure Event (as defined therein), or other cause whether similar or otherwise which is beyond the reasonable control of the relevant party provided that the relevant party shall use all reasonable efforts to minimise the effects of any such event.

The Investment Management Agreement shall be governed by the laws of Ireland and the courts of Ireland shall have non-exclusive jurisdiction to hear any disputes or claims arising out of or in connection with the Investment Management Agreement.

### **Miscellaneous**

At the date of this Supplement, the other sub-funds of the ICAV in existence are:

- Euro Credit Bond
- GIB AM Sustainable World Fund
- GIB AM Sustainable World Corporate Bond Fund
- GIB AM Emerging Markets Active Engagement Fund

## Appendix I

### Share Class Information

Share Class	Distribution Status
A2 USD AD (D)	Distributing
A2 USD (C)	Non-Distributing
A2 EUR AD (D)	Distributing
A2 EUR (C)	Non-Distributing
I2 USD AD (D)	Distributing
I2 USD (C)	Non-Distributing
I2 EUR AD (D)	Distributing
I2 EUR (C)	Non-Distributing
I2 GBP AD (D)	Distributing
I2 GBP (C)	Non Distributing
I2 CHF AD (D)	Distributing
I2 CHF (C)	Non-Distributing
J2 USD AD (D)	Distributing
J2 USD (C)	Non-Distributing
J2 EUR AD (D)	Distributing
J2 EUR (C)	Non-Distributing
J2 GBP AD (D)	Distributing
J2 GBP (C)	Non- Distributing
J2 CHF AD (D)	Distributing
J2 CHF (C)	Non-Distributing
P2 USD AD (D)	Distributing
P2 USD (C)	Non-Distributing
P2 EUR AD (D)	Distributing
P2 EUR (C)	Non-Distributing
P2 GBP AD (D)	Distributing
P2 GBP (C)	Non-Distributing

P2 CHF AD (D)	Distributing
P2 CHF (C)	Non-Distributing
R2 USD AD (D)	Distributing
SE USD AD (D)	Distributing
SE USD (C)	Non-Distributing
SE EUR AD (D)	Distributing
SE EUR (C)	Non-Distributing
R2 USD (C)	Non-Distributing
R2 EUR AD (D)	Distributing
R2 EUR (C)	Non-Distributing
X2 USD (C)	Non-Distributing
X2 GBP (C)	Non-Distributing

The Sub-Fund is a multi-class fund with Classes of Shares set out above denominated in currencies as set out above. The Net Asset Value per Share in each Class will be calculated in the relevant Class currency. In addition, all subscriptions and redemptions will be effected in that currency.

## **Appendix II**

### **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**

**Product name:** GIB AM EUROPEAN FOCUS FUND

**Legal entity identifier:** 213800IGYC3KXWB5ZJ91

## Environmental and/or social characteristics

**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.

### 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 \_\_\_\_% 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 Fund’s strategy (detailed further below) promotes environmental and social characteristics by taking a predominately bottom-up investment approach that seeks to integrate fundamental environmental, social and governance (“ESG”) factors, with an emphasis on social and governance matters.

Core to this process is a focus on corporate culture. Whilst portfolio companies will each have a distinctive philosophy of doing business, they share a common ambition to deliver innovative products, superior service and unsurpassed quality over the long-term.

#### **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?***

The following sustainability indicators are used to measure the attainment of the relevant environmental or social characteristic of an investee company:

- Companies that have a maximum 0-15% revenue exposure to the below excluded activities:
  - Weapons – nuclear (5%)
  - Weapons – civilian firearms, conventional (15%)
  - Nuclear warheads and/or whole nuclear missiles (0%)
  - Controversial Weapons (0%)
  - Fossil fuels – oil and natural gas, thermal coal, oil sands, shale gas and oil (0%)
  - Tobacco (5%)
  - Adult entertainment (5%)
  - Alcohol (15%)
  - Gambling (5%)
- ESG-specific data points used to complete a detailed assessment of each issuer. The Fund requires:
  - No companies with very severe controversies defined as an MSCI Red Flag, where covered by MSCI (or similar);
  - No companies with a 'Fail' under compliance with the United Nations Global Compact principles where covered by MSCI (or similar).

The Fund does not make sustainable investments; therefore, the sections relating to objectives of sustainable investments and do no significant harm have been removed.



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

Yes

No

If, following review against the relevant indicators mentioned above, an investment does not qualify against a particular threshold, the Fund will not make that investment. If the investment does meet the threshold then the Fund can make the

investment - assuming all other criteria are met. The impact of the Fund's investments against the relevant indicators will continue to be monitored as outlined above on a periodic basis.



### **What investment strategy does this financial product follow?**

The Investment Manager aims to achieve the Sub-Fund's investment objective by taking a predominately bottom-up investment approach that seeks to integrate fundamental environmental, social and governance ("ESG") factors, with an emphasis on social and governance matters which, in the opinion of the Investment Manager, increases an issuer's potential to generate compounded earnings and create value over the long term..

The investment universe is established first using an initial screen to exclude certain companies in line with the exclusions noted under the sustainable indicators above. The Investment Manager next undertakes an analysis which reviews a range of social and governance issues, which it believes will contribute to an issuer's overall long term value creation.

Key assessments in the Investment Manager's analysis of a company's corporate culture include:

- How a company's Board and executive management ensure that the right values, conduct and behaviours are embedded throughout the organisation. This is measured through both quantitative and qualitative assessments embedded within our research process.
- How a company aims to employ experienced and skilled individuals and build teams through diversity, inclusion, talent-development and organisational structure.
- How a company seeks to protect future generations through ethical behaviour in considering the methods by which it produces its products and services.

In determining a company's culture the Investment Manager seeks (inter alia) to understand the history of the business, its reasons for existence (purpose and values) and how that resonates throughout the firm; ensuring that the tone from management has a clear and consistent message throughout the company.

The Investment Manager targets companies that demonstrate strong corporate governance characteristics such as a balanced and engaged board of directors, that oversees a management team focused on driving continuous improvement through organisational efficiency and innovation.

The Investment Manager feels that these factors are integral to fostering collaboration and trust, which in its opinion materially improves the likelihood of a company generating long-term value for shareholders and sustainable benefits for stakeholders and communities alike.

**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 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?***

All GIB AM funds comply with the GIB AM Responsible Investment Policy, which is located at [www.gibam.com](http://www.gibam.com).

The Fund also excludes any company with above threshold revenue exposure to the excluded activities noted earlier in this document.

The Fund further avoids investment in any companies that are in breach of the UN Global Compact (which refers to OECD Guidelines for Multinational enterprises and UN Guiding Principles on Business and Human Rights) through our exclusion policy.

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

The Fund pursues an investment strategy that includes negative screening and exclusions based on the Investment Manager's Responsible Investment Policy and strategy more generally. However, it is not possible to ascertain what percentage of the investible universe as a whole is excluded based on that strategy.

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

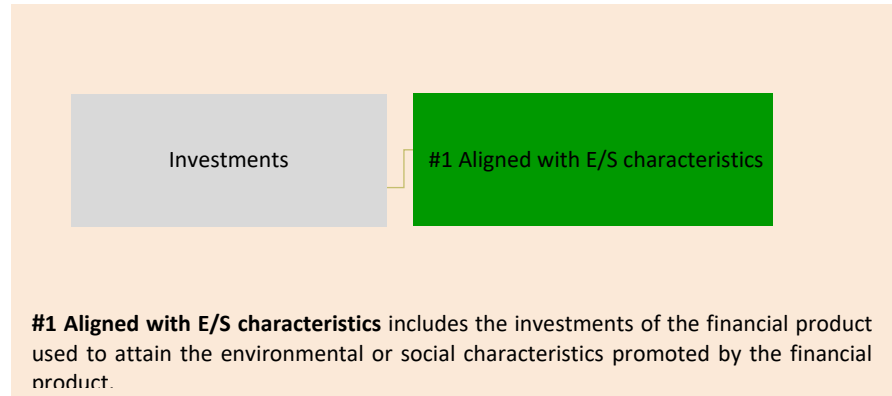
The Investment Manager's analysis of a company's governance may include, but is not limited to:

- its corporate governance structure and practices, such as the board of directors' sense of personal responsibility and influence, and relevance, experience, diversity;
- alignment of management interests;
- evidence of the company upholding the highest operational, accounting, and ethical standards;
- any past breaches of shareholders rights; and,
- assessment of the issuer's board; past track record of the controlling shareholder at dealing with minority investors; and any past breaches of shareholders right and good corporate governance practices.

**What is the asset allocation planned for this financial product?**



**Asset allocation** describes the share of investments in specific assets.



All investments in the Fund will be aligned with identified environmental and social characteristics as detailed in this document, and comply with the GIB AM Responsible Investment Policy (including excluded issuers).

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

The Fund has the ability to use derivatives; however, any usage of the derivatives will be for efficient portfolio management purposes only.



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

0% of the Sub-Fund's investments are invested in economic activities that qualify as environmentally sustainable under the EU Taxonomy.

As the Fund will not make sustainable investments, nor investments that are aligned with EU Taxonomy, the EU Taxonomy graphs, minimum share of investments in transitional and enabling activities, and minimum share of sustainable investments with an environmental objective, and minimum share of socially sustainable investment sections are not applicable and have been removed.

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 relates activities that comply with the EU Taxonomy?

- Yes:
  - In fossil gas
  - In nuclear energy
- No



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

**Not applicable**



**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?**

The Fund is actively managed, and while it uses the MSCI Europe Total Return Index for assessing the Fund’s performance, it has not designated the Index as a reference benchmark for the purpose of the Disclosure Regulation.



**Where can I find more product specific information online?**

More product-specific information can be found on the website:  
[www.gibam.com](http://www.gibam.com)