CARMIGNAC
INVESTING IN YOUR INTEREST

SUSTAINABILITY-RELATED DISCLOSURES
CARMIGNAC PORTFOLIO PATRIMOINE

IN ACCORDANCE WITH ARTICLE 10 (EU SFDR 2019/2088 – LEVEL II)

Summary

This Sub-Fund promotes Environmental/Social (E/S) characteristics in accordance with Article 8 of the Sustainable Finance Disclosure Regulation ("SFDR").

The Sub-Fund promotes environmental and social characteristics by applying best-in-universe and best-effort approaches to invests in a sustainable manner by combining a four-pillar strategy: 1) ESG integration, 2) Negative screening, 3) Positive screening applying a UN SDG alignment approach 4) Active Stewardship to promote Environment and Social characteristics.

The Sub-Fund's makes sustainable investments whereby a minimum of 10% of the Sub-Fund's net assets are invested in shares of companies that derive at least 50% of their revenue from goods and services or invest at least 50% of their CAPEX in relation to business activities which align positively with one of the following 9 out of 17 United Nations Sustainable Development Goals ("the Sustainable Development Goals") selected for this Sub-Fund: (1) No Poverty, (2) No Hunger, (3) Good Health and Well Being, (4) Quality Education, (6) Clean Water, (7) Affordable and Clean Energy, (9) Industry, Innovation and Infrastructure, (11) Sustainable Cities and Communities, (12) Responsible Consumption and Production. As part of its objective, this fund seeks to make at least 1% of sustainable investments with an environmental objective and 3% with a social objective.

The investment universe is assessed for ESG risks and opportunities recorded in Carmignac proprietary ESG platform "START" (System for Tracking and Analysis of a Responsible Trajectory). The extra-financial analysis is implemented in the investment strategy by undertaking activities described below whereby the Fund's investment universe is actively reduced by at least 20%.

Negative screening and exclusions of unsustainable activities and practices reflected in low ESG scores from START, MSCI and or ISS scores and research are performed based on the following indicators : (a) practices that are harmful to society and the environment, (b) controversies against the OECD business guidelines and UN Global compact principles, (c) controversial weapons (d) coal mining activity, (e) power companies that have not Paris alignment objectives in place, (f) companies involved in tobacco production, (g) companies involved in adult entertainment.

From an active stewardship perspective, environmental and social related company engagements are performed with an objective leading to improvement in companies' sustainability policies (active engagement and voting policies - number of engagements - level of attainment versus the 100% objective of participation at shareholder and bondholder meetings).

All the investments of the Sub-Fund are examined for adherence to global norms on environmental protection, human rights, labor standards and anti-corruption, through controversy screening. Furthermore, this Sub-Fund is committed to considering Principal Adverse Impacts whereby 14 mandatory and 2 optional environmental and social indicators and if relevant 2 Sovereign-related PAIs, are as indicated in the Annex 1 of the SFDR Level II 2019/2088.

This Sub-Fund uses the following sustainability indicators to measure the attainment of the sustainable objective:

- Alignment with Sustainable Development Goals,
- The coverage rate of ESG analysis,
- The amount the equity and corporate bonds universe is reduced by (minimum 20%),
- Principal Adverse Impacts indicators,
- Active stewardship voting participation rate.

Further information regarding the methodology of monitoring the aforementioned indicators can be found in the document below.

The investment team are ultimately responsible for the proprietary ESG assessment. The auto populated START score is determined by a proprietary formula comparing companies within 90 peer groups aggregated by capitalization, sector and region. An upgrade or downgrade of this score can be made during the proprietary analysis and commentary by the financial or ESG analyst. The START score statistics are monitored for bias, frequency, and coherence by the Sustainable Investment team.
All sectorial and controversy exclusions are hard exclusions. The Sustainable investment team have a separate reporting line to the Managing Director of Carmignac UK branch.

The Sub-Fund uses several data sources that are aggregated into the Carmignac proprietary ESG System START. The sources are FactSet for revenue data, corporate filings for CAPEX data, S&P Trucost for carbon emissions data, TR Refinitiv for raw company ESG data, MSCI and ISS ESG for controversial behaviours, UNGC and OECD Business and Human Rights Norms screening. The sovereign bond proprietary scoring process sources publicly available sovereign-related data from institutions such as the World Bank and the IMF.

The Fund’s sustainability risk may differ from the sustainability risk of the Reference indicator.
In terms of methodology, our SDG Framework is just one framework that can be used to illustrate positive outcomes; there are others that may yield different results

The attainment of the Environmental and Social characteristics and sustainable investments is ensured on a continuous basis through monitoring and controls and will be published monthly on the Sub-Fund’s webpage.

The Sub-Fund has not designated a reference benchmark for the purposes of showing the attainment of the sustainable investment objective.

No sustainable investment objective

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

Environmental or Social Characteristics of The Financial Product

The Sub-Fund applies best-in-universe and best-efforts approaches to invest in a sustainable manner by combining a four-pillar strategy: 1) ESG integration, 2) Negative screening, 3) Positive screening, 4) Active Stewardship to promote Environment and Social characteristics.

The Sub-Fund makes sustainable investments whereby a minimum of 10% of the Sub-Fund’s net assets are invested in shares of companies that satisfy the aforementioned SDG alignment approach.

The Sub-Fund has not designated a reference benchmark for the purposes of attaining the Environmental and Social characteristics.

Investment Strategy

The Sub-Fund adopts a socially responsible approach using best in universe and best-efforts selection process and both positive and negative screening to identify companies and sovereigns with long term sustainable growth criteria.

The Sub-Fund's makes sustainable investments whereby a minimum of 10% of the Sub-Fund's net assets are invested in shares of companies that derive at least 50% of their revenue from goods and services or invest at least 50% of their CAPEX in relation to business activities which align positively with one of the following 9 out of 17 United Nations Sustainable Development Goals ("the Sustainable Development Goals") selected for this Sub-Fund: (1) No Poverty, (2) No Hunger, (3) Good Health and Well Being, (4) Quality Education, (6) Clean Water, (7) Affordable and Clean Energy, (9) Industry, Innovation and Infrastructure, (11) Sustainable Cities and Communities, (12) Responsible Consumption and Production. As part of its objective, this fund seeks to make at least 1% of sustainable investments with an environmental objective and 3% with a social objective.

The investment universe is assessed for ESG risks and opportunities recorded in Carmignac proprietary ESG platform "START" (System for Tracking and Analysis of a Responsible Trajectory). The extra-financial analysis is implemented in the investment strategy by undertaking activities described below whereby the Fund's equities and corporate bond investment universe is actively reduced by at least 20%. The full process of the reduction of the investment universe is found in the corresponding Transparency Code on the Carmignac website.

(1) The Fund applies binding negative company-wide and Norms-based screening to exclude certain sectors and activities as described in the methodology section below.

(2) The Companies with high ESG risks which are reflected through their respective ESG ratings are also excluded. Both the START ESG rating and MSCI ESG rating scores are used in this screening. Equity portfolio positions having a MSCI rating below 1.4 on environmental or social pillars, Fixed income portfolio positions having a MSCI rating below 2.5 on environmental or social pillars or having an overall MSCI rating of "B" or "CCC" are a priori excluded of the Sub-Fund's investment universe. Companies rated "C" and above on the START (rating from "A" to "E") can reintegrate into the Sub-Fund's. Following these screenings and exclusions, the initial investment universe (defined as around 2800 issuers composed of MSCI ACWI Index) is reduced at least by 20%.

3) From an active stewardship perspective, environmental and social related company engagements are performed with an objective leading to improvement in companies' sustainability policies (active engagement and voting policies - number of engagements, rate of voting participation - level of attainment 100% objective at shareholder and bondholder meetings).

In order to assess good governance practices, the Sub-Fund applies Carmignac proprietary ESG research system START, which gathers key governance indicators automated for over 7000 companies, including 1) the percentage of Audit Committee Independence, Average Board Tenure, Board Gender Diversity, Board Size, Compensation Committee Independence as it relates to sound management structures, 2) Executive Compensation, Executive Sustainability Incentive, Highest Remuneration Package as it relates to remuneration of staff. Employee relations are covered within Carmignac Social indicators (namely through employee satisfaction, gender pay gap, turnover of employees) within START.

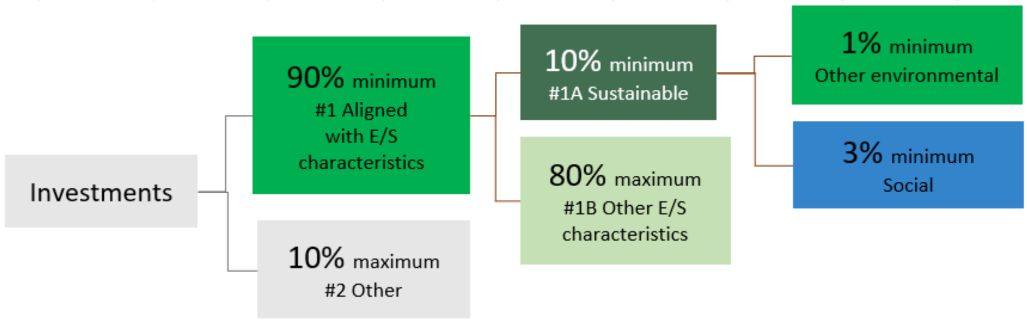
As for taxation, the Sub-Fund recognize companies in it investment universe which adhere to the OECD Guidelines for multinational enterprises on taxation and push for disclosure where necessary.

In addition, as signatory of the PRI, we Carmignac would expect from the companies it invests in to:

- o Publish a global tax policy that outlines the company's approach to responsible tax,
- o Report on tax governance and risk management processes; and
- o Report on a country-by-country basis (CBCR)

This is a consideration Carmignac increasingly integrates into its engagements with corporates and votes in support for more transparency via for example support for shareholder resolutions.

Proportion of Investments



A minimum proportion of 90% of the investments of this Fund is covered by ESG analysis.

Where investments fall outside of the 90% minimum limit incorporating Environmental and Social characteristics, ESG full analysis may not have been performed.

A proportion of 10% at a minimum of this Fund's net assets is used to meet the sustainable investment objective.

The minimum levels of sustainable investments with environmental and social objectives are respectively 1% and 3% of the Sub-Fund's net assets.

Monitoring of Environmental or Social Characteristics

Several indicators are monitored to measure the attainment of each of the environmental or social characteristics promoted by the Sub-fund and partially the sustainable investments.

Alignment with Sustainable Development Goals: the Sub-Fund makes sustainable investments whereby a minimum of 10% of the Sub-Fund's net assets, which align positively with one of the 9 out of 17 United Nations Sustainable Development Goals. For further information on the United Nations Sustainable Development Goals, please refer to https://sdgs.un.org/goals. Our proprietary Outcomes Framework maps business activities to nine of the 17 United Nations Sustainable Development Goals (SDGs), and deem them as 'investable' (i.e. companies are able to support progress towards these goals, through their products and services). The investable SDGs identified by Carmignac are listed above. In order to be considered SDG-aligned according to our Framework, a company must derive at least 50% of its revenues or invest at least 50% of their CAPEX related to business activities that have a positive contribution to at least one of the nine SDGs aforementioned. Once a company exceeds this 50% threshold, we consider the company to be 'aligned' for the Sub-fund's entire economic exposure to that company as such when calculating Sub-fund-level alignment. The minimum levels of sustainable investments with environmental and social objectives are respectively 1% and 3% of the Sub-Fund's net assets.

The coverage rate of ESG analysis: ESG integration through ESG scoring using Carmignac's proprietary ESG platform "START" (System for Tracking and Analysis of a Responsible Trajectory) is applied to at least 90% of issuers.

Amount the equities and corporate bond universe is reduced by (minimum 20%): Negative screening and exclusions of unsustainable activities and practices reflected in low ESG scores from START, MSCI and or ISS scores and reserach are performed based on following indicators : (a) practices that are harmful to society and the environment, (b) controversies against the OECD business guidelines and UN Global compact principles, (c) controversial weapons, (d) coal mining activity, (e) power companies that have not Paris alignment objectives in place, (f) companies involved in tobacco production, (g) companies involved in adult entertainment.

The Sovereign bond proprietary scoring systems (Impact and Global) are available for up to 100 countries on the START platform which details the individual countries ESG relative indicator scores.

Principal Adverse Impacts indicators. The Sub-Fund has applied the SFDR level II 2019/2088 Regulatory Technical Standards (RTS) annex 1 whereby 14 mandatory and 2 optional environmental and social indicators are monitored to show the impact of such sustainable investments against these indicators : Greenhouse gas emissions, Carbon footprint, GHG intensity (investee companies), Exposure to companies in fossil fuel sector, Non-renewable energy consumption and production, Energy consumption intensity per high-impact climate sector, Activities negatively affecting biodiversity-sensitive areas, Emissions to water, Hazardous waste ratio, Water usage and recycling (optional choice), Violations of UN Global Compact principles or OECD Guidelines for Multinational Enterprises, Lack of processes and compliance mechanisms to monitor compliance with UN Global Compact and OECD Guidelines for Multinational Enterprises, Unadjusted gender pay gap (optional choice), Board gender diversity, Exposure to controversial weapons, Excessive CEO pay ratio. Sovereign bond issuers are monitored for Social violations and GHG intensity indicators.

Active stewardship: Environmental and social related company engagements leading to improvement in companies sustainability policies are measured by folloiwng indicators: (a) level of active engagement and voting policies, (b) number of engagements, (c) rate of voting and (d) participation at shareholder and bondholder meetings.

Methodologies

SDG alignment methodology. A company is considered 'aligned' and defined as a sustainable investment when over 50% of their revenues or over 50% of their CAPEX invested are related to activities which are deemed to contribute to one of the aforementioned nine UN SDGs. These 50% thresholds represent a significant intentionality of the company in regards to the contributing activity and its plans for growth.

In order to determine which companies are aligned, we have identified a robust business classification system and mapped 1700 different business activities. In addition, we have used the SDG Compass, a resource created by GRI, the UN Global Compact and the World Business Council for Sustainable Development to identify business activities which contributed to each SDG. In addition, we created

Carmignac 'investable themes' based upon the business activities. Based on these themes, we have filtered through each business activity in the classification system, aligning the appropriate business activities with Carmignac's 'investable themes' and using the SDG targets to verify suitability. This was reviewed by members of the Responsible Investment (RI) and Investment team. Once the 50% revenue or CAPEX threshold is met, the full weight of the holding is considered aligned.

ESG analysis methodology. The Carmignac's proprietary ESG platform "START" (System for Tracking and Analysis of a Responsible Trajectory) provides a platform that aggregates raw company ESG data of 31 ESG indicators, if available, across Environmental, Social and Governance pillars. Overall ESG scores for companies grouped by sector, capitalisation and region are computed. The investment team members are responsible for company proprietary ESG analysis and confirms the START score and analysis by a commentary of ESG risks and integrates these analyses into the investment decisions. The START platform is available on the Verity RMS internal database for investment research accessible to all investment staff.

ESG Sovereign debt scoring methodology. Carmignac's proprietary Global Sovereign debt scoring model (Global Model) screens and scores 100 countries which are ranked between 1 (bad) & 5 (good), with dispersion across the full range of scores. For any criteria, countries' ESG rankings are based both on 1) spot data and 2) recent evolution/trends. These two rankings are then converted into an overall rating between 1 (bottom) & 5 (top) . The dynamic rating is overweighed for emerging countries (75%) and underweighted for developed countries (25%) in order to reward recent ESG-positive trends and to mitigate structural under-investment of developing countries in ESG projects . For any E, S & G pillar, criteria rankings are then averaged to get a pillar scoring. This score is then adjusted either positively or negatively, where appropriate, as a result of forward-looking qualitative analysis. The overall ESG score is composed of the equally weighted average of the three components E, S, and G.

Negative screening and exclusions methodology. Carmignac employs ESG related exclusions and specific extended Sub-Fund exclusions, as mentioned above, which are hard exclusions implemented into the compliance tool CMGR linked to the BBG Aim Portfolio Management Order system. Every quarter the Exclusion lists are reviewed by the Sustainable Investment team including the following updates: index reweighting, revised revenue data and revenue thresholds and new investments. The updated list is uploaded and monitored by the Risk Management team. For further information please refer to the Exclusion policy on the Carmignac Sustainable Policy and Reports web page.

Principal Adverse Indicator (PAI) Impact methodology. Carmignac sources the Principle Adverse Impact indicators for all funds classified as Article 8 or 9 under the EU SFDR from the data provider Impact Cubed. Each indicator data point is sourced and averaged over 4 quarters before a yearly publication is made. The definitions for each of the 14 mandatory equity-related PAIs plus two optional, and if relevant 2 Sovereign-related PAIs, are as indicated in the Annex 1 of the SFDR Level II 2019/2088. Publication and full methodology will be published on the Carmignac Sustainable Investment website in 2023 in line with the aforementioned Disclosure requirements.

Stewardship and engagement methodology. The Sub-Fund exercises it votes to seek a 100% voting participation target through the proxy voting provider ISS. The Portfolio Manager has control of the voting choice and exercises that right with the recommendation of the Sustainable Investment team. ESG and controversy related Engagements led by the Sustainable investment team are programmed each quarter, the outcomes of which, are documented in the Engagement tool within the Investment team Verity RMS database. For further information please refer to the Stewardship Report on the Carmignac Sustainable Policy and Reports web page.

Data Sources and Processing

(a) **The data sources used to attain the environmental and social characteristics of the financial product**: The Fund uses several data sources that are aggregated into the Carmignac proprietary ESG System START. The sources are FactSet for revenue data, corporate filings for CAPEX data, S&P Trucost for carbon emissions data, TR Refinitiv for raw company ESG data, MSCI and ISS ESG for controversial behaviours, UNGC and OECD Business and Human Rights Norms screening. The Global sovereign scoring model obtains public information from, amongst others, the World Bank, the IMF, The Heritage Foundation, the Oxford University…

(b) **The measures taken to ensure data quality:** The Sustainable investment team includes ESG data experts who are in charge of automated checks such as identifying outliers in a data set, as well as verifying alternative data sources.

(c) **How data are processed**: as explained in the Methodologies section above. The revenue data (main criteria to monitor the sustainable objective) is monitored through FactSet and mapped through investable themes that are aligned with the aforementioned 9 of the 17 UN Sustainable Development Goals.

(d) **The proportion of data that are estimated**: ESG START scoring and company revenue data is not estimated. PAIs data, contain an average of 46% estimations whereby all reported PAIs are aggregated for all Carmignac eligible funds as of 30/09/2022. Carbon emissions data (Scope 1 and 2) are mainly based on fully disclosed company emissions declarations with few estimations.

Limitations to Methodologies and Data

The Fund's sustainability risk may differ from the sustainability risk of the Reference indicator.

In terms of methodology, our SDG Framework is just one framework that can be used to illustrate positive outcomes; there are others that may yield different results. The approach uses public revenue data and is based upon the UN SDGs' targets and literature. However, as the mapping of the specific business activities that are to be considered 'aligned' is proprietary, there may be variations between our approach and others.

Due Diligence

Over 90% of the Funds' assets (listed equities, corporate and sovereign bonds where applicable) are assessed for ESG score and risks. Proprietary analysis is combined with the ESG scoring process of Carmignac's proprietary system START and the sovereign bond proprietary models (Global and Impact models) where applicable.

The investment team are ultimately responsible for the proprietary ESG assessment. The auto populated START score is determined by a proprietary formula comparing companies within 90 peer groups aggregated by capitalization, sector and region. An upgrade or downgrade of this score can be made during the proprietary analysis and commentary by the financial or ESG analyst. The START score statistics are monitored for bias, frequency, and coherence by the Sustainable Investment team.

Periodically, both the sovereign and corporate START ESG proprietary scoring systems are back tested for potential improvement.

Regarding exclusions, on a quarterly basis the Carmignac company exclusion list and the fund specific exclusion lists if relevant are reviewed including the following updates: index reweighting, revised revenue data and impact on revenue thresholds, fund new holdings. These exclusions are entered via the compliance tool. All sectorial and controversy exclusions are hard exclusions. The Sustainable investment team have a separate reporting line to the Managing Director of Carmignac UK branch.

Regarding the sovereign ESG scoring, automation of both, the data gathering, and composition of the country scores, has removed most possibility of human error in its calculation.

Engagement of Policies

Carmignac operates active voting and engagement policies that reflect their environmental, social and governance themes. The voting participation target is 100% of all possible votes. An Engagement plan is established to identify engagements with companies in which we are invested that show poor management of ESG related risks, where Carmignac has identified a specific theme, or where a specific impact or investigation of a controversy is required.

Please refer to the engagement policy : Policies and Reports

- **Fund:** Carmignac Portfolio Patrimoine
- **Management:** Diversified strategies
- **Legal form:** Luxembourg SICAV sub-fund
- **ISIN code (A EUR acc share class):** LU0992627611
- **Recommended minimum investment horizon**: 3 years
- **Risk scale**: 4
- **Fund inception date:** 15/11/2013
- **Reference indicator:** MSCI ACWI (USD) (Reinvested net dividends)

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