

**SFDR Article 9 (Sub-)Funds – Website Disclosures**  
**Sections based on Articles 37 to 49 [SFDR](#)**  
**[Delegated Regulation \(EU\) 2022/1288](#)**

**Full name of the Article 9 (sub-) fund:** Electric Mobility Value Niche

**Legal entity identifier:** 549300YAC68YVVVXQ079

**Date of review:** 30 December 2022

*Disclaimer: The present working document may be subject to further regulatory changes.*

# Sustainability-related disclosures

## Summary

### Sustainability Objective

The Sub-Fund sustainable objective is to facilitate the transition to electric mobility with significant positive repercussions in terms of decarbonization and human health. This is implemented by investing in companies instrumental to the achievement of the following United Nations Sustainable Development Goals (UN SDGs): Affordable and Clean Energy goal (SDG 7), Industry, innovation and infrastructure (SDG 9), Sustainable cities and communities (SDG 11), as well as Climate action (SDG 13).

### Investment Strategy

Electric Mobility Value Niche is an actively managed Sub-Fund that invests in companies active within the theme of electric mobility and Advanced Driver Assistance System (the "ADAS"). The selection of these stocks is based on a value approach and is implemented through fundamental analysis. The strategy integrates sustainability indicators on a continuous basis as part of the stock selection process. The Sub-Fund seeks also to invest mainly in stocks issued by companies with high quality Environmental, Social and Governance (ESG) profiles. Amongst others, the Sub-Fund applies activity-based exclusions, good governance policy and considers Principal Adverse Impacts ("PAI") in the investment process.

### Proportion of investments

This Sub-Fund invests at least 100% (excluding cash and derivatives) of its net assets in investments that are sustainable. Within this category, 100% of the Fund's equity investments are Sustainable Investments with a social objective.

### Monitoring and due diligence

The Investment Manager has carried out an adequate investment due diligence process and monitoring regarding the sustainability risks of its investment strategies. To define whether or not a company contributes to the Sustainable Development Goals (SDG), the Investment Manager has created a three-step proprietary framework. The ESG due diligence process is focused on how individual companies in the portfolio perform on ESG factors. The Sustainability team will monitor the SDG analysis results and the ESG ratings, with a particular focus on the firms with a more elevated sustainability risk.

### Data sources, methodologies and limitations

The fund uses several sources for gathering sustainability data. The Investment Manager maintains comprehensive methodology documents of its proprietary analytical frameworks on its website.

The Investment Manager relies predominantly on third-party ESG data providers. The Investment Manager has no direct control over the data collected. However, the investment manager makes best effort to verify those data, investigating apparent inconsistencies.

In terms of SDG analysis, the Investment Manager uses a clear and disclosed proprietary SDG analysis. As such this can yield different results compared to other SDG analyses.

For what concerns the violation of the OECD Guidelines for Multinational Enterprises, ILO standards, UNGPs, or UNGC, the analysis relies also on third-party providers, and/or controversies analysis and/or investee company's management feedback. For what concerns the third-party providers, the data obtained bear the same limitations disclosed about third-party data providers.

The main limitation to the methodologies and data sources is referred to the absence of information from the listed companies with respect to the PAI. Data are often not available or difficult to assemble, especially in the case of emerging markets. Then, the ESG data related to PAI can differ from one provider to another due to different methodological approaches. The Investment Manager expects the level of disclosure to improve significantly within a

few years, given the pressure from the investment community to demand more and better information from listed companies. In the meantime, the Investment will engage the companies to improve the communication framework.

**Engagement strategy**

The Investment Manager goal is to improve sustainability practices and communications through consistent and positive engagement. The Investment Manager will engage with the firms in all those cases where critical elements emerge from the ESG, DNSH, Minimum Safeguards and Controversies analysis in a way to understand the reason why the issues occurred and the firm's commitment to address them.

**Benchmark**

No specific index has been designated as a reference benchmark to determine whether this financial product is aligned with the social objective that it promotes.