# 2a. onemarkets Amundi Flexible Income Fund – Template pre-contractual disclosure for 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: onemarkets Amundi Flexible Income Fund Legal entity identifier: 529900ANIKKO9ZCAA439

#### 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, establishing environmentally sustainable economic activities. That Regulation does not lay down 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 X		
It will make a minimum of sustainable investments with an environmental objective:%	x 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 5 % 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	<ul> <li>with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy</li> <li>with a social objective</li> </ul>		
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 Sub-Fund promotes environmental and/or social characteristics by complying with the ESG analysis framework and scoring methodology of Amundi which includes a mix of exclusion, ESG integration and engagement approach.

Amundi's ESG analysis framework (available online: https://www.amundi.lu/retail/Local-Content/Footer/Quick-Links/Regulatory-information/Amundi) has been designed to assess corporate behaviour in three fields: Environment, Social, and Governance (ESG). Amundi assesses companies' exposure to ESG risks and opportunities, including sustainability factors and sustainability risks, and how corporates manage these challenges in each of their sectors. As far as issuers of listed securities are concerned, Amundi scores issuers regardless of the instrument type, equity or debt.

The environmental and/or social characteristic promoted by this financial product are embedded in the criteria identified to perform the ESG analysis framework.

These criteria are different for corporates issuing listed instruments and for sovereign entities.

Regarding corporate issuers, our ESG analysis framework is comprised of 38 criteria, of which 17 are cross-sector criteria, common to all companies whatever their business sector, and 21 sector specific criteria. These criteria were designed to either assess how sustainability issues might affect the issuer as well as the quality of the management of this dimension. Impact on sustainability factors as well as quality of the mitigation undertaken are also considered. All criteria are available in the Investment Manager's front office portfolio management system.

#### Sector specific criteria

#### **Environment**

- Clean Energy
- Green Car
- Green Chemistry
- Sustainable Construction
- Responsible Forest Management
- Paper Recycling
- Green Investing & Financing
- Green Insuring
- Green Business
- Packaging

#### Social

- Bioethics
- Responsible Marketing
- Healthy Product
- Tobacco Risk
- Vehicle Safety
- Passenger Safety
- Responsible Media
- Data Security & Privacy - Digital Divide
- Access to Medicine
- Financial Inclusion

#### **Cross sector criteria**

#### **Environment**

- Emissions & Energy
- Water Management
- Biodiversity & Pollution
- Supply Chain-Environment

#### Social

- Health & Safety
- Working Conditions
- Labour Relations
- Supply Chain Social 2
- Product & Customer Responsibility
- Community Involvement & Human Rights

- Board Structure
- Audit & Control - Remuneration
- Shareholders'
  - Rights
- Ethics - Tax Practices
- ESG Strategy

#### Governance

The extent to which these criteria affect an issuer's ESG score depends on the relative importance attributed to them in the model compared to the other factors considered. Each issuer is rated with a score measured against the average of its sector, in order to distinguish between best practices and worst practices at the sector level.

Regarding sovereign issuers, Amundi's methodology relies on a set of about 50 ESG indicators. All indicators have been grouped into 8 categories, each category falling into one of the pillars E, S or G. Similar to our corporate ESG rating scale, issuers' ESG score is translated in an ESG rating ranging from A to G:

Environment	Social	Governance
- Climate Change - Natural Capital	<ul><li>Human Rights</li><li>Social Cohesion</li><li>Human Capital</li><li>Civil Rights</li></ul>	<ul><li>Government Effectiveness</li><li>Economic Environment</li></ul>

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

What sustainability indicators are used to measure the attainment of each of the environmental or social characteristics promoted by this financial product?

Sustainability indicators used to measure the attainment of environmental or social characteristic are the ESG Rating assigned to each financial instruments according to a proprietary methodology, the resulting ESG Rating of the portfolio and the ESG Rating of the benchmark or investment universe.

Regarding the ESG Rating, Amundi bases its ESG analysis of corporates on a "best-in-class" approach. Each issuer is assessed with a quantitative score scaled around the average of their sector, which distinguishes best practices from worst practices at sector level. Amundi's assessment relies on a combination of non-financial data from third parties and qualitative analysis of associated sector and sustainability themes. The quantitative score is translated into a letter rating which ranges from a scale of A (for best practices) to G (for the worst ones). G-rated companies are excluded from investment of this fund. The ESG Rating of each issuer is the result of the aggregation of the environmental, social and corporate governance ratings.

The overall ESG Rating of the portfolio is the AUM-weighted average of each issuer's ESG Rating. The ESG Rating of the portfolio must be higher than the one of the benchmark or investment universe.

Moreover, Amundi applies a targeted exclusion policy with reference to issuers that do not comply with Amundi Group's Responsible Investment Policy, such as issuers exposed to the exclusionary rules and thresholds set out in our sector policy (i.e. thermal coal, tobacco) or do not comply with internationally recognised conventions and/or frameworks, and national regulations.

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 objectives of the sustainable investments according to article 2(17) SFDR are to invest in investee companies that seek to meet two criteria:

Sustainability indicators measure how the environmental or social characteristics promoted by the financial product are attained.

- 1. follow best environmental and social practices; and
- 2. avoid making products or providing services that harm the environment and society.

At the investee company level this means that an investee company must be a "best performer" within its sector of activity on at least one of its material environmental or social factors. The definition of "best performer" relies on Amundi's proprietary ESG methodology which aims to measure the ESG performance of an investee company.

# 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?

To ensure sustainable investments do no significant harm ('DNSH'), Amundi utilises two tests:

- 1. The first DNSH test relies on monitoring the mandatory Principal Adverse Impacts indicators where robust data is available (e.g. GHG intensity of investee companies) via a combination of indicators (e.g. carbon intensity) and specific thresholds or rules (e.g. that the investee company's carbon intensity does not belong to the last decile of the sector). In addition to the criteria that have been developed specifically for this test, Amundi already considers specific Principal Adverse Impacts indicators within its exclusion policy as part Amundi's Responsible Investment Policy (e.g. exposure to controversial weapons).
- Beyond the specific Principal Adverse Impacts indicators covered in the first test, Amundi has defined a second test in order to verify that the investee company does not have an overall environmental or social performance that is amongst the worst of its sector.

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

The first DNSH filter relies on monitoring of mandatory Principal Adverse Impacts indicators in Annex 1, Table 1 of the RTS where robust data is available via the combination of following indicators and specific thresholds or rules:

- Have a CO2 intensity which does not belong to the last decile compared to other companies within its sector (only applies to high intensity sectors), and
- Have a Board of Directors' diversity which does not belong to the last decile compared to other companies within its sector, and
- Be cleared of any controversy in relation to work conditions and human rights.
- Be cleared of any controversy in relation to biodiversity and pollution.

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, anticorruption and antibribery matters.

Amundi already considers specific Principal Adverse Impacts within its exclusion policy as part of Amundi's Responsible Investment Policy. These exclusions, which apply on the top of the tests detailed above, cover the following topics: exclusions on controversial weapons, Violations of UN Global Compact principles, coal and tobacco.

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 OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights are integrated into our ESG scoring methodology. Our proprietary ESG rating tool assesses issuers using available data from our data providers. For example the model has a dedicated criteria called "Community Involvement & Human Rights" which is applied to all sectors in addition to other human rights linked criteria including socially responsible supply chains, working conditions, and labor relations. Furthermore, we conduct controversy monitoring on a, at minimum, quarterly basis which includes companies identified for human rights violations. When controversies arise, analysts will evaluate the situation and apply a score to the controversy (using our proprietary scoring methodology) and determine the best course of action. Controversy scores are updated quarterly to track the trend and remediation efforts.

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.



☐ No

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

$\boxtimes$	Yes, Amundi considers all the mandatory Principal Adverse Impacts and relies on
	a combination of exclusion policies (normative and sectorial), ESG rating
	integration into the investment process, engagement and voting approaches.
	A respective PAI policy outlining the PAI is available online:
	https://www.structuredinvest.lu/de/en/fund-platform/esg.htmlFurther
	information on principal adverse impacts will be provided in accordance with Art.
	11 (2) of Regulation (EU) 2019/2088 in an annex to the Fund's annual report.



The investment strategy guides investment decisions based on factors such as investment objectives and risk tolerance.

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

The investment manager first constructs a macro strategy portfolio to provide a return not correlated to any market, and then overlays this with an investment strategy to generate excess return. The macro strategy portfolio consists of any type of equities and bonds from any type of issuers worldwide and the asset allocation and long or short positioning are driven by macroeconomic, thematic and regional scenarios. The excess return strategy principally targets interest rates, equities, corporate bonds, currencies and commodities. This strategy will take advantage of price differentials between correlated financial instruments but will also be based on the direction in which a specific security is heading. A sophisticated process continually assesses risk and performance and determines the allocation among different types of asset classes.

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?

The Sub-Fund integrates Sustainability Factors in its investment process as outlined above. In particular, the Sub-Fund seeks to achieve an ESG score of its portfolio greater than that of its investment universe.

The Amundi ESG rating is an ESG quantitative score translated into seven grades, ranging from A (the best scores universe) to G (the worst). All the G rated securities are excluded from the eligible universe and all the securities belonging to the exclusion list, such as those not respecting international conventions, correspond to a G rating. For further details please refer to Amundi Responsible Investment Policy available on the public website.

A targeted exclusion policy is applied to the portfolio management activity by excluding companies in contradiction with both the Management Company exclusion policy (as described in the Prospectus) and the Investment Manager Responsible Investment Policy (as described below).

The Investment Manager exclusion policy includes the following rules:

- legal exclusions on controversial weapons (anti-personnel mines, cluster bombs, chemical weapons, biological weapons and depleted uranium weapons, etc.);
- 2. exclusion of companies that seriously and repeatedly violate one or more of the 10 principles of the Global Compact, without credible corrective measures;
- 3. sectoral exclusions of Amundi group on Coal and Tobacco (details of this policy are available in Amundi's Responsible Investment Policy available on the website www.amundi.lu).

Additionally, the Sub-Fund has defined exclusion criteria identifying Companies and/or Countries and/or underlying which should not be invested in or which should be invested in respecting predefined thresholds, subject to the Sub-fund's investments not complying with such exclusion criteria remaining below 10% of the relevant Sub-Fund's net assets.

1. Companies that are involved in severe violations of the UN Global Compact

- 2. Companies manufacturing, maintaining, or trading controversial and/or morally unacceptable weapons, as identified through the international obligations, treaties and legislations.
- Companies involved in thermal coal production and/or production of energy from thermal coal which derive from these businesses more than 10% of their consolidated revenues. It's also requested a mandatory phase out by 2028.
- 4. Companies involved in controversial fuel production and companies that extract hydrocarbons with controversial techniques or in areas with high environmental impact.
- 5. Companies involved in the tobacco production which derive from these businesses more than 5% of their consolidated revenues.
- 6. Companies involved in the nuclear energy production which derive from these businesses more than 15% of their consolidated revenues.
- 7. Companies involved in the weapons production which derive from these businesses more than 10% of their consolidated revenues.
- 8. Companies involved in the gambling business which derive from these businesses more than 15% of their consolidated revenues.
- 9. Companies involved in the adult entertainment business which derive from these businesses more than 15% of their consolidated revenues.

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

N/A. There is no minimum committed rate for the Sub-Fund.

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

The governance dimension, which is one of the three pillars of ESG rating methodology, is set to ensure that a company's management is able to organise a collaborative process between the different stakeholders that guarantees it will meet long-term objectives (therefore guaranteeing the company's value over the long term). This dimension provides an analysis of how a company integrates all of its stakeholders in its development model.

Among the criteria that contribute to the rating there are:

- 1. Independence of board
- 2. Audit and control
- 3. Compensation
- 4. Shareholders' rights
- 5. Ethics
- 6. ESG strategy
- 7. Tax practices

Good governance practices include sound management structures, employee relations, remuneration of

staff and tax compliance.



#### Asset allocation

describes the share of investments in specific assets.

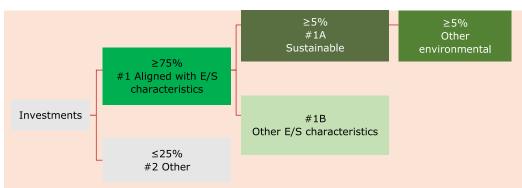
Taxonomy-aligned activities are expressed as a share of:

- 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?

A minimum of 75% of the Sub-Fund's securities and instruments will be used to meet the promoted environmental or social characteristics, where they integrate sustainability factors through the exclusion of any issuers specified in the exclusion list of Amundi's responsible investment policy as further described in section "Sustainable Investment" of the Prospectus and on the website <a href="https://www.amundi.lu">www.amundi.lu</a>.

Furthermore, the sub-fund commits to have a minimum of 5% of Sustainable Investments according to article 2(17) SFDR



**#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.

**#2 Other** 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 Subcategory **#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?

Derivatives are not used to attain the environmental and social characteristics promoted by the sub-fund.



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

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.



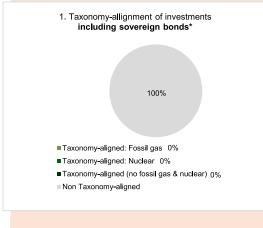
Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy<sup>9</sup>?

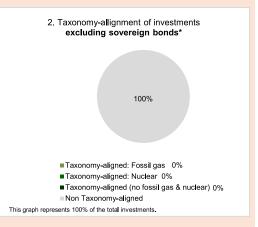
☐ Yes:

☐ 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?

N/A. The Sub-Fund has no minimum proportion of investment in transitional or enabling activities.



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

The Sub-Fund invests at least 5% of assets in Sustainable Investments according to article 2(17) SFDR, typically across both environmental and social objectives. It does not

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.

commit to any specific individual or combination of Sustainable Investment objectives and therefore there is no committed minimum share.



What is the minimum share of socially sustainable investments?

The Sub-Fund invests at least 5% of assets in Sustainable Investments according to article 2(17) SFDR, typically across both environmental and social objectives. It does not commit to any specific individual or combination of Sustainable Investment objectives and therefore there is no committed minimum share.



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

Included in "#2 Other" are cash and unrated instruments for the purpose of liquidity and portfolio risk management. Unrated instruments may also include securities for which data needed for the measurement of attainment of environmental or social characteristics is not available.



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?

There is no specific benchmark defined to assess the alignment with the promoted characteristics.

How is the reference benchmark continuously aligned with each of the environmental or social characteristics promoted by the financial product?

N/A

How is the alignment of the investment strategy with the methodology of the index ensured on a continuous basis?

N/A

How does the designated index differ from a relevant broad market index?

N/A

Where can the methodology used for the calculation of the designated index be found?

N/A



# Where can I find more product specific information online? More product-specific information can be found on the website:

https://www.structuredinvest.lu/de/en/fund-platform/esg.html