

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

Name of the product:
Mandarine Funds - Mandarine Europe Microcap

Legal entity identifier: 549300QI6VJBIEEROD28

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 established by Regulation (EU) 2020/852, which lists **environmentally sustainable economic activities**. This regulation does not list socially sustainable economic activities. Sustainable investments with an environmental objective are not necessarily aligned with the taxonomy.

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: %**

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

It will make a minimum of **sustainable investments with a social objective: %**

It **promotes Environmental and Social (E/S) characteristics** and, while it does not have as its objective a sustainable investment, it will have a minimum proportion of 10% of sustainable investments

with an environmental objective in economic activities that 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 promotes E/S features, but **will not make sustainable investments**



What environmental and/or social characteristics are promoted by this financial product?

Through the selection of the highest rated European micro-cap companies within their sector of activity ("Best-in-Class" approach), the Fund promotes the following environmental and social characteristics:

Sound governance;
 Compliance with social criteria;
 Consideration of its environmental impact.
 Consideration of the impact on stakeholders.

ESG criteria are integrated into the strategy by excluding companies and issuers based on their exposure to certain activities that are disapproved on ESG grounds.

To achieve this, the Fund implements an approach of selecting European micro- and small-cap companies with the best ESG practices within their sector, leading to the elimination of 20% of issuers from the investable universe.

Further information on the general investment policy of the Fund is available in the "Investment Objective and Policy" section of the prospectus.

Minimum proportion of sustainable investments The Fund invests in part in sustainable investments, i.e. companies and issuers involved in activities that contribute to an environmental or social objective while not causing significant harm to other environmental or social objectives.

ESG Rating The Fund invests in securities issued by companies that have been analysed and rated using Mandarine Gestion's proprietary ESG tool to ensure that only securities issued by companies that meet the minimum ESG score requirement are eligible.

The Fund's own Best-in-Class approach to ESG rating is based on a set of criteria, grouped into the following four pillars:

Sound governance;
 Compliance with social criteria;
 Consideration of its environmental impact.
 Consideration of the impact on stakeholders.

At least 90% of the net assets of the Fund are rated.

Exclusions based on sectors and values Exclusion filters are applied to the portfolio construction process to restrict investments in companies and issuers that have significant exposure to certain activities that may be detrimental to the environment or society at large:

- Any direct investment in companies involved in the manufacture, trade, stockpiling or services for anti-personnel mines, cluster bombs, in accordance with the Ottawa and Oslo Treaty;
- Companies producing, stockpiling or trading in chemical, biological and depleted uranium weapons;
- Companies that seriously and repeatedly violate one or more of the 10 principles of the UN Global Compact;
- The most controversial companies (severity level 5 on a scale of 1 to 5).

Benchmark: The Benchmark Indices used by the Fund is not “EU Paris-Aligned and Climate Transition-Benchmark”, whether it is a Climate Transition Benchmark “CTB” index of climate transition or Paris Aligned Benchmark “PAB” index aligned with the Paris Agreement.

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

To measure the achievement of environmental or social characteristics, the manager will use the following indicators, where relevant data is available.

The main sustainability indicators are the criteria for the selection of corporate issuers grouped into the four pillars of the Best-in-Universe filter:

- Governance (independence and gender balance of the board of directors, separation of CEO/Chairman, remuneration policy, share of audit costs, etc.)
- Social (staff turnover and training, etc.);
- Stakeholders (social criteria in the practices of subcontractors, etc.)
- Environmental (environmental policy, carbon intensity trends, etc.)

The Fund also monitors and publishes several ex-post impact indicators of its portfolio:

Human capital indicators The Fund analyses annual employee turnover, hours of employee training and the percentage of companies with employee share-ownership schemes.

Carbon footprint The Fund tracks its carbon impact in comparison to the benchmark. It is expressed in tonnes of CO2 equivalent per million euros invested.

Board diversity This indicator reflects the weight of independent directors in the collegial management body of invested companies. It is expressed as a percentage and is compared to the benchmark.

Fossil fuel policy The Fund monitors its exposure to fossil fuels in accordance with the management company's dedicated internal policy.

Issuers concerned: The gas, oil and coal sectors, both upstream/midstream and downstream and from the first euro of turnover or capital employed.

Engagements: Shareholder engagement, in particular by checking the consistency of the divestment scenarios of the issuers concerned. The managers are systematically alerted to the level of exposure of eligible issuers in their investment universe. The assessment of exposure to fossil fuels is also carried out at the level of all the investments of the management company.

With regard to coal, the management company is committed to the cessation of all investments in funds managed by Mandarin Gestion by 2030.

○ ***What are the objectives of the sustainable investments that the financial product mainly intends to make and how does the sustainable investment contribute to such objectives?***

The Fund promotes environmental and social characteristics and will invest at least 10% of its assets in sustainable investments.

The Fund's sustainable objective is to create a positive impact by investing in companies that carry out economic activities that contribute substantially to at least one of the objectives of the EU taxonomy. The Fund uses a benchmark that is not aligned with its sustainable objective.

The EU taxonomy identifies six environmental objectives: climate change mitigation, adaptation to climate change, sustainable use and protection of water and marine resources, transition to a circular economy (including waste prevention and recycling), pollution prevention and reduction, and protection and restoration of biodiversity and ecosystems, and identifies economic activities considered environmentally sustainable for investment purposes. The alignment of companies' activities with the objectives of the EU taxonomy is identified and assessed provided that data is available and of adequate quality. Depending on the availability of feasible investment opportunities, the Fund

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

may contribute to one of the environmental objectives set out in the taxonomy regulation.

The Fund benefits from an extra-financial rating of the issuers in its investment universe. The construction of this rating is based on the proprietary ESG-View system, which is based on 4 pillars: Environment (E), Social (S), Governance (G) and Stakeholders (SH). The analysis of the extra-financial indicators that make up the pillars results in a score ("**ESG-View Score**") for each pillar, ranging from -2 to +2.

Sustainable investment is subject to a regulatory definition, according to the provisions of the SFDR regulation. It corresponds to an investment in an economic activity:

1. Contributing significantly to an environmental (taxonomy or not) or social objective,
2. Provided that these investments do not cause material harm to any of these objectives (Do Not Significantly Harm or DNSH),
3. and that the companies in which investments are made apply good governance practices.

In addition to the constraints related to the promotion of E and S characteristics, economic activities qualifying as sustainable investments must verify points 1 to 3 above, as follows:

1. **Significant contribution:** The issuer's ESG-View Score must be strictly above average, i.e. 0 for a score between -2 and +2, on the E or S pillar, in order to be considered as contributing significantly to an E or S objective.
2. **No significant harm:**
 - a. The absence of significant harm to other sustainable objectives is verified by requiring an ESG-View Score above -1 on both pillars E and S for a score between -2 and +2. The ESG-View Score includes indicators relating to the principle adverse impacts on each of the E and S pillars, enabling the management company to ensure that the economic activity being invested in complies with the DNSH principle.
 - b. For issuers passing this first filter, all 14 indicators relating to the Principal Adverse Impact (PAI) defined by the regulation are analysed, as well as those (at least two) of the 26 optional indicators that are relevant. Thresholds are defined for each of these indicators and crossing a threshold is considered as an alert, leading to the need for a specific analysis by an ESG analyst, which will lead to the acceptance or refusal of the issuer's sustainable investment status.
3. **Good governance:** Finally, the eligible issuer will have to achieve an ESG-View Governance Score above -1 to ensure that it applies certain minimum standards.

- To what extent do the sustainable investments that the financial product intends to mainly achieve not cause significant harm to an environmentally or socially sustainable investment objective?***

The Fund shall ensure that investments (other than investments in cash or cash equivalents and derivatives held for hedging purposes) do not have a significant negative impact on one or more environmental and social objectives.

To this end, all issuers that qualify as sustainable investments are assessed on the basis of an Extra-financial rating that takes into account the following main negative impacts:

Greenhouse gas (GHG) emissions	<ol style="list-style-type: none"> 1. Greenhouse gas emissions; 2. Carbon footprint; 3. Greenhouse gas emission intensity of invested companies; 4. Exposure to companies operating in the fossil fuel sector; 5. Share of non-renewable energy consumption and production; 6. Energy consumption intensity by high climate impact sectors;
Biodiversity	7. Activity with a negative impact on biodiversity-sensitive areas
Water	8. Activity with a negative impact on water
Waste	9. Ratio of hazardous waste
Social and employee issues	<ol style="list-style-type: none"> 10. Violation of the principles of the UN Global Compact and the OECD Guidelines for Multinational Enterprises; 11. Lack of control and compliance relating to point 10.; 12. Unadjusted gender pay gap; 13. Gender balance on the board of directors; 14. Exposure to controversial weapons.

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

The main negative impacts of each of the qualified sustainable investment issuers in the portfolio are analysed and taken into account at the time of the investment decision, in particular to ensure that the issuers do not significantly impair environmental and/or social objectives.

In particular, within the Extra-Financial Rating, a specific score is given on the 14 indicators listed above in order to identify the level of negative impact of an issuer's activity on sustainable investment objectives.

In addition, the Fund takes into account the sustainability risks implemented at the management company level through its sustainability policy (https://www.mandarine-gestion.com/uploads/reg/reg_mandarine_durabilite-politique_fr.pdf). At Fund level, risk analysis may lead to the exclusion of particularly exposed issuers, whether or not they are already in the portfolio.

The management company has set up an indicator called "SSRI" (Synthetic Sustainability Risk Indicator) for each investment in the portfolios, which is divided into 5 parts:

- Company risk exposure, which is mainly a function of the risks associated with its sector of activity;
- The portion of risk exposure that may be taken on by the company;
- The portion of risk exposure taken on by the company;
- The portion of unhedged risk that can be taken on by the company;
- And finally the portion of unhedged risk that cannot be taken on by the company.

The figure used by the management company is the net risk carried by the issuer, i.e. its gross risk exposure (Company exposure below) minus an amount corresponding to the risk covered by the company (Managed risk).

Fund-level monitoring is then applied on the basis of aggregated scores.

- **How are the sustainable investments aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights?**

Alignment with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights is tested and ensured through the process of identifying sustainable investments.

In fact, the analysis of compliance with the OECD Guidelines is an integral part of the definition of sustainable investment activities.

In addition, the OECD principles and the UN guidelines are taken into account in the analysis of key negative impacts, which is an integral part of the analysis of the sustainability of issuers.

The EU taxonomy establishes a 'do no significant harm' principle whereby taxonomy-aligned investments should not cause significant harm to the objectives of the EU taxonomy and is accompanied by specific EU criteria. The "do no significant harm" principle only applies to investments underlying the financial product that take into account the European Union's criteria for environmentally sustainable economic activities. The investments underlying the remaining portion of this financial product do not take into account the European Union's criteria for environmentally sustainable economic activities. Any other sustainable investment must also not cause significant harm to environmental or social objectives.

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

Yes

No

The negative impacts of investments on sustainability factors are taken into account **when selecting sustainable investments** in their own right in the investment process.

What investment strategy does this financial product follow?

The objective of the Fund is to provide investors with long-term growth from an actively managed portfolio of listed equities selected from the universe of European micro and small cap companies and to outperform the 50% MSCI® Europe Microcap NR and 50% MSCI® Europe Microcap NR Ex UK composite benchmark.

To achieve this objective, the Fund pursues the following investment strategy:

1. Identification, within the investment universe, of companies eligible for the portfolio by applying a liquidity filter (average daily liquidity of €100,000 per day over the last three months);
2. Extra-financial strategy: Within the universe of eligible companies, implementation of the best-in-class strategy consisting of identifying companies with the best ESG practices in their sector and excluding 20% of issuers (exclusion of the last "E" quintile).
3. Financial strategy:
 - o Application of a quantitative scoring based on five pillars (growth, valuation, quality, momentum, sentiment);
 - o Fundamental analysis of managers.

For further information on the general policy, please refer to the general investment policy in the "Investment Objectives" section of the Sub-Fund factsheet.

o **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 Fund implements two types of binding exclusions, impacting the selection of stocks within the portfolio:

- The exclusion resulting from its Best-in-Class strategy, which means that it is impossible to invest in entities representing the lowest 20% of each sector in the investable universe.
- The Fund respects a minimum sustainable investment level of 10% of its net assets;
- The Fund is committed to ensuring that at least 90% of its net assets are subject to an ESG Rating.

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

The Fund also implements a "group" exclusion related to:

- companies exposed to controversial weapons;
- companies committing serious or repeated violations of one or more of the 10 principles of the UN Global Compact;
- The most controversial companies (severity level 5 on a scale of 1 to 5). In fact, controversies are an integral part of the ESG evaluation of the companies in which the Fund invests. Mandarin Gestion's ESG expertise centre carries out bi-monthly monitoring of controversies that may affect the reputation of companies in the portfolio. It is based in particular on the research work of the non-financial rating agency Sustainalytics, which ranks the level of seriousness of controversies on a scale from 1 to 5. Companies exposed to level 5 controversies are systematically excluded.

Controversy level	Penalty applied
Level 3	-0.25
Level 4	-0.50
Level 5	-0.75

○ **To what minimum extent does the financial product commit to reducing its investment scope before applying this investment strategy?**

The Fund's initial investment universe, made up of European micro- and small-cap companies that have passed the liquidity and financial analysis filters referred to above, and excluding those excluded from the investment strategy, is then reduced by at least 20% (last quintile of the Fund's investment universe rating). To this proportion should also be added entities subject to sectoral and/or normative exclusions (i.e. where a sustainability risk or the existence of a level 5 controversy has been identified, for example).

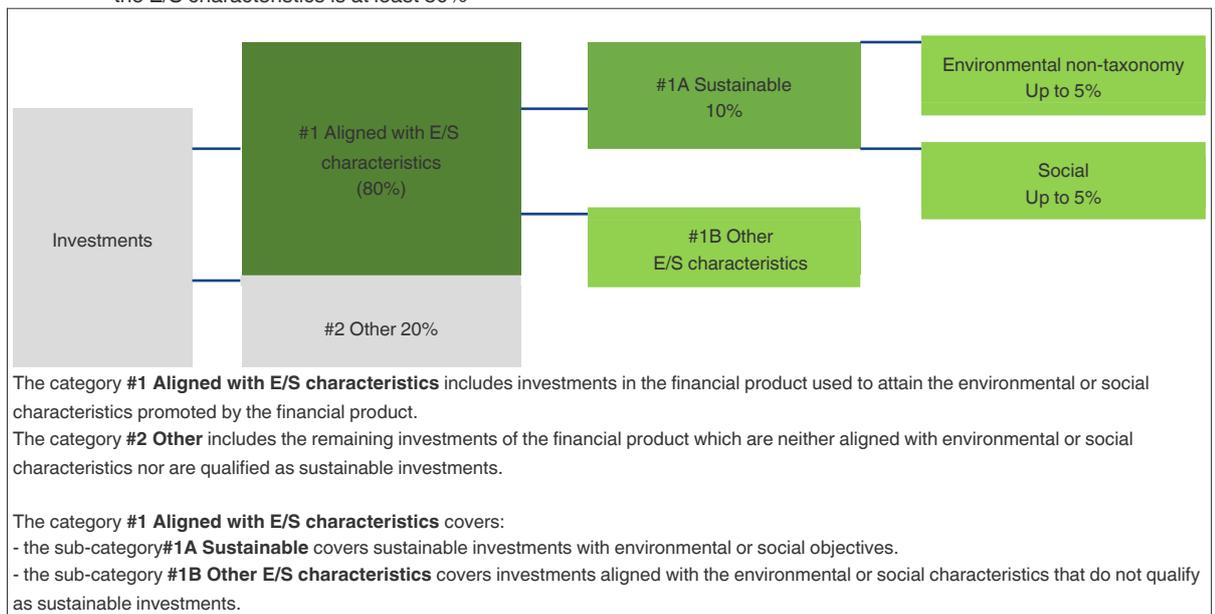
○ **What is the policy to assess good governance practices of the investee companies?**

The analysis of the good governance practices of the invested entities is taken into account at several levels of the portfolio construction process:

- ✓ Prior to investment, governance is taken into account in the rating of the company eligible for investment. The rating is particularly influenced by criteria such as the composition and functioning of the board of directors, remuneration policy and distribution among employees, treatment of shareholders and dialogue, internal anti-corruption and anti-money laundering policies (...).
- ✓ In addition, the quality of the governance practices of the entities invested by the fund may also influence the rating of the companies. Indeed, the outcome of the shareholder dialogue between the Fund's teams and the company's representatives may lead to the adoption of malus or bonus on the ESG rating.

What is the asset allocation planned for this financial product?

The expected asset allocation for this financial product is as follows: the percentage of portfolio assets aligned with the E/S characteristics is at least 80%



Good governance practices relate to sound management structures, staff relations, staff remuneration and compliance with tax obligations.

Asset allocation describes the share of investments in specific assets. Activities aligned with the taxonomy are expressed as a percentage 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.

The asset allocation is likely to change over time and the percentages should be considered as averages over long periods of time. Calculations may be based on incomplete or fragmentary data from the company or third parties.

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

N/A



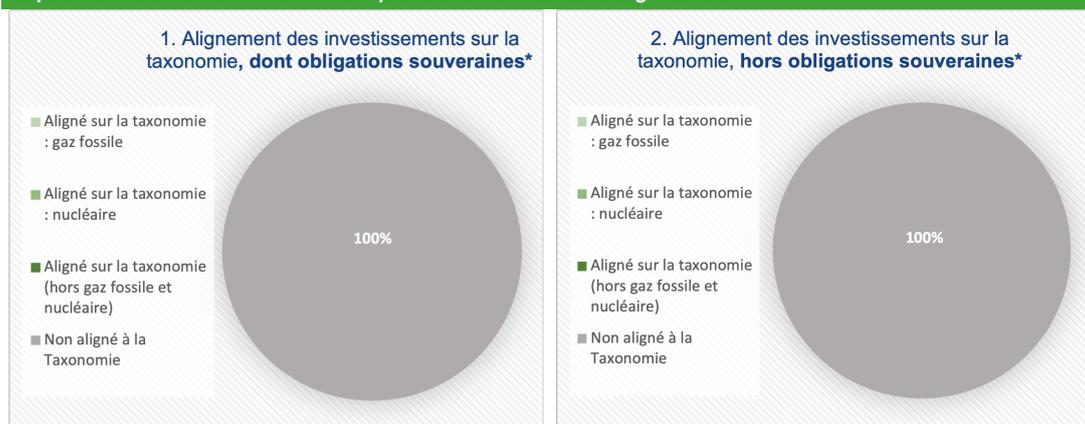
To what minimum extent are sustainable investments with an environmental objective aligned with the EU Taxonomy?

For the reasons set out above, the minimum proportion of investment in economic activities defined as environmentally sustainable according to the EU environmental taxonomy is 0%. Disclosure is therefore only focused on investments in environmental economic activities that are sustainable according to Article 2(17) of Regulation (EU) 2019/2088. Sufficiently reliable data on taxonomy alignment is scarce and data coverage remains too low to support a meaningful commitment to a minimum proportion of taxonomy-aligned investments in this fund. It cannot be excluded that some of the fund's holdings may qualify as taxonomy-aligned investments. The information to be provided and the reporting on alignment with the taxonomy will develop as the European framework evolves and company data becomes available.

Did the financial product invest in fossil gas and/or nuclear energy related activities complying with the EU Taxonomy⁽¹⁾ ?

- Yes
- fossil gas nuclear energy
- No

The two graphs below show in green the minimum percentage of investments aligned with the EU taxonomy. As there is no appropriate methodology for determining the taxonomy alignment of sovereign bonds, the first graph shows the taxonomy alignment with respect to all investments in the financial product, including sovereign bonds, where applicable, while the second graph represents the taxonomy alignment only with respect to investments in 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 investment in transitional and enabling activities?**

There is no commitment to a minimum proportion of investment in transitional and enabling activities.



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

The manager generally seeks a balanced mix of environmental and social objectives among the Fund's sustainable investments. The Fund commits to a minimum proportion of 5% of total investments that are classified as sustainable investments with an environmental objective that are not aligned with the EU taxonomy.

The Fund may invest in economic activities that are not yet eligible as environmentally sustainable economic activities or for which technical standards are not yet finalised. Company data on alignment with the European taxonomy is not yet widely available in the information published by investee companies. However, some investments may be linked to environmental objectives because of their contribution to the United Nations' SDGs.

To comply with the EU Taxonomy, the criteria for **fossil gas** include limitations on emissions and switching to fully renewable power or low-carbon fuels by the end of 2035. For **nuclear energy**, the criteria include comprehensive safety and waste management rules.

The **enabling activities** directly allow other activities to make a substantial contribution to the achievement of an environmental objective. The **transitional activities** are activities for which low-carbon alternatives are not yet available and, among others, whose greenhouse gas emission levels correspond to the best achievable performances.

The symbol  represents sustainable investments with an environmental objective that **do not take into account** the criteria for environmentally sustainable economic activities under the EU taxonomy.

(1) 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 no significant harm to 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 sustainable investments with a social objective?

The manager generally seeks a balanced mix of environmental and social objectives among the Fund's sustainable investments. The Fund is committed to a minimum proportion of 5% of total investments that are classified as sustainable investments with a social objective.

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

- Assets #2 "other" represent a maximum of 20%; these are entities that have not been evaluated due to lack of available information or contradictions; or
- Cash, possible UCIs including MMFs. The Fund may use derivatives, for example, for hedging purposes or to manage investments in issuers listed in a currency other than the Fund's reference currency (i.e.: USD, GBP, CHF, etc.).



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 does not have a reference benchmark aligned with the E/S characteristics it promotes. N/A

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

The Fund does not have a reference benchmark aligned with the E/S characteristics it promotes. N/A

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

The Fund does not have a reference benchmark aligned with the E/S characteristics it promotes. N/A

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

The Fund does not have a reference benchmark aligned with the E/S characteristics it promotes. N/A

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

The Fund does not have a reference benchmark aligned with the E/S characteristics it promotes. N/A

Where can I find more product specific information online?

More information on the product is available on the website:

- the transparency code
(<https://www.mandarine-gestion.com/FR/fr/docs/funds/mandarine-europe-microcap/TRANSPARENCY>),
- the sustainability policy
(https://www.mandarine-gestion.com/uploads/reg/reg_mandarine_durabilite-politique_fr.pdf),

The reference benchmark are indices that measure whether the financial product achieves the environmental or social characteristics it promotes.

