

# iMGP Dolan McEniry Corporate 2028 Fund

Template 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

**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.

Product name: iMGP Dolan McEniry Corporate 2028 Fund

Legal entity identifier: 3912001L1SNJKNVSXQ16

## Environmental and/or social characteristics

Does this financial product have a sustainable investment objective?	
<input checked="" type="radio"/> <input checked="" type="radio"/> Yes	<input checked="" type="radio"/> <input type="radio"/> No
<div><input type="checkbox"/> It will make a minimum of <b>sustainable investments with an environmental objective:</b> ____%</div> <div><div><input type="checkbox"/> in economic activities that qualify as environmentally sustainable under the EU Taxonomy</div><div><input type="checkbox"/> in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy</div></div> <div><input type="checkbox"/> It will make a minimum of <b>sustainable investments with a social objective:</b> ____%</div>	<div><input type="checkbox"/> It <b>promotes Environmental/Social (E/S) characteristics</b> and while it does not have as its objective a sustainable investment, it will have a minimum proportion of ____% of sustainable investments<div><div><input type="checkbox"/> with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy</div><div><input type="checkbox"/> with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy</div><div><input type="checkbox"/> with a social objective</div></div></div> <div><input checked="" type="checkbox"/> It promotes E/S characteristics, but <b>will not make any sustainable investments</b></div>



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

The environmental, social and governance (ESG) characteristics promoted by this Fund consist of investing in assets with good ESG ratings while excluding certain companies because of the extent of their involvement in controversial products and services. No reference benchmark has been designated to attain the environmental and social characteristics promoted.

**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?*

To attain environmental or social characteristics promoted by the Fund, the portfolio seeks to achieve a Weighted Average Carbon Intensity Score as measured by the Sub-Manager methodology lower than 200. The ESG Risk Score of the portfolio is also monitored. The sustainability indicators included in the ESG score may include, but are not limited to the following indicators:

- Environmental: Greenhouse gas emissions, carbon footprint, waste reduction, resource conservation.
- Social: Human rights including labor rights, worker health & safety, customer safety and welfare, diversity, equity & inclusion.

The Weighted Average Carbon Intensity is calculated by weighting the division of the issuer's Scope 1 and Scope 2 GHG emissions by the issuer's USD million revenues on the current total portfolio value.

- *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?*

Not applicable as the Fund does not make sustainable investments.

**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, anti-corruption and anti-bribery matters.

- *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?*

Not applicable as the Fund does not make sustainable investments.

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

Not applicable as the Fund does not make sustainable investments.

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

Not applicable as the Fund does not make sustainable investments.

*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.*



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

☒ Yes, in line with Article 7 of the Sustainable Finance Disclosure Regulation, this Fund considers the Principal Adverse Impacts (PAI) of its investment decisions.

While the ability to currently meaningfully assess these impacts may be limited by an absence or limited availability and quality of information; the Sub-Manager will continue to further develop these processes to gather, when available, information and data on PAI of their investments.

The present table summarizes the lists of the principal adverse impacts considered by this Fund in its investment process (Annex I of the Commission delegated regulation supplementing Sustainable Finance Disclosure Regulation). More information on how the Fund considers its principal adverse impacts may be found in the periodic reporting of the Fund.

Adverse sustainability indicator	Metric	Impact year	Explanation and Actions taken, actions planned, and targets set for the next reference period
Carbon footprint	Data to be calculated at the end of 2024	2024	Principal adverse impacts are taken into account by this Fund through the following measures: <ul style="list-style-type: none"> <li>the exclusion policy implemented by the Sub-Manager limits the exposure to certain PAI on ESG aspects by excluding sectors that have a negative impact on sustainability (ex: exclusion of controversial weapons)</li> <li>the analysis of ESG score using PAI such as carbon footprint to measure the alignment of the portfolio with the ESG characteristics promoted by the Sub-Manager</li> </ul>
Exposure to companies active in the fossil fuel sector	Data to be calculated at the end of 2024	2024	
Exposure to controversial weapons (anti-personnel mines, cluster munitions, chemical weapons and biological weapons)	0%	2024	

☐ No



## What investment strategy does this financial product follow?

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

While this Fund promotes environmental characteristics within the meaning of Article 8 of the SFDR, it does not currently commit to investing in any “sustainable investment” within the meaning of the SFDR or the Taxonomy Regulation. Accordingly, it should be noted that this Fund does not take into account the EU criteria for environmentally sustainable economic activities within the meaning of the Taxonomy Regulation and its portfolio alignment with such Taxonomy Regulation is not calculated. Therefore, the “do not significantly harm” principle does not apply to any of the investments of this Fund.

The Sub-Manager believes that responsible investment practices incorporating an assessment of ESG factors add sustainable value for investors by mitigating risk and positively influencing long-term financial performance, consistent with its fiduciary duty. As part of its decision-making process for this portfolio, the Sub-Manager considers material ESG factors within its fundamental research process, leveraging external ESG data and in-house qualitative assessment to identify potential material risk factors.

The investment strategy used to attain these environmental and social characteristics include:

4) The integration of the consideration of ESG factors into the investment analysis and decision-making processes. When selecting new securities, the investment team takes into consideration ESG risks and opportunities that are material to a given investment. Typical ESG factors that may be reviewed and analyzed for particular investment opportunities may include:

- Environmental: GHG emissions, Carbon Intensity, Fossil Fuel Involvement, Stranded Asset Exposure, Carbon Solutions Involvement.
- Social: Human rights including labor rights, worker health & safety, customer safety and welfare.

Material ESG risks are documented in an Internal Research Note for each investment, along with all other fundamental and financial analysis. If an investment scores poorly on relevant factors according to third-party data sources, the investment team conducts further research to determine what is driving the score. A poor ESG score does not preclude the Sub-Manager from investing in the company, but rather is used as an input to the investment decision making process. Ultimately, ESG considerations inform the Sub-Manager decision making process, but it is important to note that this is but one of many qualitative and quantitative inputs to its investment process, not a primary objective.

5) Engagement in dialogue with companies about ESG-related disclosures to better understand how potential ESG risks and opportunities are managed, among issues. The investment team may engage with company management in conversations about ESG-related disclosures to help the companies further enhance their knowledge of ESG risks and take action to reduce their environmental and social impacts.

6) The application of exclusionary criteria to identify issuers that are not aligned with certain environmental and social characteristics that may negatively affect a business’s long-term value creation.

### ● *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 entire investment process described above is binding.

The Fund process excludes from consideration companies or securities that derive more than 5% of their revenues from the following:

- Fossil fuels, like coal, oil or gas.

Beyond the investment guidelines of this Fund, as part of the Sub-Manager’s assessment of potential investment opportunities for the Fund, the Sub-Manager is committed to the complete exclusion of investment in the following sectors:

- Direct Investments in Controversial Weapons
- Cluster Bombs
- Landmines
- Chemical Weapons
- Biological Weapons
- Nuclear Weapons

**Good governance** practices include sound management structures, employee relations, remuneration of staff and tax compliance.

Additionally, the Fund screens potential investments to identify and exclude companies with known instances of corruption, as well as transparency, ethics, or other human rights violations that significantly harm society, and any violations of the OECD Guidelines Multinational Enterprises or the UN Global Compact.

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

There is no committed minimum rate to reduce the scope of investments prior to the application of the Fund's investment strategy.

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

The Sub-Manager screens potential investments to identify and exclude companies with known instances of corruption, as well as transparency, ethics, or other human rights violations that significantly harm society.

Incorporated within the firm's ESG policy, the Sub-Manager's investment team seeks to understand ESG risks and opportunities that are material to a given investment. The Sub-Manager is committed to being a responsible steward of the assets of the Fund's clients and is committed to transparency on how it integrates ESG risks and opportunities into its investment analysis. While the factors vary by company and sector, typical ESG factors that may be reviewed and analyzed for particular investment opportunities' governance practices may include, but are not limited to, the following: board composition and independence; executive compensation; shareholder rights; legal and regulatory compliance; anti-bribery and corruption; and cybersecurity and data privacy.

In addition to reviewing and analyzing each individual investment opportunity, the Fund actively monitors voting opportunities at its companies for potential governance and other ESG risks.

The Sub-Manager has the ability to vote proxy but it is uncommon within this space. If such an event were to occur, the Sub-Manager will take into consideration the relevant ESG items. the Sub-Manager will vote in line with this document and its proxy voting guidelines, which are available upon request.

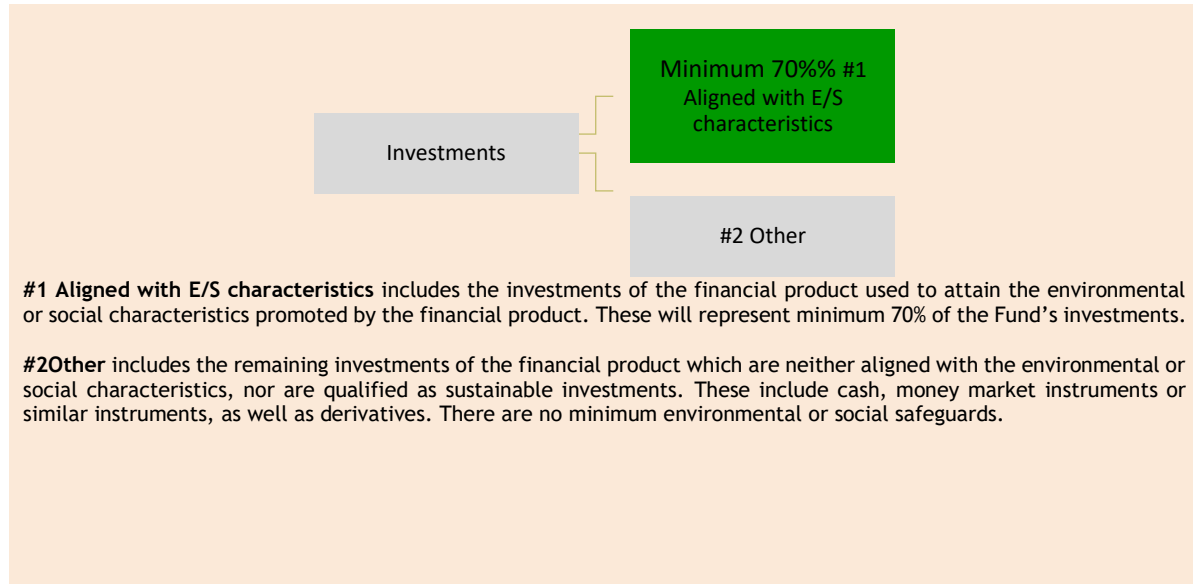


**Asset allocation** describes the share of investments in specific assets.

What is the asset allocation planned for this financial product?

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.



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

The ESG performance of the Fund does not take into consideration the derivatives to measure the attainment of environmental and social characteristics promoted.



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

The Fund does not currently commit to invest in any sustainable investment within the meaning of the EU Taxonomy. However, the position will be kept under review as the underlying rules are finalised and the availability of reliable data increases over time.

Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy<sup>12</sup>?

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

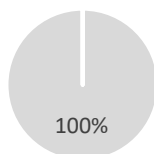
The two graphs below show in green the minimum percentage of investments that are aligned with the EU Taxonomy. As there is no appropriate methodology to determine the Taxonomy-alignment of sovereign bonds\*, the first graph shows the Taxonomy alignment in relation to all the investments of the financial 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.

**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.

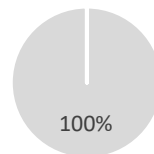
1. Taxonomy-alignment of investments including sovereign bonds\*

■ Taxonomy-aligned (no fossil gas & nuclear)  
 ■ Non Taxonomy-aligned



2. Taxonomy-alignment of investments excluding sovereign bonds\*

■ Taxonomy-aligned (no fossil gas & nuclear)  
 ■ Non Taxonomy-aligned



This graph represents up to 100% of the total investments\*\*

\*For the purpose of these graphs, 'sovereign bonds' consist of all sovereign exposures.

\*\*As the Fund does not commit to making sustainable investments aligned with the EU Taxonomy, the proportion of sovereign bonds in the Fund's portfolio will not impact the proportion of sustainable investments aligned with the EU Taxonomy included in the graph.

<sup>12</sup> 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.

● **What is the minimum share of investments in transitional and enabling activities?**

As the Fund does not commit to invest any sustainable investment within the meaning of the EU Taxonomy, the minimum share of investments in transitional and enabling activities within the meaning of the EU Taxonomy Regulation is therefore also set at 0%.

 are sustainable investments with an environmental objective that **do not take into account the criteria** for environmentally sustainable economic activities under the EU Taxonomy.



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

The Fund promotes environmental and/or social characteristics but does not commit to making any sustainable investments. As a consequence, the Fund does not commit to a minimum share of sustainable investments with an environmental objective that are not aligned with the EU Taxonomy.



**What is the minimum share of socially sustainable investments?**

Not applicable as the Fund does not make sustainable investments.



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

“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. These include cash, money market instruments or similar instruments, as well as derivatives. These investments do not follow minimum environmental and social safeguards.



**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?**

Not applicable: no designated benchmark for this Fund to measure whether the financial product attains the environmental or social characteristics that it promotes.

**Reference benchmarks** are indexes to measure whether the financial product attains the environmental or social characteristics that they promote.



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

More product-specific information can be found on the website:  
<https://www.imgp.com/en/sustainability>