



EUROPEAN
COMMISSION

Brussels, 31.10.2022
C(2022) 7545 final

ANNEXES 1 to 4

ANNEXES

to the

COMMISSION DELEGATED REGULATION (EU) .../...

amending and correcting the regulatory technical standards laid down in Delegated Regulation (EU) 2022/1288 as regards the content and presentation of information in relation to disclosures in precontractual documents and periodic reports for financial products investing in environmentally sustainable economic activities

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: **Sequoia Duurzaam ETF** Legal entity identifier: 7245006Q2K7NC27UWC89

Environmental and/or social characteristics

Does this financial product have a sustainable investment objective? [tick and fill in as relevant, the percentage figure represents the minimum commitment to sustainable investments]

● ● 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/Social (E/S) characteristics and while it does not have as its objective a sustainable investment, it will have a minimum proportion of ___% 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 characteristics, but **will not make any sustainable investments**



What environmental and/or social characteristics are promoted by this financial product? Er wordt zoveel mogelijk gekozen voor instrumenten met een artikel 8 classificatie. Hierbij wordt gerefereerd aan de Europese wetgeving op dit gebied, bekend als de "Sustainable Finance Disclosure Regulation" (SFDR). Deze wet beschrijft in artikel 8 de criteria waaraan een product voldoet dat duurzaamheid promoot. Per instrument, dat is opgenomen in de portefeuille, is door de verstrekker van het instrument (provider) vastgelegd op basis van welke indicatoren de classificatie is gedaan. In veel gevallen worden bedrijven uitgesloten die zich niet houden aan de 10 principes van de Global Compact.

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?

Per instrument, dat is opgenomen in de portefeuille, zijn verschillende criteria gebruikt. Door de provider wordt hierover informatie gegeven. Gebruikte criteria zijn, afhankelijk van het instrument:

- onderschrijven van de Global Compact
- MSCI ESG rating

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.

● **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?** Niet van toepassing, aangezien het product dit niet als doel heeft.

● **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?** Niet van toepassing

— **How have the indicators for adverse impacts on sustainability factors been taken into account?** [include an explanation of how the indicators for adverse impacts in Table 1 of Annex I and any relevant indicators in Tables 2 and 3 of Annex I, are taken into account]

[Include statement for financial products referred to in Article 6, first paragraph, of Regulation (EU) 2020/852]

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.

How are the sustainable investments aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights? Details: [include an explanation on the alignment with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights, including the principles and rights set out in the eight fundamental conventions identified in the Declaration of the International Labour Organisation on Fundamental Principles and Rights at Work and the International Bill of Human Rights]



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



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

Yes, _____ [if the financial product considers principal adverse impacts on sustainability factors, include a clear and reasoned explanation of how it considers principal adverse impacts on sustainability factors. Indicate where, in the information to be disclosed pursuant to Article 11(2) of Regulation (EU) 2019/2088, the information on principal adverse impacts on sustainability factors is available]

Nee, niet volledig

Bij de selectie van instrumenten wordt rekening gehouden met diverse risico's. Hieronder vallen ook negatieve effecten op de waarde van de belegging als gevolg van klimaatverandering (dit is een duurzaamheidsfactor, met als gevolg bijvoorbeeld schade door storm of overstroming). Echter: in sommige gevallen kunnen deze risico's ondergeschikt worden geacht in vergelijking met andere risico's die worden beoordeeld. Het beleggingsbeleid beschrijft dat het mogelijk is om instrumenten op te nemen zonder artikel 8 classificatie. Daarnaast ontbreekt de data momenteel nog om hiervoor voor elk instrument een oordeel te kunnen geven.

What investment strategy does this financial product follow? Er wordt door Sequoia een visie bepaald op basis van fundamentele analyse. Deze visie bepaalt de asset allocatie en eventuele voorkeur voor regio's of sectoren. Daarnaast worden interessante thematische beleggingen geïdentificeerd. Vervolgens zoeken wij geschikte instrumenten voor het betreffende deel van de portefeuille. De invulling van het product, Sequoia Duurzaam EFT, vindt plaats op basis van deze visie, waarbij thematische accenten worden gezet. We zoeken in dat geval naar instrumenten die de SFDR classificatie "artikel 8" hebben. Dit geeft in bepaalde gevallen beperkingen omdat een dergelijke ETF niet of bij slechts een enkele aanbieder vorhanden is. Het is daarom niet altijd mogelijk om een volledig duurzame portefeuille samen te stellen, die in lijn is met onze visie. Wij maken dan een keuze, welke uitgangspunten voorrang krijgen. Voorlopig is onze voorkeur het volgen van de beleggingsvisie, waarbij dan niet de gehele portefeuille "duurzaam" ingevuld wordt. Gezien de snelheid en de ontwikkeling in het aantal instrumenten met een duurzaam karakter denken wij dat deze keuze tijdelijk zal zijn.

- 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?**

[include note only for the financial products referred to in Article 6, first paragraph, of Regulation (EU) 2020/852]

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



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.

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.

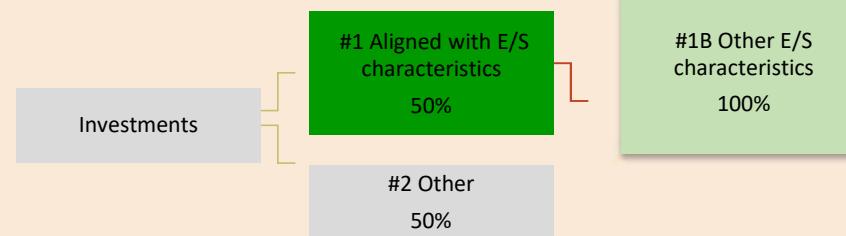
SFDR artikel 8. Hierbij beschrijft het beleggingsbeleid dat het mogelijk is om instrumenten op te nemen die deze classificatie niet hebben. Het streven is om tenminste 50% van het vermogen in SFDR artikel 8 instrumenten te beleggen.

- **What is the committed minimum rate to reduce the scope of the investments considered prior to the application of that investment strategy? Niet van toepassing**
- **What is the policy to assess good governance practices of the investee companies?** Door het gebruik van passieve instrumenten (ETFs) is er afhankelijkheid van de betreffende provider bij het beoordelen van de onderliggende bedrijven. In het selectieproces van instrumenten worden de providers door Sequoia beoordeeld. Bij de classificatie van een instrument wordt door veel providers gebruik gemaakt van scores van MSCI ESG of het onderschrijven van de Global Compact.

What is the asset allocation planned for this financial product? Er wordt belegd in zakelijke- en vastrentende waarden door middel van ETF's. Daarnaast wordt een beperkt percentage aan liquiditeit aangehouden. Er kunnen zowel ETF's met SFDR rating artikel 6, 8 als 9 worden opgenomen. Het streven is om tenminste 50% van het vermogen in SFDR artikel 8 instrumenten te beleggen.

- **How does the use of derivatives attain the environmental or social characteristics promoted by the financial product? Niet van toepassing, aangezien deze niet worden opgenomen.**

[Include only relevant boxes, remove irrelevant ones for the financial product]



#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.

[Include the note below where the financial product commits to making sustainable investments]

The category **#1 Aligned with E/S characteristics** covers:

- The sub-category **#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.



To what minimum extent are sustainable investments with an environmental objective aligned with the EU Taxonomy? Niet van toepassing. Het product richt zich op het promoten van ecologische en sociale kenmerken, zonder een duurzame belegging als doelstelling te hebben.

● Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy¹?

Yes: [specify below, and details in the graphs of the box]

In fossil gas In nuclear energy

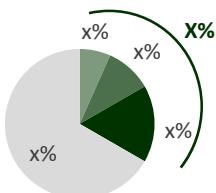
No

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.

[only include in the graphs the figures for Taxonomy aligned fossil gas and/or nuclear energy as well as the corresponding legend and the explanatory text in the left hand margin if the financial product makes investments in fossil gas and/or nuclear energy]

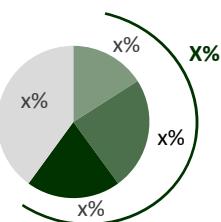
1. Taxonomy-alignment of investments including sovereign bonds*

- Taxonomy-aligned: Fossil gas
- Taxonomy-aligned: Nuclear
- Taxonomy-aligned (no fossil gas & nuclear)
- Non Taxonomy-aligned



2. Taxonomy-alignment of investments excluding sovereign bonds*

- Taxonomy-aligned: Fossil gas
- Taxonomy-aligned: Nuclear
- Taxonomy-aligned (no fossil gas & nuclear)
- Non Taxonomy-aligned



This graph represents x% of the total investments.

* 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?

[include section for the financial products referred to in Article 6, first paragraph, of Regulation (EU) 2020/852]

[include note for financial products referred to in Article 6, first paragraph, of Regulation (EU) 2020/852 that invest in environmental economic activities that are not environmentally sustainable economic activities]



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



What is the minimum share of socially sustainable investments? Niet van toepassing



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 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.