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

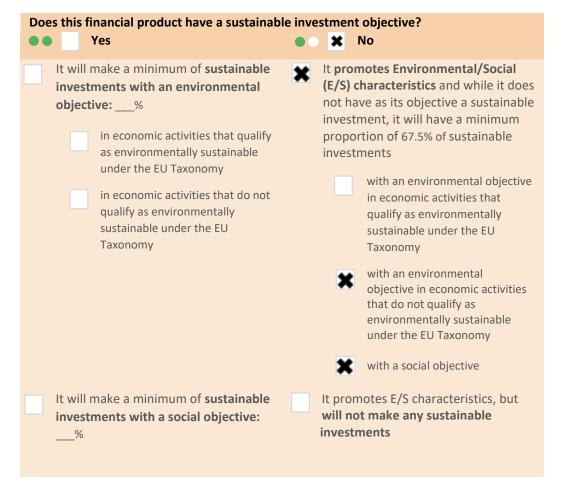
**Product name:** CT (Lux) Responsible Global Equity

**Legal entity identifier:** 213800QUBFOSM6S1V262

## 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 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.





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

The overarching philosophy of the Portfolio is to:

- Avoid companies with environmentally or socially damaging products, or unsustainable business or governance practices
- Invest in companies that make a positive contribution to society and/or the environment
- Improve management of ESG issues, using our influence as an investor to encourage best practice through engagement and voting

The Investment Manager adheres to this philosophy through a variety of means, including:

- Avoid: The Responsible Investment Team screens every company considered for inclusion in the Portfolio against exclusion criteria. The application of these productbased and conduct-based criteria, which the Investment Manager reviews regularly, results in the avoidance of companies with environmentally or socially damaging products, or unsustainable business or governance practices, and companies which breach global norms, including the UN Global Compact.
- **Invest**: The Portfolio seeks investment opportunities across key sustainability themes which have an environmental or social focus addressing the following:
  - Connect and protect recognising that technological advances create opportunities to accelerate our connectivity, as well as technology being placed to progress social well-being, supply chain efficiencies and sustainable cities
  - 2. Digital empowerment this is the opportunity set for data to be harnessed for good; enabling better healthcare, empowering smaller businesses, leading to broader competition and employment opportunities.
  - 3. Energy transition transformation is required across all types of energy use, including power generation. Transport is another key area.
  - 4. Health and well-being with increased globalisation and urbanisation comes rising communicable diseases. There are ageing demographics, rising obesity and an increasing prevalence of non-communicable diseases so the demand for healthcare is rising but the supply of healthcare remains constrained, particularly in emerging markets.
  - 5. Resource efficiency essentially this is about using the planet's finite resources in a more sustainable way, while minimising the impact on the environment, i.e. do less, with more.
  - 6. Sustainable cities a growing global population puts cities under increasing stress so this theme covers social issues like the provision of reliable healthcare and education and environmental challenges like global warming.
  - 7. Sustainable finance by integrating sustainability into their business strategies and decision-making, financial institutions can play a significant role in adapting and promoting innovation to address global sustainability challenges.

Companies' alignment with these seven themes is assessed pre-investment, and the Investment Manager assesses the Portfolio's overall alignment with each theme. In addition, the Investment Manager analyses how individual companies' key sources of revenue map to the targets which underpin the Sustainable Development Goals (SDGs), which the Investment Manager can link to environmental and social outcomes.

The Portfolio will hold a minimum proportion (67.5%) of sustainable investments in companies that provide sustainability solutions or that otherwise make a positive contribution to society or the environment.

• Improve: Our objective-orientated engagement encourages companies to improve their management of material environmental, social and governance (ESG) issues, which should translate into companies – over the longer term – contributing more positively to the environment and society.

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

The Portfolio has not designated a benchmark for the purpose of attaining the environmental or social characteristics promoted, as the Investment Manager considers that sustainability indicators are a more appropriate measure of the environmental and social characteristics promoted. It is an actively managed Portfolio with the MSCI World Index used for a comparator benchmark and the Portfolio has significant freedom to invest in a portfolio that is materially different to the benchmark's own composition.

The Investment Manager will apply the non-financial criteria described above to at least 90% of the total net assets of the Portfolio.

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

The Investment Manager uses the following indicators to measure the attainment of the environmental and social characteristics promoted by the Portfolio:

- The number of companies determined to be in breach of the Portfolio's exclusion criteria and/or global norms.
- The percentage of the Portfolio which aligns to its key sustainability themes
- Held companies' revenue alignment with the targets which underpin the Sustainable Development Goals (SDGs)
- The number of environmental- and social-linked engagement objectives and/or milestones achieved

#### 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?

As a result of the Portfolio's sustainability philosophy, the Portfolio will invest a minimum proportion of 67.5% in sustainable investments.

These investments contribute to a sustainable objective through their contribution to key sustainability themes which have an environmental or social focus, including: energy transition, health and well-being and resource efficiency.

The Investment Manager uses a proprietary framework to assess the extent to which companies prioritise sustainability:

- Additionality: Is the company a leader in its industry, making a real difference
  to the positive direction of the industry? Here the Investment Manager
  focuses on and evidence the Portfolio's exposure through our view of high
  quality, wide moat businesses.
- Intentionality: How core is sustainability to the company's strategy and overall raison d'être? Here the Investment Manager leverages our extensive engagement capability to assess the company's transparency and communication around strategic goals, which will evidence the management team's and Board's intentions in prioritising these issues/opportunities.
- Materiality: How material are sustainability opportunities for the company?
   Here, the Investment Manager makes an assessment of the company's revenue alignment to seven sustainability themes.

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?

The Portfolio's investment philosophy, as explained in more detail in the "investment strategy" below ensures that the sustainable investments made by the Portfolio do not significantly harm sustainable investment objectives.

The Portfolio screens out investments that are contrary to the goals of making positive contributions to the environment and/or society. These exclusions are detailed under the "avoid" section of the investment process and additional information is available in the Article 10 SFDR disclosures at <a href="https://www.columbiathreadneedle.com">www.columbiathreadneedle.com</a> by selecting the Portfolio and accessing the Literature section. These criteria are product- and conduct-based, covering topics such as tobacco and weapons, and United Nations Global Compact breaches.

Through the Portfolio's investment research, Sustainability Risks are considered throughout the investment cycle which serves to mitigate the risks of significant harm. Furthermore, companies are identified which the Investment Manager thinks could benefit from active engagement to address material ESG issues.

The Investment Manager monitors portfolio holdings every quarter, and any position held by the Portfolio that no longer qualifies must be sold within the following six months taking due consideration of the best interests of the shareholders.

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

Investments which are reported as sustainable investments have been assessed to ensure they do not significantly harm (DNSH) sustainability objectives using an in-house data driven model and investment team due diligence.

The model identifies harm by using a quantitative threshold against a selection of principal adverse impact indicators. Issuers which fall below these thresholds are flagged as potentially harmful. This is then considered taking account of the materiality of the harm, whether harm has or is occurring, and whether mitigating activities are underway to address harm. Where data is not available, investment teams endeavour to satisfy that no significant harm has taken place through desk-based research or issuer engagement.

In addition, all holdings must comply with a set of environmental and social exclusions which seek to avoid harming Sustainability Factors as detailed below.

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 sustainable investments are aligned 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 Portfolio excludes companies which breach UN Global Compact (UNGC) principles and further considers good conduct when making investments. In addition, the DNSH checks also assess issuers for explicit harm against the underlying principles of the UNGC and OECD Guidelines.

The EU Taxonomy sets out a "do not significant harm" principle by which Taxonomyaligned 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,

The Portfolio proactively considers the principal adverse impact ("PAIs") of investment decisions that may negatively harm Sustainability Factors through a combination of exclusions, investment research and monitoring and engaging with investee companies.

As part of portfolio construction and stock selection, the Portfolio has in place exclusions that correspond to PAI indicators that cannot be held by the Portfolio. The exclusions applied by the Portfolio relate to fossil fuel exposure, non-renewable energy production, biodiversity, hazardous and radioactive waste, global norms, controversial weapons, deforestation and incidents of discrimination. In addition, it considers PAIs as part of research into, and engagement with, investee companies on environmental sustainability indicators relating to decarbonisation and biodiversity, and social PAI indicators such as discrimination.

More information on how the Portfolio considers the PAIs of its investment decisions on Sustainability Factors will be made available in the Fund's annual reports available at the registered office of the Fund.

	Exclusions	Stewardship <sup>10</sup>	
Indicators Applicable to Investments in Corporate Issuers			
1.1. GHG emissions		✓	
1.2. Carbon footprint		✓	

bribery matters.

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-

 $<sup>^{\</sup>rm 10}$   $\,$  PAIs are considered as part of engagement prioritisation.

1.3. GHG intensity of investee companies		<b>√</b>
1.4. Exposure to companies active in the fossil fuel sector	✓	√
1.5. Share of non- renewable energy consumption and production	✓	✓
1.6. Energy consumption intensity per high impact climate sector		<b>√</b>
1.7. Activities negatively affecting biodiversity sensitive areas	<b>√</b>	<b>√</b>
1.9. Hazardous waste and radioactive waste ratio	√	✓
1.10. Violations of UN Global Compact principles and Organisation for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises	✓	✓
1.13. Board gender diversity		√
1.14. Exposure to controversial weapons (antipersonnel mines, cluster munitions, chemical weapons and biological weapons)	<b>√</b>	
2.15. Deforestation	√	✓
3.7. Incidents of discrimination	√	✓



#### 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 Portfolio is an actively managed equities Portfolio and for non-ESG/sustainable strategy information.

To ensure that the environmental and/or social characteristics promoted by the Portfolio are attained, the investment strategy embeds an "Avoid, Invest, Improve" philosophy in the investment policy:

#### Avoid –

- The Investment Manager has a set of exclusion criteria setting standards to avoid investment in companies with socially or environmentally damaging products or unsustainable business or governance practices.
- For inclusion in the investable universe, stocks are submitted by the Investment Team to the Responsible Investment Team, which screens companies against product- and conduct-based criteria using data providers and primary research. An external advisory council the Responsible Investment Advisory Council provides advice on the development of these criteria and reviews screening decisions.
- The product- and conduct-based criteria include exclusions on among other issues tobacco, alcohol, weapons, gambling, nuclear energy, pornography and United Nations Global Compact (UNGC) breaches. In addition, companies should meet high standards in how they operate and manage ESG risks.
- The product- and conduct-based criteria apply to all Portfolio assets other than ancillary assets, unless otherwise stated.

#### Invest –

- The Investment Manager invests in companies providing sustainability solutions and/or companies making a positive contribution to society and/or the environment, provided that these companies have good governance.
- To assess whether sustainability objectives are met, the Investment Manager looks to key sustainability themes such as energy transition, health and wellbeing and resource efficiency.

Alignment with sustainability themes is assessed through Sustainable Development Goal (SDG) revenue mapping, i.e. linking companies' underlying segmental revenues to specific SDG targets, as well as a Fundamental assessment of companies' sustainability credentials and management of ESG risks.

#### Improve –

- The Investment Manager engages with the companies that the Portfolio invests in on significant ESG issues with most business relevance.
- As part of active ownership, the Investment Manager has the responsibility to take key ESG issues into account before, during and after investment decisions made in the Portfolio. The purpose of engagement is to mitigate risk, to underpin long-term returns, and to contribute to a more sustainable world by encouraging better management of sustainability issues by our investee companies. The global engagement programme of the Investment Manager is structured around the following core themes:

- o Environmental Stewardship
- Climate Change
- o Human Rights
- Labour Standards
- Public Health
- Business Ethics
- Corporate Governance
- An independent Responsible Investment Advisory Council (RIAC) works with the Responsible Investment and Investment Teams to provide input on key ESG trends and engagement priorities.

In addition, the Investment Manager believes that an appropriate comparator benchmark for reviewing Portfolio performance is the MSCI World NR Index, given the investment policy of the Portfolio and the approach taken by the Investment Manager. The Portfolio is not constrained by this benchmark and has significant freedom to invest in a portfolio that is materially different to the benchmark's own composition.

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 following elements of the investment strategy are binding on the Portfolio:

- (1) The Portfolio complies with exclusion criteria, which are both product- and conduct-based, to avoid companies with environmentally or socially damaging products, or unsustainable business or governance practices.
- (2) The Portfolio avoids investment in companies which are determined to be in breach of global norms, including the UN Global Compact and the Organisation for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises.
- (3) The Portfolio invests in companies making a positive contribution to society and/or the environment which are aligned with sustainability themes with an environmental or social focus: alignment is assessed through mapping companies' revenue segments or through their enterprise impact that contributes to the Sustainable Development Goals' (SDG) underlying targets.

The Portfolio complies with the Paris-aligned Benchmark exclusions contained in Article 12 (1) (a)-(g) of Article 12(1)(a)-(g) of Commission Delegated Regulation (EU) 2020/1818). The restrictions referred to in point (1) and (2) above are applied regardless of the severity of any controversies which an investee company is/has been involved in. For further information, please refer to the Responsible Investment Strategies available on <a href="https://www.columbiathreadneedle.lu">www.columbiathreadneedle.lu</a> by selecting the Portfolio and accessing the ESG information section.

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 of reduction in the scope of the investments considered

#### Good governance

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



All companies in which investments are made are subject to a pre-investment good governance assessment and ongoing post-investment review of governance practices. The Investment Manager uses third-party data to assess a company's governance practices and supplements this with its fundamental research.

**Pre-investment:** The Investment Manager assesses all companies before investment. It may engage with a company to better understand or to encourage improvements relating to any flagged issues. If, however, it is concluded from the assessment that the company demonstrates poor governance practices, the Investment Manager will not invest in its securities.

**Post-investment:** Investee companies are monitored on an ongoing basis to confirm that there has been no material diminution in governance practices. The Investment Manager may engage with a company to better understand any flagged issues as part of its review. Where it is considered that a company no longer demonstrates good governance practices, the securities will be divested from the Portfolio.

The Investment Manager employs stringent criteria to determine the eligibility of investee companies' good governance practices. It uses proprietary ESG scores to assess performance on corporate governance, corporate behaviour, and human capital development. Companies scoring in the lowest segment of ESG scores will not be invested in, unless mitigating factors exist. The Investment Manager also monitors holdings using governance risk flags, which identify governance failures or risks which should be addressed by further research, voting or engagement where relevant.



#### What is the asset allocation planned for this financial product?

The Portfolio invests directly and globally in a range of equities.

All investments in which the Portfolio invests are subject to the binding elements of the investment strategy to make a positive contribution to the environment and/or society, excluding ancillary assets.

As a result of the Portfolio's sustainability philosophy, the Portfolio will invest in sustainable investments. The Portfolio will hold a minimum proportion of 67.5% in sustainable investments. However, the expected proportion of sustainable investments is 75%.

The minimum proportion of investments held in the Portfolio used to promote the environmental or social characteristics is 90%. Nevertheless, the expected proportion of investments aligned with the environmental and social characteristics is 100%.

An investment is considered sustainable where the issuer has greater than 50% of its revenue net positively aligned to the Sustainable Development Goals (SDG), or an issuer contributing to a sustainable objective by embedding sustainability into the economic purpose of its business (e.g. growing the proportion of revenue aligned with sustainability objectives, or delivering its enterprise impact in a way which contributes to a sustainable outcome).

Investments which do not meet the criteria for sustainable investments are not included in the Portfolio's proportion of sustainable investments. To calculate the Portfolio's overall proportion of sustainable investments, each investment that meets the above criteria is included in the calculation of sustainable investments (without adjusting for example for the percentage of revenue that contributes to SDGs) held in the Portfolio. It being noted, however, that the percentage of revenue that is not linked to a contribution to SDGs will also need to meet the "do no significant harm test" in order to for the entire investment to be considered a sustainable investment. The entire position of these investments is included in the calculation

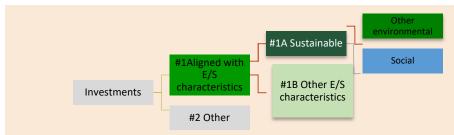
### **Asset allocation** describes the share

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.

and added together to determine the total proportion of sustainable investments within the Portfolio.



**#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.

**#20ther** 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 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.

The Portfolio does not commit to any minimum Shares of socially sustainable investments and sustainable investments with an environmental objective.

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

Derivatives are not used for the purposes of attaining the environmental or social characteristics promoted by the Portfolio but ESG criteria are considered when assessing counterparties.



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

None. There is no commitment to Taxonomy-aligned investments at the present time.

Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy<sup>11</sup>?

Yes:

In fossil gas
In nuclear energy

No

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.

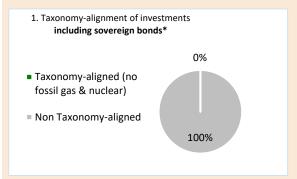
Fossil gas and/or nuclear related activities will only comply with the EU Taxonomy where they contribute to limiting climate change ("climate change mitigation") and do not significantly harm any EU Taxonomy objective – see explanatory note in the left hand margin. The full criteria for fossil gas and nuclear energy economic activities that comply with the EU Taxonomy are laid down in Commission Delegated Regulation (EU) 2022/1214.

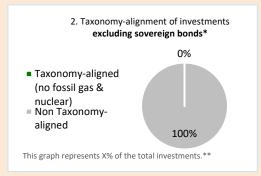
Enabling activities directly enable other activities to make a substantial contribution to an environmental objective.

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.

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
- \*\* As the investments are not Taxonomy-aligned, the exclusion of sovereign bonds has no impact on the graph and therefore no such percentage is shown here.

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

None. There is no commitment to Taxonomy-aligned investments at the present time.

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?

None. The Portfolio may invest in environmentally sustainable investments but has not set a minimum commitment. However, no minimum allocation to sustainable investments with either an environmental or social objective has been set, ensuring that the Portfolio can allocate capital to the very best investments available to achieve the sustainable investment objective for a proportion (minimum of 67.5% across both environmental and/or social sustainable investments) of the Portfolio's investments.



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

None. The Portfolio may invest in socially sustainable investments but has not set a minimum commitment. However, the Portfolio no minimum allocation to sustainable investments with either an environmental or social objective has been set, ensuring that the Portfolio can allocate capital to the very best investments available to achieve the sustainable investment objective for a proportion (minimum of 67.5% across both environmental and/or social sustainable investments) of the Portfolio's investments.



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

This category includes ancillary liquid assets, money market instruments, money market funds and eligible deposits as well as hedging assets used for treasury management, defensive or hedging purposes. Derivatives are permitted within the Portfolio in order to assist with efficient management of overall asset class positions such as mitigating interest rate fluctuations, hedging against price falls in equity markets, or managing currency exposure.

Derivatives are not used for the purposes of attaining the environmental or social characteristics promoted by the Portfolio but ESG criteria are considered when assessing counterparties.

Currency exposure may arise from unhedged equity positions or a currency strategy and are limited to developed markets or major emerging markets. No ESG screens are applied to currencies.



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 Portfolio has not designated a benchmark for the purpose of attaining the environmental or social characteristics promoted. The Investment Manager does not use a reference benchmark in respect of the environmental and social characteristics promoted. As such, the benchmark should only be used by investors as a comparison against the Portfolio's financial performance.

#### Reference benchmarks

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

- How is the reference benchmark continuously aligned with each of the environmental or social characteristics promoted by the financial product?
  - Not applicable.
- How is the alignment of the investment strategy with the methodology of the index ensured on a continuous basis?
  - Not applicable.
- How does the designated index differ from a relevant broad market index?
  Not applicable.
- Where can the methodology used for the calculation of the designated index be found? Not applicable.



Where can I find more product specific information online?

More product-specific information can be found on the website:

https://www.columbiathreadneedle.lu/en/intm/fund-details/ct-lux-responsible-global-equity-a-acc-eur SF18 LU1890813915/