

Pre-contractual disclosure for the financial products referred to in Article 9, paragraphs 1 to 4a, of Regulation (EU) 2019/2088 and Article 5, first paragraph, of Regulation (EU) 2020/852

Product name: CT (Lux) Sustainable Opportunities European Equity

Legal entity identifier: 21380012XH3WOKJOYQ92

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.

Sustainable investment objective

Does this financial product have a sustainable investment objective?



Yes



No



It will make a minimum of **sustainable investments with an environmental objective: 1%**



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 **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 will make a minimum of **sustainable investments with a social objective: 1%**



It promotes E/S characteristics, but **will not make any sustainable investments**



What is the sustainable investment objective of this financial product?

The Portfolio aims to achieve long term capital growth by investing in equities of European companies. The Investment Manager seeks to avoid investments that are contrary to the goals of making positive contributions to society and/or the environment; invest in companies that provide sustainable solutions or that make positive contributions to society and/or the environment; and improve companies by targeted engagement on material ESG issues.

The Portfolio aims for a minimum of 90% of investments to be classified as sustainable investments. The remaining portion of the Portfolio consist of ancillary assets used for treasury management, defensive or hedging purposes that the Portfolio may hold as described below.

The Portfolio's minimum allocation to sustainable investments with either an environmental or social objective is 1%, respectively. However, the actual allocations between environmental and social objectives will depend on the investment opportunities considered by the Investment Manager. This is to ensure that the Portfolio can allocate

Sustainability indicators measure how the sustainable objectives of this financial product are attained.

capital to those sustainable investments available offering the most potential upside from a sustainability and financial returns perspective.

The Investment Manager does not use a reference benchmark in respect of the sustainable investment objective applied to the Portfolio.

● ***What sustainability indicators are used to measure the attainment of the sustainable investment objective of this financial product?***

The Investment Manager uses the following indicators to measure the attainment of the sustainable objective of 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 the Portfolio achieves

● ***How do sustainable investments 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 www.columbiathreadneedle.com 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 Investment Manager'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 to the best interest of the shareholder.

— ***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.



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

X Yes

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.

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. A selection of exclusions applied by the Portfolio relate to PAIs such as fossil fuel exposure, non-renewable energy production, global norms, and controversial weapons. In addition, it considers PAIs as part of research into, and engagement with, investee companies on environmental PAI indicators relating to decarbonisation and biodiversity, and social PAI indicators such as board gender diversity and 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 ⁶
Indicators Applicable to Investments in Corporate Issuers		
1.1. GHG emissions		✓
1.2. Carbon footprint		✓
1.3. GHG intensity of investee companies		✓
1.4. Exposure to companies active in the fossil fuel sector	✓	✓

⁶ PAIs are considered as part of engagement prioritisation. Where certain harmful practices are identified, and engagement is unsuccessful, this may, over time and in certain instances, lead to divestment.

1.5. Share of non-renewable energy consumption and production	✓	✓
1.6. Energy consumption intensity per high impact climate sector		✓
1.7. Activities negatively affecting biodiversity sensitive areas		✓
1.8. Emissions to water		✓
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	✓	✓
1.11. Lack of processes and compliance mechanisms to monitor compliance with UN Global Compact principles and OECD Guidelines for Multinational Enterprises		✓
1.12. Unadjusted gender pay gap		✓
1.13. Board gender diversity		✓
1.14. Exposure to controversial weapons (antipersonnel mines, cluster munitions, chemical weapons and biological weapons)	✓	
2.15. Deforestation		✓
3.7. Incidents of discrimination		✓

☐ No

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



What investment strategy does this financial product follow?

The investment strategy embeds an "Avoid, Invest, Improve" philosophy:

Avoid – The Investment Manager has a set of exclusion criteria setting threshold standards to avoid investment in companies with socially or environmentally damaging products or unsustainable business or governance practices.

Invest – The Investment Manager invests in companies providing sustainability solutions and/or companies making a positive contribution to society and/or the environment. The majority of revenues from a company held in the Portfolio will contribute to key sustainability challenges and opportunities such as:

- Connect & 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.

- 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.
- Energy transition - transformation is required across all types of energy use, including power generation. Transport is another key area, for example.
- Health and well-being - with increased globalisation and urbanisation comes rising communicable diseases. We have 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.
- 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.
- 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.
- 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.
- The Investment Manager also considers the alignment of an investee with the SDGs.

The Portfolio applies a framework dubbed "A.I.M" (Additionality, Intentionality, Materiality) which helps include both qualitative as well as quantitative assessments to the sustainability credentials of a company.

Improve – While all investments of the Portfolio will be sustainable, the Investment Manager considers that all investments can nevertheless be improved. The Investment Manager engages with companies on material ESG issues with most business relevance, and believes that this active ownership is part of our duty as an investor acting in the best interests of our clients, and as a participant in the global financial system.

In addition, 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 for 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:

- Environmental Stewardship
- Climate Change
- Human Rights
- Labour Standards
- Public Health
- Business Ethics
- Corporate Governance

As noted above, the Investment Manager adheres to international standards such as 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.

In addition to assurance around good corporate governance, the Investment Manager may seek to engage companies to encourage them to adopt best-in-class practices in their management of a range of ESG risks.

The Investment Manager believes that an appropriate comparator benchmark for reviewing Portfolio performance is the MSCI Europe 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.

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

● ***What are the binding elements of the investment strategy used to select the investments to attain the sustainable investment objective?***

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 Investment Policies available on www.columbiathreadneedle.lu by selecting the Portfolio and accessing the Literature section.

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

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.

Good governance

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

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.



Asset allocation
describes the share
of investments in
specific assets.

What is the asset allocation and the minimum share of sustainable investments?

The Portfolio invests in European companies listed on one of the European States' Stock Exchanges or a regulated market in accordance with their respective investment objective and policy. The proportion of direct investment varies given the actively managed nature of the Portfolio but generally a large majority of the Portfolio will be directly invested in these asset classes.

At least 90% of the investments made by the Portfolio are "sustainable investments" for the purposes of SFDR. These assets are subject to investment policy of the Portfolio and the binding elements of the investment strategy to meet the sustainable investment objective. The remaining portion of the Portfolio consist of ancillary assets used for treasury management, defensive or hedging purposes that the Portfolio may hold as described below.

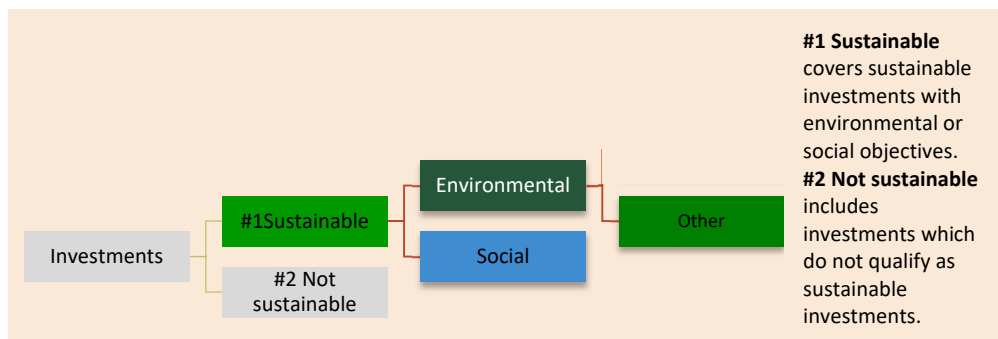
An investment is considered sustainable where the issuer has greater than 50% of its revenue net positively aligned to the Sustainable Development Goals (SDG), or an issuer contributing to a sustainable objective by embedding sustainability into the economic purpose of its business (e.g. growing the 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 and added together to determine the total proportion of sustainable investments within the Portfolio.

All assets, with the exception of ancillary assets described below, in which the Portfolio invests are subject to the investment policy of the Portfolio and the binding elements of the investment strategy to meet the sustainable investment objective.

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 sustainable investment objective?**

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 sustainable investment objective of the Portfolio.



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

None.

● **Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy⁷?**

☐

Yes:

☐

In fossil gas

☐

In nuclear energy



No

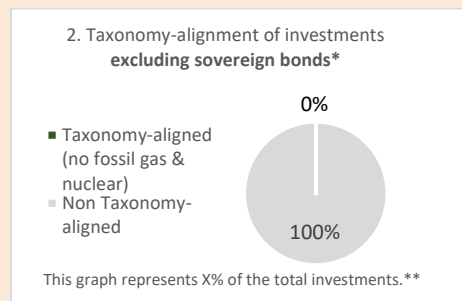
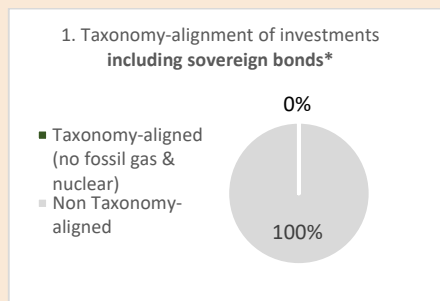
To comply with the EU Taxonomy, the criteria for **fossil gas** include limitations on emissions and switching to fully renewable power or low-carbon fuels by the end of 2035. For **nuclear energy**, the criteria include comprehensive safety and waste management rules.

⁷ 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.

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.



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 Portfolio's minimum allocation to sustainable investments with an environmental objective is 1%. The actual allocations between environmental and social objectives will depend on the investment opportunities considered by the Investment Manager. This is to ensure that the Portfolio can allocate capital to those sustainable investments available offering the most potential upside from a sustainability and financial returns perspective. The Portfolio aims to invest a minimum of 90% of its assets in sustainable investments and the remaining portion of the Portfolio consist of ancillary assets used for treasury management, defensive or hedging purposes that the Portfolio may hold as described below.



What is the minimum share of sustainable investments with a social objective?

The Portfolio's minimum allocation to sustainable investments with a social objective is 1%. The actual allocations between environmental and social objectives will depend on the investment opportunities considered by the Investment Manager. This is to ensure that the Portfolio can allocate capital to those sustainable investments available offering the most potential upside from a sustainability and financial returns perspective. The Portfolio aims to invest a minimum of 90% of its assets in sustainable investments and the remaining portion of the Portfolio consist of ancillary assets used for treasury management, defensive or hedging purposes that the Portfolio may hold as described below.



What investments are included under "#2 Not sustainable", 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 sustainable investment objectives of 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 meet the sustainable investment objective?

The Investment Manager does not use a reference benchmark in respect of the sustainable investment objective applied to the Portfolio.

Reference benchmarks are indexes to measure whether the financial product attains the sustainable investment objective.

- ***How does the reference benchmark take into account sustainability factors in a way that is continuously aligned with the sustainable investment objective?***

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:

[Columbia Threadneedle Investments - Funds and Prices - CT \(Lux\) Sustainable Opportunities European Equity A Acc EUR- SF04-LU2032054814 - Luxembourg - EN - Intermediary](#)