

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.¹

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: Eden Global Natural Resources UCITS ESG Fund

Legal entity identifier:

Environmental and/or social characteristics

Does this financial product have a sustainable investment objective?

Yes

No

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

in economic activities that qualify as environmentally sustainable under the EU Taxonomy

in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy

It **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 0% of sustainable investments

with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy⁴

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.**

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



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

Eden Global Natural Resources UCITS ESG Fund (the “Fund”) promotes the following environmental characteristics:

- the transition of the global economy to a more sustainable basis through the exploration and production of critical minerals

The Fund promotes the following social characteristic:

- promotion of diversity and inclusiveness in the workforces in investee companies;

The Investment Manager will undertake an initial internal screening process using both in-house and independent industry analysis to identify and monitor companies stance on these characteristics, and will assess on-going improvement. The Investment Manager will work with ESG service providers to construct ESG Roadmap programs to assist companies with improving their environmental and social performance.

The Fund will prioritize investments in companies where it can be established that they have alignment with at least one of the themes above. In a scenario where a company does not have alignment with

any of these themes, the company will be expected to commit to an ESG Roadmap where they achieve alignment to at least one of these themes during the course of the investment.

Companies which undertake certain activities which the Investment Manager considers do not meet the Fund's ESG criteria, but which might otherwise be classified as part of the Fund's investment universe, will be excluded from consideration for investment by the Fund (the "Exclusion Policy"). These activities include:

- mining, processing and generating energy from thermal coal, oil and gas and fossil fuels;
- a negative impact to local biodiversity;
- any violations of UN Global Compact principles and Organisation for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises;
- exposure to controversial weapons (anti-personnel mines, cluster munitions, chemical weapons and biological weapons); and
- manufacture of tobacco.

● ***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 will use the following indicators to measure the attainment of the environmental and social characteristics promoted by the Fund:

- % of portfolio that produces, or is aiming to produce critical minerals required for the transition to a more sustainable economy
- % of portfolio companies that have a formal Diversity, Equality & Inclusion policies in place for their workforce. Which are considered appropriate in the opinion of the investment manager

● ***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?***

This question and the related questions below are not applicable, as the Fund does not intend to make sustainable investments.

● ***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.

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

Not applicable.

● *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.

Sustainability

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

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.



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

Yes

No

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 Fund considers the following principal adverse impacts on sustainability factors, as part of its Exclusion Policy defined previously:

1. Greenhouse Gas Emissions:
 - Unacceptable greenhouse gas emitters and companies involved in production of coal or coal-based energy are excluded.
2. Exposure to companies active in the fossil fuel sector:
 - Companies involved in the production of coal or coal-based energy are excluded, and those with exposure to other fossil fuels (e.g., oil and gas) are deprioritised.
3. Activities negatively affecting biodiversity-sensitive areas:
 - Companies involved in severe environmental damage to local biodiversity are excluded. This is established by referring to the Norges Bank Exclusion list.
4. Violations of UN Global Compact principles and Organisation for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises:
 - Assessed through a web search, as well as, by referring to the Norges Bank Exclusion list.
5. Exposure to controversial weapons (anti-personnel mines, cluster munitions, chemical weapons and biological weapons)
 - Assessed through a web search, as well as, by referring to the Norges Bank Exclusion list.



What investment strategy does this financial product follow?

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

The Fund is an actively managed investment vehicle that focuses on long-only investments in equities and equity-related securities. It primarily targets companies involved in the exploration, development and production of natural resources, as well as, related support services. The Fund may invest in preference shares and convertible bonds, with the latter subject to a maximum limit of 10% of the Fund's Net Asset Value. At a minimum, Eden is dedicated to ethical and sustainable investments by excluding coal, companies involved in child labour and tobacco from our Investment universe as well as "high risk" natural resources companies.

The investment process involves a two-step approach. Firstly, a quantitative analysis is conducted, considering macroeconomic trends, trade flows, commodity reports, and economic

indicators in different commodity markets. This analysis helps generate preferred sector weightings for the Fund's investment universe. Secondly, a qualitative analysis is performed on individual companies, considering their industry, business performance, financials, management, and governance structure. Due diligence is carried out to assess investment risks, including geographic/geopolitical risk, commodity price risk, project risk, and management track record. The selection of stocks follows a risk-averse approach, with negative screening excluding companies with high volatility and low liquidity.

The portfolio construction is based on the selection criteria mentioned above, aiming to align with sustainable characteristics such as renewable energy generation, sustainable food production, and carbon capture/sequestration. The Fund also considers external ESG ratings for investment decisions and conducts due diligence on ESG policies and reporting for companies without available ratings.

● ***What are the binding elements of the investment strategy used to select the investments to attain each of the environmental or social characteristics promoted by this financial product?***

The Fund's investment universe is the resources sector, which includes the sub-sectors of mining, energy and agriculture. Companies which undertake certain activities which the Investment Manager considers do not meet the Fund's ESG criteria, but which might otherwise be classified as part of the Fund's investment universe, will be excluded from consideration for investment by the Fund, based on the Exclusion Policy defined previously.

In addition, the Fund assists companies in achieving better outcomes in the environmental and social characteristics listed above through its ESG Roadmap programs.

The Fund will prioritize investments in companies where it can be established that they have alignment with at least one of the themes above. In a scenario where a company does not have alignment with any of these themes, the company will be expected to commit to a roadmap where they achieve alignment to at least one of these themes, during the course of the investment.

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

The Fund does not commit to a minimum rate to reduce the scope of investments prior to the application of the investment strategy.

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

In addition to review of third party ESG ratings, the Investment Manager's policy to assess good governance practices of the investee companies incorporates the Corporate Governance Principles and Recommendations as outlined by the Australian Securities Exchange Governance Council, including assessment of:

- sound management structures;
- employee relations;
- remuneration of staff; and
- tax compliance



What is the asset allocation planned for this financial product?

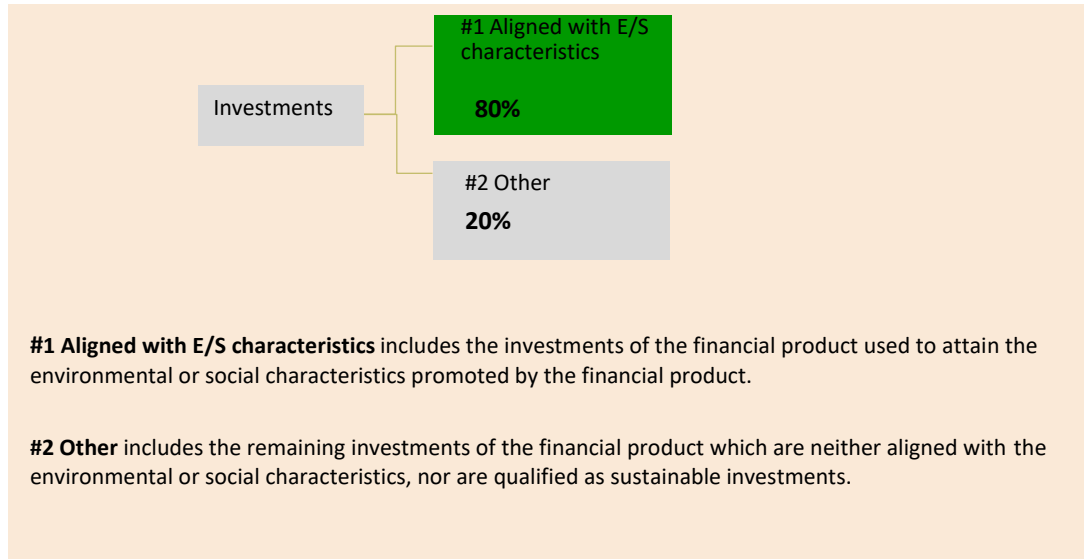
The Fund invests in direct financial instruments, at least 100% of which are aligned with the environmental and social characteristics that it promotes on the basis of screening and

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.

exclusionary strategy.



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

Financial Derivative Instruments (“FDIs”) are not expected to be used unless for efficient portfolio management purposes and not to speculate. The use of FDIs will only be when the UCITS Coll Source Bok could not be relied upon to achieve the fund’s investment objectives.



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

The investments underlying this Fund do not take into account the EU criteria for environmentally sustainable economic activities within the meaning of the Taxonomy Regulation and, as such, the Fund’s portfolio alignment with such Taxonomy Regulation is not calculated. It follows that the minimum extent of sustainable investments with an aligned environmental objective aligned with the Taxonomy Regulation is currently 0%.

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

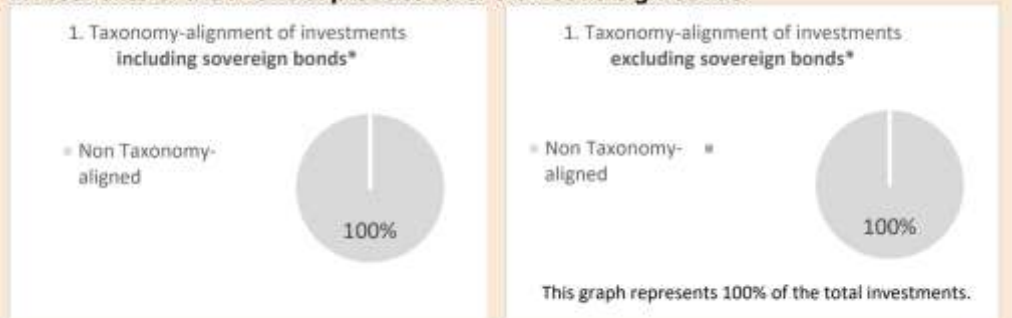
Yes

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.



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

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.

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

The minimum share of investments in transitional and enabling activities is 0%.



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

The minimum share of non-aligned environmental sustainable investments is 0%.



What is the minimum share of socially sustainable investments?

The minimum share of socially sustainable investments is 0%.



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

The investments included under “#Other” includes cash held as ancillary liquidity and FDIs.

As minimum environmental or social safeguards, each of these investments need to follow the Exclusion Policy of the Fund as defined above.



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



Is a specific index designated as a reference benchmark to determine whether this financial product is aligned with the environmental and/or social characteristics that it promotes?

The Fund does not designate an index to measure alignment with environmental and social characteristics it promotes.

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 I find more product specific information online?

www.eden-asset.com

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

ESG Eden Partners (eden-asset.com)