

## Additional information for products promoting social and/or environmental characteristics

Art.81

## **Summary**

The Sub-Fund promotes environmental or social characteristics through the application of financial and extra-financial criteria with the objective of integrating sustainability into investments. To this end, elements of financial, environmental, social and governance analysis are used to obtain a more complete view of the assets in which it invests, taking into consideration, among other aspects, ESG (environmental, social and governance) characteristics such as care for the environment, social aspects such as promoting respect for human rights and good governance and business ethics.

The Management Company, through its decision and control mechanisms, ensures that the assets in which the Sub-Fund invests comply with the ESG characteristics promoted by the Sub-Fund, based on the ESG information on assets provided by ESG data providers and on which it applies its own analysis methodology to obtain an assessment of the ESG performance of those assets by granting an ESG rating to the issuer.

No reference benchmark has been designated for the purpose of attaining the environmental or social characteristics promoted by the Sub-Fund.

The Sub-Fund does not have a sustainable investment objective. However, it partially makes investments considered sustainable investments aimed at achieving environmental and/or social objectives with a minimum sustainable investment commitment of 1%, which partly corresponds to environmentally sustainable investments not aligned with the taxonomy and partly to socially sustainable investments.

The binding elements used in the selection of investments for the promotion of environmental, social and corporate governance characteristics are the exclusion and valuation criteria described in the investment strategy.

- Exclusion criteria: Excluding direct cash investment assets from issuers that do not comply with the exclusions described above.
- Valuation criteria: The minimum average ESG rating of the issuers of the assets in the cash direct investment and qualifying investment funds, with ESG rating (in accordance with the Management Company's methodology in the analysis of underlying assets), will be at least an A- on a 7-level scale (C-, C, C+, B, A-, A and A+, where A+ reflects the best ESG performance) so that the portfolio meets the criteria described for the promotion of the aforementioned ESG characteristics.

However, as an exception, some investments could be considered as compliant with the environmental or social characteristics promoted by the Sub-Fund in the following cases:

- They are considered sustainable investments (in accordance with the management's company 's own analysis and methodology) and in particular may be classified as green, social or sustainable bonds, and are part of the universe of assets that the Sub-Fund may invest in pursuant to its promoted ESG characteristics, after prior validation by the Management Company.
- Investment funds without ESG rating but that promote ESG characteristics. (Investment Funds considered Art. 8 under SFDR) and/or targeting sustainable investments (Art. 9 under SFDR).



The Investment Manager takes into account the main adverse impacts on sustainability factors when making investment decisions. These include all mandatory indicators in table 1 and a selection of optional indicators in tables 2 and 3 as described in Annex I of the Regulatory Technical Standards supplementing SFDR. To this end, it monitors a number of environmental and social indicators (KPIs) which, through the consideration of published information on the issuers in which it invests, make it possible to warn of the negative effects that investments made by this product could cause to the outside.

For this Sub-Fund, the mitigation of such adverse impacts is carried out by applying certain exclusion criteria for those sectors with the greatest potential to generate them, as well as assessing and monitoring possible disputes of the companies analyzed that could lead to significant impacts due to non-compliance with internationally recognized standards or regulations. In addition, an ESG analysis is applied, allowing managers to have a more complete view of the assets to invest in in order to prevent potential risks and adverse impacts. In addition, the monitoring activities carried out in the area of ESG are key to detect these potential adverse impacts on sustainability, to monitor the management of these adverse impacts by companies and establish procedures in the event of an inadequate or insufficient response by companies. Information on how principal adverse impacts on sustainability factors were considered for this Sub-Fund will be provided in the annual report.

Currently, the Investment Management works with limited availability and quality of data for the indicators. For this reason, a periodic analysis is carried out, through collaboration with issuers and data providers, of the coverage and quality of the data to ensure the robustness and reliability of the indicators and to integrate this information into management.

## Important information

"This document is intended to provide information that summarizes the main characteristics of the product and under no circumstances constitutes a contractual agreement, a recommendation, personalized advice, an offer or solicitation.

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This fund has a prospectus which is drafted in English and can be obtained from www.santanderassetmanagement.lu

For product information, please contact Santander Asset Management Luxembourg S.A. (43, Av. John F. Kennedy, L-1855 Luxembourg - Grand Duchy of Luxembourg), management company of the fund under the supervision of Commission de Surveillance du Secteur Financier (CSSF). The depositary and administrator of the fund is JP Morgan SE, Luxembourg Branch (6, route de Treves, L-2633 Senningerberg - Grand Duchy of Luxembourg).

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