

PART C

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

Product name: Megatrends

Legal entity identifier: 213800WBUV64IWP7T815

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 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**

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 lay down 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 Sub-Fund promotes environmental and social characteristics by promoting climate change mitigation and adaptation characteristics among the investee companies.

The Sub-Fund does this in three ways:

- (1) Part of the portfolio is invested in the Decarbonisation of the economy theme, so we

invest in companies that their activities provide solutions for climate change mitigation and/or adaptation. For example, companies involved in renewable energies and electrification of the economy.

- (2) Furthermore, for the rest of the companies whose activities do not directly provide solutions for climate change mitigation and/or adaptation, the Sub-Fund expects them to embed climate change in their strategy and operations. Thus, the Sub-Fund expects companies to implement plans to align their businesses to the objectives of the Paris agreement and to effectively manage climate transition risks. The Sub-Fund also promotes that companies provide transparent and reliable information about their climate footprint and progress towards the climate targets they have set. As a matter of fact, these issues are the pillars of the Sub-Fund's internal ESG rating targets regarding the internal environmental score.
- (3) Finally, the Sub-Fund applies specific exclusion criteria to avoid investment in companies that have substantial involvement in activities that are considered to be detrimental to climate change mitigation and adaptation.

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

In order to measure the attainment of the promotion of climate change mitigation and/or adaption, the fund uses the following indicators:

- (1) For the companies that are invested through the Sub-Fund decarbonisation of the economy theme, we require that at least 30% of the revenues are related to solutions for climate change mitigation and/or adaptation. In order to measure this involvement, the Sub-Fund uses the RBICS (Reverse Business Industry Classification system) and maps the subindustries that carry out these activities, matching them with the activities carried out by the invested companies.
- (2) For the whole portfolio, even for the companies whose activities do not directly provide a solution for climate change mitigation and/or adaptation, the Sub-Fund expects them to embed climate change in their strategy and operations. Thus, the Sub-Fund expects companies to implement plans to align their businesses to the objectives of the Paris agreement and to effectively manage climate transition risks. The Sub-Ffund also promotes that companies provide transparent and reliable information about their climate footprint and progress towards the climate targets they have set. In order to assess the alignment of the companies with the Paris agreement and the level of transparency regarding climate change related information, the Sub-Fund uses the following indicators:
 - a. Whether company's climate targets are set according to the Science Based targets initiative <https://sciencebasedtargets.org/>
 - b. Whether the company provides information to CDP and what score has CDP assigned to their climate change policies www.cdp.net
 - c. Whether the company follows the recommendations of the Task Force for Climate Related Financial Disclosures www.fsb-tcf.org

- **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?**

N/A

- **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?**

N/A

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

N/A

- **How are the sustainable investments aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights? Details:**

N/A

Principal adverse impacts are the most significant negative impacts of investment decisions on sustainability factors relating to environmental

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.



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

Yes, _____

No



What investment strategy does this financial product follow?

The investment strategy of the fund follows a thematic approach and applies exclusions and ESG integration.

Thematic approach:

The Sub-Fund invests in companies with exposure to trends with great long-term growth potential. In order to identify those trends with the highest growth potential, the Sub-Fund focuses in three dimensions:

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

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

- (1) People. Improvement of quality of life and its implications for consumption habits, mainly driven by the following themes: Health, Knowledge, Standards of living and economic well-being and leisure.
- (2) Companies. Companies are essential for innovation and technological progress, both of which are the engines of a sustainable economy. In this area, the digitization and automation of the economy are particularly important, as they are catalysts for progress and productivity improvement.
- (3) Planet. The biggest challenge facing humanity is climate change. For this reason, those activities that contribute to the decarbonization of the economy, the adoption of sustainable production processes and the best management of natural resources are considered critical for the future of the planet.

The definition of the investment universe therefore involves identifying those companies that are involved in at least one of these three dimensions (or “megatrends”):

- (1) Improvement of the quality of life.
- (2) Interconnectivity, innovation and high technology.
- (3) Decarbonization of the economy.

Exclusions:

To ensure that the companies in which the Sub-Fund invests contribute to a more sustainable world, the Sub-Ffund will avoid investing in activities that can cause significant harm, for which it applies exclusion criteria to certain activities that we detail in this document. In addition to considering the activities excluded by the BESTINVER group's responsible investment policy, the Sub-Fund integrates additional criteria that provide the minimum guarantees that the activities of the companies contribute to a sustainable world (also detailed later in this document).

ESG integration:

Once the eligible universe is established by means of applying the fund exclusion policy (described in the fund prospectus), the identified opportunities that are considered to be potential additions to the portfolio are subjected to detailed fundamental analysis. An exhaustive evaluation is carried out of the key environmental, social and corporate governance risks and opportunities, using both the investment team knowledge and the information provided by external ESG data providers. Based on this analysis, an internal ESG rating is assigned to each company, classifying them into 4 categories: Gold, Green, Amber and Red.

- Gold category: This category includes companies with the best ESG performance and that are especially sensitive to the sustainable impact of their businesses. These companies not only represent a financial investment opportunity, they are also considered to be the most sustainable overall by the Bestinver investment team.
- Green category: After exhaustively analysing the inputs of the ESG factors, both external and internal, and having evaluated their risks, the investment team considers that the potential benefit of investing in these companies is much higher than the identified risks, as these are of low impact and with a high potential of mitigation.
- Amber category: The investment team considers that certain aspects of the business or the ESG

management of the company can be improved, but that they do not create a significant risk to people and/or the environment and do not endanger its potential profitability.

- Red category: The companies with a red rating have no place in the portfolio. Severe environmental, social or corporate governance risks are identified in their analysis. These are considered unacceptable and/or, in any case, greater than the potential profitability of investing in them.

● ***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?***

As stated in the Sub-Fund's investment strategy, there are four overall binding elements used to select the investments to attain the promotion of climate change mitigation and adaptation characteristics:

- (1) For the companies that are invested through the Sub-Fund decarbonisation of the economy theme, the Sub-Fund requires that at least 30% of the revenues are related to solutions for climate change mitigation and/or adaptation. In order to measure this involvement, the fund uses the RBICS (Revere Business Industry Classification system) and maps the subindustries that carry out these activities, matching them with the activities carried out by the invested companies.
- (2) For the whole portfolio (even for the companies whose activities do not directly provide solutions for climate change mitigation and/or adaptation), the fund will not invest in companies that have substantial involvement in activities that are considered to be detrimental to climate change mitigation and adaptation, using the following exclusion criteria:
 - a. Companies with any (more than 0%) of their revenues involved in extraction of thermal coal;
 - b. Companies with more than 10% of revenues involved in the following activities: thermal coal power generation, extraction of non-conventional oil and gas (shale gas and oil sands), fossil fuel exploration and exploitation in Arctic regions, palm oil production; and
 - c. Companies with more than 15% of their revenues involved in conventional oil and gas production.
- (3) The Sub-Fund will apply additional exclusion criteria to all companies not related to climate change mitigation and adaptation:
 - a. Companies with any (more than 0%) of their revenues involved in the following activities: production and distribution of tobacco, controversial weapons, production or distribution of assault weapons for use by civilians, production or distribution of adult entertainment;
 - b. Companies with more than 10% of revenues involved in the following activities: alcohol production and distribution, operation, production and distribution of specialised equipment and support services in the gaming and gambling sector; and

- c. Companies involved in the operation and construction of nuclear energy plants if such company's activities are carried out in any country that does not comply with any of the following three conditions:
 - i. the host country must be a member of the IAEA (International Atomic Energy Agency),
 - ii. the host country must have ratified the Convention on Nuclear Safety, the Convention on the Physical Protection of Nuclear Material and the Joint Convention on the Safety of Spent Fuel Management and on the Safety of Radioactive Waste Management (or have adopted adequate measures to comply with the requirements included in said conventions), and
 - iii. the host country must have ratified the Non-Proliferation of Nuclear Weapons Treaty and the International Convention for the Suppression of Acts of Nuclear Terrorism.

(4) At least 50% of the Sub-Fund is invested in companies with Gold and/or Green rating (as detailed in previous paragraphs). Climate change is the main pillar of the fund's internal ESG rating targets regarding the internal environmental score.

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

N/A

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

The Investment Manager takes into account good governance practices as part of the fundamental ESG analysis carried out for all investee companies. As such, the Investment Manager rely on information provided by multiple ESG external partners, mainly focused (but not limited to) the following factors: Board/Management quality and integrity, Board structure, Diversity, Ownership and shareholder rights, Remuneration policies and schemes, Audit and financial reporting and Stakeholder governance, among others.



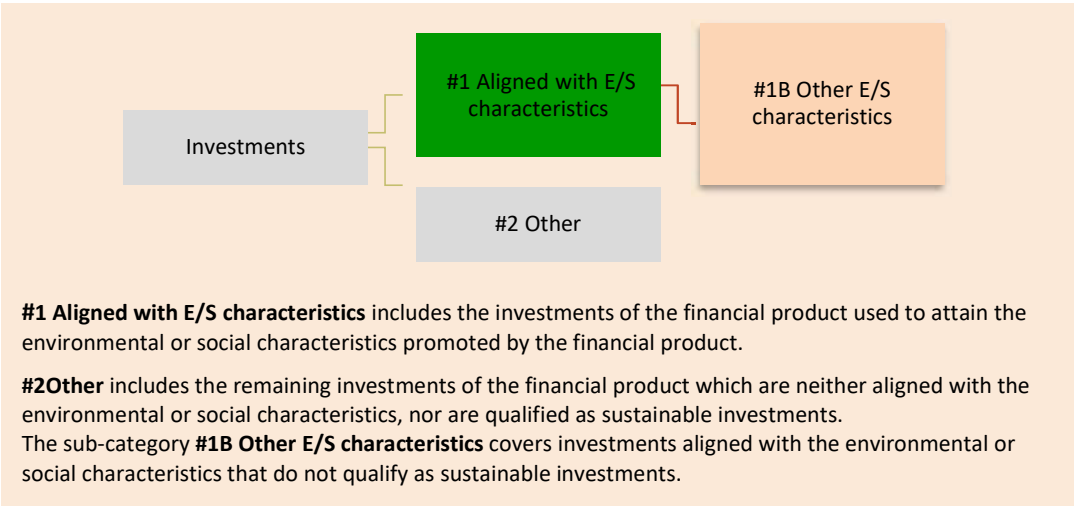
What is the asset allocation planned for this financial product?

The minimum proportion of the investments of the financial product used to attain the environmental or social characteristics promoted by the financial product in accordance with the binding elements of the investment strategy is 50%. The Sub-Fund investment will be made to attain the Environmental and Social characteristics of the product.

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.



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

Whilst the Sub-Fund may use derivatives as part of its investment strategy, the use of derivatives is not with a view to attaining the environmental or social characteristics promoted by the product.

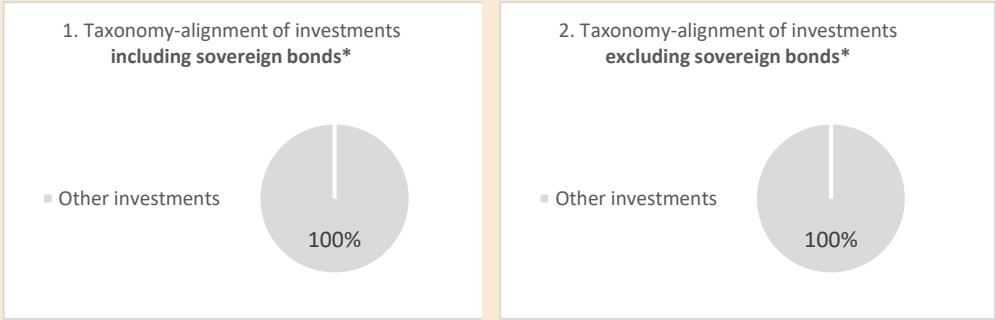


To what minimum extent are sustainable investments with an environmental objective aligned with the EU Taxonomy? N/A

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

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

N/A

 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?

N/A



What is the minimum share of socially sustainable investments?

N/A



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

The remaining 50% of the portfolio will be invested in the following instruments and/or under the compliance of the following criteria:

- (1) Instruments which, by their own nature, cannot be considered as eligible to apply the fund’s ESG investment strategy and analysis process. These instruments are, though not limited to, cash, deposits, derivatives, etc.
- (2) Companies which do not comply with the binding elements of the fund (detailed in the section “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?”). However, even though these companies do not comply with the binding elements, the fund will enforce them to comply with Bestinver’s Responsible Investment policies and principles, which are mandatory to all Bestinver’s funds and which can be summarized in the following elements:
 - a. An exclusion policy, classified in three groups (depending on the impact their activities have on society and the environment):
 - i. Group 1: Companies with any (more than 0%) of their revenues involved in the following activities: controversial weapons, production and distribution of assault weapons for use by civilians, thermal coal extraction, operation and construction of nuclear energy plants in certain countries (if the companies do not comply with the criteria described in the previous section “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?”) and production of tobacco and tobacco-related products;
 - ii. Group 2: Companies with more than 10% of their revenues involved in the following activities: thermal coal power generation, distribution of tobacco and tobacco-related products and associated services, extraction of non-conventional oil and gas (shale gas and oil sands), fossil fuel exploration and exploitation in Arctic regions, palm oil production, production and distribution of adult entertainment content and operation, production and distribution of specialised equipment and support services in the gaming and gambling sector; and
 - iii. Group 3: Companies included in this group will be “under observation”, which means that Bestinver will perform exhaustive analysis to make sure that they are carrying out their business responsibly and that they have established transformation plans to improve their environmental, social and/or corporate governance performance. These sectors and activities are the following: companies with over 50% of their turnover derived from conventional oil and gas production,

generation and associated services, companies with over 10% derived from alcohol production and distribution, companies with over 10% derived from pesticide production and distribution and companies that are guilty of serious violations of international human rights standards and principles.

- b. An ESG integration policy, by which all companies in the eligible universe (once the exclusion policy has been enforced) are subjected to detailed ESG analysis, using both the investment team knowledge and the information provided by external ESG data providers. This analysis requires that all companies are assigned an internal ESG rating (ranging from Gold or Green to Amber or Red).
- c. An active ownership policy, by which all companies in the portfolio must comply with the engagement and the voting policies described in Bestinver's Responsible Investment principles and policies (publicly available in the following link: https://www.bestinver.es/wp-content/uploads/Responsible_Investment_Principles_Bestinver.pdf)



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? N/A

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? N/A*
- *How is the alignment of the investment strategy with the methodology of the index ensured on a continuous basis? N/A*
- *How does the designated index differ from a relevant broad market index? N/A*
- *Where can the methodology used for the calculation of the designated index be found? N/A*



Where can I find more product specific information online?

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

The Investment Manager's Responsible Investment Philosophy can be found in the following link: <https://www.bestinver.es/filosofia-de-inversion/inversion-responsable/>

Additionally, two other relevant documents have been uploaded on the Investment Manager's website, as follows:

- The Investment Manager's Responsible Investment Principles and Policies: https://www.bestinver.es/wp-content/uploads/Responsible_Investment_Principles_Bestinver.pdf
- Explanation of no consideration of Principle Adverse Impacts (PAIs): <https://www.bestinver.es/wp-content/uploads/no-consideracio%CC%81n-de-las-principales-incidencias-adversas.pdf>