

ARTICLE 10 – THREADNEEDLE (LUX) PAN EUROPEAN ESG EQUITIES FUND

ARTICLE 10

Promotion of environmental or social characteristics and of sustainable investments

ESG Investment Guidelines

The Threadneedle (Lux) Pan European ESG Equities fund adopts environmental, social and governance (“ESG”) investment criteria as set out in its ESG Investment Guidelines, which may be amended from time-to-time.

The key components to the ESG Investment Guidelines are as follows:

- 1.** ESG exclusion screening, which aims to exclude companies that are unable to satisfy the ESG Investment Guidelines from time to time. By way of example, it may seek to exclude companies where a significant element of the business revenue is derived from activities such as the manufacture of controversial weapons, tobacco, gambling services, or companies that breach accepted international standards and principles;
- 2.** Companies that do not satisfy this exclusion screening may be assessed as suitable for investment by the Portfolio, if in the opinion of the Sub-Advisor, they are clearly demonstrating improving ESG characteristics. By way of example, this may include companies that are actively reducing their share of business revenue derived from the type of activities described above.



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