Sustainability-related disclosures for Private Suite - Lombard Odier Natural Capital

This document provides you with a summary of sustainability-related information available on our website about this financial product. It is prepared in relation to Article 10 of the Sustainable Finance Disclosure Regulation (EU) 2019/2088. The information disclosed is required by law to help you understand the sustainability characteristics and/or objectives and risks of this financial product.

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Summary	This Sub-fund has a sustainable investment objective.The Investment Manager identifies the sustainable investments according to SFDR on the basis of UN SDGs as described in more detail below in the section "Methodologies".The Investment Manager identifies the sustainable investments according to SFDR on the basis of UN SDGs as described in more detail below in the section "Methodologies".No reference benchmark has been designated for the purpose of attaining the environmental or social characteristics promoted by the Sub-fund.The Investment Manager will focus on the following primary indicator to measure attainment of the specific commitments outlined above: • the % of the sub-fund's assets invested in 'green', investments accordiing to the LOIM Classification Framework. Given the specific focus of this sub-fund, the Investment Manager will also prioritise consideration of the portfolio's performance on the following indicators, which are also considered as part of the Investment Manager's do no sigificant harm considerations outlined in the LOIM Classification Framework. • Water withdrawal (m3 / MEUR revenues) • Operational assets in biosensitive areas (#) • Forest management quality score (Investment Manager's scoring system) • Controversies related to water use, land use or biodiversity (# level 1-5) • Controversies related to non-GHG emissions, effluents and waste (# level 1-5)The criteria for good governance and minimum social safeguards include an analysis of exposure to high level social and governance controversies and the company's performance on social and governance scores under the Investment Manager's proprietary ESG scoring framework, if highly material to the company's sector. Good governance is also considered as part of the LOIM Classification Framework, including consideration of social and employee matters PAIs (e.g. violations of UN Global Compact principles and OECD Guidelines for Multinational Enterprises and lack of processes and compliance mechanisms to monitor compliance with UN Global). In pursuing a sustainable investment objective being a positive environmental impact, the Investment Manager aims to select companies which generate material revenues and/or earnings from business activities that have a positive contribution towards one or more of the following areas of natural capital investment opportunities: Circular Bio-Economy, Resource Efficiency, Outcome-oriented Economy and Zero Waste. The Investment Manager aims to invest at least 70% of the sub-fund's assets in #1A Sustainable
No significant harm to the sustainable investment objective	The analysis of possible significant harm to environmental or social sustainable investment objectives forms an inherent part of the analysis undertaken under the LOIM Classification Framework. This LOIM Classification Framework takes explicit account of any material environmental or social dimensions, an investee company's performance with respect to these indicators, on a current or forward-looking basis. The Investment Manager identifies 'Sustainable investments' as companies classified as 'green' under the LOIM Classification Framework which have specifically been assessed to not cause significant harm or to be subject to credible mitigating factors.
Sustainable investment objective of the financial product	This Sub-fund has a sustainable investment objective. The Investment Manager aims to invest at least 70% of the sub-fund's assets in sustainable investments.The Sub-fund does not committ to make sustainable investments with a social objective.The Sub-fund invests in companies whose growth will benefit from regulations, innovations, services or products favoring the transition to a more circular economy and to an economy that values natural capital. The Sub-fund seeks to invest in high quality companies with sustainable financial models, business practices and business models showing resilience and the ability to evolve and benefit from long term structural trends using inter alia the profiling tools and methodologies set out below. The Sub-fund's investment philosophy is rooted in the Investment Manager's worldview describing a necessary transition from a Wasteful, Idle, Lopsided and Dirty (WILD) economic model to one that is Circular, Lean, Inclusive and Clean (CLIC®). The Investment Manager believes this transition will require a transformation across the global economic systems related to energy, land & oceans and materials, enabled by carbon markets, which the Investment Manager refers to as the '3+1 framework'. The Sub-fund focuses in particular on the following transformations: • Transformation of land & ocean systems: transitions across our reliance on land & oceans, including the transformation of agriculture, food and land use (AFOLU) systems through more sustainable food production and sustainable forestry, the expansion of the bioeconomy, and the improvement of water systems, aiming to restore land and ecosystems back to nature. • Materials - transitions across our material systems, including moves towards improved resource productivity, adoption of less harmful production processes, reduced reliance on resource extraction, and reductions and improvement management of waste. The Sub-fund is expected to contribute to the following environmental objectives established by article 9 of the Taxonomy Regulation: • The sustainable use and protection of water and marine resources • The transition to a circular economy • Pollution prevention and control • The protection and restoration of biodiversity and ecosystems The Sub-fund is also expected to indirectly contribute to Climate change mitigation. In order to acheive the objectives and contributions described above, the Investment Manager aims to: • invest the Sub-fund's assets primarily in investments making a meaningful contribution to the specific objectives outlined above as determined by reference to the Investment Manager's proprietary classification

	framework in which activities and companies may be classified as either 'green', 'grey' or 'red' (the "LOIM Classification Framework"). • invest at least 70% of the Sub-fund's assets in sustainable investments described as 'green' according to the LOIM Classification Framework. The Investment Manager uses a pass/fail approach to define whether a given investment, defined at the company level, is considered as a "sustainable investment" or not. The Investment Manager classifies companies into three categories, referred to as Green Star, Grey Star and Red Star companies, with only Green Star companies considered sustainable. To "pass" as a Green Star company, a company must: 1. Have at least 25% revenue exposure to environmentally-sustainable "green" activities, understood to include: a. Activities that in and of themselves contribute to one of the six environmental objectives recognised by the EU Taxonomy; or b. Transitioning activities for which there are no technologically and economically feasible low-carbon alternatives, but that support the transition to a climate-neutral economy in a manner that is consistent with Paris-aligned (well below 2C) objectives; or c. Enabling activities: activities that enable other activities to make a substantial contribution to one or more of the objectives; and where the specific activities included and technical criteria applicable to these are defined by: a. The activities and technical criteria already or expected to be included in the EU Taxonomy; or b. The Investment Manager, where it believes specific activities are either already low-impact within high-impact industries in a relative or absolute sense, contribute to the transition including through commitments to credible transition strategies, or are enabling other activities to meet key thresholds; and where a company's exposure to relevant activities can be established using either: a. The company's own disclosures related to the EU Taxonomy; or b. The Investment Manager's documented assessment of the company and its activities; and 2. Have at most 5% revenue exposure to "red" activities that are: a. Classified by the Investment Manager as inherently harmful in nature, including activities related to the mining of thermal coal, the generation of power using coal, the extraction or refining of oil and gas, along with selected other activities; or 3. If not meeting the criteria above, to be dedicating more than 50% of its capital expenditure to the "green" activities defined above and to have specific targets around the accelerated phaseout or mitigation of any applicable "red" activities; or 4. If not meeting the criteria above, to be subject to a documented, facts-based assessment by the Investment Manager – undertaken ex ante for any investments made from January 1, 2023 – outlining the specific reasons the company's activities are considered well-aligned to desirable environmental transitions and are deemed appropriate to a given theme or environmental objective; and 5. In all cases, and as a minimum safeguard, not have exposure to level 4 and level 5 UN Global Compact controversies using the Sustainalytics rating scale, subject only to overrides correcting for factual or data errors. While the above criteria constitute the minimum criteria applicable to a Green Star company, the Investment Manager may apply additional criteria to its assessment of companies involved in specific activities to act as additional safeguards, particularly in its assessment of Do No Significant Harm criteria. While such additional criteria cannot be used to "pass" companies if they do not meet the criteria above, they may lead companies to "fail" as a sustainable investment even if they meet the criteria above. Grey Star and Red Star companies: Only companies classified as Green Star companies are considered by the Investment Manager to be sustainable investments. For all other companies, the Investment Manager applies additional criteria to distinguish between Grey Star and Red Star companies. Red Star companies are those companies with material exposure to the "red" activities referenced above, where such companies lack a credible phaseout strategy for those activities or include companies with exposure to high level controversies or other harmful aspects. There can be no guarantee that the above aims will be achieved. It should be noted that whilst the Investment Manager may make certain comparisons with one or more benchmarks for certain elements of its investment process as described above, the Investment Manager has not designated a formal benchmark for the purpose of attaining the sustainable investment objective of the Sub-fund.
Investment strategy	In pursuing a sustainable investment objective being a positive environmental impact, the Investment Manager aims to select companies which generate material revenues and/or earnings from business activities that have a positive contribution towards one or more of the following areas of natural capital investment opportunities: Circular Bio-Economy, Resource Efficiency, Outcome-oriented Economy and Zero Waste. Good governance practices of investee companies in which the Sub-Fund invests is assessed by reference to PAI 10. (Violations of UN Global Compact principles and Organisation for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises) and PAI 11 (Lack of processes and compliance mechanisms to monitor compliance with UN Global Compact principles and OECD Guidelines for Multinational Enterprises) of PAI Table 1 of Annex I of the SFDR RTS 2022/1288. Governance practices are addressed by the Investment Manager through a combination of data analysis and direct engagement with companies.
Proportion of investments	The Investment Manager aims to invest at least 70% of the sub-fund's assets in #1A Sustainable
Monitoring of sustainable investment objective	There are four levels of responsibility for the monitoring of the sustainable investment objectives of the financial product and the sustainability indicators used to measure the attainment of the sustainable investment objectives of the Sub-Fund throughout the lifecycle of the Sub-Fund.

	The role of the Sustainable Research Team – the Investment Manager's Sustainable Research Team are responsible for the design and maintenance of the Investment Manager's proprietary sustainability-related data management including the sourcing, review, validation, coding and monitoring of data/sustainability indicators used in the LOIM Classification Framework described in paragraph (g) below. The Sustainable Research Team are independent of the Portfolio Management Team referenced below. The role of the Portfolio Management Team – the Investment Manager's Portfolio Management Team review the sustainability profile of prospective investee companies using the LOIM Classification Framework. The LOIM Classification Framework produce multiple sustainability-related data points for each prospective investee company, including the classification of the company as sustainable/grey/red companies and more granular data points relating to do no significant harm factors. The Portfolio Management Team have the primary responsibility to ensure that the Sub-Fund's assets are invested in investments #1 Aligned with E/S characteristics, #1A Sustainable Investments and "#2 Other are in line with the percentages referred to in paragraph (e) above. The role of the Risk Team - the Investment Manager's Risk Team monitor the portion of the Sub-Fund's assets invested in investments #1 Aligned with E/S characteristics, #1A Sustainable Investments and "#2 Other in line with the percentages referred to in paragraph (e) above on a daily basis by reference to the outputs from the LOIM Classification Framework. The Risk Team have the responsibility to identify any breaches of the percentages referred to in paragraph (e) above and to work with the Portfolio Management Team to examine the reasons for and if necessary to cure any breaches. The Risk Team also monitor post trade implementation in relation to excluded investments. The Risk Team are independent of the Portfolio Management Team referenced above. The role of the Compliance Team – the Investment Manager's Compliance Team are responsible for coding and monitoring pre-trade and post-trade compliance in relation to excluded investments noted in paragraph (d) above. The Compliance Team are independent of the Portfolio Management Team referenced above.
Methodologies	The Investment Manager uses a pass/fail approach to define whether a given investment, defined at the company level, is considered as a "sustainable investment" or not. The Investment Manager classifies companies into three categories, referred to as Sustainable, Grey and Red companies, with only sustainable companies considered sustainable investments (i.e. falling in the category of #1A Sustainable for the purposes of the planned asset allocation section below). To be classified as sustainable, a company must meet the following criteria according to the LOIM Classification Framework: 1. Contribution a. The company has at least 30% revenues exposure to sustainable activities understood to include i. Activities that are eligible to at least one of the six environmental objectives recognised by the EU Taxonomy and that meet the contribution screening criteria as defined by the Investment Manager with objectively applied quantitative thresholds and/or indicators selected based on the EU Taxonomy technical screening criteria and considerations of the underlying sector, the nature of their business, data availability, and complemented by a qualitative review; or ii. Transitioning or enabling activities not included in the EU Taxonomy but that have been mapped by the Investment Manager to at least one of the six environmental objectives recognized by the EU Taxonomy or socially sustainable activities identified by the Investment Manager, that meet the screening criteria as defined by the Investment Manager above. or b. The company demonstrates significant CapEx (or equivalent investment metric relevant for the industry) alignment with the above activities in a.i and a.ii and support a clearly articulated and ambitious transition strategy to sustainable activities. A company's exposure to relevant activities can be established using either: • The company's self-disclosed alignment to the EU Taxonomy; or • The Investment Manager's documented assessment of the company and its activities which can be systematically quantitatively performed or fundamentally research based. 2. Do No Significant Harm (DNSH) The Investment Manager tests if a company, aside or despite any positive contributions, is harming, or significantly harming the sustainable transition across any parts of its business. To assess the do no significant harm, the Investment Manager has developed for each environmental objective of the EU Taxonomy and social targets in-house quantitative and qualitative tests, including but not limited to i) proprietary sustainability indicators, such as the company's implied temperature rise, ii) Principal Adverse Indicators including climate change, water and waste related PAIs; and iii) controversy assessment. To be considered a sustainable company: a. a company must do no significant harm any social and environmental objectives assessed at the company level against a sub-set of indicators selected by the Investment Manager depending on the activity exposure of the company. b. a company must have at most 5% revenue exposure to harmful activities that are classified by the Investment Manager as inherently harmful in nature, including to activities related to the mining of thermal coal, the generation of power using coal, the extraction or refining of oil along with selected other activities. 3. Governance According to LOIM Classification Framework, the Investment Managers classifies sustainable investments only companies that meet good governance standards. The Investment Manager has developed an in-house points-based scoring system that reviews several important factors, including ownership & control, board structure, remuneration and controversies, amongst others.

	While the above criteria constitute the minimum criteria applicable to a sustainable company, the Investment Manager may apply additional criteria to its assessment of companies involved in specific activities to act as additional safeguards, particularly in its assessment of Do No Significant Harm criteria. While such additional criteria cannot be used to "pass" companies if they do not meet the criteria above, they may lead companies to "fail" as a sustainable investment even if they meet the criteria above. Grey and red companies: Only companies classified as sustainable companies are considered by the Investment Manager to be sustainable investments. For all other companies, the Investment Manager applies additional criteria to distinguish between grey and red companies. Companies that do not contribute to the sustainable transition and/or where the Investment Manager identifies material concerns may be classified as grey, where those concerns are material but of a limited nature or with relevant mitigating factors, or red, where concerns are more acute, elevated and avoidable nature.
Data sources and processing	To assess the proportion of sustainable investments, the Investment Manager relies on a large number of underlying data sources: • Bloomberg is the main source for figures on estimated and reported degrees of EU Taxonomy Alignment. • Sustainalytics is the Investment Manager's main source for various underlying ESG indicators that may, selectively, form part of the Investment Manager's assessment criteria. • Trucost is the Investment Manager's main source for quantitative data on environmental footprints, breakdowns of company revenues by type of activity, and asset locations. • FactSet is a secondary source providing breakdowns of company revenues by type of activity and by region. • The Carbon Disclosure Project (CDP), the Science Based Targets initiative (SBTi), Renewable Energy 100 (RE100), the Transition Pathway Initiative (TPI), Climate Action 100+, and the UN Climate Ambition Alliance Race to Zero are key sources of information to assess the ambition and credibility of companies' decarbonisation commitments. • Various supplementary sources may be used to assess sustainability risks and considerations in specific industries. These various sources carry primary responsibility for the accuracy of these respective data points. The Investment Manager, however, may carry out additional checks where specific anomalies are identified or brought to its attention. In particular, analysts in investment and research teams familiar with companies may review assigned scores and underlying data points, comparing such data points to their own knowledge and research on the company. Where possible discrepancies are identified, such stakeholders may escalate the issue to the Sustainability Research team for internal review and/or discussion with the respective providers. Data are processed through the use of a proprietary quantitative data platform. This data platform acts as a central repository for financial and non-financial data pertaining to issuers. Data from this data platform may be accessed by investment teams directly, integrated into summary dashboards used by investment teams, and forms the basis for periodic reports produced. Some of the underlying data indicators can be definitively assessed (such as whether a company has a given type of policy in place), other indicators may only be assessed qualitatively (such as the strength of a company's water management programme). For quantitative indicators, data may not be consistently available for a given reporting year, and in most cases would rely on estimates of companies themselves (given that even emissions can today at best be estimated by a company, rather than measured definitively). The Investment Manager would therefore consider all data to represent an estimate and should be considered as a signal rather than a definitive statement of fact. The various data points may be used directly but are also processed into various derived metrics. This includes, amongst others, the definition of internal ESG/CAR scores, the definition of Implied Temperature Rise metrics, or the final classification of investments into those deemed sustainable, and those not deemed such. The combination of different data points into a derived metric necessarily involves various modelling, gap-filling and estimation procedures. Hence, the Investment Manager would similarly consider such derived data as estimates, providing additional signals and insights into a company's sustainability profile, but would not consider these a definitive statement of fact.
Limitations to methodologies and data	The creation of internal sustainability data points, including those needed to identify definitions of sustainable investment, may be affected by the following data and methodological limitations: • Possible errors in underlying data points disclosed by investee companies, due to inaccuracies in disclosures, time lags, incompleteness, language barriers, fraud, company's own lack of data or dependence on estimation procedures, or otherwise. • Possible errors in data points received from data providers, owing to imperfections in data collection processes, imperfect alignment of frameworks, gap-filling and estimation procedures, or otherwise. • Possible errors in the correct attribution of relevant data points, owing to inaccuracies or imperfections in the definition or breakdown of company activities. • Possible discrepancies in the weighting of individual data points to create the final assessment compared to other frameworks, given that such weighting schemes (often referred to as "materiality maps") are inherently judgmental in nature • Possible errors in final reported figures, owing to human errors, undetected anomalies in data systems and infrastructure, or otherwise. • Judgmental decisions involved in the design and implementation of key metrics, where specific design choices may have a material outcome on the final scores and assessment of an investee company, issuer, or portfolio.

	The Investment Manager has a dedicated Sustainability Research team which is responsible for the development and maintenance of the relevant methodologies. This team seeks to monitor data quality, engage with data providers, refine methodologies, and implement additional safeguards, but cannot guarantee that the final data received, derived, produced or reported is free from errors. The final data provided is considered a signal, rather than a definitive statement of fact. Nonetheless, the Investment Manager believes that on average, across a reasonably diversified investment universe, average or aggregated scores provide a useful and meaningful insight as regards the social and environmental characteristics of the financial product. The Investment Manager believes that the measurement of most environmental or social data points often involve a degree of estimation and interpretation. Some of the data points and methodologies used may require contextualisation as part of a more holistic assessment. Given the limitations described above, in selected cases it may be desirable to amend, override, adapt, or underweight specific data points or assessments. Despite these caveats, the Investment Manager believes that the data points collected provide useful additional context and insights to investment teams, helping these to deliver the environmental or social characteristics promoted and the sustainability objectives of the product. Albeit, given the limitations above, the Investment Manager does not believe it is possible to make definitive statement on the characteristics achieved in individual cases, but that on balance products with improved ratings and metrics on the methodologies outlined above contribute positively to environmental or social characteristics they pursue in a good faith manner within the constraints outlined. No guarantee or undertaking is given in relation to the financial performance of a particular company based upon its scoring under LOIM Classification Framework.
Due diligence	The Investment Manager monitors sustainability-related information with various proprietary IT systems and dedicated teams. This aims to ensure that a proper due diligence is performed on underlying assets and investment principles are not breached. The following additional controls are in place with respect to the methodologies outlined above, which seek to reduce – albeit not eliminate – possible data errors or inaccuracies: • The Investment Manager's Market Data Services team is responsible for relationships with data providers and for ensuring appropriate contractual terms to ensure, to the extent possible, the quality of data points delivered. • The Investment Manager's Quant Platform team is responsible for the maintenance of data systems and incoming data feeds to ensure, to the extent possible, appropriate data management systems and the detection of possible data anomalies. • The Investment Manager's Sustainability Research team is responsible for reviewing methodologies and derived data point to ensure, to the extent possible, that methodologies are appropriate and identify opportunities for improvement, as well as to ensure, to the extent possible, that data is made available to investment teams and reporting functions in a timely manner. • The Investment Manager's Portfolio Management Teams are responsible for reviewing investment recommendations and to ensure, to the extent possible, that possible discrepancies or anomalies are raised with the Sustainability Research team for review. • The Investment Manager's Stewardship team is responsible for engagement with investee companies and selected partners to ensure, to the extent possible, that identified discrepancies or anomalies can be clarified with these companies or partners.
Engagement policies	With the aim of preventing, containing and managing the main adverse impacts of investment decisions on sustainability factors, the Management Company conducts engagement actions - both individual and collective with other investors - and exercises its voting rights on the issuers in its portfolio, in order to create awareness and orient the issuers' behaviors towards specific sustainability issues, according to the times and methods formalized in its "Engagement Policy" and in the "Strategy for the exercise of the attendance and voting rights attached to the financial instruments held by the UCITS under management". In this case, the Company informs the issuer about the identified criticalities, directing its decisions towards their immediate reduction. If these actions are not addressed in an effective and timely manner by the issuer, the Company evaluates to initiate specific reduction or disposal initiatives, even of a progressive nature, of the investment in these issuers. The initiatives carried out and the decisions taken regarding these activities are reported and formalized in order to guarantee a thorough traceability of the decision-making processes and outcomes
Attainment of the sustainable investment objective	No reference benchmark has been designated for the purpose of attaining the sustainable investment objective by the Sub-fund .The Investment Manager will focus on the following primary indicator to measure attainment of the specific commitments outlined above:• the % of the sub-fund's assets invested in 'green', investments accordiing to the LOIM Classification Framework.Given the specific focus of this sub-fund, the Investment Manager will also prioritise consideration of the portfolio's performance on the following indicators, which are also considered as part of the Investment Manager's do no sigificant harm considerations outlined in the LOIM Classification Framework.• Water withdrawal (m3 / MEUR revenues)• Operational assets in biosensitive areas (#)• Forest management quality score (Investment Manager's scoring system)• Controversies related to water use, land use or biodiversity (# level 1-5)• Controversies related to non-GHG emissions, effluents and waste (# level 1-5)