

Template periodic disclosure for the financial products referred to in Article 9, paragraphs 1 to 4a, of Regulation (EU) 2019/2088 and Article 5, first paragraph, of Regulation (EU) 2020/852

Product name: Willerfunds - Private Suite - Lombard Odier Natural Capital

Legal entity identifier 54930087IT0UJM6RN654

## Sustainable investment objective

### Does this financial product have a sustainable investment objective?

Yes

It made **sustainable investments with an environmental objective:** 96.30%

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 made **sustainable investments with a social objective:** 0.00%

No

It **promoted Environmental/Social (E/S) characteristics** and while it did not have as its objective a sustainable investment, it had a 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 promoted E/S characteristics, but **did not make any sustainable investments**

### To what extent was the sustainable investment objective of this financial product met?



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 achieve 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 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 technical screening criteria as defined by the Investment Manager; 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 technical screening criteria as defined by the Investment Manager.

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 in-house quantitative and qualitative tests, including but not limited to proprietary sustainability indicators, PAIs and controversy assessment, for

each environmental objective of the EU Taxonomy and social targets.

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 red 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.

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.

## ● **How did the sustainability indicators perform?**

The Investment Manager focused 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 according to the LOIM Classification Framework (96.30%)

Given the specific focus of this sub-fund, the Investment Manager also prioritised consideration of the portfolio's performance on the following indicators, which are also considered as part of the Investment Manager's do no significant harm considerations outlined in the LOIM Classification Framework.

- Water withdrawal (85670.1183885073 m<sup>3</sup> / MEUR revenues)
- Operational assets in biosensitive areas (7)
- Forest management quality score (8.67/12- Investment Manager's scoring system)
- Controversies related to water use, land use or biodiversity (# level 1-5):
  - controversies of level 1: 0.09
  - controversy of level 2: 0.06
- Controversies related to non-GHG emissions, effluents and waste (# level 1-5):

- controversies of level 1: 0.16
- controversy of level 2: 0.14

## ● ***...and compared to previous periods?***

During 2024, the Investment Manager focused on the following primary indicator to measure attainment of the specific commitments outlined above:

- % of the sub-fund's assets invested in 'sustainable', investments according to the LO Sustainable Investment Framework. (98,83%)

Given the specific focus of this sub-fund, the Investment Manager also prioritized consideration of the portfolio's performance on the following indicators, which were also considered as part of the Investment Manager's do no significant harm considerations outlined in the LOIM Classification Framework.

- Water withdrawal (12981,58 m3 / MEUR revenues) .
- Operational assets in bio sensitive areas (27).
- Forest management quality score (8.84 / 12 - Investment Manager's scoring system).
- Controversies related to water use, land use or biodiversity (# level 1-5):
  - 2 controversies of level 1 ;
  - 1 controversy of level 2 ;
  - 1 controversy of level 3.
- Controversies related to non-GHG emissions, effluents and waste (# level 1-5)
  - 8 controversies of level 1 ;
  - 7 controversies of level 2 ;
  - 2 controversies of level 3.

## ● ***How did the sustainable investments not cause significant harm to any 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 took 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 identified '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.

### → ***How were the indicators for adverse impacts on sustainability factors taken into account?***

Indicators for adverse impact on sustainability factors are considered as part of the Investment Manager's activity-by-activity assessment of possible significant harm under the LOIM Classification Framework.

The specific Principal Adverse Indicators considered as part of this assessment are described further below.

### → ***Were sustainable investments aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights? Details:***

The Investment Manager considered exposure to UN Global Compact, the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights controversies under to the LOIM Classification Framework. In the absence of credible mitigating factors, companies exposed to high level controversies, were not be considered as 'green'.

## **How did this financial product consider principal adverse impacts on sustainability factors?**

Through its LOIM Classification Framework, the Investment Manager considered PAIs as follows:

PAI 1-2-3 of Table I and PAI 4 of Table II:

We consider a the scope 1, 2 and material 3 emissions of investee companies and the relevance of emissions to specific activities and sectors.

We consider both the current scale of emissions, as well as whether a company has a credible and ambitious decarbonisation strategy in place that is compatible with Paris-aligned objectives, using our internal Implied Temperature Rise assessments.

To be considered “sustainable” the dimensions above must either not be highly material to the company or activity, must already demonstrate improved performance compared to peers, must be subject to a credible and ambitious mitigation strategy, or the must generate significant avoided impacts on emissions or by virtue of the inherent nature of the activity or activities of the company.

PAI 4 of Table I:

We assess exposure to business activities deemed fundamentally incompatible with the 3+1 framework.

This includes exposure to activities linked to the exploration, production, refining and distribution of fossil fuel.

The level of exposure to fossil fuel is taken into account as part of the classification of investments into ‘green’, ‘grey’ and ‘red’ categories.

PAI 5-6 of Table I:

These two PAIs do not form an explicit part of the Investment Manager's classification framework, but are considered implicitly as part of the PAIs above on the assessment of emissions

PAI 7-8-9 of Table I:

We assess the intensity of water withdrawals, and generation of hazardous waste, and the proximity of a company's known operational assets to biosensitive areas and, the quality of a company's forest management practices, where these considerations are material to the company's activities.

To be considered “green” the dimensions above must either not be highly material to the company or activity, must already demonstrate improved performance compared to peers, must be subject to a credible and ambitious mitigation strategy, or the must generate significant avoided impacts on related environmental dimensions or by virtue of the inherent nature of the activity or activities of the company.

PAI 10-11 of Table I:

Exposure to moderate or more severe controversies, and the outlook of such controversies, is considered as part of the classification of investments into ‘green’, ‘grey’ and ‘red’ categories as per the Investment Manager's framework outlined above.

PAI 12-13 of Table I:

Aspects related to diversity programmes, board structure, along with other social and governance dimensions form part of the Investment Managers ESG scoring framework, with performance on social and governance scores explicitly taken into account as part of the green, grey, red classification framework outlined above.

We endeavour to collect data, where available, on the specific indicators described here but consider these engagement/proxy voting priorities rather than individually forming part of the green, grey, red classification framework.

PAI 14 of Table I:

The Sub-fund has an exclusion on companies found to have direct exposure to controversial weapons.

PAI 2 of Table III:

Where a company is operating in a sector with high risk of fatalities, we consider the company's fatality rate.

To be considered “green” the dimensions above must either not be highly material to the company or activity, must already demonstrate improved performance compared to peers, or must be subject to a credible and ambitious mitigation strategy.



## What were the top investments of this financial product?

The list includes the investments constituting **the greatest proportion of investments** of the financial product during the reference period which is:  
31/08/2025 - 31/08/2025

Largest Investments	Sector	% Assets	Country
SMURFIT WESTROCK PLC	MANUFACTURING	4.22%	Ireland
COMPASS GROUP PLC	ACCOMMODATION AND FOOD SERVICE ACTIVITIES	3.32%	United Kingdom
XYLEM INC-W/I	MANUFACTURING	3.25%	United States of America
TREX COMPANY INC	MANUFACTURING	3.19%	United States of America
EBAY INC	WHOLESALE AND RETAIL TRADE; REPAIR OF MOTOR VEHICLES AND MOTORCYCLES	3.08%	United States of America
CLEAN HARBORS INC	WATER SUPPLY; SEWERAGE, WASTE MANAGEMENT AND REMEDIATION ACTIVITIES	2.96%	United States of America
ZEBRA TECHNOLOGIES CORP-CL A	MANUFACTURING	2.87%	United States of America
ADVANCED DRAINAGE SYSTEMS IN	MANUFACTURING	2.78%	United States of America
ECOLAB INC	CONSTRUCTION	2.75%	United States of America
VERALTO CORP	MANUFACTURING	2.61%	United States of America
FLEX LTD	MANUFACTURING	2.59%	United States of America
CROWN HOLDINGS INC	MANUFACTURING	2.50%	United States of America
ZURN ELKAY WATER SOLUTIONS C	MANUFACTURING	2.45%	United States of America
BRAMBLES LTD	MANUFACTURING	2.45%	Australia
KION GROUP AG	MANUFACTURING	2.41%	Germany



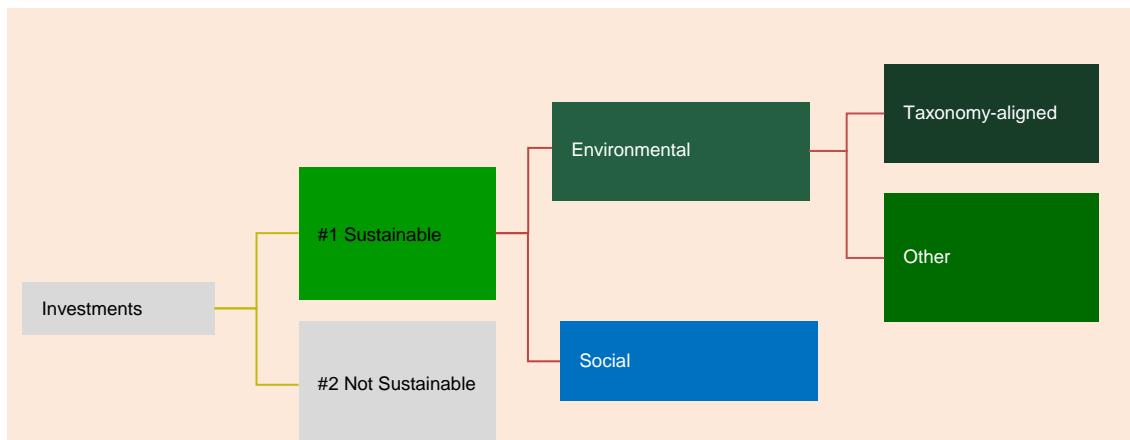
## What was the proportion of sustainability-related investments?

### What was the asset allocation?

The Investment Manager aimed to invest at least 70% of the sub-fund's assets in #1A Sustainable (as of 31/08/25 the share of sustainable investments was equal to 96.30% excluding cash, which is included in the #2 Not Sustainable category).

The Investment Manager identified 'Sustainable investments' as companies classified as 'sustainable' under the LOIM Classification Framework which have specifically been assessed to not cause significant harm or to be subject to credible mitigating factors.

Assets which are not sustainable only included cash and cash equivalents.



#1 Sustainable covers sustainable investments with environmental or social objectives.

#2 Not sustainable includes investments which do not qualify as sustainable investments

● ***In which economic sectors were the investments made?***

Sector	Sub-sector*	% Assets
MANUFACTURING	C	62.00%
INFORMATION AND COMMUNICATION	J	10.37%
WATER SUPPLY; SEWERAGE, WASTE MANAGEMENT AND REMEDIATION ACTIVITIES	E	8.15%
WHOLESALE AND RETAIL TRADE; REPAIR OF MOTOR VEHICLES AND MOTORCYCLES	G	4.74%
ACCOMMODATION AND FOOD SERVICE ACTIVITIES	I	3.32%
CONSTRUCTION	F	2.75%
PROFESSIONAL, SCIENTIFIC AND TECHNICAL ACTIVITIES	M	2.74%
OTHER SERVICES ACTIVITIES	S	1.50%
AGRICULTURE, FORESTRY AND FISHING	A	0.51%

\* Sub-Sector: NACE Section Code

Sub-sector represents the NACE Section Code, or rather the Nomenclature of Economic Activities (NACE) Section Code and it refers to the Level 1 economic activity code identified by alphabetical letters A to U established by the European Union.

**Enabling activities**  
directly enable other activities to make a substantial contribution to an environmental objective.

**Transitional activities**  
are economic activities for which low-carbon alternatives are not yet available and that have greenhouse gas emission levels corresponding to the best performance.



**To what extent were the sustainable investments with an environmental objective aligned with the EU Taxonomy?**

The Investment Manager aimed to invest at least 70% of the sub-fund's net assets in sustainable investments. There is no commitment to have any share of the Sub-Fund's sustainable investments aligned with the EU Taxonomy.

● ***Did the financial product invest in fossil gas and/or nuclear energy related activities complying with the EU Taxonomy? <sup>1</sup>***

Yes

In fossil gas

In nuclear energy

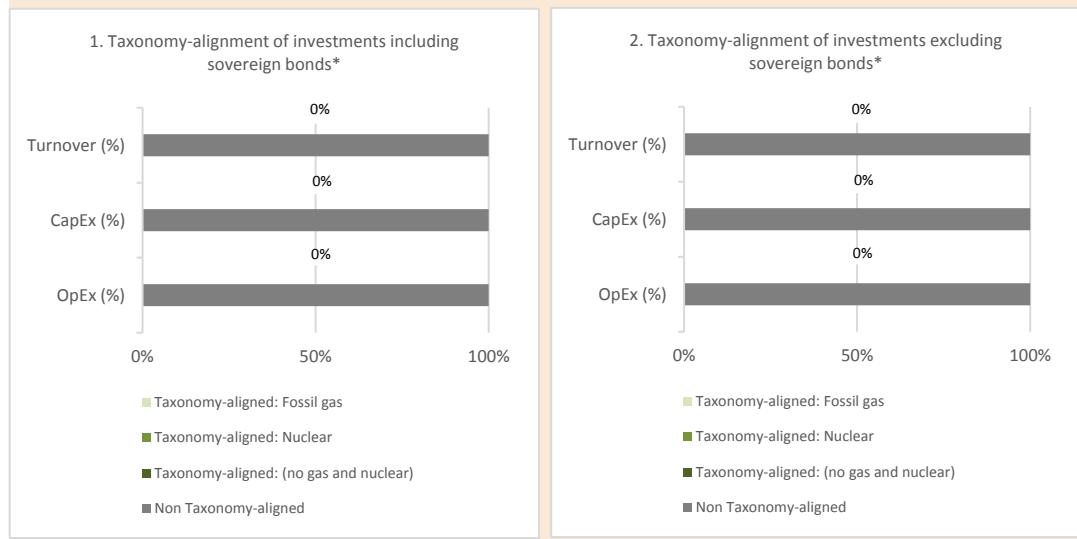
No

<sup>1</sup> Fossil gas and/or nuclear related activities will only comply with the EU Taxonomy where they contribute to limiting climate change ("climate change mitigation") and do not significantly harm any EU Taxonomy objective - see explanatory note in the left hand margin. The full criteria for fossil gas and nuclear energy economic activities that comply with the EU Taxonomy are laid down in Commission Delegated Regulation (EU) 2022/1214.

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.

The graphs below show in green the percentage of investments that were 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.



This graph represents 100.00 % of the total investment.

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

● **What was the share of investments made in transitional and enabling activities?**

Not applicable

● **How did the percentage of investments that were aligned with the EU Taxonomy compare with previous reference periods?**

Not applicable, the financial product does not have a commitment to invest in activities that qualify as environmentally sustainable under the EU Taxonomy.

**What was the share of sustainable investments with an environmental objective not aligned with the EU Taxonomy?**

The Sub-fund, as of 31/08/25, invested 96.30% of its investments in sustainable investments with environmental objectives that are not aligned with the EU Taxonomy, compared to the minimum threshold of 70%.



are sustainable investments with an environmental objective that **do not take into account the criteria for environmentally sustainable economic activities under Regulation (EU) 2020/852.**



**What was the share of socially sustainable investments?**

0%. The sub-fund focuses on sustainable investments with an environmental and not a social objective.



## **What investments were included under “not sustainable”, what was their purpose and were there any minimum environmental or social safeguards?**

Investments classified as “#2 not sustainable” were cash and cash equivalents. Cash might have been kept for liquidity purposes or pending investment or where suitable sustainable investments are not available.



## **What actions have been taken to attain the sustainable investment objective during the reference period?**

The sub-fund made sustainable investments, as defined by article 2(17) SFDR in accordance with the Investment Manager's methodology for selecting sustainable investments.

### **Exclusions**

The following exclusions were binding:

#### **Exclusion of Controversial Weapons**

The Sub-fund excluded direct exposure to companies involved in controversial weapons i.e. companies that produce, trade or store controversial weapons (biological and chemical weapons, anti-personnel mines, cluster weapons, depleted uranium, white phosphorus). The scope of this exclusion includes weapons banned or outlawed by the Ottawa Treaty on landmines (effective 1999), the Convention on Cluster Munitions (Oslo Convention) of 2008, the Biological and Toxin Weapons Convention (BWC – 1972), the Treaty on the Non-Proliferation of Nuclear Weapons (1968), the Chemical Weapons Convention (CWC – 1993) and SVVK-ASIR exclusion list. In addition, depleted uranium and white phosphorus are excluded.

#### **Exclusion of Tobacco, Coal, Unconventional Oil & Gas and Breaches of the UN Global Compact Principles**

##### **The Sub-fund excluded :**

Tobacco : companies deriving more than 10% of their revenues from either production of tobacco products or retailing of tobacco products/services.

##### **Thermal Coal:**

Mining - companies deriving more than 10% of their revenues from thermal coal extraction.

Power Generation - companies deriving more than 10% of their revenues from coal power generation.

Unconventional Oil & Gas - companies deriving more than 10% in aggregate of their revenues from any of tar sands, shale gas and oil and artic oil & gas exploration.

Material breaches of UN Global Compact Principles, the Organisation for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights (UNGPs) and their underlying conventions: Companies involved in the most severe breaches of the UN Global Compact Principles ("Level 5 Controversies").

The exclusions relating to tobacco, coal, unconventional oil and gas and Level 5 Controversies are subject to the Investment Manager's exclusion policy and may be overridden in the exceptional circumstances described in that policy, such as where a company makes a firm commitments to a credible and rapid phaseout of the above activities.



## **How did this financial product perform compared to the reference sustainable benchmark?**

Not applicable

### **● *How did the reference benchmark differ from a broad market index?***

Not applicable

### **● *How did this financial product perform with regard to the sustainability indicators to determine the alignment of the reference benchmark with***

**Reference benchmarks** are indexes to measure whether the financial product attains the sustainable objective.

***the sustainable investment objective?***

Not applicable

● ***How did this financial product perform compared with the reference benchmark?***

Not applicable

● ***How did this financial product perform compared with the broad market index?***

Not applicable