



Article 10 (SFDR)

Website disclosure for an Article 8 fund

Convictions IV ELTIF

Product name: **Convictions IV ELTIF**

Legal entity identifier: 529900Y7NPZ6FKBKG211

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 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 promotes E/S characteristics, but **will not make any sustainable investments**



A. Summary

No Sustainable Investment Objective:

This financial product promotes environmental or social characteristics but does not have as its objective a sustainable investment.

Environmental or Social Characteristics of the Financial Product:

- Environmental characteristics: Improving Environmental Performance: Focus on reducing resource consumption, waste production, and greenhouse gas (GHG) emissions.
- Social & Governance characteristics: Improving Social and Governance Performance: Emphasizes employee training, gender diversity, and strengthened governance for equitable work environments.
- Investment in specific environmental activities: Includes renewable energy, clean mobility, hydrogen, and other low carbon technologies to address climate change.
- Investment in specific social activities: Includes projects in hospitals, schools, and universities that enhance community health and well-being.

No benchmark has been designated to assess these characteristics, reflecting the flexible nature of the Sub-Fund's investment strategy.

Investment Strategy :

The Sub-Fund aims to create a diversified portfolio of up to 25 Target Investments across various strategies while adhering to specific guidelines. It allows for up to 100% of investments in both primary and secondary Target Funds. The focus includes allocating up to 80% of Capital Commitments to buy-out and growth strategies in sectors like SME succession, Agri-foodtech, and technology buyouts, as well as investing up to 40% in real assets such as mobility infrastructure and urban regeneration. Additionally, it can pursue up to 20% in emerging markets, particularly for SME development in Africa.

Managed by Edmond de Rothschild's investment advisors, the Sub-Fund is committed to primarily investing in Europe and up to 40% globally, aligning with ELTIF Regulation for long-term investments. Cash reserves may be directed towards Liquid Investments as per regulatory guidelines, with compliance monitored by the AIFM.

To ensure alignment with environmental and social goals, the investment strategy involves a dedicated ESG team that assesses each opportunity. Annual reviews of Target Funds help monitor progress regarding ESG objectives. The Sub-Fund is committed to investing at least 75% of its Capital in Target Funds that promote ESG characteristics, adhering to the Sustainable Finance Disclosure Regulation (SFDR).

Moreover, the strategy includes strict exclusion criteria that prohibit investments in harmful sectors such as weapons, fossil fuels, and activities involving forced or child labor, as well as violations of human rights or environmental damage. Companies with significant revenue (over 33%) from excluded sectors are also avoided to prevent indirect financing of harmful activities.

Finally, the strategy aligns with the UN's Sustainable Development Goals (SDGs), selecting investments that contribute positively to environmental and social impact. This comprehensive approach ensures compliance with ESG objectives and promotes responsible investing.

Control and monitoring of environmental or social characteristics:

The Sub-Fund implements a thorough policy to assess good governance practices in investee companies at the levels of Target Funds and Co-Investment vehicles.

Pre-investment assessment: evaluates how these entities manage governance risks, ensuring they meet minimum standards in areas such as transparency and ethics.

Ongoing Monitoring: conducts annual evaluations during the holding period, focusing on anti-corruption, human rights, and compliance with global standards like the UN Global Compact.

The Sub-Fund does not commit to reducing investment scope or consider principal adverse impacts on sustainability factors. It aims to invest at least 75% of its Capital in Target Funds promoting ESG characteristics aligned with the SFDR, particularly Article 8 or Article 9 products. The Sub-Fund does not plan to use derivatives or make sustainable investments with defined environmental or social objectives. Instead, cash reserves may be held in short-term, high-quality debt instruments without minimum environmental or social safeguards.

Sustainability Indicators are used to measure environmental or social characteristics:

- The proportion in value of investments in Target-Funds that conduct systematic ESG due diligence prior to any investment to the aggregate Sub-Fund's Capital;
- The proportion in value of investments in Target Funds that comply with the exclusion policy (defined below) to the aggregate Sub-Fund's Capital;
- The proportion in value of investments in Target Funds that report on a set of ESG indicators at least annually as per their pre-contractual disclosures to the aggregate Sub-Fund's Capital;
- The proportion in value of investments in Target Funds contributing to at least one Sustainable Development Goals as defined by the UN to the aggregate Sub-Fund's Capital.

Throughout its lifecycle, the Sub-Fund ensures transparent monitoring of ESG performance with the help of Edmond de Rothschild's investment advisors. Risk management teams conduct second-level controls to uphold compliance with ESG criteria and regulatory standards.

Methodologies:

Edmond de Rothschild Private Equity collects annual ESG data from portfolio companies for regulatory and investor reporting, ensuring compliance with an exclusion list throughout the investment lifecycle. Annual questionnaires assess common and specific ESG KPIs for Target Funds, which are consolidated to evaluate the Sub-Fund's environmental and social commitments.

Data Sources and Processing:

Post-investment, the AIFM conducts annual reviews to monitor ESG progress, engaging directly with fund managers to identify and manage risks. It combines external ESG research data with proprietary insights for a comprehensive evaluation.

Limitations and Solutions:

The fund-of-funds structure limits direct control over underlying companies and can lead to inconsistencies in ESG reporting standards. To address this, the Sub-Fund conducts thorough pre-investment due diligence and standardizes its reporting framework focused on key sustainability indicators.

Due Diligence Process:

Pre-investment due diligence involves evaluating the ESG maturity of target companies and governance practices. Internal ESG and Risk teams collaborate to analyze data, ensuring compliance with exclusion criteria and systematic assessments.

Engagement:

Engagement is a key part of the Sub-Fund's environmental and social investment strategy:

- Direct Investments: The sub-fund acts as a shareholder per the management company's policy.
- Indirect Investments via FCPs: These are excluded from engagement since the sub-fund is not a shareholder.
- Corporation-structured Funds: These follow the management company's policy for engagement.

The Sub-Fund primarily invests in in-house funds and integrates relevant themes for co-investments with French AIFM-managed funds, using a best-efforts approach for Luxembourg AIFM-managed funds.



B. No sustainable investment objective

This financial product promotes environmental or social characteristics, but does not have as its objective a sustainable investment.



C. Environmental or social characteristics of the financial product

What are the environmental or social characteristics promoted by this financial product?

The Sub-Fund is a fund of funds that aims to provide investors with a diversified portfolio while adhering to environmental, social, and governance (ESG) principles. It invests at least 75% of its capital in target funds that promote ESG characteristics, although it does not commit to sustainable investments as defined by the SFDR. The investments encompass a variety of strategies and are not limited to specific environmental or social characteristics.

The expected characteristics promoted by this financial product include:

- Improving Environmental Performance: investments focus on reducing resource consumption, waste production, and greenhouse gas (GHG) emissions, thereby minimizing the environmental impact of companies and contributing to sustainability.
- Improving Social and Governance Performance: by fostering employee training, gender diversity, and strengthened governance, these investments aim to create more equitable and responsible work environments, which can enhance overall company performance.
- Investments in specific environmental activities: the Sub-Fund may invest in activities related to renewable energy production, clean mobility, electro mobility, hydrogen, and other low carbon technologies that provide solutions to adapt to climate change.
- Investment in specific social activities: the Sub-Fund may also focus on investments in hospitals, schools, universities, and other infrastructure that contribute to the health and well-being of local communities.

No benchmark has been designated to assess these characteristics, reflecting the broad and flexible nature of the Sub-Fund's investment strategy.

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?

Not applicable - The Sub-Fund does not intend to make sustainable investments.

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?

Not applicable - The Sub-Fund does not intend to make sustainable investments.



D. Investment strategy

What investment strategy does this financial product follow and how is the strategy implemented in the investment process on a continuous basis?

The Sub-Fund aims to build a diversified portfolio of up to 25 Target Investments across various strategies, types, and geographies, adhering to specific investment guidelines. Key points include:

- Up to 100% of investments in primary and secondary Target Funds.
- Up to 80% of Capital Commitments in Target Funds focused on buy-out and growth strategies, including sectors like SME succession in France and Benelux, Agri-foodtech, and technology buyouts in Europe and the US.
- Up to 40% of Capital Commitments in Target Funds focused on real assets strategies, such as mobility infrastructure, environmental projects, and urban regeneration in Europe.
- Up to 20% of Capital Commitments in Target Funds targeting emerging markets, including SME development in Africa.

All target funds are funds advised by Edmond de Rothschild's investment advisors. The Sub-Fund is committed to investing up to 100% of its Capital in Europe and up to 40% globally, in line with the ELTIF Regulation's goal of promoting long-term European investments. Additionally, it may opportunistically invest up to 20% of its Capital in Co-Investments.

Cash held by the Sub-Fund may be invested in Liquid Investments as per ELTIF Regulation guidelines. The AIFM will monitor compliance with these investment guidelines based on total Commitments at the Final Closing Date.

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?

The investment strategy of the Sub-Fund incorporates several binding elements to ensure alignment with its environmental and social characteristics:

- A dedicated ESG team collaborates with the Risk and Investment team to conduct thorough assessments of each investment opportunity, evaluating risks, returns, and potential weaknesses. The findings are included in the investment memorandum for consideration by the investment committee.
- Once investments are made, the AIFM conducts annual reviews of Target Funds and Co-Investment vehicles to monitor their progress against the Sub-Fund's ESG objectives. This includes ongoing due diligence and active dialogue with fund managers to identify and manage ESG risks and opportunities.
- The Sub-Fund commits to investing at least 75% of its Capital in Target Funds that promote ESG characteristics or objectives and are subject to the Sustainable Finance Disclosure Regulation (SFDR), specifically Article 8 or Article 9 products. If investments are made outside of these funds, they must still substantially promote similar ESG characteristics.
- Exclusion Criteria: The AIFM has established minimum exclusion criteria for Target Funds and Co-Investment vehicles, which prohibit investments in sectors such as:
 - Radioactive materials and unbounded asbestos fibers;
 - Racist and/or antidemocratic media;
 - Weapons and munitions;
 - Products / activities deemed illegal under regulations or international conventions and agreements, or subject to international phase outs or bans;
 - Ozone depleting substances and other hazardous chemicals such as pesticides / herbicides;
 - Fossil fuels (conventional and unconventional) extraction, exploration and refining activities. We refrain from investing in companies / Funds that directly contribute to the growth of these activities, or in companies / funds for which these activities or fields account for 10% or more of their consolidated balance sheet and results – except for gas projects in less advanced countries aiming at distributing energy to those markets.
 - Shale oil & gas activities;
 - Activities related to minerals classified as “conflict minerals”;
 - Tobacco products;

- Gambling, casinos and equivalent enterprises;
- Pornography & Prostitution;
- Forced labor or child labor;
- Resettlement of 50,000 or more persons;
- Destruction of High Conservation Value (HCV) areas;
- Significant altercation, damage and removal of way critical cultural heritage; and
- Investments resulting in limiting people's individual rights and freedom, or violating of human rights within the meaning of the Universal Declaration of Human Rights;
- Indirect Financing Criteria: The AIFM excludes companies whose turnover from excluded sectors is equal to or greater than 33%, ensuring that indirect investments do not contribute to harmful activities.
- Alignment with Sustainable Development Goals (SDGs): The AIFM selects Target Funds and Co-Investment vehicles that aim to contribute to one or more of the UN's Sustainable Development Goals, reinforcing the commitment to positive environmental and social impact.

These elements collectively guide the Sub-Fund's investment strategy to ensure compliance with its ESG objectives and promote responsible investment practices.

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

The Sub-Fund's policy to assess good governance practices of investee companies involves a comprehensive evaluation process at both the Target-Funds and Co-Investment vehicles levels. Key components of this policy include:

- Pre-Investment Assessment: During the pre-investment period, the Sub-Fund appraises how Target-Funds and Co-Investment vehicles evaluate good governance practices through an ESG due diligence and risk management process. This assessment focuses on governance risks to ensure that potential portfolio companies meet minimum governance standards.
- Key Governance Elements: The AIFM analyzes several critical elements of good governance practices, including:
 - Commitments to good governance
 - Functioning of governance bodies
 - Strategic vision
 - Transparency
 - Ethics
 - Risk management
- Ongoing Monitoring: During the holding period, the Sub-Fund ensures transparent monitoring of all target funds through annual evaluations of the ESG performance of portfolio companies. This monitoring includes an assessment of governance practices related to:
 - Anti-corruption and anti-money laundering measures
 - Fair taxation and anti-competition practices
 - Human rights adherence
 - Activities in conflict zones
- Compliance with the United Nations Global Compact (UNGC) principles, OECD Guidelines, and International Labor Organization (ILO) principles.

Overall, the Sub-Fund's policy emphasizes thorough pre-investment evaluations and continuous monitoring to uphold good governance standards among its investee companies.

Is there a commitment to reduce by a minimum rate the scope of investments considered prior to the application of the strategy? (Including an indication of the rate)

No commitment has been made to reducing the scope of investments by a minimum rate. The Sub-Fund shall not invest in any fund or company falling within the scope of the exclusion list.

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

- Yes
 No



E. Proportion of investments

What is the planned asset allocation for this financial product?

The Sub-Fund is a fund-of-funds that seeks to provide investors access to a diversified portfolio of underlying strategies in a manner consistent with the principles of environmental, social and good governance (ESG) by investing at least [75]% of the Sub-Fund’s Capital (effective as of the end of the Ramp-Up Period and not applicable during the winding-up of the Fund) to Target Funds promoting ESG characteristics or objectives and that are subject to SFDR (i.e. article 8 or article 9 SFDR financial products) or, where investments are not made through Target Funds that are subject to SFDR (i.e., indirect or direct Co-Investment vehicles), to investments substantially promoting similar ESG characteristics or objectives.

```

graph LR
    Investments --> #1["#1 Aligned with E/S characteristics"]
    Investments --> #1B["#1B Other E/S characteristics"]
    Investments --> #2["#2 Other"]
  
```

#1 Aligned with E/S characteristics includes the investments of the financial product used to attain the environmental or social characteristics promoted by the financial product.

#2 Other includes the remaining investments of the financial product which are neither aligned with the environmental or social characteristics, nor are qualified as sustainable investments.

The category #1 Aligned with E/S characteristics covers:

- The sub-category #1A Sustainable covers sustainable investments with environmental or social objectives.
- The sub-category #1B Other E/S characteristics covers investments aligned with the environmental or social characteristics that do not qualify as sustainable investments.

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

Not applicable as the Sub-Fund will not make use of derivatives.

What is the minimum share of investments with an environmental objective aligned with the EU Taxonomy? (including what methodology is used for the calculation of the alignment with the EU Taxonomy and why; and what the minimum share of transitional and enabling activities)

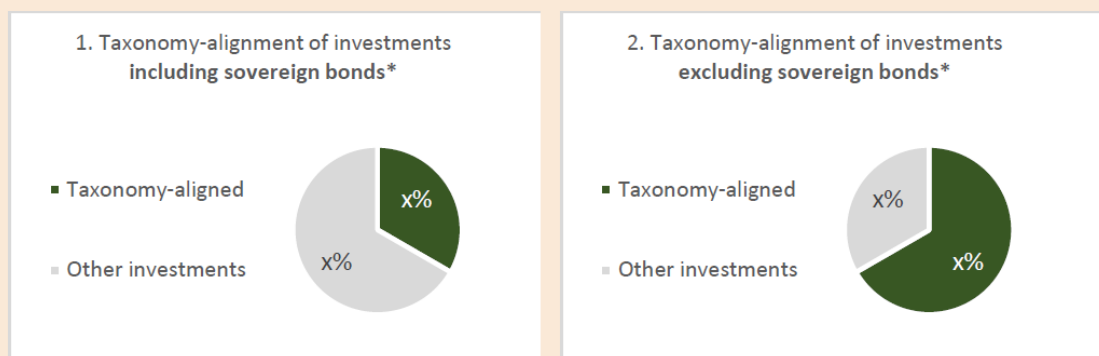
The EU Taxonomy sets out a “do not significant harm” principle by which Taxonomy-aligned investments should not significantly harm EU Taxonomy objectives and is accompanied by specific EU criteria.

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.

Not applicable.

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 sustainable investments with an environmental objective that are not aligned with the EU Taxonomy?

Not applicable - The Sub-Fund does not intend to make sustainable investments.

What is the minimum share of sustainable investments with a social objective?

Not applicable - The Sub-Fund does not intend to make sustainable investments.

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

Monies may be held by the Sub-fund as reserves or prior to distribution to Ordinary Shareholders and such monies may be invested in high-quality, short-term debt instruments, cash and cash equivalents and/or money market mutual funds.

For the avoidance of doubt, for the “#2 Other” the Sub-Fund does not commit to investing in sustainable investments with an environmental or social objective aligned with the Taxonomy Regulation and will not apply any minimum environmental and social safeguards as referred to in the Taxonomy Regulation.



F. Monitoring of environmental or social characteristics

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

The Sub-Fund will measure the attainment of each of the environmental or social characteristics promoted by the Target Funds or its investments through direct or indirect Co-Investment vehicles by using the following sustainability indicators:

- **ESG Due Diligence:** the proportion in value of investments in Target-Funds that conduct systematic ESG due diligence on any investment to the aggregate Sub-Fund’s Capital;
- **Exclusion Policy:** the proportion in value of investments in Target Funds that comply with the exclusion policy (defined in the prospectus) to the aggregate Sub-Fund’s Capital;
- **Reporting:** the proportion in value of investments in Target Funds that report on a set of ESG indicators at least annually in their pre-contractual disclosures to the aggregate Sub-Fund’s Capital;
- **Sustainable Development Goals:** the proportion in value of investments in Target Funds contributing to at least one Sustainable Development Goal as defined by the UN to the aggregate Sub-Fund’s Capital.

The ratios referred to here above in this section be effective only as of the end of the Ramp-Up Period and shall cease to apply during the winding-up of the Sub-Fund.

How are the environmental or social characteristics and the sustainability indicators monitored throughout the lifecycle of the financial product and the related internal/external control mechanism?

During the holding period, the Sub-Fund will ensure to receive transparent monitoring of all Target Funds through an annual monitoring of the ESG performance of portfolio companies, focusing on key indicators such as compliance with the exclusion policy, assessment of good governance practices and contributions to Sustainable Development Goals (SDGs). This involves ongoing engagement with by Edmond de Rothschild’s investment advisors to ensure transparency, availability of ESG data and accountability. The Sub-Fund might leverage data from recognized ESG research providers to validate and complement the information received from Target funds, ensuring a comprehensive assessment of their ESG practices.

The compliance and risk management teams will conduct second-level controls to ensure adherence to ESG criteria and regulatory standards. They will review ESG data from Target Funds to identify potential risks and discrepancies.



G. Methodologies

What is the methodology to measure the attainment of the environmental or social characteristics promoted by the financial product using the sustainability indicators?

Edmond de Rothschild Private Equity collects ESG data from portfolio companies on an annual basis for ESG reporting purposes, to satisfy investor requests to monitor and report on ESG performance to regulators. Among these ESG criteria, the Fund ensures that each portfolio company complies with the exclusion list in pre-investment phase and throughout the holding period. The questionnaires sent annually to each Target Fund of the Sub-Fund will contain common ESG KPIs across all Funds but also KPIs that are specific to the investment strategy of each Target Fund. The results will be consolidated to report against the sustainability indicators measured by the Sub-Fund as a commitment to promote the environmental and social characteristics.



H. Data sources and processing

What are the data sources used to attain each of the environmental or social characteristics including the measures taken to ensure data quality, how data is processed and the proportion of data that is estimated?

Once investments are made, the AIFM performs annual reviews to monitor the progress of Target Funds and Co-Investment vehicles against the ESG objectives of the Sub-Fund. This continuous monitoring involves ongoing due diligence, including regular, direct, and active dialogue with the managers of Target Funds and Co-Investment vehicles. The purpose is to ensure that ESG risks and opportunities are appropriately identified, assessed, and managed, and that the ESG performance is being consistently evaluated and improved.

The AIFM will assess, promote and monitor the ESG characteristics of the Sub-Fund by combining proprietary insights and shareholder engagement with data from external ESG research providers.



I. Limitations to methodologies and data

What are the limitations to the methodologies and data sources? (Including how such limitations do not affect the attainment of the environmental or social characteristics and the actions taken to address such limitations)

The methodologies and data sources used by the Sub-Fund to measure environmental and social characteristics face limitations primarily due to its status as a fund-of-funds, which restricts direct control over the underlying portfolio companies of Target Funds. This limited influence can hinder the enforcement of specific ESG criteria. Additionally, variability in ESG reporting standards among these funds can lead to inconsistencies in data, making comparisons challenging. To address these issues, the Sub-Fund conducts thorough pre-investment due diligence to select funds aligned with its ESG objectives and standardizes its reporting framework to focus on key sustainability indicators. This approach ensures that despite the limitations, the Sub-Fund can effectively report on and achieve its ESG goals.



J. Due diligence

What is the due diligence carried out on the underlying assets and what are the internal and external controls in place?

As described in the previous sections, the pre-investment phase includes several steps of due diligence to assess the ESG maturity of target companies, as well as their potential and actual impact on the environment and society. This due diligence involves a thorough evaluation of governance practices, ESG commitments,

and associated risks for each investment. Internal teams, including the ESG team and the Risk team, collaborate to analyze data and reports from target funds, ensuring they meet exclusion criteria and conduct systematic ESG assessments.



K. Engagement policies

Is engagement part of the environmental or social investment strategy?

Yes

No

If so, what are the engagement policies? (Including any management procedures applicable to sustainability-related controversies in investee companies)

The Sub-Fund's investment strategy is outlined in three distinct scenarios. For direct investments, the Sub-Fund will act as a shareholder within the framework of the Management Company's engagement policy. In the case of indirect investments via funds structured as FCPs, these will be excluded from the scope of our shareholder engagement policy, as the Sub-Fund will not be a shareholder. However, for funds structured as corporations, these will fall under the purview of the Management Company's policy, allowing the Sub-Fund to take on a shareholder role.

We anticipate that the Sub-Fund will primarily invest in in-house funds. For co-investments with funds managed by the French AIFM, the Management Company will actively commit to integrating relevant themes in line with the shareholder engagement policy. This principle will apply equally to funds managed by the French AIFM. Regarding funds managed by the Luxembourg AIFM, or co-investments involving these entities, we will adopt a best effort approach to implement the themes of our policy.



L. Reference benchmark

Has a reference benchmark been designated for the purpose of attaining these characteristics promoted by the financial product?

Yes

No