
DISCLOSURES PURSUANT TO ARTICLE 10 OF REGULATION 2019/2088 ON SUSTAINABILITY- RELATED DISCLOSURE IN THE FINANCIAL SERVICES SECTOR (SFDR)

SUMMARY

APPLICABLE TO THE SUB-FUND FLAB FUNDS SICAV – FLAB EQUITY

Pure Capital S.A.

2 rue d'Arlon, L-8399 Windhof (Luxembourg)

CONTENTS

A) Summary	2
No sustainable investment objective :.....	2
Environmental or social characteristics of the financial product :.....	2
Investment strategy :.....	2
Proportion of investments.....	3
Monitoring of environmental or social characteristics.....	3
Methodologies.....	3
Data sources and processing	3
Limitations to methodologies and data.....	3
Due Diligence	3
Engagement policies.....	3
Designated reference benchmark	3

A) SUMMARY

No sustainable investment objective :

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

Environmental or social characteristics of the financial product :

Use of the ESG scoring generated from the S&P Corporate Sustainability Assessment (“S&P CSA”) to select the companies in which the Sub-Fund invests, which will be monitored throughout the life of the investment. The Investment Manager thus ensures that only securities issued by entities that meet the minimum required ESG score for the Sub-Fund are eligible for inclusion

Use of Exclusion filters are applied to the portfolio construction process to restrict investments in companies and issuers with significant exposure to certain activities deemed to be detrimental to the environment or the society at large.

Investment strategy :

The Investment Manager selects companies based on its own fundamental research, taking a long-term horizon and always seeking to invest in high ranked companies in terms of profitability (quality), value, good momentum and low volatility. To promote environmental and social characteristics, the Sub-Fund uses a selective approach regarding its portfolio.

The portfolio is subject to the ESG screening process, described below.

1. Exclusion list

First, the Investment Manager applies a strict exclusion list, identifying companies that are allegedly involved in breaches of international law and norms on environmental protection, human rights, labour standards and anti-corruption (the “Exclusion List Criteria”) as described above.

In that respect, the Investment Managers refers to publicly available lists of companies which are allegedly exposed to activities detrimental for the environmental and human rights.

2. Use of S&P Ratings

The S&P Global CSA, provided by Bloomberg, will serve as a sustainability roadmap helping participating companies to prioritize corporate sustainability initiatives that are most likely to enhance the company’s competitiveness.

A minimum of 55 % of the portfolio of the Sub-Fund is composed of direct equity holdings, which are subject to the ESG screening process.

The Investment Manager will overweight the companies with the best ranks and underweight the companies with the lowest.

The Sub-fund will not be invested in any company under the 33% rank.

Proportion of investments

The minimum proportion to attain the environmental and social characteristics promoted by the financial product is 55%.

Monitoring of environmental or social characteristics

On an ongoing basis by Risk Management function.

Methodologies

S&P Global ESG Scores, calculated from the CSA, are available publicly and accessible to the financial community on the S&P Global Market Intelligence platform

Data sources and processing

Ongoing due diligence monitoring performed on ESG data providers ensuring that the data are consistent and reliable

Limitations to methodologies and data

There is no clear harmonized guidelines to calculate ESG scores. Different ESG data providers.

Due Diligence

Investment Management as the first line of defense, and Risk Management team as the second line of defense

Engagement policies

The Investment Manager assesses good governance practices of investee companies through : Accounting practices, Board, Business Ethics, Ownership and control, Pay and Tax Transparency.

Designated reference benchmark

No specific index has been designated as a benchmark to determine whether this financial product is aligned with the environmental and/or social characteristics it promotes.