Nevastar Finance (Luxembourg) S.A.
17a Rue des Bains • L -1212 • Luxembourg
Telephone: +352 27 48 72 1

Article 9 Website Product Disclosure – January 2023

NSF CLIMATE CHANGE + FUND

Sustainability-related disclosures

This sustainability-related disclosure includes information relating to environmental and social characteristics of the financial product, and sustainable investments, in accordance with the Regulation (EU) 2019/2088 of the European Parliament and of the Council of 27 November 2019 on sustainability-related disclosures in the financial services sector (SFDR) requires that firms publish information on any environmental (E) or social (S) characteristic that their products promote and on any sustainable investment objective that their products pursue.

This document is intended to provide a description of these features for this Fund, together with information on the methodologies used to assess, measure and monitor them. This document should be read in conjunction with the Fund's Prospectus and Pre-Contractual Disclosure before investing.

A - SUMMARY

The sustainable objective of the Fund is to invest in companies contributing particularly to the environmental objective of climate change mitigation (aiming to reduce or prevent emission of greenhouse gases) and also, albeit to a lesser extent, the sustainable use and protection of water, transition to a circular economy, and pollution prevention and control. The fund uses a broad market Paris-aligned benchmark for the purpose of attaining its sustainable objective and excludes issuers with activities that could materially undermine this objective.

To attain the Fund's Sustainable Investment Objective, the Investment Manager focuses in particular on whether companies' products and/or services enable **clean energy production** (climate mitigation), greater **energy efficieny** (climate mitigation), better **resource management** (sustainable use and protection of water; transition to a circular economy; pollution prevention and control), and/or the transition to a more **sustainable mobility** (climate mitigation; pollution prevention and control). A company must be identified as contributing to at least one of the Investment Manager's sustainable themes and pass the investment manager's **Do No Significant Harm (DNSH) test** before being assessed from a fundamental perspective. Specific sustainability indicators are used to measure the fund's success in achieving its sustainable investment objective, as described in the methodologies below.

The Fund will invest at least 90% of NAV in shares of companies that meet the Investment Manager's sustainability criteria. The remaining 10% of NAV can be composed of investments which do not qualify as sustainable investments such as cash and derivative instruments.

Nevastar Finance have identified a number of activities which automatically do not qualify for inclusion as a Sustainable Investment as they are considered to be causing significant harm. These include but are not limited to companies deriving any revenues from controversial weapons, cultivation and production of tobacco, 10% or more of their revenues from the exploration, extraction, distribution or refining of fossil fuels, coal or pesticides but also companies active in the generation of CO_2-intensive electricity or found to significantly harm one or more of the environmental objectives referred to in Article 9 of Regulation (EU) 2020/852 of the European Parliament and of the Council.

To define whether a given investment, defined at the company level, is considered as a "sustainable investment" or not, the Investment Manager selects companies identified by Refinitiv as generating Green Revenues from at least one of ten sectors considered to be contributing to the attainment of the Sub-Fund's Sustainable Objective. The Investment Manager's qualitative assessment will take into account, among other things, whether a company's services or products contributes to the reduction of harmful emissions, proliferation of waste and/or the pollution of air or water, and/or whether the products or services enable a more sustainable use of resources.

Where the Investment Manager's qualitative analysis of a company finds revenues to contribute to any one of the Sub-Fund's sustainable objectives but such company fails to be considered by FTSE Russell's Green Revenues Classification System as green, the Investment Manager reserves the right, acting reasonably, to consider such company a "sustainable investment" pursuant to its own analysis (including the DNSH test) as further detailed below.

FTSE Russell's Green Revenues is a unique data model enabling users to identify and quantify revenue exposure to the green economy and measure companies' progress in achieving green standards, based on a transparent and robust methodology. FTSE Russell's Green Revenues Classification System identifies green products and services across the whole value chain covering 10 green sectors, 64 subsectors and 133 micro sectors. Further information on the thresholds used to qualify a "sustainable investment" can be foud at: https://content.ftserussell.com/sites/default/files/ftse_russell_green_revenues_2.0_classification_system_grcs_12-2020.pdf.

B – SUSTAINABLE INVESTMENT OBJECTIVE

☒ **Yes**	☐ **No**
☒ It will make a minimum of **sustainable investments with an environmental objective:** 90%	☐ It **promotes Environmental/Social (E/S) characteristics** and while it does not have as its objective a sustainable investment, it will have a minimum proportion of ___% of sustainable investments
☒ in economic activities that qualify as environmentally sustainable under the EU Taxonomy	☐ 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	☐ with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy
	☐ with a social objective
☐ It will make a minimum of **sustainable investments with a social objective:** ___%	☐ It promotes E/S characteristics, but **will not make any sustainable investments**

HOW DO SUSTAINABLE INVESTMENTS NOT CAUSE SIGNIFICANT HARM TO ANY ENVIRONMENTAL OR SOCIAL SUSTAINABLE INVESTMENT OBJECTIVE?

The Sub-Fund avoids making investments that cause significant harm to the environment / social sustainable investment objective by considering principal adverse impacts and by applying its exclusions, as both disclosed below.

As required by the SFDR Delegated Regulation, the investment does not cause Significant Harm ("Do No Significant Harm"/ "DNSH") to any of the sustainable investment objectives.

The Investment Manager has created a 2-step process to ensure consideration of DNSH:

i. Activity-Based Exclusions
Nevastar Finance have identified a number of activities which automatically do not qualify for inclusion as a Sustainable Investment as they are considered to be causing significant harm. These include but are not limited to companies deriving any revenues from controversial weapons, cultivation and production of tobacco, 10% or more of their revenues from the exploration, extraction, distribution or refining of fossil fuels, coal or pesticides but also companies active in the generation of CO2-intensive electricity.

ii. DNSH Binary Test
The DNSH test, is a binary pass/fail test which signals if the company passes or fails criteria for the SFDR Article 2 (17) "do no significant harm".
Pass indicates a company has no ties to controversial weapons, thermal coal, oil & gas, is not a tobacco producer, and has no severe ESG Controversies. If the company fails this test, it cannot be considered a Sustainable Investment. Nevastar Finance's approach is aligned with the SFDR PAIs included within tables 1, 2 & 3 of the SFDR Delegated Regulation and is based on external data sources and the Investment Manager's internal insights.

HOW HAVE THE INDICATORS FOR ADVERSE IMPACTS ON SUSTAINABILITY FACTORS BEEN TAKEN INTO ACCOUNT?

The Management Company has implemented a policy which ensures that adverse impacts and additional adverse impacts set out in the table below, are identified prior to investment, monitored throughout the investment period and, where necessary, target improvement plans are implemented and reported.

HOW ARE THE SUSTAINABLE INVESTMENTS ALIGNED WITH THE OECD GUIDELINES FOR MULTINATIONAL ENTERPRISES AND THE UN GUIDING PRINCIPLES ON BUSINESS AND HUMAN RIGHTS?

The Fund uses norms-based screens and controversy filters to exclude companies that may be in breach of international norms described in the OECD guidelines for multinational enterprises and the UN guiding principles on business and human right

C – SUSTAINABLE INVESTMENT OBJECTIVE OF THE FINANCIAL PRODUCT

The Sub-Fund has a sustainable investment objective by seeking to contribute to climate change mitigation pursuant to article 9 of the EU Taxonomy Regulation (EU) 2020/852 (the "EU Taxonomy Regulation"). To achieve the sustainable investment objective, the Sub-Fund seeks to contribute to climate change mitigation and the keeping of the maximum global temperature rise below 1.5°C by investing in companies enabling through their products and/or services the reduction of global greenhouse gas (GHG) emissions in order to ensure that emissions from the Sub-Fund's portfolio are aligned with the EU Green Deal and the EU's Paris Agreement commitment to limit global warming to 1.5% of pre-industrial levels by 2050. In addition to (1) climate change mitigation, the Sub-Fund also includes as secondary objectives (2) the sustainable use and protection of water; (3) transition to a circular economy; and (4) pollution prevention and control.

To define whether a given investment, defined at the company level, is considered as a "sustainable investment" or not, the Investment Manager selects companies identified by LSEG Refinitiv as generating Green Revenues from at least one of ten sectors considered to be contributing to the attainment of the Sub-Fund's Sustainable Objective. The Investment Manager's qualitative assessment will take into account, among other things, whether a company's services or products contributes to the reduction of harmful emissions, proliferation of waste and/or the pollution of air or water, and/or whether the products or services enable a more sustainable use of resources.

Where the Investment Manager's qualitative analysis of a company finds revenues to contribute to any one of the Sub-Fund's sustainable objectives but such company fails to be considered by FTSE Russell's Green Revenues Classification System as green, the Investment Manager reserves the right, acting reasonably, to consider such company a "sustainable investment" pursuant to its own analysis (including the DNSH test) as further detailed below.

FTSE Russell's Green Revenues is a unique data model enabling users to identify and quantify revenue exposure to the green economy and measure companies' progress in achieving green standards, based on a transparent and robust methodology. FTSE Russell's Green Revenues Classification System identifies green products and services across the whole value chain covering 10 green sectors, 64 subsectors and 133 micro sectors. Further information on the thresholds used to qualify a "sustainable investment" can be found at: https://content.ftserussell.com/sites/default/files/ftse_russell_green_revenues_2.0_classification_system_grcs_12-2020.pdf

The Sub-Fund designates the Morningstar Global Markets Paris-Aligned Index, an EU Paris-aligned Benchmark under Title III, Chapter 3a, of Regulation (EU) 2016/1011, as reference benchmark for the purpose of attaining the sustainable investment objective. Methodology used for the calculation of the benchmark can be found: https://indexes.morningstar.com/docs/rulebook/morningstar-global-markets-paris-aligned-benchmark-FS0000H6E3

D –INVESTMENT STRATEGY

DESCRIPTION OF THE INVESTMENT STRATEGY USED TO ATTAIN THE SUSTAINABLE OBJECTIVE

The Sub-Fund provides an investment medium associating financial gain to climate protection. The Management Company will focus on investments in equity securities of companies that are considered to have a positive contribution to climate mitigation, sustainable use and protection of natural resources, transition to a circular economy and, pollution prevention and control. This particularly includes technology and industrial companies active in sustainable mobility, clean energies, energy efficiency and resource management.

BINDING ELEMENTS OF THE INVESTMENT STRATEGY USED TO SELECT THE INVESTMENTS TO ATTAIN THE SUSTAINABLE INVESTMENT OBJECTIVE:

1. The Sub-Fund's weighted GHG intensity of investee companies is equal or better than that of the Morningstar Global Markets Paris-Aligned Index, an EU Paris-aligned Benchmark under Title III, Chapter 3a, of Regulation (EU) 2016/1011.

2. The Sub-Fund’s portfolio companies must be considered by Nevastar Finance to directly and/or indirectly enable activities to make a substantial contribution to an environmental objective any company involved in the research, development, manufacturing, marketing and/or distribution of goods and/or services destined to the clean energy, resource management, energy efficiency and/or sustainable mobilitiy industries.

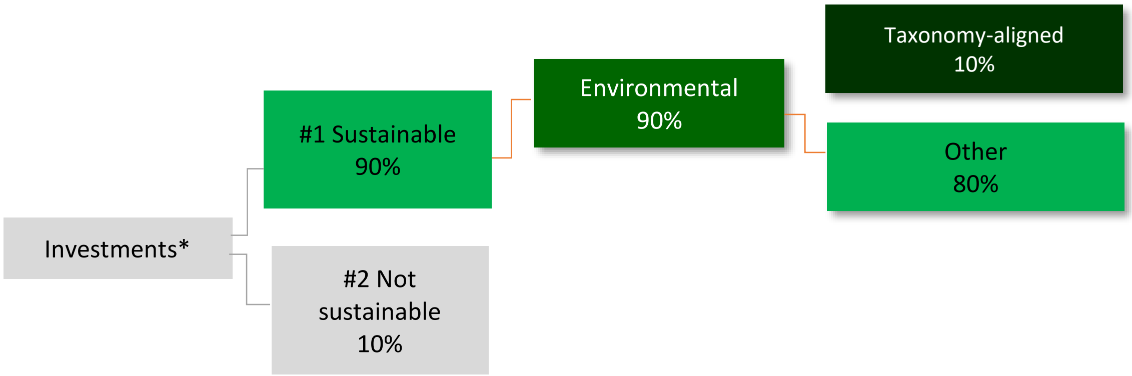
3. **Exclusions**:
   - Production of controversial weapons, including cluster weapons, anti-personnel mines, biological and chemical weapons, depleted uranium weapons, and/or white phosphorus munitions
   - Production of civilian arms
   - Production of nuclear weapons
   - Production of palm oil
   - Exploration, mining, extraction, distribution or refining of arctic oil & gas exploration
   - Exploration, mining, extraction, distribution or refining of oil sands
   - Exploration, mining, extraction, distribution or refining of hard coal and lignite
   - Cultivation and production of tobacco
   - 10% or more of revenues from the exploration, extraction, distribution or refining of fossil fuels
   - 10% or more of revenues from pesticides
   - CO_2-intensive electricity producers

4. The Sub-fund avoids investment in companies that are in breach of the ILO standards, UNGPs, UNGC or OECD Guidelines for Multinational Enterprises. Companies that breach international norms will be excluded from the investment universe.

POLICY TO ASSESS GOOD GOVERNANCE PRACTICES OF THE INVESTEE COMPANIES:

Nevastar Finance’s policy incorporates requirements amongst other with regards to sound management structures, employee relations, remuneration of staff and tax compliance. To that respect, companies that are non-compliant of the 3rd or 10th principle of the UN Global Compact and/or with severe governance-related controversies (ie. rated 5 out of 5) are excluded from the initial investment universe for Article 8 and 9 products. Non-compliance to other principles of the UN Global Compact will be scrutinised as part of the invstment process. Companies should also have at least one independent board member on their Supervisory Board and published unqualified audited financial statements and reports.

E – PROPORTION OF INVESTMENTS



#1 Sustainable covers sustainable investments with environmental or social objectives.
#2 Not Sustainable includes investments which do not qualify as sustainable investments such as cash, and derivatives.

*Investments refer to the fund's NAV which is the total market value of the fund.

Nevastar Finance is expected to invest a minimum of 90% of the Sub-Fund’s holdings in investments meeting the environmental objective promoted, in accordance with the binding elements of the financial product. Nevastar Finance sets the minimum share of sustainable investments at 90%. The asset allocation may change over time and percentages should be seen as an average over an extended period of time. Calculations may rely on incomplete or inaccurate company or third-party data.

F – MONITORING OF ENVIRONMENTAL CHARACTERISTICS

The Investment Manager uses internal compliance screening processes, and may rely on third party sources to provide data necessary to analyse the indicators to monitor the binding elements to attain the sustainable investment objective referenced above. Compliance screening is performed pre-trade and continuously throughout the life cycle of an investment. Any exceptions that are identifed by the compliance screeening processes are analysed by the Investment Manager and the Investment Committee for assessment of whether or not such an exception represents a breach of the binding binding elements to attain the sustainable investment objective as referenced above.

G – METHODOLOGIES

Sustainable investment is defined under the SFDR as an investment in an economic activity that contributes to an environmental or social objective, provided that the investment does not significantly harm any environmental or social objective and that the investee companies follow good governance practices (“Sustainable Investment”). We take into consideration the regulatory framework for sustainable finance, as well as proprietary investment methodologies, to ensure that Sustainable Investments can be identified, invested in and measured.

In order to select Sustainable Investments, we apply three tests. The investment should pass all three tests to qualify as a Sustainable Investment.

Step 1: Good Governance Test
Nevastar Finance’s policy incorporates requirements in respect of investee companies amongst other with regards to sound management structures, employee relations, remuneration of staff and tax compliance. To that respect, companies that are non-compliant of the 3rd or 10th principle of the UN Global Compact and/or with severe governance-related controversies (ie. rated 5 out of 5) are excluded from the initial investment universe for Article 8 and 9 products. Non-compliance with other principles of the UN Global Compact will be scrutinised as part of the investment process. Companies should also have at least one independent board member on their Supervisory Board and published unqualified audited financial statements and reports

Step 2: Do No Significant Harm Test
i. Activity-Based Exclusions
Nevastar Finance have identified a number of activities which automatically do not qualify for inclusion as a Sustainable Investment as they are considered to be causing significant harm. These include but are not limited to companies deriving any revenues from controversial weapons, cultivation and production of tobacco, 10% or more of their revenues from the exploration, extraction, distribution or refining of fossil fuels, coal or pesticides but also companies active in the generation of CO_2-intensive electricity.

ii. DNSH Binary Test
The DNSH test, is a binary pass/fail test which signals if the company passes or fails criteria for the SFDR Article 2 (17) “do no significant harm”.

Pass indicates a company has no ties to controversial weapons, thermal coal, oil & gas, is not a tobacco producer, and has no severe ESG Controversies. If the company fails this test, it cannot be considered a Sustainable Investment. Nevastar Finance’s approach is aligned with the SFDR PAIs included within tables 1, 2 & 3 of the SFDR Delegated Regulation and is based on external data sources and the Investment Manager’s internal insights. For further information, please refer to the description of the principal adverse impacts on sustainability factors as disclosed in the pre-contractual disclosure for the relevant sub-fund

Step 3: Environmental or Social Contribution
The Investment Manager primarily selects companies identified by FTSE Russell’s as generating Green Revenues (as defined by FTSE Russell) from at least one of ten sectors. FTSE Russell’s Green Revenues is a unique data model enabling users to identify and quantify revenue exposure to the green economy and measure companies’ progress in achieving green standards, based on a transparent and robust methodology. FTSE Russell’s Green Revenues Classification System identifies green products and services across the whole value chain covering 10 green sectors, 64 subsectors and 133 micro sectors. Further information on the relevant sectors can be found at:
https://content.ftserussell.com/sites/default/files/ftse_russell_green_revenues_2.0_classification_system_grcs_12-2020.pdf.proportion.

In order to qualify as a Sustainable Investment, the minimum proportion of revenue that a company derives from economic activities that actively contribute to a sustainable objective are as follows:

- Minimum 20% of the Green Revenue;

- In certain special cases, the Investment Manager may also consider a lower minimum proportion of revenue if, pursuant to the Investment Manager's own due diligence, the company can be considered to be contributing to the attainment of the Sub-Fund's Sustainable Objective.

In both cases, the Investment Manager's qualitative assessment both will take into account, among other things, whether a company's services or products contributes to the reduction of harmful emissions, proliferation of waste and/or the pollution of air or water, and/or whether the products or services enable a more sustainable use of resources.

H – DATA SOURCES AND PROCESSING

a) What are the data sources used to attain the environmental objective of the financial product?

The investment manager uses a range of different internal and external data sources and data providers, including LSEG Refinitiv, to ensure that the fund is invested in accordance with the environmental and/or social characteristics promoted. Data received from external providers may be complemented by internal research and analysis provided by the investment manager.

b) What are the measures taken to ensure data quality?

To the extent possible, data reported by companies, regulatory authorities and/or non-governmental organisations are prioritised over data from data providers' estimation models. This is done in order to minimise the reliance on third party estimation efforts which in turns improves the overall quality of the data the investment uses as input in investment processes.

The external data providers and other data sources are assessed on an ongoing basis for data quality, coverage and other attributes.

c) How is data processed?

The data used comes in part from third-party data providers that provide raw data at the issuer level. The investment manager tries to get as much data from companies as possible and as detailed as possible. External data received is enriched with other external data sets, may be supplemented by internal ESG analysis of the data, and company identifiers (ISINs) are matched against incoming raw data from companies in which the investment manager can potentially invest, as well as the current investee companies.

d) What proportion of data is estimated?

Where available the investment manager will always prioritise reported data over estimated data, however, where reported data is not available the investment manager will rely on internal estimates using reasonable assumptions. Specifically, the investment manager will use simple averages of indicators disclosed by companies within similar sectors and use them as estimated indicators.

I – LIMITATIONS TO METHODOLOGIES AND DATA

ESG scores rely on ESG data which is backward-looking and may not reflect forward-looking ESG information or risks of investee companies, which may change. Similarly, Principal Adverse Impact indicators are backward-looking and may not reflect future impact of a company.

While the methodology used for estimated data is systematic, the human factor cannot be ignored in the construction or manipulation of these estimates.

Prior to a data provider being chosen as a supplier, extensive market research is conducted, and the potential data providers are assessed on issues such as: data quality, coverage, security, methodology, price, reliability and conflict of interest. The quality of external data is evaluated on an ongoing basis and is subject to manual verification by the investment manager.

J – DUE DILIGENCE

The Management Company carries oversight on the Investment Manager to ensure due diligence processes and procedures are implemented to ensure that they are carrying out due diligence on investments in the best interests of the Fund and its investors. The Management Company carries out regular oversight on the Investment Manager to enable it to obtain an understanding of the Investment Manager's due diligence processes and procedures and to ensure that they are effectively implemented.

The Investment Manager has established several sources of external data on investee companies/issuers that along with proprietary research, enable the Investment Manager to make an informed decision prior to making an investment on behalf of the Fund, that includes considering sustainability risks and principal adverse impacts of an investment decision on sustainability factors.

The Investment Manager has also established several pre-trade and post trade investment controls, under the supervision of the Management Company, to ensure that the Fund only invests in assets that are aligned with the investment objective and policy of the Fund.

K – ENGAGEMENT POLICIES

The investment manager seeks to engage directly with the management teams of investee companies but does not commit to do so. Specifically, the investment manager may engage with the management teams of investee companies through ongoing company engagement, proxy voting, or ESG reviews, among other things.

In some cases, the investment manager may take a more focused approach, depending on the circumstances of investee companies; such approach may extend to meetings with the management teams or directors of investee companies, or participate in stakeholder dialogues.

The investment manager recognises that the exercise of voting rights is an important aspect of shareholder engagement, in particular if the funds' shareholding is material with regard to the outstanding shares of investee companies. The investment manager is ultimately responsible for determining whether and how to exercise voting rights.

L – DESIGNATED REFERENCE BENCHMARK

In the absence of reference benchmark, the Sub-Fund designates the Morningstar Global Markets Paris-Aligned Index, an EU Paris-aligned Benchmark under Title III, Chapter 3a, of Regulation (EU) 2016/1011, as reference benchmark for the purpose of attaining the sustainable investment objective.

Methodology used for the calculation of the benchmark can be found:
https://indexes.morningstar.com/docs/rulebook/morningstar-global-markets-paris-aligned-benchmark-FS0000H6E3.