

# Multi-Asset Class Solutions – Core ESG Portfolios

## Summary of website disclosure

The Sustainable Finance Disclosure Regulation requires that we summarise information provided in our pre-contractual disclosure in respect of a financial product which promotes environmental and/or social characteristics and certain other information published on a website. This disclosure is made for these purposes by Citibank Europe plc, in relation to clients of its Luxembourg branch in relation to the Multi-Asset Class Solutions – Core ESG Portfolios

### **No sustainable investment objective**

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

### **Environmental or social characteristics of the financial product**

The financial product will only invest in funds that have been categorised as Article 8 or 9 products under SFDR.

### **Investment strategy**

The financial product will only invest in UCITS funds that have been confirmed by the underlying fund manager as meeting the requirements for Article 8 or 9 products under SFDR.

As the financial product only has indirect exposure to operating or commercial companies through its investment in the UCITS fund, we defer to the good governance assessment undertaken by the underlying fund managers (who are required under SFDR to ensure that the investee companies in their Article 8 and 9 funds follow good governance practices).

### **Proportion of investments**

The financial product commits to a minimum proportion of 80% of investments to attain the characteristics promoted by the financial product. The remaining portion of the investment of the financial product consists of cash and cash equivalents, including securities issued by money market mutual funds, held for the purposes of efficient portfolio management.

The financial product does not intend to make any sustainable investments and does not take into account the EU Taxonomy and as such 0% of the financial product is Taxonomy aligned. All exposure to investee companies is expected to be indirect, through investment funds.

### **Monitoring of environmental or social characteristics**

We review the underlying funds annually to ensure only Article 8 and Article 9 funds (including ETFs) are held in the financial product.

### **Methodologies for environmental or social characteristics**

The investment process uses a positive screen to define an investment universe for the financial product by identifying funds categorised as Article 8 or Article 9 under SFDR. Further information is provided in the detailed website disclosure.

### **Data sources and processing**

The SFDR categorisation of the fund (as Article 8 or Article 9) is confirmed using data provided by Morningstar which sources the SFDR fund categorisation information directly from the underlying fund managers.

As we rely on the SFDR categorisation of the funds, and other data communicated by the underlying fund managers, we do not estimate any of the data used by the financial product to meet its environmental or social characteristics.

### **Limitations to methodologies and data**

The underlying fund managers may have different approaches, eligibility criteria or frameworks for classifying funds as Article 8 or 9 or for classifying investments as “sustainable investments” or as investments aligned with specific environmental / social characteristics or themes. Accordingly, different managers may classify the same investment, or funds with similar strategies, differently under their framework.

As the SFDR rules and guidance have confirmed that fund managers may use a variety of strategies to meet the requirements of Article 8 or 9 of SFDR, we consider that we are still able to appropriately meet the characteristics promoted by the financial product.

#### **Due diligence**

Potential investments will only be included in the financial product if they comply with the binding ESG elements summarised above, that are implemented in the investment process as binding screens. Additionally, our ESG-dedicated investment team engages in ongoing internal discussions related to the investments in the financial product.

#### **Engagement policies**

Engagement is not directly part of the environmental or social investment strategy promoted by the financial products. We do not have any procedures applicable to sustainability-related controversies in underlying funds.

#### **Designated reference benchmark**

The financial product has not designated a reference benchmark for the purpose of attaining its environmental or social characteristics.

## **Important information**

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