

Transparency of the promotion of environmental or social characteristics

10 March 2021 v1



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 Ossiam to publish on its website certain disclosures for each product that either promotes ESG characteristics or has sustainable investment as its objective (together, the “ESG Products”). These disclosures are set out below.

OSSIAM US MINIMUM VARIANCE ESG NR UCITS ETF

A Sub-Fund of Ossiam IRL ICAV

The fund promotes environmental and social characteristics; it does not have a sustainable investment objective.

- Data sources

Ossiam requires that securities in a ESG Product's investment universe have ESG data or an ESG rating so that the algorithm can apply the relevant ESG rules to conduct security selection.

This fund utilizes Sustainalytics as an ESG provider for (i) ESG rating and (ii) normative, controversy and controversial sector exclusions.

- Screening criteria for the underlying assets

The strategy applies a best-in-class filter which excludes the worse 30% of companies based on their ESG rating.

In addition, the following exclusions apply:

- ✓ Global Compact exclusions (provided by the ESG providers based on the 10 Principles of Global Compact defined by the United Nations: <https://www.unglobalcompact.org/what-is-gc/mission/principles>);
- ✓ Controversy level 5 exclusions on a scale from 0 to 5 (as per ESG providers' data, as described below); and
- ✓ Companies involved in controversial weapon business, as defined by the ESG provider.

The ESG provider rates the controversy levels described above by monitoring 10 specific indicators, namely:

Operations Incidents	Public Policy Incidents
Environmental supply Chain Incidents	Employee Incidents
Product & Service Incidents	Social supply Chain Incidents
Governance Incidents	Customer Incidents
Business Ethics Incidents	Society & Community Incidents

These indicators are rated from 0 (lowest) to 100 (highest). The controversy level score for each stock is given as the minimum value across these 10 indicators. A stock with one indicator at 0 is rated controversy level 5.

- Key sustainability indicators used to measure the environmental or social characteristics of the fund

For controversy exclusions, the indicators set out above apply.

For ESG rating:

Environment	Social	Governance
-------------	--------	------------

Emissions GHG (GreenHouse Gas) Land use and biodiversity Resource use	Access to basic services Community relations Data privacy and security Human capital Human rights Product governance	Board and management quality and integrity Board structure Ownership and shareholder rights Remuneration Financial reporting Stakeholder governance Business ethics
--	---	---

- “Do not significantly harm” (“DNSH”)

The principle of not doing significant harm to environmental or social objectives is linked to the disclosures of principal adverse impacts (“PAIs”) of investment decisions on sustainability factors. Ossiam will consider PAIs in relation to its ESG Products and consequently ensure that these products are aligned with the DNSH principle. Additional information on PAIs is available at www.ossiam.com.

- SFDR Reference benchmark

The Sub-Fund does track the Index and as such, the Index is a reference index within the meaning of SFDR. As described above, the securities are selected for inclusion in the Index based on the ESG characteristics which the Sub-Fund promotes and therefore the Index is, by definition, consistent with those characteristics.

A detailed description of the Index, as well as current components and weights comprising the Index, is publicly available on Solactive’s website (www.solactive.com).

OSSIAM ESG LOW CARBON SHILLER BARCLAYS CAPE US SECTOR UCITS ETF

A Sub-Fund of Ossiam IRL ICAV

The fund promotes social and environmental characteristics; it does not have a sustainable investment objective.

- Data sources

Ossiam requires that securities in a ESG Product's investment universe have ESG data or an ESG rating so that the algorithm can apply the relevant ESG rules to conduct security selection.

This fund utilizes Sustainalytics as an ESG Provider for (i) ESG rating and (ii) normative, controversy and controversial sector exclusions, and Trucost for GHG-related information.

- Screening criteria for the underlying assets

The strategy selects and weights the equities of the fund using an optimisation procedure which respect the constraints:

- Total GHG emissions which are 40% lower than the emissions related to the index (based on an assessment of the absolute value of the previous year's emissions data for each company);
- GHG intensity which is 40% lower than the impact of the index (based on an assessment of the previous year's emissions data for each company over the previous year's annual revenue of the company);
- Potential greenhouse emissions from reserves which are 40% lower than the potential emissions related to the index (based on an assessment which uses potential emissions figures calculated using the previous year's oil reserve data of each company, where applicable).

In addition, the following exclusions apply:

- ✓ Global Compact exclusions (provided by the ESG Providers based on the 10 Principles of Global Compact defined by the United Nations: <https://www.unglobalcompact.org/what-is-gc/mission/principles>);
- ✓ Major Scandinavian institutions' (such as Norges Bank) publicly available exclusion lists;
- ✓ Controversy level 4 and 5 exclusions on a scale from 0 to 5 (as per ESG Providers' data, as described below); and
- ✓ Companies involved in controversial weapon business, as defined by the ESG Provider;
- ✓ Tobacco and Coal industries as per GICS-4 classification.

The ESG Provider rates the controversy levels described above by monitoring 10 specific indicators, namely:

Operations Incidents	Public Policy Incidents
Environmental supply Chain Incidents	Employee Incidents
Product & Service Incidents	Social supply Chain Incidents
Governance Incidents	Customer Incidents
Business Ethics Incidents	Society & Community Incidents

These indicators are rated from 0 (lowest) to 100 (highest). The controversy level score for each stock is given as the minimum value across these 10 indicators. A stock with one indicator at 0 is rated controversy level 5, while a stock with one indicator below 20 is rated controversy level 4.

- Key sustainability indicators used to measure the environmental or social characteristics of the fund

For controversy exclusions, the indicators set out above apply.

For climate, the key indicators are: GHG total emissions, GHG intensity and potential GHG emissions from reserves.

- “Do not significantly harm” (“DNSH”)

The principle of not doing significant harm to environmental or social objectives is linked to the disclosures of principal adverse impacts (“PAIs”) of investment decisions on sustainability factors. Ossiam will consider PAIs in relation to its ESG Products and consequently ensure that these products are aligned with the DNSH principle. Additional information on PAIs is available at www.ossiam.com.

- SFDR reference benchmark

While the Sub-Fund’s Investment Universe is limited by the Index, the Sub-Fund does not track the Index or seek to replicate its composition. As such, the Index is not a reference index within the meaning of SFDR.

OSSIAM FOOD FOR BIODIVERSITY UCITS ETF

A Sub-Fund of Ossiam IRL ICAV

The objective of the strategy is to significantly reduce the biodiversity footprint of the fund in comparison to its investment universe, while delivering the net total returns of a selection of listed equities. The strategy also considers other environmental and social characteristics in its asset selection.

- Data sources

Ossiam requires that securities in a ESG Product's investment universe have ESG data or an ESG rating so that the algorithm can apply the relevant ESG rules to conduct security selection.

This fund utilizes Sustainalytics as an ESG provider for (i) ESG rating and (ii) normative, controversy and controversial sector exclusions, ISS for SDG rating, Trucost for GHG-related information and Iceberg DataLab for biodiversity impact.

- Screening criteria for the underlying assets

The fund's biodiversity footprint is minimized by optimizing, under constraints, the Mean Species Abundance ("MSA") indicator, which measures the mean abundance of original species, compared to the undisturbed situation.

The strategy also:

- ✓ Applies a best-in-class filter that eliminates the 20% worse ESG rated stocks;
- ✓ Excludes the stocks which are among the 20% with highest GHG emission impact;

In addition, the following exclusions apply:

- ✓ Global Compact exclusions (provided by the ESG Providers based on the 10 Principles of Global Compact defined by the United Nations: <https://www.unglobalcompact.org/what-is-gc/mission/principles>);
- ✓ Major Scandinavian institutions' (such as Norges Bank) publicly available exclusion lists;
- ✓ Controversy level 4 and 5 exclusions on a scale from 0 to 5 (as per ESG Providers' data, as described below);
- ✓ Companies involved in controversial weapon business, as defined by the ESG Provider;
- ✓ Companies involved in palm oil production, as defined by the ESG Provider; and
- ✓ Tobacco and Coal industries as per GICS-4 classification.

The ESG Provider rates the controversy levels described above by monitoring 10 specific indicators, namely:

Operations Incidents	Public Policy Incidents
Environmental supply Chain Incidents	Employee Incidents
Product & Service Incidents	Social supply Chain Incidents
Governance Incidents	Customer Incidents
Business Ethics Incidents	Society & Community Incidents

These indicators are rated from 0 (lowest) to 100 (highest). The controversy level score for each stock is given as the minimum value across these 10 indicators. A stock with one indicator at 0 is rated controversy level 5, while a stock with one indicator below 20 is rated controversy level 4.

- Key sustainability indicators used to measure the environmental or social characteristics of the fund

For controversy exclusions, the indicators set out above apply.

For ESG rating:

Environment	Social	Governance
Emissions GHG Land use and biodiversity Resource use	Access to basic services Community relations Data privacy and security Human capital Human rights Product governance	Board and management quality and integrity Board structure Ownership and shareholder rights Remuneration Financial reporting Stakeholder governance Business ethics

For climate, the indicator is the GHG total emissions.

For biodiversity, the indicator is the MSA.

- “Do not significantly harm” (“DNSH”)

The principle of not doing significant harm to environmental or social objectives is linked to the disclosures of principal adverse impacts (“PAIs”) of investment decisions on sustainability factors. Ossiam will consider PAIs in relation to its ESG Products and consequently ensure that these products are aligned with the DNSH principle. Additional information on PAIs is available at www.ossiam.com.

- SFDR reference benchmark

The Sub-Fund does not track an index and as such, there is no reference index within the meaning of SFDR.



OSSIAM WORLD ESG MACHINE LEARNING UCITS ETF

A Sub-Fund of Ossiam IRL ICAV

The fund promotes social and environmental characteristics; it does not have a sustainable investment objective.

- Data sources

Ossiam requires that securities in a ESG Product's investment universe have ESG data or an ESG rating so that the algorithm can apply the relevant ESG rules to conduct security selection.

This fund utilizes Sustainalytics as an ESG Provider for (i) ESG rating and (ii) normative, controversy and controversial sector exclusions, and Trucost for GHG-related information.

- Screening criteria for the underlying assets

The strategy uses machine learning techniques to select the patterns that show a significant link between ESG characteristics and financial performance for the securities in the investment universe. The outcome of the machine learning process consists in selecting only securities of companies which, given their ESG profile, have a positive financial outlook.

It also integrates a rule-based optimization process which ensures that the fund's (i) total GHG emissions must be 40% lower than that of its benchmark, and (ii) ESG score is 10% higher than that of its benchmark.

In addition, the following exclusions apply:

- ✓ Global Compact exclusions (provided by the ESG Providers based on the 10 Principles of Global Compact defined by the United Nations: <https://www.unglobalcompact.org/what-isgc/mission/principles>);
- ✓ Controversy level 5 exclusions on a scale from 0 to 5 (as per ESG Providers' data, as described below);
- ✓ Companies involved in controversial weapon business, as defined by the ESG Provider
- ✓ Tobacco and Coal industries as per GICS-4 classification; and
- ✓ Companies which are among the worst polluters (based on an assessment of the absolute value of the previous year's GHG emissions data for each company) unless the companies rank among the best in terms of transition toward a low GHG economy (based on an assessment of the share of previous year's green energy over total energy produced by the company).

The ESG Provider rates the controversy levels described above by monitoring 10 specific indicators, namely:

Operations Incidents	Public Policy Incidents
Environmental supply Chain Incidents	Employee Incidents
Product & Service Incidents	Social supply Chain Incidents
Governance Incidents	Customer Incidents
Business Ethics Incidents	Society & Community Incidents

These indicators are rated from 0 (lowest) to 100 (highest). The controversy level score for each stock is given as the minimum value across these 10 indicators. A stock with one indicator at 0 is rated controversy level 5.

- Key sustainability indicators used to measure the environmental or social characteristics of the fund

For controversy exclusions, the indicators set out above apply.

For ESG data and rating:

Environment	Social	Governance
Emissions GHG Land use and biodiversity Resource use	Access to basic services Community relations Data privacy and security Human capital Human rights Product governance	Board and management quality and integrity Board structure Ownership and shareholder rights Remuneration Financial reporting Stakeholder governance Business ethics

For climate, the indicator is the GHG total emissions.

- “Do not significantly harm” (“DNSH”)

The principle of not doing significant harm to environmental or social objectives is linked to the disclosures of principal adverse impacts (“PAIs”) of investment decisions on sustainability factors. Ossiam will consider PAIs in relation to its ESG Products and consequently ensure that these products are aligned with the DNSH principle. Additional information on PAIs is available at www.ossiam.com.

- SFDR reference benchmark

While the Sub-Fund’s Investment Universe is determined, in part, by reference to what global index providers have included in their indices, the Sub-Fund does not track those indices or seek to replicate their composition. As such, no such index is a reference index within the meaning of SFDR.

OSSIAM US ESG LOW CARBON EQUITY FACTORS UCITS ETF

A Sub-Fund of Ossiam IRL ICAV

The fund promotes social and environmental characteristics; it does not have a sustainable investment objective.

- Data sources

Ossiam requires that securities in a ESG Product's investment universe have ESG data or an ESG rating so that the algorithm can apply the relevant ESG rules to conduct security selection.

This fund utilizes Sustainalytics as an ESG Provider for (i) ESG rating and (ii) normative, controversy and controversial sector exclusions, and Trucost for GHG-related information.

- Screening criteria for the underlying assets

The strategy applies a best-in-class filter which excludes the worse 20% of companies based on their ESG rating.

The strategy also integrates a rule-based optimization process which ensures that the fund's total GHG emissions, GHG intensity and potential GHG emissions from reserves must each be 40% lower than those of its investment universe.

In addition, the following exclusions apply:

- ✓ Global Compact exclusions (provided by the ESG Providers based on the 10 Principles of Global Compact defined by the United Nations: <https://www.unglobalcompact.org/what-is-gc/mission/principles>);
- ✓ Major Scandinavian institutions' (such as Norges Bank) publicly available exclusion lists;
- ✓ Controversy level 5 exclusions on a scale from 0 to 5 (as per ESG Providers' data, as described below);
- ✓ Companies involved in controversial weapon business, as defined by the ESG Provider; and
- ✓ Tobacco and Coal industries as per GICS-4 classification.

The ESG Provider rates the controversy levels described above by monitoring 10 specific indicators, namely:

Operations Incidents	Public Policy Incidents
Environmental supply Chain Incidents	Employee Incidents
Product & Service Incidents	Social supply Chain Incidents
Governance Incidents	Customer Incidents
Business Ethics Incidents	Society & Community Incidents

These indicators are rated from 0 (lowest) to 100 (highest). The controversy level score for each stock is given as the minimum value across these 10 indicators. A stock with one indicator at 0 is rated controversy level 5.

- Key sustainability indicators used to measure the environmental or social characteristics of the fund

For controversy exclusions, the indicators set out above apply.

For climate, the indicators are the GHG total emissions, the GHG intensity and the potential GHG emissions from reserves.

For ESG rating

Environment	Social	Governance
Emissions GHG Land use and biodiversity Resource use	Access to basic services Community relations Data privacy and security Human capital Human rights Product governance	Board and management quality and integrity Board structure Ownership and shareholder rights Remuneration Financial reporting Stakeholder governance Business ethics

- “Do not significantly harm” (“DNSH”)

The principle of not doing significant harm to environmental or social objectives is linked to the disclosures of principal adverse impacts (“PAIs”) of investment decisions on sustainability factors. Ossiam will consider PAIs in relation to its ESG Products and consequently ensure that these products are aligned with the DNSH principle. Additional information on PAIs is available at www.ossiam.com.

- SFDR reference benchmark

While the Sub-Fund’s Investment Universe is determined by reference to what global index providers have included in their indices as being listed US equities, the Sub-Fund does not track those indices or seek to replicate their composition. As such, no such index is a reference index within the meaning of SFDR.

OSSIAM GLOBAL SUSTAINABLE INCOME UCITS ETF

A Sub-Fund of Ossiam IRL ICAV

The fund promotes environmental characteristics; it does not have a sustainable investment objective.

- Data sources

Ossiam requires that securities in a ESG Product's investment universe have ESG data or an ESG rating so that the algorithm can apply the relevant ESG rules to conduct security selection.

This fund utilizes Sustainalytics as an ESG Provider for (i) ESG rating and (ii) normative, controversy and controversial sector exclusions, and Trucost for GHG-related information.

- Screening criteria for the underlying assets

The strategy applies a best-in-class filter which excludes the worse 20% of companies based on their ESG rating and also integrates a rule-based optimization process which ensures that the fund's total GHG emissions, GHG intensity and potential GHG emissions from reserves must each be 40% lower than those of its investment universe.

In addition, the following exclusions apply:

- ✓ Global Compact exclusions (provided by the ESG Providers based on the 10 Principles of Global Compact defined by the United Nations: <https://www.unglobalcompact.org/what-is-gc/mission/principles>);
- ✓ Major Scandinavian institutions' (such as Norges Bank) publicly available exclusion lists;
- ✓ Controversy level 4 and 5 exclusions on a scale from 0 to 5 (as per ESG Providers' data, as described below);
- ✓ Companies involved in controversial weapon business, as defined by the ESG Provider; and
- ✓ Tobacco and Coal industries as per GICS-4 classification.

The ESG Provider rates the controversy levels described above by monitoring 10 specific indicators, namely:

Operations Incidents	Public Policy Incidents
Environmental supply Chain Incidents	Employee Incidents
Product & Service Incidents	Social supply Chain Incidents
Governance Incidents	Customer Incidents
Business Ethics Incidents	Society & Community Incidents

These indicators are rated from 0 (lowest) to 100 (highest). The controversy level score for each stock is given as the minimum value across these 10 indicators. A stock with one indicator at 0 is rated controversy level 5, while a stock with one indicator below 20 is rated controversy level 4.

- Key sustainability indicators used to measure the environmental or social characteristics

For controversy exclusions, the indicators set out above apply.

For climate, the indicators are the GHG total emissions, the GHG intensity and the potential GHG emissions from reserves.

For ESG rating:

Environment	Social	Governance
Emissions GHG Land use and biodiversity Resource use	Access to basic services Community relations Data privacy and security Human capital Human rights Product governance	Board and management quality and integrity Board structure Ownership and shareholder rights Remuneration Financial reporting Stakeholder governance Business ethics

- “Do not significantly harm” (“DNSH”)

The principle of not doing significant harm to environmental or social objectives is linked to the disclosures of principal adverse impacts (“PAIs”) of investment decisions on sustainability factors. Ossiam will consider PAIs in relation to its ESG Products and consequently ensure that these products are aligned with the DNSH principle. Additional information on PAIs is available at www.ossiam.com.

- SFDR reference benchmark

While the Sub-Fund’s Investment Universe is limited by the Index, the Sub-Fund does not track the Index or seek to replicate its composition. As such, the Index is not a reference index within the meaning of SFDR.

OSSIAM EURO GOVERNMENT BONDS 3-5Y CARBON REDUCTION

A Sub-Fund of Ossiam Lux SICAV

The Fund promotes environmental characteristics; it does not have a sustainable investment objective.

- Data sources

The GHG data is published by the European Commission in the Emissions Database for Global Atmospheric Research (EDGAR)

- Screening criteria for the underlying assets

The strategy integrates a rule-based optimization process which ensures that the fund's total GHG emissions is 30% lower than that of the investment universe.

The choice of the investment universe, European countries, results in a strategy with mitigated risk of being involved with money laundering, terrorism, or being a non-cooperative jurisdiction with regards to tax purposes. This is due to the European Union having stringent regulations around these matters.

- Key sustainability indicators used to measure the environmental or social characteristics of the fund

For climate, the indicator is the fossil GHG emission per capita.

- “Do not significantly harm” (“DNSH”)

The principle of not doing significant harm to environmental or social objectives is linked to the disclosures of principal adverse impacts (“PAIs”) of investment decisions on sustainability factors. Ossiam will consider PAIs in relation to its ESG Products and consequently ensure that these products are aligned with the DNSH principle. Additional information on PAIs is available at www.ossiam.com.

- SFDR reference index

The Index qualifies as a reference index under SFDR and is aligned with the ESG characteristics promoted by the Fund, in that it includes assessment of carbon emissions in its construction.

A detailed description of the Index, components and weights comprising the Index are available on ICE's website (<https://indices.theice.com>).