ADEPA

Article 10 (SFDR)

Website disclosure for an Article 8 fund

Adepa Asset Management S.A.
DIP - Value Catalyst Equity Fund

Product name: DIP - Value Catalyst Equity Fund | **Legal entity identifier: 549300448T7N5SYVE567**

A. Summary

Investment Strategy
The Sub-Fund is actively managed. The investment objective of the Sub-Fund is to generate positive returns for its investors over the long term (over the investment cycle, at least 4-5 years) via capital appreciation and dividends, by investing in global equities.
The investment philosophy for the Sub-Fund is based on the belief that listed equity markets over time are efficient and reflect the underlying value of relevant assets, businesses and the quality of management teams. However, it is also true that in the short term this market efficiency is sometimes lacking, and the market is slow to reflect changes in specific catalysts, such as companies´ investments and prospects as well as cycles. All these offer the Sub-Fund opportunities to generate superior risk adjusted returns for its investors over the investment cycle. Therefore, the investment process focuses on the fundamental analysis of companies´ assets and businesses, the assessment of the quality of management teams, the understanding of industries´ cycles and trends and companies´ relevant social and environmental considerations. Both a quantitative sustainability screening and a qualitative assessment are used to direct the engagement in terms of social and environmental practices. The Sub-Fund promotes various environmental and social characteristics along with good governance practices through a commitment to systematically identify and address sustainability factors throughout the investment management process and through active engagement. Direct exposure to Environmental, Social and Governance (ESG) driven equity investments which have a positive or an improving profile can be a relevant source of return to the Sub-Fund. For the avoidance of doubt, the granular or limited portions of the investments of the Sub Fund will not bear an ESG assessment.

Benchmark
There is no reference benchmark designated for the purpose of attaining the environmental or social characteristics promoted by the Sub-fund.

Proportion of investments
A minimum of 70% of the financial product will be invested in assets promoting the E/S characteristics of the Sub-fund.
The remaining 30% includes non-eligible assets (such as liquid asset or derivatives), and assets not in line with E/S characteristics of the Sud-Fund (such assets form an investee company with a ESG score of 1).
Still, minimum environmental and social safeguards are ensured via the applicable of the exclusion policy.

Monitoring and due diligence (applicable at underlying target fund level)
Once the decision to invest in a particular asset or company has been made, the Investment Manager will track and monitor the progress of ESG indicators over the life of the investment.s, companies' environmental and social policies, ESG risk integration strategies, etc.).

Data sources, methodologies and limitations (applicable at underlying target fund level)
When making investment decisions, extra-financial information should be available to allow an adequate integration of sustainability risks. This information could be obtained by:
- Internally through company knowledge or active dialogue activities or through specific questionnaires (investment due diligence) or
- Through information provided by third parties (ESG data providers), publicly available information or others.

The information may be either quantitative (based on ESG indicators scores) or qualitative (relating to management strategies companies' environmental and social policies, ESG risk integration strategies, etc.),
Based on the information obtained and the knowledge of the Investment Area (subject to certain discretion which must be duly justified), an ESG score is assigned to each investible asset or company.

Engagement strategy (applicable at underlying target fund level)
ESG criteria are continuously and actively monitored, through the research and understanding of documents such as the Annual Accounts and the Non-Financial Statements of the companies. This is done with the aim of checking the company's level of commitment and vocation for improvement, following up on the measures taken to achieve the Environmental and Social targetspromoted by the fund and, whenever possible, engaging and collaborating with them to implement an adequate ESG Risk Management strategy.

B. No sustainable investment objective

The Fund promotes environmental or social characteristics but does not have as its objective a sustainable investment.

C. Environmental or social characteristics of the Fund

What are the environmental or social characteristics promoted by the Fund?

The Sub-Fund promotes several environmental and social characteristics related to sustainable business practices. These characteristics are mainly related to energy efficiency, water efficiency, environmental impact on land reduction, good working conditions and minimum labor rights, promotion of diversity, product responsibility, and community involvement.

The environmental characteristics promoted by this financial product are adaptation to climate change, pollution prevention and control, as well as sustainable use and protection of resources, with greenhouse gases emission, responsible water consumption, R&D investment and environmental litigation being the Key Performance Environmental Indicators.
As for social characteristics, the product promotes the reduction of reputational risk, prevention of workplace accidents, human talent attraction and retention, through the following Key Performance Social Indicators: equality and diversity, controversy ratios, employees' physical security, number of accidents and deaths, training and qualification, employee rotation and corporate social responsibility (CSR) policies.

D. Investment strategy

What investment strategy does the Fund use to meet the environmental or social characteristics provided by the Fund?

The Sub-Fund is actively managed without reference or restriction to an index or benchmark. The investment objective of the Sub-Fund is to generate positive returns for its investors over the long term (over the investment cycle, at least 4-5 years) via capital appreciation and dividends, by investing in global equities.
The investment philosophy for the Sub-Fund is based on the belief that listed equity markets over time are efficient and reflect the underlying value of relevant assets, businesses and the quality of management teams. However, it is also true that in the short term this market efficiency is sometimes lacking, and the market is slow to reflect changes in specific catalysts, such as companies´ investments and prospects as well as cycles. All these offer the Sub-Fund opportunities to generate superior risk adjusted returns for its investors over the investment cycle. Therefore, the investment process focuses on the fundamental analysis of companies´ assets and businesses, the assessment of the quality of management teams, the understanding of industries´ cycles and trends and companies´ relevant social and environmental considerations. Both a quantitative sustainability screening and a qualitative assessment are used to direct the engagement in terms of social and environmental practices. The Sub-Fund promotes various environmental and social characteristics along with good governance practices through a commitment to systematically identify and address sustainability factors throughout the investment management process and through active engagement. Direct exposure to Environmental, Social and Governance (ESG) driven equity investments which have a positive or an improving profile can be a relevant source of return to the Sub-Fund. For the avoidance of doubt, the granular or limited portions of the investments of the Sub Fund will not bear an ESG assessment.
The Sub-Fund will look to invest most of the times in 30-50 global companies covering any industries and countries, based on a value investment methodology combined with the presence of circumstantial catalysts.

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

The investment process focuses, among others, on the assessment of the quality of the management teams in terms of corporate governance, corporate ethics, CSR and sustainability, and partnerships and awards. The Investment Manager may use a range of different metrics based on information obtained (for instance from Clarity) or published by the companies in which the fund invests or supported by external ESG analysis providers.
When no information can be retrieved from the different metrics, the IM is cross-checking the investees governance with industry experts and industry peers.

This data is reflected in the proprietary Governance score explained above. In order to guarantee a minimum of good governance practices, the Investment Manager will exclude any company with a proprietary score of 1 for Governance at the time of acquisition. Additionally, any investee company whose Governance rating is downgraded to 1 will be divested.

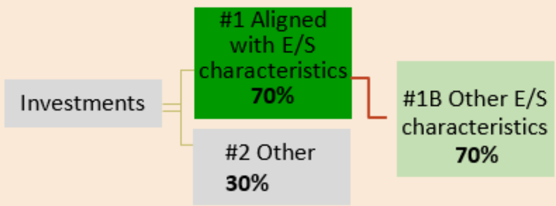
Does the Fund consider principal adverse impacts on sustainability factors?

In accordance with the requirements of Article 7(2) of the SFDR (EU) 2019/2088, this Sub-Fund does not take into account PAIs. The Investment Manager will regularly monitor the market development in relation to PAIs as well as the corresponding data development in order to assess whether it can take into account PAIs on a company level and will accordingly assess whether it can also take them into account for this Sub-Fund in accordance with Article 7(1) of the said Regulation.

E. Proportion of investments

What is the planned asset allocation for the Fund?

- A minimum of 70% of the financial product will be invested in assets promoting the E/S characteristics of the Sub-fund.
- The remaining 30% includes non-eligible assets (such as liquid asset or derivatives), and assets not in line with E/S characteristics of the Sud-Fund (such assets form an investee company with a ESG score of 1).
- Still, minimum environmental and social safeguards are ensured via the applicable of the exclusion policy.



#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.

What is the minimum share of investments with an environmental objective aligned with the EU Taxonomy? What is the minimum share of investments in transitional and enabling activities?

The Sub-Fund does not commit to make sustainable investments.

What is the minimum share of sustainable investments with an environmental objective that are not aligned with the EU Taxonomy?

The Sub-Fund does not commit to make sustainable investments.

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

“2 Other” investments include (i) non-eligible assets (such as liquid assets and derivatives) and (ii) assets that are not in line with E/S characteristics promoted by the sub-fund (such as assets from investee companies with an ESG score of 1)

Still, minimum environmental and social safeguards are ensured via the application of the exclusion policy.

F. Monitoring of environmental or social characteristics

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

The sustainability indicators used to measure and attain the environmental and social characteristics promoted are:

- Exclusion criteria based on income: the Sub-Fund will not invest in companies whose income is derived from adult entertainment/pornography, weapons of mass destruction, anti-personnel landmines, gambling, and casinos activities.

- An indicator that summarizes the quality and development of the sustainability business practices related with the characteristics promoted of the investee companies. A proprietary methodology is used for this evaluation based on information obtained or published by the companies in which the fund invests, supported by our external ESG data provider (Clarity). A proprietary score is constructed for each of the sub fund investments. This proprietary score takes into account the ESG score of external data providers (Clarity) and an internal assessment score. The score tiers each of the companies in which the fund invests from 1 to 3, being 1 the lowest ESG score and 3 the highest. The proprietary score is company specific and it takes into consideration the context of type of business, peers, engagement and improvement over time. In addition to this, governance is scored separately, with the same methodology from 1-3.

- Controversies are monitored and taken very much into account in the investment process. With such a deep fundamental analysis and frequent contact with the companies, brokers covering them and industry players, controversies scores tend to be very stale as issues get resolved. For that reason, we use third party controversy data, which we constantly qualify internally.

How are the environmental or social characteristics and the sustainability indicators monitored throughout the lifecycle of the Fund and what are the related internal/external control mechanisms?

The investment process focuses on the assessment of the quality of the management teams in terms of corporate governance, corporate ethics, CSR and sustainability, and partnerships and awards. The Manager iss using a range of different metrics based on information obtained or published by the companies in which the fund invests or supported by external ESG analysis providers

G. Methodologies

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

The sustainability risk integration process is started with quantitative analysis. The Investment Manager begins the ESG risk analysis process through an external quantitative filter. In the first phase, main strengths, weaknesses and areas for ESG improvement of each company, will be identified. A detailed breakdown of Environmental, Social and Governance variables are disclosed and considered. Later an in-depth qualitative analysis on the ESG risk factors is carried out.
The investment process focuses,on the assessment of the quality of the management teams in terms of corporate governance, corporate ethics, CSR and sustainability, and partnerships and awards. The Manager may use a range of different metrics based on

information obtained or published by the companies in which the fund invests or supported by external ESG analysis providers.
These data are reflected in the Governance proprietary score asigned to each investment. used for this evaluation based on information obtained or published by the companies in which the Sub-Fund invested, supported by an external ESG data provider. This proprietary score takes into account the ESG score of external data providers and an internal assessment score. The score tiers each of the companies in which the Sub-Fund invested from 1 to 3, being 1 the lowest ESG score and 3 the highest. In order to guarantee a minimum of good governance practices, the Investment Manager will exclude any company with a proprietary score of 1 for Governance at the time of acquisition.

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?

ESG criteria are continuously and actively monitored, through the research and understanding of documents such as the Annual Accounts and the Non-Financial Statements of the companies. In addition the Investment Manager uses for the ESG risk analysis process an external quantitative filter, Clarity AI, this being one of the benchmark tools in the sustainability data industry, strategic partner of some of the main sustainability players in the asset management industry.

I. Limitations to methodologies and data

What are the limitations to the methodologies and data sources?

The fund promotes engagement with companies and will not limit itself to investing in companies with a good ESG rating, but also engage and invest in “improvers”, understood as companies involved in an improvement process of their ESG metrics and policies, which will be promoted and aligned with the characteristics promoted by the fund. Those will be reviewed periodically and failure to make progress will, in most cases, be a reason for the forced sale of the shares of that company owned by the fund, within a reasonable period. When the engagement with a company is more complicated, either for reasons of access or due to a low capacity to impact on it, a common engagement with the rest of the signatories of UNPRI (United Nations Principles of Responsible Investors) will be considered.

J. Due diligence

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

By using the Clarity tool the Investment Manager is screening the ESG score of the fund portfolio with regards to ESG risk score, the ESG impact score, how companies operation affect the environment and society, Industry analysis, Carbon performance and Footprint and exclusion of sector screening. The ESG score and and internal assement scrore plus the governance score of a company are creating together the proprietary score for each investment, which is constantely monitored.

The Investment Manager is also constantly monitoring the Governance proprietary score of the selected companies. Any investee company whose Governance rating is downgraded to 1 will be divested.

K. Engagement policies

Is engagement part of the environmental or social investment strategy?
Yes.
If so, what are the engagement policies (including any management procedures applicable to sustainability-related controversies in investee companies)?
Both a quantitative sustainability screening and a qualitative assessment are used to direct the engagement in terms of social and environmental practices along with good governance practices through a commitment to systematically identify and address sustainability factors throughout the investment management process and through active engagement. To start the engagement with the investees it is important to build a position in the companies. While engagement was important to narrow down the topics of the discussion a parallel cross-checking by using tools like Clarity allowed to select appropriate engagement points before deeply engaging with the investee. In regular meetings and telephone calls held with the representatives of the companies in which the fund is invested, ESG issues are adressed from different angles, in addition to economic, financial and strategic factors. When the engagement with the company is more complicated, either for reasons of access or due to a low capacity to impact on it, a common engagement with the rest of the signatories of UNPRI (United Nations Principles of Responsible Investors) will be considered.

L. Reference benchmark

Has a reference benchmark been designated for the purpose of attaining these characteristics promoted by the Fund?
There is no reference benchmark designated for the purpose of attaining the environmental or social characteristics promoted by the Sub-fund.