

Product Names:

MIRALTA SICAV - SEQUOIA

Legal Entity Identifier:

636700WCJGWY3W41MY38

Information related to financial products that promote environmental or social characteristics – Article 8

TABLE OF CONTENTS:

1. SUMMARY
2. NO SUSTAINABLE INVESTMENT OBJECTIVE
3. ENVIRONMENTAL OR SOCIAL CHARACTERISTICS OF THE FINANCIAL PRODUCT
4. INVESTMENT STRATEGY
5. PROPORTION OF INVESTMENTS
6. MONITORING OF ENVIRONMENTAL OR SOCIAL CHARACTERISTICS
7. METHODS
8. SOURCES AND TREATMENT OF DATA
9. LIMITATIONS OF METHODS AND DATA
10. DUE DILIGENCE
11. ENGAGEMENT POLICIES
12. REFERENCE BENCHMARKS

1. SUMMARY

This financial product promotes environmental characteristics under Article 8 of Regulation (EU) 2019/2088 on sustainability-related disclosures in the financial services sector. However, the fund does not have a sustainable investment objective.

This financial product does not intend to make sustainable investments under the SFDR, but it applies extra-financial criteria to analyse whether the revenue generation of the companies in which it invests is aligned with certain Sustainable Development Goals (SDGs). It will also establish specific exclusions aimed at ensuring that the product's investments are aligned with its sustainability charter. Its ESG investment strategy will therefore consist of investing in assets that enable compliance with this ESG charter.

Miraltabank has its own ESG evaluation methodology which, combined with external data providers, gives it a broad view of the risks and opportunities to which the different assets considered as potential investments are exposed, seeking to identify those deemed better prepared to meet the challenge of pursuing the Sustainable Development Goals, with optimal policies and systems to achieve the desired positive impact on both society and the environment, while also allowing it to anticipate associated risks. To determine the securities in which to invest, the sustainability charter will be taken into account, applying the following criteria that are used in the decision-making process for all investments:

1. Exclusion criteria (they will apply to at least 51 % of invested positions, excluding from this percentage cash or those assets for which a valuation cannot be obtained, which will be considered neutral in this respect):

In the first place, as a basic exclusionary analysis criterion, any countries (as well as companies from those countries) sanctioned for non-compliance with international regulations (EU Sanctions or United Nations Security Council Consolidated List), or included by the Financial Action Task Force on its list of high-risk jurisdictions (FATF list) as territories with serious shortcomings in anti-money-laundering or counter-terrorism-financing measures, will be excluded from the investment universe.

In the second place, to complete the exclusions analysis and applying it to corporations, issuers will be excluded based on the very nature of their business, or because additional risks have been detected in the processes analysed. Thus, as a general rule, all issuers whose main source of revenue comes, in the proportions indicated as a percentage of revenue (a maximum of 20 % in each of these areas individually), from any of the following areas will be excluded:

- Electricity generation using coal.
- Thermal coal mining.
- Exploration of oil or gas deposits in the Arctic Ocean.
- Tobacco production.

2. Valuation criteria: as a valuation methodology, the alignment of the portfolio with certain United Nations Sustainable Development Goals (SDGs) established by the UN General Assembly in 2015 will be analysed, using Revenue Alignment as the main measure of whether the portfolio

actively contributes to achieving those goals. The analysis will rely on information obtained from publicly available websites of specialised organisations, data from UN-related bodies, publicly disclosed information on the issuers or regulator's website, and, primarily, third-party applications (specialised sustainability data providers).

Given that this methodology is considered sufficiently comprehensive and particularly well-suited (because it values the alignment of each company's revenues with specific SDGs), the Fund will not seek to make sustainable investments as defined by the EU Taxonomy Regulation (EU) 2020/852 and will therefore neither measure nor report alignment with it. Likewise, in line with the Group-level policy, the Fund will not consider Principal Adverse Impacts (PAIs) in its investment decisions, in accordance with Article 4 of the SFDR.

Consistent with the proportion applied to the valuation criteria, the Fund will aim to achieve at least 51 % of its investments in assets that meet those valuation criteria (cash or assets such as derivatives for which, by their nature, no valuation can be obtained will be deemed neutral in this respect). Compliance with the valuation criteria will be assessed on the overall composition of the portfolio, without conducting a prior ESG analysis for each new investment, provided that the basic exclusions are met. Nonetheless, a comprehensive internal review of the portfolio will be carried out at least quarterly, alongside ongoing monitoring of ESG compliance levels. This enables the early detection of deviations and efficient corrective action, ensuring that the alignment percentage does not fall below the minimum 51 % threshold.

Control mechanisms are internal and will focus on monitoring the investment universe and remaining within the established limits. At least annually, a report will be produced and reviewed by the Sustainability Committee to assess progress in meeting sustainability policies, outlining strengths and weaknesses observed in the portfolio positions and setting the course of action, including the potential exclusion of assets that do not meet the established criteria. The minimum 51 % threshold will be calculated on the set of assets for which reliable ESG information is available, excluding assets without assessable data such as derivatives, cash positions or other instruments lacking sufficient coverage.

Data sources used to achieve each of the environmental or social characteristics promoted by the financial product include the FATF high-risk jurisdiction list, information from UN-related bodies such as the UN Global Compact, country-level SDG performance statistics from the Sustainable Development Report of the SDG Transformation Centre (formerly the SDG Index & Dashboards Sustainable Development Report published by the University of Cambridge), private third-party data from specialised providers, and publicly available issuer data found on the issuer's or regulator's website (e.g., annual reports or sustainability reports).

The main limitation we encounter when applying our methodology and the ESG policies described to the entire portfolio lies in the limited availability and updating of relevant non-financial data from some companies, as well as from certain types of assets in which the fund invests.

With regard to the due-diligence measures adopted for the product's underlying assets, the entity takes into account sustainability risks and opportunities together with the other risks and financial variables of the assets. These are managed through the aforementioned methodology, involving a large part of the organisation's structures and, above all, the highest-level decision-

making bodies in order to establish and monitor the application of due diligence and integrate it into the group strategy.

As for the engagement policy, every effort will be made—whether through the exercise of voting rights at shareholders’ meetings or corporate events, or through collaborative commitment or engagement actions, provided that the asset type and the shareholding percentage (minimum 1 %) allow it—to take actions aligned with the environmental or social characteristics of the vehicles.

No reference index has been designated for achieving the environmental or social characteristics promoted by this financial product.

2. NO SUSTAINABLE INVESTMENT OBJECTIVE

This financial product promotes environmental or social characteristics but does not have a sustainable investment objective. Likewise, it sets no minimum percentage of its investments to be allocated to sustainable investments, nor does it analyse their weight, without prejudice to the fact that it may regularly hold a percentage of its investments so classified (which will be the norm, but without being targeted). In line with the Group-level policy, the Fund will not consider Principal Adverse Impacts (PAIs) in its investment decisions, in accordance with Article 4 of the SFDR.

Additionally, in the selection process the Fund will analyse whether the investee companies comply with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights, including the principles and rights set out in the eight fundamental conventions referred to in the ILO Declaration on Fundamental Principles and Rights at Work and in the International Bill of Human Rights.

3. ENVIRONMENTAL OR SOCIAL CHARACTERISTICS OF THE FINANCIAL PRODUCT

The Fund will invest predominantly in companies that demonstrate prudent sustainability management, assessing their ESG performance through the analysis of various indicators. These companies, in addition to meeting exclusions based on their country of origin or the nature of their business, must for the most part show a minimum alignment with certain Sustainable Development Goals (SDGs) established by the UN General Assembly in 2015. Their contribution will be analysed on an aggregate basis mainly through the Revenue Alignment criterion or another comparable measure that allows a detailed assessment of both individual companies and the portfolio as a whole.

Among the environmental or social characteristics that this product will promote are ending discrimination against women and girls, valuing unpaid care work, promoting shared responsibility within the household, ensuring full participation of women in leadership and decision-making, and helping to strengthen resilience and adaptive capacity to climate-related disasters, among others.

4. INVESTMENT STRATEGY

The Fund follows financial and extra-financial criteria based on its sustainability charter. Investments must largely comply with the Fund's sustainability charter (at least 51 % of the portfolio positions must comply with said charter, provided data are available, excluding from this percentage cash or those assets for which reliable information cannot be obtained, which will be considered neutral for these purposes). To assess the positions in which to invest, the following criteria are established and will be applied in the decision-making process:

1. Exclusion criteria:

First, as an initial basic exclusionary analysis criterion, any country (as well as companies from those countries) sanctioned for non-compliance with international regulations (EU Sanctions or United Nations Security Council Consolidated List), or included by the Financial Action Task Force on its list of high-risk jurisdictions (FATF list) as territories with serious deficiencies in anti-money-laundering or counter-terrorist-financing measures, will be excluded from the investment universe.

Second, to complete the exclusion analysis, which will apply mainly to corporations, issuers will be excluded based on revenue percentages, taking into account the very nature of their business. Thus, as a general rule, any issuer whose main source of revenue comes, in no more than 20 % of the company's revenue, from the following areas will be excluded (individually, not in aggregate):

- Electricity generation using coal.
- Thermal-coal mining.
- Exploration or extraction of oil or gas deposits in the Arctic Ocean.
- Tobacco production

These specific exclusions have been updated after assessing their environmental and social impact, as they are considered to generate greater negative externalities relative to the Fund's sustainability charter. Nevertheless, the established exclusions may be reviewed from time to time in light of regulatory developments or if deemed necessary following a review by the Sustainability Committee.

2. Valuation criteria: as a valuation methodology, by consulting publicly available websites of specialised organisations, data from bodies linked to the United Nations, public information on the issuer's or regulator's website, or, mainly, by using third-party applications (specialised sustainability data providers), the alignment of issuers with certain Sustainable Development Goals (SDGs) established by the UN General Assembly in 2015 will be analysed, preferably through the Revenue Alignment criterion as the principal measure to assess whether the companies in the portfolio actively contribute to achieving those goals and to what extent they do so, although other comparable criteria that allow consistent conclusions may also be used. The assessment of compliance with the sustainability criteria will be carried out on the overall composition of the portfolio, without conducting a prior analysis for each new investment, provided that, at a minimum, the basic exclusions are met. The portfolio will be considered in line with the Fund's sustainability charter, and therefore to meet the established sustainability

criteria, if it maintains a positive net alignment overall with at least two Sustainable Development Goals (SDGs). SDG 5 (Gender Equality) and SDG 13 (Climate Action) will be prioritised, but it could be selected other SDGs depending on the portfolio composition.

Likewise, the issuer's country of origin will be taken into account as an element for those investments for which no additional data can be obtained (a methodology that will be applied by default to public debt), considering the differences between regulations regarding sustainability oversight. For this purpose, the Fund will refer to the statistics on country-level SDG compliance collected in the Sustainable Development Report of the SDG Transformation Centre published by Dublin University Press (formerly the SDG Index & Dashboards Sustainable Development Report published by the University of Cambridge), available at <https://dashboards.sdindex.org/rankings>, which provides complementary information to the official SDG indicators, promoting investments in jurisdictions that achieve a minimum score of 60 out of 100 on compliance with the 17 SDGs and avoiding the rest. Investments in official bodies (as well as municipal or regional entities) of all jurisdictions exceeding that level will thus be considered aligned, and the same approach will apply to domestic companies that cannot be rated but are in any case subject to national regulation. For supranational issuers, which in principle would not be rateable in this sense, and when no issuer-specific information can be obtained, the Luxembourg rating may be used, as Luxembourg is the reference issuing country for the majority of supranational issuances worldwide. Compliance with the country SDG criterion will be reviewed at least annually. In the event that a jurisdiction falls below the threshold of 60 points out of 100, its continued eligibility will be reviewed and corrective measures—up to and including full divestment—may be taken.

For the calculation of the 51 % compliance with the valuation criteria for individual positions, a position will be considered aligned if it meets at least one of the following criteria: either it shows a positive net alignment with at least two Sustainable Development Goals (SDGs) according to the Revenue Alignment methodology or a comparable approach, or—provided it shows a neutral or zero net alignment and no misalignment—it comes from a country scoring above 60 points in the aforementioned SDG Index, in which case it is deemed subject to relatively stringent sustainability standards. Positions showing any misalignment with any of the analysed SDGs will therefore be excluded from the aligned category.

As part of the policy update aimed at integrating and aligning the policies of the various funds with the Group-level framework, the Fund will cease to consider Principal Adverse Impacts (PAIs) in its investment decisions, in accordance with Article 4 of the SFDR, because its sustainability methodology relies on specific exclusionary and valuation criteria that ensure the ESG alignment of the portfolio. Likewise, the Fund will maintain its decision not to pursue EU Taxonomy-aligned investments, as its ESG approach is based on integrating ESG factors into investment selection and management rather than on the substantial-contribution criteria set out in Regulation 2020/852.

This methodology will be applied analogously to both fixed-income and equity funds and, similarly, to investments in collective investment schemes. For the latter, look-through analyses performed by external data providers will be used to assess their alignment with the aforementioned SDGs, although funds classified under Article 8 or 9 will be considered aligned by default with the sustainability charter without additional assessment and will count toward the minimum 51 % of investments that promote environmental or social characteristics, given

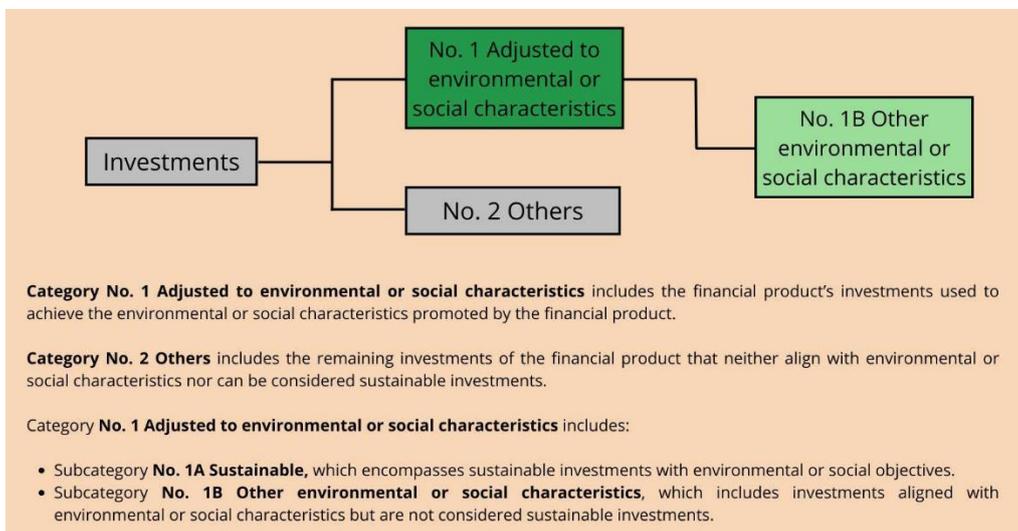
that such funds have already been evaluated under the SFDR regulatory criteria. For private-equity, direct-lending or similar funds for which publicly available information cannot be used, or where obtaining it through external providers is not viable, specific questionnaires may be developed to assess which portfolio companies do or do not meet our sustainability charter in order to gauge the ESG alignment of those funds and their associated risks. For assets without available ESG data, alternative criteria such as analysis by comparable or alignment with the issuer’s country of origin—on the grounds that it is subject to basic sustainability regulations—may be used.

Although at least 51 % of the Fund’s investments must promote environmental or social characteristics, in practice this percentage is expected to be much higher, since the vast majority of the assets in the portfolio already meet the high ESG standards set by their countries of issuance and the Fund’s investments are typically made in large, well-established companies subject to very strict regulations and significant reputational risk. Should the portfolio approach the 51 % ESG-alignment threshold at any time, the necessary adjustments would be proposed to remain in compliance with the established sustainability criteria.

Although the remaining 49 % is not required to meet these criteria, the overall composition of the portfolio will be continuously reviewed, enabling the detection of potential exposures to highly controversial sectors or issuers, which would be reported to the Sustainability Committee. The Fund will likewise periodically monitor the portfolio’s ESG risks, seeking to avoid significant exposures to sectors or activities that could pose a material sustainability risk to the portfolio.

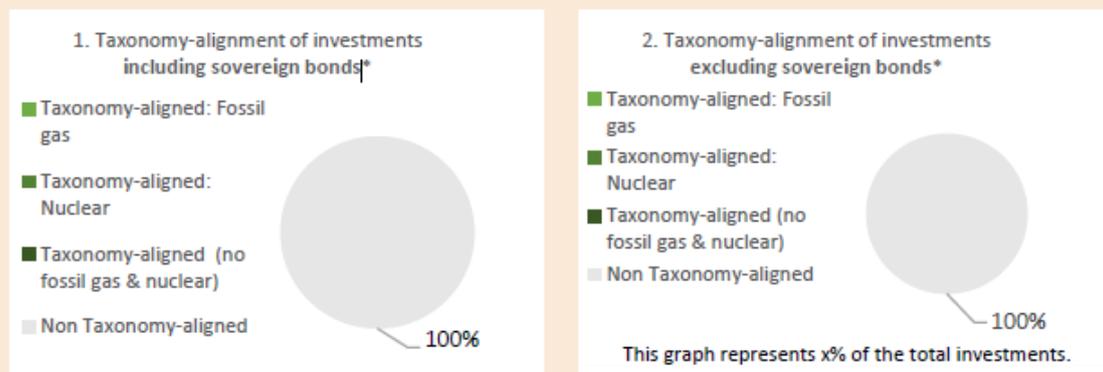
5. PROPORTION OF INVESTMENTS

The procedures described will apply generally to all Fund positions whenever data are available. In many cases, however—such as for derivative instruments (used mainly for hedging), cash positions, or short-term paper like commercial paper—sufficient data are not available, as these instruments lack the depth of information that can be obtained for larger or listed companies. Because many of these instruments cannot be assessed from an ESG standpoint, they will be excluded from the calculation of the minimum 51 % threshold, which will be applied only to assets for which data are available.



In any case, at least 51 % of the Fund’s assets must be invested in assets that meet the aforementioned exclusionary and valuation criteria. No predetermined proportion of investments needs to be achieved individually for the SDGs analysed in the valuation criteria. The percentage of assets that meet the exclusionary criteria and the percentage that meet the valuation criteria, both in line with the sustainability charter, may differ. The remaining 49 % of the Fund’s assets will comprise investments that are not aligned with environmental or social characteristics or classified as sustainable, consisting mainly of derivative positions for risk-hedging or financial-return maximisation purposes, as well as the Fund’s own liquidity.

The two graphs below show in green the minimum percentage of investments that are aligned with the EU Taxonomy. As there is no appropriate methodology to determine the Taxonomy-alignment of sovereign bonds, the first graph shows the Taxonomy alignment in relation to all the investments of the financial product including sovereign bonds, while the second graph shows the Taxonomy alignment only in relation to the investments of the financial product other than sovereign bonds.*



* For the purpose of these graphs, 'sovereign bonds' consist of all sovereign exposures

Regarding the Fund’s minimum percentage of investments in transition and enabling activities, it is not determined and is therefore 0%. The Fund’s minimum proportion of environmentally sustainable investments not aligned with the EU Taxonomy will likewise be 0% of its assets, as none has been set. The minimum proportion of socially sustainable investments will also be 0%.

6. MONITORING OF ENVIRONMENTAL OR SOCIAL CHARACTERISTICS

The environmental and social characteristics of the Fund will be integrated into the investment process, first through the basic exclusions and then through the aggregate study of alignment with the SDGs. Once a company is deemed eligible for investment and the acquisition is executed, the aggregate performance of the portfolio will be monitored and, at least annually, the Fund’s sustainability progress will be reviewed by the Sustainability Committee.

To monitor the sustainability performance of the investments, a continuous analysis of the portfolio’s aggregate revenue alignment (or a comparable criterion) with respect to the above-mentioned SDGs will be maintained, seeking to keep the portfolio aligned with those goals over time. If at any point the aggregate portfolio alignment approaches levels that could breach the Fund’s sustainability charter, or the threshold of positions meeting the exclusionary or valuation

criteria, this situation will be reported to the decision-making bodies so they can take the appropriate measures to ensure ongoing compliance with the sustainability standards the Fund promotes. Periodic checks on the portfolio's alignment will be carried out as necessary to detect promptly any risk of misalignment.

7. METHODS

To assess compliance with the environmental or social characteristics, the exclusionary-criteria filter will be applied first. Thereafter, on a periodic basis, an analysis will be carried out of the evolution of the portfolio's aggregate alignment with the Sustainable Development Goals pursued, thereby monitoring overall progress toward the environmental or social characteristics promoted. This strategy will be implemented on an ongoing basis within the investment process for the manager's vehicles that are adjusted to environmental or social characteristics. At least annually, any changes in the territorial rating of positions will also be reviewed, with a view to maintaining positions in the portfolio or proposing their divestment when a jurisdiction is deemed to have fallen out of line with the Fund's sustainability charter. The retention or divestment of positions thought to have undergone substantial changes in this respect, or that could do so as a result of extraordinary events (for example, certain corporate actions), will likewise be evaluated.

The Sustainability Committee will be responsible for ensuring that the assets in which the Fund invests remain largely in line with its sustainability charter.

8. SOURCES AND TREATMENT OF DATA

The data sources that may be used to achieve the promoted characteristics may primarily include the following:

- United Nations Security Council Consolidated List (<https://www.un.org/securitycouncil/sanctions/information>).
- FATF list (<https://www.tesoro.es/sites/default/files/publicaciones/Lista%20GAFI%20Jurisdicciones%20de%20riesgo%20y%20monitoreadas.%20Octubre%202024.pdf>).
- UE Sanctions List (<https://www.sanctionsmap.eu/#/main?search=%7B%22value%22:%22%22,%22searchType%22:%7B%7D%7D>).
- Bloomberg.
- Moody's.
- Clarity.
- UN Global Compact (<https://www.unglobalcompact.org/what-is-gc/participants>) (ODS).
- Cambridge/Dublin Universities (<https://dashboards.sdindex.org/rankings>) (ODS país).
- Sustainability reports and annual reports of the different issuers.

All of the sources listed have been duly analysed and are recognised globally, maintaining an appropriate level of quality for this purpose.

9. LIMITATIONS OF METHODS AND DATA

The main limitation we encounter both in the methods and in the data sources themselves is the lack of updating or inclusion of some of the data analysed, as well as inconsistencies among different providers. For example, cases have been detected in which globally recognised companies are reported as being in violation of UN Global Compact principles or the OECD Guidelines for Multinational Enterprises by some data providers, while others do not report such violations. In these situations a detailed analysis will be carried out to clarify the case.

Another limitation is that certain financial instruments (derivatives, structured products, cash) are subject to even less data coverage than other assets, and in some cases no information is obtainable. These will not be considered aligned with the environmental or social characteristics, but they will also be excluded from the minimum 51% aligned with ESG characteristics and will be treated as neutral.

An additional limitation is the frequency with which data are updated, usually once a year, which restricts the capacity to respond to short-term changes. For this reason an annual review has been established, in line with the update frequency of most data providers.

10. DUE DILIGENCE

This methodology is under continuous review to ensure it is aligned, as far as possible, with current regulations and to optimise the use and exploitation of data sources, while constantly seeking and evaluating alternatives that may increase the reliability of our analyses in this area. Periodic due-diligence reviews are also carried out to verify the accuracy of the data extracted from third-party tools and to compare them with other providers in order to report any inconsistencies detected or to uncover discrepancies in our analysis.

The established sustainability criteria are reviewed on a regular basis to ensure that, while their observance is promoted, they remain in line with the other objectives of stakeholders (such as return and risk). The Sustainability Committee likewise conducts periodic checks to confirm that the sustainability charter is being met, that all extra-financial information is integrated into the investment-decision process for the vehicles managed that promote environmental or social characteristics, and that the various portfolios comply, on an aggregate basis, with the requirements that have been set.

11. ENGAGEMENT POLICIES

Every effort will be made—whether through the exercise of voting rights at shareholders' general meetings, as well as through collaborative engagement actions—when the asset type and the holding percentage allow it (set for a stake exceeding 1% of the share capital in any company), to take the actions that are appropriate and aligned with the environmental or social characteristics of the vehicles, as well as in any potential corporate events or litigation related to sustainability that may arise in the investee companies, always maintaining alignment with the objective of maximising returns for clients. Thus, insofar as possible and depending on our

capacity to influence, we will seek to maintain active participation that promotes, through dialogue with the corporate issuers themselves or through those alternatives that allow us to keep in contact with them or to contribute to decision-making, the alignment of the underlying company's corporate policies with the sustainability preferences established in the sustainability charter. For those assets in which the holding does not reach the established threshold, and in the understanding that our capacity will not be significant enough to influence the decisions sufficiently, decision-making at the company's shareholders' meeting will by default be delegated, without prejudice to the possibility that, in some extraordinary situations, a specific alternative may be chosen, always aligned with the environmental or social characteristics promoted.

In this respect, when analysing the decisions to be taken, the potential impact of the choice to be promoted will be assessed in financial terms, in terms of risk or suitability, as well as the potential sustainability risks and opportunities.

12. REFERENCE BENCHMARKS

No reference benchmark has been designated to measure the portfolio's alignment with the environmental or social characteristics it promotes.