

Article 10 (SFDR) Website disclosure for an article 8 fund

L-GAM Strategic Value Fund SLP



Product name: L-GAM Strategic Value Fund SL N/A	P Legal entity identifier:
Does this financial product have a sustainable i	nvestment objective?
☐ Yes	⊠ No
☐ It will make a minimum of sustainable investments 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	It promotes Environmental/Social (E/S) characteristics and while it does not have as its objective a sustainable investment, it had a proportion of% of sustainable investments with an environmental objective in economic activities that 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



A. Summary



L-GAM recognizes the importance of our impact on the environment and society. We target responsible investments into businesses that make a positive contribution to shareholders, employees, and customers, in line with the long-term oriented investment and management approach that is enshrined in our core values. L-GAM believes that incorporating Environmental, Social and Governance (ESG) principles into its investment and portfolio management processes can enhance investment performance and develop a more sustainable strategy for its portfolio companies, while also benefiting society as a whole.

L-GAM has been a signatory of the United Nations Principles for Responsible Investment since 2017 and is committed to making these principles an integral part of its investment activities.

Furthermore, L-GAM and its portfolio companies strive to adhere to the ten principles of the United Nations Global Compact, which we believe serve as an important guideline for both our investment activities, as well as the activities of our portfolio companies.

L-GAM has set high standards with this policy and expects to work towards its sustainability goals, which include:

- Limiting its environmental footprint
- Working towards a safe, respectful, diverse, and supportive work environment
- Ensuring business integrity and transparency for itself and its portfolio companies.



B. No sustainable investment objective

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



C. Environmental or social characteristics of the financial product

What are the environmental or social characteristics promoted by this financial product?

The characteristics promoted by this Partnership consist of avoiding making investments in companies that are incompatible with the corporate values. For this purpose, the Partnership will implement an exclusion list which is further described below.

No reference benchmark has been designated for the purpose of attaining the environmental and social characteristics promoted.

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

To measure the attainment of the characteristics promoted, the Partnership will use the following indicators:



- % of companies whose principal activity relates to:
 - Pornography or vice
 - The direct manufacturing, sales, or marketing of weapons, artillery, and ammunition to be used in the act of war or military conflict ("Military Products"), or components of the same, if the primary purpose of such component is for it to be included in a Military Product
 - Coal-based activities, including, but not limited to coal extraction and coal power generation
 - The manufacture of tobacco products
 - The operation of gambling facilities
- % of companies which are involved in:
 - The production, trade and/or distribution of cluster bombs, antipersonnel mines, or nuclear/chemical/biological weapons
 - Any activity of prostitution or procuring of prostitutes
 - The systematic use of harmful or exploitative forms of forced or child labour
 - The illegal manufacture, sale or production of drugs under applicable law

Does this financial product take into account principal adverse impacts on sustainability factors?
☐ Yes



D. Investment strategy

What investment strategy does this financial product follow?

When evaluating an investment opportunity, ESG forms an integral part of the due diligence on all potential investments. This ensures that minimum environmental and social safeguards are part of the investment advisory committee recommendations to the General Partner. The Partnership integrates ESG factors throughout the investment process including in the pre-investment, the ownership and the exit phase of the investment process.

Already in the early screening and analysis of targets investments, investments are screened against the firm's exclusion policy as further outlined in the section below and the management of investee companies will be asked to undertake that it will operate in line with L-GAM's key ESG guiding principles and encourage them to adopt similar business principles. Identified ESG matters or themes to be addressed are discussed with the investee companies' management and where applicable integrated into value-creation plans and monitored over the lifetime of the investment.

What are the binding elements of the investment strategy used to select the investments to attain each of the environmental or social characteristics promoted by this financial product?

The Partnership will not make investments in companies that are incompatible with the corporate values and ESG objectives of the firm. In particular, the Partnership will not knowingly make direct investments in:

- Companies whose principal activity relates to:
 - Pornography or vice



- The direct manufacturing, sales, or marketing of weapons, artillery, and ammunition to be used in the act of war or military conflict ("Military Products"), or components of the same, if the primary purpose of such component is for it to be included in a Military Product
- Coal-based activities, including, but not limited to coal extraction and coal power generation
- The manufacture of tobacco products
- The operation of gambling facilities
- Companies which are involved in:
 - The production, trade and/or distribution of cluster bombs, antipersonnel mines, or nuclear/chemical/biological weapons
 - Any activity of prostitution or procuring of prostitutes
 - The systematic use of harmful or exploitative forms of forced or child labour
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How is the strategy implemented in the investment process on a continuous basis?

ESG factors are part of the investment process and are considered when identifying potential investment opportunities.

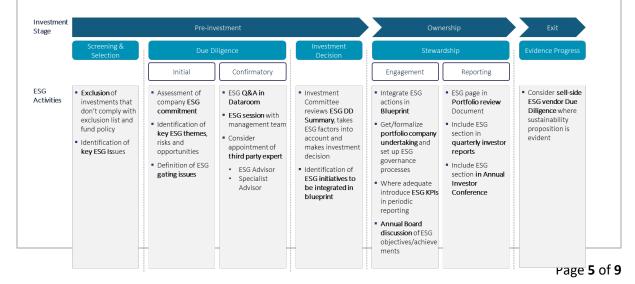
L-GAM includes ESG factors in the early screening and analysis of the targeted investments and their teams. At this stage, investments are screened against the Firm's Exclusion Policy and specific Fund LPAs' restriction policies. The team also seeks to determine whether there are any critical ESG or reputational risks with regards to a target.

Once a new investment opportunity is validated, the investment team carries out a due diligence of the targeted company. As part of the due diligence process L-GAM also evaluates the ESG profile of the business and seeks to assess potential ESG-related risks and to identify possible opportunities.

Any material risks and opportunities identified during the pre-investment process are included in the documents presented to the Investment Committee.

Identified ESG matters or themes to be addressed are discussed with the portfolio companies management and where applicable integrated into value-creation plans and monitored over the lifetime of the investment.

The below diagram summarizes our ESG approach through the investment process:





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

As a signatory to the UN's Principles for Responsible Investment, L-GAM recognizes the importance of corporate governance issues vis-à-vis its investors, portfolio companies, employees, and other stakeholders. Every portfolio company will be requested to undertake that the business will be carried out in a manner that:

- a) provides safe and healthy working conditions for its employees and contractors;
- b) treats all employees fairly in terms of recruitment, progression, remuneration and conditions of work, irrespective of gender, race, colour, language, disability, political opinion, age, religion, or national/social origin;
- c) upholds high standards of business integrity and honesty, complies with local laws and international good practice and does not directly or indirectly offer, pay, solicit or accept bribes in any form;
- d) takes account of the impact of its operations on the local community and seeks to ensure that potentially harmful occupational health and safety, environmental and social effects are properly assessed, addressed and monitored; and
- e) provides for the reporting as soon as practicably possible of any incident involving the company that results in any loss of life or any material effect on the environment.



E. Proportion of investments

What is the planned asset allocation for this financial product?

The Partnership will invest at least 90% of its NAV in companies aligned with the E/S characteristics promoted (#1). Hence, the remaining (<10%) includes cash and cash equivalents held as ancillary liquidity, which will not follow any minimum E/S safeguards (#2 Other).



#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.

#20ther 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 investments are included under "#2 Other", what is their purpose and are there any minimum environmental or social safeguards?



"#2 Other" includes cash and cash equivalents held as ancillary liquidity, which will not follow any minimum E/S safeguards.



F. Monitoring of environmental or social characteristics

How are the environmental or social characteristics and the sustainability indicators monitored throughout the lifecycle of the financial product and the related internal/external control mechanism?

Identified ESG matters or themes to be addressed are discussed with the portfolio companies management and where applicable integrated into value-creation plans and monitored over the lifetime of the investment. L-GAM will encourage and assist the management of portfolio companies to identify and address material ESG risks and opportunities and work towards and monitor continuous improvement in these areas.

The progress of each portfolio company towards its ESG objectives is discussed at least once a year in a board meeting, where ESG topics are discussed and presented.

Key ESG risks and opportunities are included in the quarterly Portfolio Review Committee documents and discussions, where applicable.



G. Methodologies

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

We will seek to define 5-10 environmental, social and governance KPIs common to all portfolio companies that can be aggregated at fund level.



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?

The data will be primarily collected from the companies and aggregated by our ESG team.

We will prioritise KPIs that can be easily determined and aggregated. We do not expect any data to be estimated. Where we require deeper data collection/analysis or benchmarks we will seek the support of our external ESG advisors.





I. Limitations to methodologies and data

If any, what are the limitations to the methodologies and data sources? (Including how such limitations do not affect the attainment of the environmental or social characteristics and the actions taken to address such limitations)

Where the portfolio company is too small or L-GAM funds have a minority or debt stake with limited influence, the approach will be limited by company's resources and/or the level of influence and control L-GAM has with the portfolio company.



J. Due diligence

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

Once a new investment opportunity is validated, the investment team carries out a due diligence of the targeted company. As part of the due diligence process L-GAM also evaluates the ESG profile of the business and seeks to assess potential ESG-related risks and to identify possible opportunities.

The due diligence is based on a set of targeted, standardised questions addressed to management and, where appropriate, extended to include the support of an external ESG due diligence provider. It will typically focus on

- an assessment of sector-specific ESG risks and opportunities of the targeted company, and
- a survey of the company's level of maturity on ESG matters in terms of policies and resources.

Identified material issues and mitigation measures can be further explored with support from environmental, social and legal advisors where required.

	K. Engagement policies
	Is engagement part of the environmental or social investment strategy?
☐ Yes	
⊠ No	



L. Reference benchmark
Has a reference benchmark been designated for the purpose of attaining these characteristics
promoted by the financial product?
☐ Yes
⊠ No