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SUSTAINABILITY-RELATED DISCLOSURES
LAZARD EUROPEAN EQUITIES FINANCIAL PRODUCTS

Summary

Lazard is providing these Sustainability-Related Disclosures for the following actively managed financial products pursuant to Article 8(1) of the Sustainable Finance Disclosure Regulation 2019/2088:

Lazard Continental European Equity Alpha Strategy

Lazard European Long/Short Equity Strategy

Lazard European Small Cap Equity Strategy

Lazard Pan European Equity Alpha Strategy

Each of these financial products is offered to investors in the European Union and United Kingdom in the form of segregated mandates by the appropriate Lazard entity. Pursuant to the relevant prospectus, the products also are offered as the following sub-funds of a UCITS sponsored by Lazard Fund Managers (Ireland) Limited: Lazard European Equity Fund, Lazard European Alternative Fund and Lazard Pan European Small Cap Fund.

No Sustainable Investment Objective

These Lazard financial products promote environmental and/or social characteristics as part of their investment processes, but they do not have as their objective sustainable investment.

Environmental or Social Characteristics of the Financial Products

The portfolios for these financial products are managed by distinct investment teams at Lazard Asset Management LLC or its affiliates (the “Investment Manager”). Each team has adopted its own steps to incorporate the consideration of sustainability risks and to promote environmental and social characteristics.

For the **Lazard Continental European Equity Alpha Strategy and the Lazard Pan European Equity Alpha Strategy**, the Investment Manager’s proprietary research on each issuer under consideration for investment involves a holistic approach to sustainability assessments. Stress testing a range of financial and ESG variables to create scenario analysis enables the Investment Manager to understand the asymmetry of an investment thesis, highlighting both the margin of safety and the potential return. The Investment Manager incorporates a qualitative approach to make the ESG assessment more forward looking, as available data can be backward looking. The Investment Manager carries out this analysis through engagement with senior management of the issuers and by drawing on its wider knowledge of the industry and peer companies. In addition, a sustainability assessment that is designed to identify issuers with strong or weak practices relating to labor relations, employee health/safety, community impact, sustainability of raw materials supply chain and similar resources, sustainability of product and services, management accountability, corruption controls and regulatory compliance, among other matters, is employed where the Investment Manager is concerned about a risk or identifies an opportunity. The Investment Manager’s assessment is informed by data such as company reports and extra-financial sources, data and information from the sources described elsewhere in this disclosure, as well as by the Investment Manager’s engagement with senior management of issuers. Where Manager watchlists highlight weak ESG scores, this will cause the Investment Manager to conduct additional analysis to understand the potential financial risks associated

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with an investment and may lead to additional engagement with an issuer or ultimately a decision to divest from an investment if it is in the best interests of the strategy to do so. The Investment Manager believes that there are a set of industries and companies that will continue to have a negative environmental and social impacts over the long-term and which will, in turn, face ongoing regulatory and economic risks. For this reason, the Investment Manager applies a lower valuation to such companies with the result that, when constructing the portfolio, investment is pushed towards companies that generally have higher ESG credentials than the average European company.

For the **Lazard European Long/Short Equity** strategy, the Investment Manager's proprietary research on each issuer under consideration for investment includes assessment against a proprietary sustainability scoring model for discrete environmental, socio-economic and corporate governance issues – *i.e.* the scoring model is designed to identify issuers with strong or weak practices relating to labor relations, employee health/safety, community impact, sustainability of raw materials, supply chain and similar resources, sustainability of product and services, management accountability, corruption controls and regulatory compliance, among other matters. The Investment Manager's scoring is informed by data such as company reports and extra-financial sources, data and information from the sources described elsewhere in this disclosure, as well as by the Investment Manager's engagement with senior management of the issuers. A very weak ESG score will cause the Investment Manager to conduct additional analysis to understand the potential financial risks associated with an investment.

For the **Lazard European Small Cap Equity** strategy, the Investment Manager's proprietary research on each issuer under consideration for investment involves detailed fundamental analysis and sustainability scoring for environmental, socio-economic and corporate governance issues. The Investment Manager's proprietary research on each issuer under consideration for investment involves engagement with senior management of the issuers, detailed risk assessments, pricing targets and financial modelling for discrete environmental, socio-economic and governance issues. In particular, the Investment Manager undertakes an assessment of each stock being considered for investment that is informed by proprietary materiality mapping.

In addition to the foregoing, the Investment Manager applies an ESG exclusion policy to the UCITS financial products offered by Lazard Fund Managers (Ireland) Limited, which prohibits those funds from investing in or seeking exposure to the securities of issuers involved in the manufacture or production of controversial weapons (*i.e.* weapons of mass destruction, nuclear weapons, biological weapons, chemical weapons, depleted uranium weapons, cluster munitions or landmines). Such exclusions are available to be applied to segregated mandate versions of the financial products.

Investment Strategies

Descriptions of the investment strategies for each of the financial products follows:

- The Lazard Continental European Equity Alpha strategy seeks to outperform the FTSE World Europe ex-UK Index by 3.0% per annum (gross of fees) over a full market cycle of 3 to 5 years. The strategy primarily invests in companies domiciled in those countries that comprise the FTSE World Europe ex-UK Index. The strategy is constructed on a bottom-up basis. The basic tenet of its bottom-up investment philosophy is the focus on companies with high or rising sustainable financial productivity and the trade-off between that and valuation. The expertise of our portfolio managers and analysts is in the bottom-up analysis of companies. We seek to ensure that stock specific factors drive the risk and return in the portfolio through a rigorous risk control process. The strategy typically invests in 45-60 securities.

- The Lazard European Long/Short strategy is a diversified long/short strategy with a strong focus on bottom-up stock selection aimed at delivering disproportionate positive returns given the risk taken. The strategy employs a robust risk management framework aimed at capital preservation. The team tracks a universe of over 250 large and mid-capitalization stocks within the markets of Developed European countries which have undergone deep research and that are followed closely. The portfolio comprises approximately 50 - 70 carefully selected liquid European large and mid-cap companies. There are typically 35-45 long positions and 15-25 short positions. Market circumstances will dictate turnover, but it is anticipated that dollar turnover could be a multiple of the asset base per annum (approximately 500%).
- The Lazard Pan European Equity Alpha strategy primarily invests in companies domiciled in those countries that comprise the MSCI Europe Index. The strategy is constructed on a bottom-up basis. The basic tenet of its bottom-up investment philosophy is the focus on companies with high or rising sustainable financial productivity and the trade-off between that and valuation. The expertise of our portfolio managers and analysts is in the bottom-up analysis of companies. We seek to ensure that stock specific factors drive the risk and return in the portfolio through a rigorous risk control process. The strategy typically invests in 50 to 70 securities.
- The Lazard European Small Cap Equity strategy seeks to generate strong relative returns over a long-term time horizon by investing in companies with strong financial productivity at attractive valuations.

The Investment Manager's bottom-up fundamental analysis of companies held by these financial products includes an assessment of their governance practices, which assessment can be based in either qualitative or quantitative criteria. The Investment Manager's analysis may result in various outcomes, including without limitation an adjustment to its valuation of an issuer's securities, a decision to overweight or underweight exposure to those securities in the relevant financial product portfolio, or a decision to avoid investment in the securities. The Investment Manager's assessment relating to the governance practices of an issuer will evolve as it continues to conduct fundamental research concerning that issuer, its industry/sector, and other interested entities and stakeholders.

For further information concerning the investment strategy for each financial product, please refer to the relevant UCITS prospectus or approved marketing material for segregated mandates.

Proportion of Investments

The financial products are expected to have direct exposure to investee entities through holding stocks issued by entities in the product's investment universe.

Promotion of environmental and social characteristics is designed to be achieved by applying the relevant investment process to the portfolios of each financial product, and Lazard has not identified a minimum portion of each portfolio that would be used to attain such environmental and social characteristics. The financial products have not committed to making any sustainable investments.

Monitoring of Environmental or Social Characteristics

The Investment Manager's investment personnel responsible for the discretionary management of the financial product portfolios have the primary responsibility for monitoring the environmental and social characteristics designed to be promoted by the financial products, using the data and potential systems available to those personnel. The investment team may be assisted in its monitoring efforts by the firm's ESG research personnel.

Methodologies

Please see the section "Environmental or Social Characteristics of the Financial Products" above for a description of the methodologies used by the Investment Manager to attempt to attain the social and environmental characteristics promoted by the financial products.

Data Sources and Processing

The Investment Manager has access to ESG data from both internal and external resources, which allows it to assess the Sustainability Risks associated with prospective or existing investments for these financial products. This data includes:

- a) The Investment Manager's proprietary Materiality Mapping¹ analysis, which evaluates ESG issues facing specific industry groups.
- b) Trucost², part of S&P Global, provides environmental ratings and research enabling the Investment Manager to assess a company's environmental impact and the overall environmental footprint of investment portfolios.
- c) Sustainalytics ESG Research³, provides the Investment Manager with research that enhances the Investment Manager's understanding of a company's ESG practices, and also with risk ratings that allow for systematic comparison of ESG performance across companies.
- d) The Investment Manager's ESG watchlist, produced quarterly by its Global Risk Management team, which contains ESG ratings for a universe of more than 5,500 companies.
- e) Proprietary research reports in respect of issuers prepared by the Investment Manager, each of which includes an evaluation of the ESG impacts and/or attributes of potential investments for the Fund. Analysis in these reports is derived from, among other sources, engagement with the senior management of the issuers.

When selecting investments for each financial product, the Investment Manager may employ some combination of the above-referenced data as well as other data (developed or acquired by the individual investment team). The Investment Manager's analysis may result in various outcomes, including without limitation an adjustment to its valuation of an issuer's securities, a decision to overweight or underweight exposure to those securities in the relevant financial product portfolio, or a decision to avoid investment in the securities. The Investment Manager's assessment relating to an investment for a financial product will

¹ The Investment Manager's proprietary Materiality Mapping analysis uses as its foundation the Sustainability Accounting Standards Board (SASB)'s Materiality Map™

² Copyright © 2018 S&P Trucost Limited, an affiliate of S&P Global Market Intelligence.

³ Sustainalytics© 2020.

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evolve as it continues to conduct fundamental research concerning that issuer, its industry/sector, and other interested entities and stakeholders.

Limitations to Methodologies and Data

The effectiveness of Lazard's fundamental research processes depend in large part upon the experience and skill of our investment personnel and the quality of data and information available to those personnel. While the Investment Manager's fundamental research techniques are designed to accurately assess the ESG profile and Sustainability Risks of issuers, there is no guarantee that such techniques will identify all matters relevant to the team's assessment or ongoing investment due diligence. Similarly, while Lazard presumes that the data it acquires from third-parties and develops using proprietary research is reliable and comprehensive, it is possible that such data will be impacted by inaccuracies or limitations that may be imperceptible to Lazard.

Due Diligence

The Investment Manager's relevant investment personnel are responsible for conducting ongoing due diligence on the securities held in the portfolios of the financial products. The Investment Manager's due diligence is grounded largely in the investment team's fundamental research analysis applied to the securities and issuers in their investment universe. The investment team's fundamental analysis is based upon data acquired by Lazard, data and research tools developed by the team, and engagement with securities issuers and other stakeholders, among other things. The portfolios of the financial products are actively managed by the Investment Manager's personnel, and their review of those portfolios is ongoing.

Engagement Policies

The Investment Manager's global Sustainable Investment and ESG (environmental, social and governance) Integration Policy outlines its approach and commitment to incorporating environmental, social, and corporate governance considerations in investment processes to safeguard the interests of its clients and other relevant stakeholders, including investors in the financial products described herein.

As set forth in the Policy, engagement with issuers is an integral part of Lazard's investment process. Investment professionals conduct meetings with the issuers of equity securities as a regular part of the research process and in order to understand how companies are using their capital and conducting their business. During such meetings, investment professionals may engage on a variety of issues, including ESG matters. Our engagements on ESG issues with is predominately informed by our proprietary materiality mapping framework and company level assessments, as well as data developed by our individual investment teams. This helps analysts and portfolio managers focus upon the governance, human and natural capital issues that are most material and relevant to the long-term financial success of an issuer. This includes both how a company invests in its human capital – including employees, suppliers, their customers and the community – as well as its approach to natural capital, including its dependency and use of natural resources and its approach to manage climate change risk.

No Reference Benchmark

The financial products do not designate an index as a reference benchmark aligned with the environmental or social characteristics they may promote. To the extent the financial products employ indices, they are used for performance measurement.

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These Sustainability-Related Disclosures are published by Lazard Asset Management, Lazard Asset Management Limited, Lazard Asset Management Deutschland and Lazard Fund Managers (Ireland) Limited (collectively “Lazard”) based upon its good faith interpretation of the EU Sustainable Finance Disclosure Regulation for financial products related to Article 8(1) of the Regulation and relevant guidance thereunder. Our disclosures are subject to change due to developments relating to, but not limited to, business practices, information availability, technology, standards, community expectations, and the Regulation itself.