



Dynamic Multi Fund

DUURZAAMHEIDSINFORMATIE

Precontractuele productinformatie voor financiële producten die ecologische of sociale kenmerken promoten

Productbenaming: Dynamic Multi Fund

Het Dynamic Multi Fund belegt voor 100% in SHELTER UCITS DYNAMIC MULTI SUSTAINABLE FUND, beheerd door Shelter Investment Management (ISIN-code: LU2439543393).

De ter beschikking gestelde informatie is opgemaakt op het niveau van het onderliggende fonds.

Identificatiecode voor juridische entiteiten (LEI): 529900UVBCD39GT3X913

Versie opgemaakt : 05/2023

De informatie over duurzaamheid die in dit document over het product is opgenomen, werd naar best vermogen opgesteld door Vivium. Hiervoor is Vivium echter afhankelijk van de informatie over de verschillende duurzaamheidsaspecten die door de vermogensbeheerders beschikbaar wordt gesteld. Evenwel, de wetgeving die verplicht om deze informatie ter beschikking te stellen, is pas op 1 januari 2023 in werking getreden. De informatie in dit document is bijgevolg opgesteld op basis van de informatie die reeds beschikbaar is en kan onvolledig zijn. Deze kan nog gewijzigd en/of aangevuld worden in de toekomst.

Template pre-contractual disclosure for the financial products referred to in Article 8, paragraphs 1, 2 and 2a, of Regulation (EU) 2019/2088 and Article 6, first paragraph, of Regulation (EU) 2020/852

Product name: **Shelter UCITS Dynamic Multi Sustainable Fund** Legal entity identifier: **254900KU8107UITEH745**

Environmental and/or social characteristics

Does this financial product have a sustainable investment objective?



Yes



No

- | | |
|---|---|
| <p><input type="checkbox"/> It will make a minimum of sustainable investments with an environmental objective: ___%</p> <ul style="list-style-type: none"> <input type="checkbox"/> in economic activities that qualify as environmentally sustainable under the EU Taxonomy <input type="checkbox"/> in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy <p><input type="checkbox"/> It will make a minimum of sustainable investments with a social objective: ___%</p> | <p><input checked="" type="checkbox"/> It promotes Environmental/Social (E/S) characteristics and while it does not have as its objective a sustainable investment, it will have a minimum proportion of 10% of sustainable investments</p> <ul style="list-style-type: none"> <input type="checkbox"/> with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy <input checked="" type="checkbox"/> with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy <input type="checkbox"/> with a social objective <p><input type="checkbox"/> It promotes E/S characteristics, but will not make any sustainable investments</p> |
|---|---|

Sustainable investment means an investment in an economic activity that contributes to an environmental or social objective, provided that the investment does not significantly harm any environmental or social objective and that the investee companies follow good governance practices.

The **EU Taxonomy** is a classification system laid down in Regulation (EU) 2020/852, establishing a list of **environmentally sustainable economic activities**. That Regulation does not lay down a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.



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

The Dynamic Multi Sustainable Fund is a Fund of Fund. The E/S characteristics promoted by this Fund of Fund are the following :

(1) The Fund of Fund will at least invest 75% in underlying funds that themselves have a sustainable objective or promote E/S characteristics as defined by Regulation (EU) 2019/2088 and it will at least invest 50% of its assets in underlying funds that themselves have a sustainable objective or promote E/S characteristics including a defined minimum of sustainable investments.

The Fund of Fund thus promotes a mix of environmental and social E/S characteristics derived from the different E/S characteristics promoted by the different underlying UCITS funds that it will be invested in.

The Fund of Fund does not directly define specific E/S characteristics that the underlying funds are required to promote and it may therefore invest in underlying funds that each promote different E/S characteristics as determined independently by each underlying fund (manager). The E/S characteristics of these underlying funds might include, depending on the underlying funds, resource-efficient operations, respect for human and labour right and the mitigation of climate impact.

(2) The Fund of Fund will also take into consideration the Morningstar® Low Carbon Designation™ when selecting the underlying funds (as will be explained infra). This means that the Fund of Fund promotes E/S characteristics as “low carbon scores” and “low fossil fuel emissions” as E/S characteristics directly.

(3) The Fund of Fund will also ensure that, on a look-through basis, a minimum exposure of 10% is achieved in sustainable investments (that contribute positively to one or more sustainable objectives, whilst at the same time observing do not significantly harm principles);

There is no specific reference benchmark designated for the purpose of attaining the environmental or social characteristics promoted by the Dynamic Multi Sustainable Fund.

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

- The Fund of Fund will firstly monitor and analyse different sustainability indicators provided by the underlying funds to measure the attainment of the E/S characteristics to the extent that these underlying funds qualify as funds that promote E/S characteristics or that have a sustainable investment objective.

To ensure that sustainability indicators to measure the E/S characteristics within these underlying funds are effectively available, the Fund of Fund

Sustainability indicators measure how the environmental or social characteristics promoted by the financial product are attained.

will at least invest 75% of its assets in underlying funds that themselves have (1) a sustainable objective; or (2) that promote E/S characteristics as defined by Regulation (EU) 2019/2088.

- The Fund of Fund will secondly also control the indicators in relation to the E/S characteristics of each of the underlying funds on the basis of the Morningstar® Low Carbon Designation™. Reference is made to the Morningstar Methodology Paper on Low Carbon Designation™ (<https://www.morningstar.com/research/signature>) for a more detailed explanation on the indicators. The indicators used are carbon intensity, fossil-fuel involvement, stranded assets exposure, mitigation strategies, and green solutions.

Using these sustainability indicators the Fund of Fund can monitor :

(1) the Morningstar® Portfolio Carbon Risk Score™ that measures the risk that the investee companies or issuers of an underlying fund face from the transition to a low-carbon economy. The Morningstar® Low Carbon Designation™ requires that the investee companies and issuers within the underlying funds are in general alignment with the transition to a low-carbon economy; and

(2) the Morningstar® Portfolio Fossil Fuel Involvement™ percentage that assesses the degree to which the portfolio of an underlying fund is exposed to thermal coal extraction and power generation, oil and gas production and power generation, and oil and gas products & services.

Fossil-fuel involvement is defined more broadly as an underlying fund portfolio's percentage exposure to companies or issuers that derive at least 5% of their revenue from thermal-coal extraction, thermal-coal power generation, oil and gas production, or oil and gas power generation, or 50% of their revenue from oil and gas products and services.

● ***What are the objectives of the sustainable investments that the financial product partially intends to make and how does the sustainable investment contribute to such objectives?***

The Fund of Fund itself intends to achieve a minimum of 10% (indirect) exposure to sustainable investments with either environmental or social objectives.

The objectives of these (indirect) sustainable investments in the Fund of Fund will be determined by the objectives that are set for the (portion of) the sustainable investments of the underlying funds (that either have themselves a specific sustainable investment objective or that promote E/S characteristics, with a minimum proportion in sustainable investments).

The Fund of Fund will therefore consider a variety of sustainable objectives related to their respective portions of investments considered sustainable investments by the underlying funds. These may include (1) **environmental sustainable objectives**: including Clean Water and Sanitation, Affordable & Clean Energy, Sustainable Cities and Communities, Responsible Consumption and Production, Climate Action, Life

Below Water, Life on Land; or (2) **social sustainable objectives**: including No Poverty, Zero Hunger, Good Health & Well-being, Quality Education, Gender Equality and/or Decent Work.

The way these sustainable investments effectively contribute to these objectives will have to be properly disclosed by the underlying funds that target sustainable investments and the contribution will be controlled and monitored by the Fund of Fund using the data provided by the underlying funds.

The Fund of Fund does not require that the sustainable investments achieved via the underlying funds qualify as environmentally sustainable under EU Taxonomy, although this is authorised.

This minimum proportion of 10% of sustainable investments indirectly made by the Fund of Fund is thus determined by:

(1) A look through the underlying funds with a sustainable objective and/or underlying funds that promote E/S characteristics and have a minimum proportion of sustainable investments and assessing that that such proportion of sustainable assets effectively contributes to a sustainable objective and does not significantly harm to any environmental or social sustainable objective (eventually limited in scope or analysis based on acceptable explanations by the investment manager of the underlying fund and taking into account the context of a incomplete and developing landscape in the data quality and availability).

(2) Adding up the percentage weight of each underlying fund that has sustainable investments times the percentage of the sustainable investments achieved by that relevant underlying fund and ensuring that, unless exceptional market circumstances and in the context of an incomplete and developing data landscape, such sum results in a percentage that is at least equal to 10% of the investments of the Fund of Fund.

How do the sustainable investments that the financial product partially intends to make, not cause significant harm to any environmental or social sustainable investment objective?

The Fund of Fund will invest in underlyings funds that will produce satisfactory precontractual information and regular disclosures regarding the compliance with “do not significantly harm to any environmental or social investment objectives” of the sustainable investments that they make.

The investment methodology and monitoring role of the Fund of Fund stipulates that the underlying funds that make sustainable investments have to ensure that these sustainable investments meet minimum social safeguards within their investment framework of investee companies, namely no violation against (1) the OECD Guidelines for Multinational Enterprises and (2) the UN Guiding Principles on Business and Human Rights.

The investment methodology and monitoring of the Fund of Fund furthermore stipulates that the underlying funds should target to report in a satisfactory and transparant manner on (different) principal adverse indicators (PAI’s) or other methodologies that they may use in the determination of the DNSH. It will also be

Principal adverse impacts are the most significant negative impacts of investment decisions on sustainability factors relating to environmental, social and employee matters, respect for human rights, anti-corruption and anti-bribery matters.

essential that the underlying funds provide an acceptable explanation why (certain) principal adverse indicators are not applied with regard to the determination of the DNSH of their sustainable investments. This investment methodology and monitoring by the Fund of Fund is subject to ongoing review, particularly as the availability, and quality, of the data evolves.

These do not significantly harm objectives on the level of the sustainable investments are monitored by the Fund of Fund on a regular basis.

– ***How have the indicators for adverse impacts on sustainability factors been taken into account?***

The Fund of Fund will, wherever possible in the context of an incomplete and developing data landscape, target and monitor that the underlying funds take into consideration the mandatory (and eventually additional) PAI's (or similar do not significantly harm parameters) as indicators for adverse impacts on sustainability factors.

This monitoring will at least be undertaken for the part of the investments that are considered as sustainable investments by the underlying funds that have a sustainable objective or by the underlying funds that promote E/S characteristics with a minimum proportion of sustainable investments.

– ***How are the sustainable investments aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights? Details:***

The Fund of Fund requires and monitors that the underlying funds that claim to make sustainable investments in investee companies or issuers, properly demonstrate that the investee companies and issuers they consider sustainable, are verified for not acting in violation of 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 identified in the Declaration of the International Labour Organisation on Fundamental Principles and Rights at Work and the International Bill of Human Rights.

The EU Taxonomy sets out a “do not significant harm” principle by which Taxonomy-aligned investments should not significantly harm EU Taxonomy objectives and is accompanied by specific EU criteria.

The “do no significant harm” principle applies only to those investments underlying the financial product that take into account the EU criteria for environmentally sustainable economic activities. The investments underlying the remaining portion of this financial product do not take into account the EU criteria for environmentally sustainable economic activities.



Does this financial product consider principal adverse impacts on sustainability factors?



Yes, the Fund of Fund considers principal adverse impacts (PAIs) on sustainability factors. Such PAI's are in a first stage in principle at least taken into account in relation to the investments in the underlying funds that have either a sustainable objective or that either promote E/S characteristics with a minimum proportion into sustainable investments.

The Fund of Fund targets that these underlying funds provide satisfactory information regarding their analysis of the adverse impacts on sustainability factors using PAI's:

(1) the Fund of Fund will in particular monitor the disclosures and where appropriate the use of proper thresholds on the level of the sustainable investments in corporates by the abovementioned underlying funds on the level of:

- PAI 1 & 3 - regarding GHG emissions and GHG Intensity.
- PAI 4 - Exposure to companies active in the fossil fuel sector.
- PAI 10 - Violations of UN Global Compact (UNGC) principles and Organisation for Economic Cooperation (OECD) Guidelines for Multinational Enterprises: Issuers with alleged or verified failures to respect established norms as well as severe or very severe controversies have to be excluded.
- PAI 14 - Exposure to controversial weapons (anti-personnel mines, cluster munitions, chemical weapons and biological weapons): Issuers with a verified ongoing involvement in chemical weapons, biological weapons, nuclear weapons, Depleted Uranium, nuclear weapons outside the Non-Proliferation Treaty, Cluster munitions or Anti-personnel mine.

(2) the Fund of Fund will in particular monitor the disclosures and where appropriate the use of proper thresholds on the level of the sustainable investments in nationals and supra-nationals by the abovementioned underlying funds regarding:

- PAI 15 - regarding GHG Intensity
- PAI 16 - countries subject to social violations

Relevant information on the consideration of PAI's will be disclosed pursuant to Article 11(2) of Regulation (EU) 2019/2088 in due course in the annual report of the Dynamic Multi Sustainable Fund of Fund.

The analysis by the Fund of Fund will be done taking into account the evolving landscape in terms quality and availability of data on PAI's.



No



The investment strategy guides investment decisions based on factors such as investment objectives and risk tolerance.

What investment strategy does this financial product follow?

The investment strategy of this Fund of Fund is to actively invest in collective investment undertakings which, in turn, invest mainly in different government and corporate bond markets and/or in the equity markets (including real estate investment trusts) and occasionally in other strategies such as alternative investments.

The Fund of Fund may also invest in money market funds and in certain transferable securities. The remaining investments may include individual stocks, bonds with underlying equity risk, derivatives and cash.

Generally, the Fund of Fund is only invested in UCITS Funds or in cash (on an ancillary basis) and this in accordance with the investment restrictions established in this Prospectus.

The core ESG investment strategy of the Fund of Fund is to organise this exposure to global equity and bond markets through investments in underlying funds that are managed by investment managers that are properly analysed and monitored by Shelter IM on the level of their ESG investment approach and on the level of their internal governance processes on the basis of data provided by these underlying funds and their managers.

Fund Managers that do not meet (1) proper standards in terms of ESG investment processes and reporting; or (2) internal governance safeguards, are excluded. This “ESG” monitoring of the underlying funds occurs on a regular basis by the Fund of Fund.

The Fund of Fund will take into account the Morningstar® Low Carbon Designation™ when selecting these underlying funds (as explained supra) and will respect certain minima in terms of investing in underlying funds that have a sustainable objective and underlying funds that promote E/S characteristics.

Finally the Fund of Fund will achieve a minimum of 10% indirect exposure to sustainable investments with a specific environmental objective (that do not need to qualify as environmentally sustainable under the EU Taxonomy).

● ***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 binding elements of the investment strategy used to select investments to attain the ESG characteristics promoted by the fund of fund are the following :

- The existence of Good Governance Practices screening criteria by the managers of the underlying fund on investee companies and issuers. Screening exclusions include involvement in verified or alleged governance relates violations such as fundamental human rights violations, fundamental labour rights violations (child labour, forced labour, labour standards, union rights, workplace discrimination and business malpractices (including bribery and money laundering);
- The requirement that minimum 75% of the investments of the Fund of Fund in the underlying funds are made in (1) funds that are aligned with E/S characteristics and are therefore funds with E/S characteristics (with or without sustainable investments) or (2) funds with a sustainable objective.

- The requirement that minimum 50 % of the investments of the Fund of Fund in the underlying funds are made in (1) funds that have themselves a clear sustainable investment objective or (2) funds that promote clear E/S characteristics, with a minimum proportion in sustainable investments.
- The requirement that an important percentage of the investments of the Fund of Fund is made in underlying funds that have a Morningstar® Low Carbon Designation™.
- The requirement that 10% or more of the (indirect) investments of the Fund of Fund are to be considered as sustainable investments as per article 2(17) or the Regulation EU 2019/2088 and that they contribute to one or more sustainable goals, respect DNSH and the overall safeguards. These indirect sustainable investments of the Fund of Fund within the underlying funds, do not need to qualify as sustainable investments under the EU Taxonomy.

● ***What is the committed minimum rate to reduce the scope of the investments considered prior to the application of that investment strategy?***

There is no committed minimum rate applicable and any indication could substantially change given the changes in relation to the landscape of ESG funds following the SFDR.

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

The policy of the Fund of Fund to assess good governance practices is three fold:

Firstly, the Fund of Fund will only invest in underlying funds that have themselves robust policies covering “good governance” requirements when they are selecting and investing in investee companies or issuers within the underlying fund.

Such policies of the underlying funds have to include controls on verified or alleged failures to respect established norms related to eg bribery, accounting disclosure/standards, anti-competitive behavior, money laundering, taxes, child labor, forced labor, union rights, workplace discrimination and labor standards.

The requirement to have such robust policies also applies for the underlying funds that do not promote any E/S characteristics or do not have a sustainable investment objective.

Secondly, the Fund of Fund will exclude underlying funds where the manager might not follow good governance himself and have exposure to controversial business areas or controversial business practices (including business malpractice, controversial human rights and labour rights).

Thirdly, each underlying Fund manager undergoes a regular screening against a series of sanction lists as provided by the Luxembourg data provider KYC3. Appearance on such sanctions list leads to additional controls and in most cases to exclusion.

Good governance practices include sound management structures, employee relations, remuneration of staff and tax compliance.

The Fund of Fund will thus apply the requirement of sound corporate governance throughout the portfolio's of each selected underlying fund and on the level of the underlying funds themselves, and this will be monitored on a regular basis.



What is the asset allocation planned for this financial product?

Asset allocation describes the share of investments in specific assets.

Taxonomy-aligned activities are expressed as a share of:

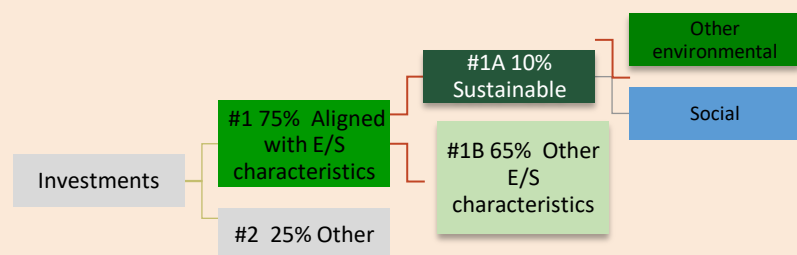
- **turnover** reflecting the share of revenue from green activities of investee companies
- **capital expenditure** (CapEx) showing the green investments made by investee companies, e.g. for a transition to a green economy.
- **operational expenditure** (OpEx) reflecting green operational activities of investee companies.

The Fund of Fund will not invest more than 25% of its assets in underlying funds that are not aligned with E/S characteristics. This means that at least 75% of the underlying funds are aligned with E/S characteristics and are funds with E/S characteristics (with or without sustainable investments) or funds with a sustainable objective.

The Fund of Fund furthermore requires an exposure of at least 50% to underlying funds that either (1) have themselves a clear sustainable investment objective or (2) either themselves promote clear E/S characteristics, with a minimum proportion in sustainable investments.

The Fund of Fund also promotes directly E/S characteristics and requires that a minimum proportion of 10% of its (indirect) investments are sustainable investments as per article 2(17) or the Regulation EU 2019/2088.

This minimum proportion of sustainable investments is to be achieved by looking through the investments in the underlying funds and monitor the sustainable investments in funds with a sustainable objective and/or sustainable investments in underlying funds with a minimum proportion of sustainable investments and controlling that such sustainable assets effectively contribute to a sustainable objective, respect do not significantly harm criteria and overall safeguards in terms of good governance practices. These indirect sustainable investments of the Fund of Fund within the underlying funds, do not need to qualify as sustainable investments under the EU Taxonomy.



#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.

The category **#1 Aligned with E/S characteristics** covers:

- The sub-category **#1A Sustainable** covers sustainable investments with environmental or social objectives.
- The sub-category **#1B Other E/S characteristics** covers investments aligned with the environmental or social characteristics that do not qualify as sustainable investments.

The Fund of Fund can invest maximum 25% in underlying funds that do not promote E/S characteristics. Minimum governance requirements also apply for these investments.

● ***How does the use of derivatives attain the environmental or social characteristics promoted by the financial product?***

There is no use of derivatives intended in this Fund of Fund.

● **To what minimum extent are sustainable investments with an environmental objective aligned with the EU Taxonomy?**

There is no alignment minimum extent for sustainable investments with an environmental objective to be aligned with EU Taxonomy is deemed to be 0%.

At the date of this prospectus, it is not yet possible to commit to the Fund of Fund maintaining a minimum alignment with the Taxonomy, as the Investment Manager is not a position to accurately determine to what extent the Underlying Fund's investments are in taxonomy-aligned environmentally sustainable activities.

However it is possible that the Fund of Fund will invest in investee companies and economic activities that contribute to the environmental objectives of climate change mitigation and climate change adaptation within the meaning of the Taxonomy. In future it is therefore possible that the Fund of Fund will assess and report on the extent to which its underlying investments are in economic activities that qualify as environmentally sustainable under the Taxonomy, along with information relating to the proportion of enabling and transitional activities.

This Prospectus will be updated once it is possible in the Investment Manager's opinion to accurately disclose to what extent the Fund of Fund's investments are in Taxonomy-aligned environmentally sustainable activities.

Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU taxonomy¹?

- Yes:
- In fossil gas In nuclear energy
- No

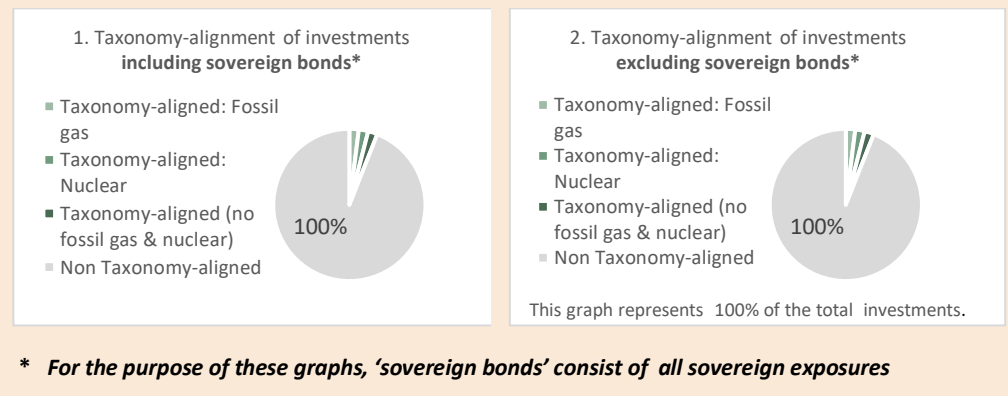
To comply with the EU Taxonomy, the criteria for **fossil gas** include limitations on emissions and switching to renewable power or low-carbon fuels by the end of 2035. For **nuclear energy**, the criteria include comprehensive safety and waste management rules.

Enabling activities directly enable other activities to make a substantial contribution to an environmental objective.

Transitional activities are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.

¹ Fossil gas/and or nuclear related activities will only comply with the EU Taxonomy where they contribute to limiting climate change ("climate change mitigation") and do not significantly harm any EU Taxonomy objective – see explanatory note in the left hand margin. The full criteria for fossil gas and nuclear energy economic activities that comply with the EU Taxonomy are laid down in Commission Delegated Regulation (EU) 2022/1214.

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.



What is the minimum share of investments in transitional and enabling activities?

There is no alignment with the EU Taxonomy therefore the minimum share of investments in transitional and enabling activities is currently at 0%.

At the date of this prospectus, it is not yet possible to commit to the Fund of Fund maintaining a minimum alignment with the Taxonomy, as the Investment Manager is not a position to accurately determine to what extent the Fund of Fund’s investments are in taxonomy-aligned environmentally sustainable activities.

However it is expected that the Fund of Fund invests in underlying funds that invest in investee companies and issuers that have activities that contribute to the environmental objectives of climate change mitigation and climate change adaptation within the meaning of the Taxonomy. In the future it is expected that the Fund of Fund will assess and report on the extent to which the underlying funds are in economic activities that qualify as environmentally sustainable under the Taxonomy, along with information relating to the proportion of enabling and transitional activities.

This Prospectus will be updated once it is possible in the Investment Manager’s opinion to accurately disclose to what extent the Fund of Fund’s investments are in Taxonomy-aligned environmentally sustainable activities.



are sustainable investments with an environmental objective that **do not take into account the criteria** for environmentally sustainable economic activities under the EU Taxonomy.



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

There is no minimum share of sustainable investments with an environmental objective that are not in alignment with the EU Taxonomy as the Fund of Fund does not provide for mandatory proportions between the environmental or social objectives of sustainable investments. We are of the opinion that at least 1% will belong to the environmental bucket.



What is the minimum share of socially sustainable investments?

There is no minimum share of socially sustainable investments defined as the Fund of Fund does not provide for mandatory proportions between the environmental or social objectives of sustainable investments.



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

Investments in the category “#2 Other” will not exceed 25% of the total portfolio of the Fund of Fund. The category “#2 Other” will in normal circumstances contain:

- Ancillary cash on account with the depositary bank; and/or
- Underlying funds that do not promote E/S characteristics but that are considered important for specific exposure or risk distribution.

The Fund of Fund will only invest in underlying funds that have policies that include “good governance” requirements regarding investee companies or issuers in the underlying fund. Such policies have to include robust controls on verified or alleged failures to respect established norms related to bribery, accounting disclosure/standards, anti-competitive behavior, money laundering, taxes, child labor, forced labor, union rights, workplace discrimination and labor standards.

The Fund of Fund will exclude underlying funds where the manager might not follow good governance himself and have exposure to controversial business areas or controversial business practices (including business malpractice, controversial human rights and labour rights).

Each underlying Fund manager undergoes a regular screening against a series of sanction lists as provided by the Luxembourg data provider KYC3. Appearance on such sanctions list leads to additional controls and in most cases to exclusion.



Is a specific index designated as a reference benchmark to determine whether this financial product is aligned with the environmental and/or social characteristics that it promotes?

Not applicable.

Reference benchmarks are indexes to measure whether the financial product attains the environmental or social characteristics that they promote.

Reference benchmarks are indexes to measure whether the financial product attains the environmental or social characteristics that they promote.

- ***How is the reference benchmark continuously aligned with each of the environmental or social characteristics promoted by the financial product?***

Not applicable.

- ***How is the alignment of the investment strategy with the methodology of the index ensured on a continuous basis?***

Not applicable.

- ***How does the designated index differ from a relevant broad market index?***

Not applicable.

- ***Where can the methodology used for the calculation of the designated index be found?***

Not applicable.



Where can I find more product specific information online?

More product-specific information can be found on the website: www.shelter-im.com/sustainability-related-disclosures

