

WEBSITE DISCLOSURE OF A FUND THAT PROMOTES E/S CHARACTERISTICS

In accordance with Article 10 of Regulation (EU) 2019/2088

Fund Name:

Alpha Cosmos Stars USA Equity Fund of Funds

SFDR Classification: Article 8

Legal Entity Identifier: 213800YZMTL37TWQMR85

Share Class	ISIN
Classic	GRF000227006
Institutional	GRF000228004

This document provides the investor with detailed information about the Fund required under Article 10 of Regulation (EU) 2019/2088 on sustainability-related disclosures in the financial services sector (Sustainable Finance Disclosure Regulation - “SFDR”) for financial products that promote environmental and/or social characteristics and qualify as products in accordance with Article 8 of the SFDR.

(a) Summary

Alpha Cosmos Stars USA Equity Fund of Funds (the “Fund”) promotes environmental or social characteristics but does not have as its objective sustainable investment. The characteristics promoted consist of investing in underlying funds with excellent Environmental, Social and Governance (ESG) ratings, while excluding underlying funds with lagging performance in terms of ESG ratings.

As part of its investment strategy, the Fund applies certain ESG criteria in order to define an eligible universe of underlying funds that has leading ESG ratings and tilt the portfolio in favour of strong sustainability performers. This is mainly implemented through a combination of exclusion/negative screening and positive/best-in-class screening at the “asset manager” and “underlying fund” level.

At the “asset manager” level, the investment team aims to identify ESG quality and accountability in asset managers’ processes and investment culture. More specifically, the Fund selects underlying funds managed by asset managers that are UN Principles for Responsible Investment (PRI) signatories.

At the “underlying fund” level, the resilience of underlying funds to long-term risks and opportunities arising from ESG issues is measured by their MSCI ESG Fund rating. In order to meet the environmental and/or social characteristics promoted, the Fund invests at least 60% of its total assets in underlying funds with leading ESG ratings, meaning having an MSCI ESG Fund rating of AAA, AA or A. Funds with a MSCI ESG Fund rating of BBB or BB account for no more than 40% of the Fund’s total assets, while funds with a MSCI ESG Fund rating of B or CCC are excluded. Non ESG-rated funds account for no more than 10% of the Fund’s total assets.



The environmental or social characteristics and the sustainability indicators used to measure their attainment are monitored on an ongoing basis, including pre-trade and post-trade checks, weekly reviews, and annual reviews.

The Management Company uses MSCI ESG Fund ratings, scores and metrics, sourced from MSCI Inc.'s subsidiary, MSCI ESG Research, to attain the ESG characteristics promoted by the Fund. MSCI ESG Research is a recognized independent provider of ESG data, reports and ratings based on published methodologies and available to clients on a subscription basis. MSCI ESG Fund ratings and scores are derived from MSCI ESG Manager platform, which also offers access to over 200 ESG-related fund metrics. The Management Company does not currently estimate any ESG ratings, scores or metrics.

MSCI ESG Fund ratings, scores and metrics will only be based upon covered holdings in an underlying fund. As a result, they may not fully represent an underlying fund's ESG performance in case of a potential lack of coverage. In order to mitigate this risk, the investment team ensures that the underlying funds' ESG issuer coverage is relatively high.

Due diligence is carried out on external asset managers and underlying funds that have passed the initial screening phase. The investment team targets high level of accountability in external asset managers' ESG processes and investment culture. The due diligence process targets a clear understanding of their responsible investment offering, ESG style applied and research capabilities. At the product level, the investment team performs qualitative and quantitative assessment of underlying funds, incorporating ESG characteristics. Emphasis is placed on the level of commitment to the strategy and how the investment process relates to sustainable investing.

Since the Fund invests primarily in externally managed funds, no engagement policies are implemented at the issuer (i.e. underlying funds' holdings) level. However, as part of the due diligence carried out on external asset managers, the investment team evaluates the engagement policies implemented by them.

Incorporation of ESG criteria in the Fund's investment strategy is not implemented with a reference to its benchmark or a designated index, sustainability index or mainstream index.

(b) No sustainable investment objective

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

(c) Environmental or social characteristics of the financial product

The Fund is managed by Alpha Asset Management M.F.M.C. (the "Management Company") in accordance with its ESG policy.

The Fund invests primarily in units of externally managed UCITS and/or other UCIs, including ETFs ("underlying funds"). The characteristics promoted by this Fund consist of investing in underlying funds with excellent Environmental, Social and Governance (ESG) ratings, while excluding underlying funds with lagging performance in terms of ESG ratings. Highly rated underlying funds consist of issuers with leading or improving management of key ESG risks.

As part of its investment strategy, the Fund applies certain Environmental, Social, and Governance (ESG) criteria in order to define an eligible universe of underlying funds that has leading ESG ratings and tilt the portfolio in favour of strong sustainability performers. This is mainly implemented

through a combination of exclusion/negative screening and positive/best-in-class screening at the “asset manager” and “underlying fund” level.

(d) Investment strategy

The Fund actively integrates ESG criteria on a continuous basis. The methodology considers the following elements depending on the extent to which investments are expected to contribute to the promoted ESG characteristics:

- negative screening (exclusion criteria): (i) asset manager level, (ii) underlying funds level;
- positive screening: best-in-class MSCI ESG Fund rating at underlying funds level.

For further details on the above approaches and the binding elements used to select the investments to attain the ESG characteristics of the Fund please refer to section (g) below.

Underlying funds that are held by the Fund but become restricted according to the above exclusion criteria (i.e. MSCI ESG Fund rating of B or CCC) after they are acquired for the Fund will be sold. Such sales will take place over a time period to be determined by the Management Company, taking into account the best interests of the unitholders of the Fund.

The Fund considers good governance as part of the investment decision making process. Good governance practices are taken into account qualitatively and quantitatively in the process. As such, at the “underlying fund” level, MSCI uses a scoring model which includes aspects of corporate governance. More specifically, MSCI provides corporate governance research and data on approximately 10,000 public companies worldwide. Its model is based on a set of unique metrics organized into four individual scoring Key Issues (Ownership & Control, Board, Pay and Accounting). The Key Issues include considerations regarding, but not limited to, board independence and diversity, pay performance alignment, non-executive director pay, ownership structure, control mechanisms, shareholder rights, and auditor independence. Input data is collected and reviewed on an ongoing basis throughout the year, automatically updating the key metrics that drive overall assessments and scores.

(e) Proportion of investments

The Fund invests primarily (meaning at least 65% of its total assets) in units of externally managed UCITS and/or other UCIs, including ETFs (“underlying funds”).

The proportion of investments aligned with the environmental or social characteristics promoted by the Fund amount to at least 80%.

Investments	Min	Max
#1 Aligned with E/S characteristics	80%	100%
#2 Other	0%	20%

The Fund does not use derivative instruments to attain the environmental or social characteristics promoted.

Investments in category “#2 Other” are limited to 20% of the Fund’s total assets and include:

- (i) non-ESG rated funds up to 10% of its total assets,
- (ii) deposits with credit institutions and/or money market instruments, as a liquidity cushion in active portfolio management, depending on market conditions,
- (iii) derivative instruments for the purpose of achieving the Fund's investment objective or for hedging purposes.

The Fund will not invest in money market instruments issued by corporate or sovereign issuers with an issuer MSCI ESG rating of B or CCC. Therefore, the Fund will exclude issuers with lagging ESG performance, based on MSCI's seven-point scale from AAA (best) to CCC (worst).

(f) Monitoring of environmental or social characteristics

The environmental or social characteristics and the sustainability indicators used to measure their attainment are monitored on an ongoing basis. Specifically, the investment team is conducting a weekly review, as well as pre-trade and post-trade checks, to determine compliance with the binding elements used to select the investments to attain the ESG characteristics of the Fund. The process includes a review of potential changes in underlying funds' MSCI ESG Fund ratings. In addition, the investment team verifies via the PRI portal that the asset managers of the underlying funds remain PRI signatories, while it monitors their PRI assessment scores, where available.

MSCI ESG Fund ratings are derived from MSCI ESG Manager platform and are based on monthly underlying fund holdings (provided by Refinitiv Lipper) and the most current MSCI ESG Research corporate or sovereign issuer data. MSCI monitors corporate issuers on a systematic and ongoing basis, including daily monitoring of controversies and governance events. New information is reflected in reports on a weekly basis and significant changes to scores trigger a full analyst review and re-rating. Companies also receive an in-depth review, typically annually. Regarding sovereign issuers, MSCI updates ESG Government ratings annually. MSCI ESG Research also tracks high-impact global events and incorporates the impact of such events in ESG Government ratings on a monthly basis.

(g) Methodologies

The Fund uses the following sustainability indicators, through a combination of exclusion/negative screening and positive/best in class screening, to measure how the social or environmental characteristics promoted by the financial product are met:

- at the “**asset manager**” level: the ESG policy aims to identify ESG quality and accountability in asset managers' processes and investment culture. More specifically, the Fund selects underlying funds managed by asset managers that are UN Principles for Responsible Investment (PRI) signatories. Asset managers who participate in the PRI recognise that the implementation of the Principles for Responsible Investment can help to better align investors' interests with the broader goals of society, and commit to incorporating ESG criteria into their investment analysis, investment decision-making processes, and ownership policies and practices. The PRI conducts an annual assessment to measure and understand the progress made by signatories in implementing and improving their responsible investment practices. For further details on the PRI please refer to <https://www.unpri.org/>.
- at the “**underlying fund**” level: the resilience of underlying funds to long-term risks and opportunities arising from ESG issues is measured by their MSCI ESG Fund rating. The MSCI ESG



Fund rating is designed to assess the resilience of a fund's aggregate holdings to long-term ESG risks, with an intuitive seven-point scale from AAA (best) to CCC (worst) and a diverse set of ESG exposure categories.

The Fund invests at least 60% of its total assets in underlying funds with a MSCI ESG Fund rating of AAA, AA or A. Funds with a MSCI ESG Fund rating of BBB or BB account for no more than 40% of the Fund's total assets, while funds with a MSCI ESG Fund rating of B or CCC are excluded. Non ESG-rated funds account for no more than 10% of the Fund's total assets.



Highly rated funds consist of issuers with leading or improving management of key ESG risks. MSCI ESG Fund Rating is based on a "Fund ESG Quality Score", measured on a scale of 0 (worst) to 10 (best), which aggregates issuer-level ESG scores on underlying factors in three pillars: Environmental, Social, and Governance.

For corporate issuers, issuer-level ESG scores aim to measure a company's resilience to long-term, financially relevant ESG risks. More specifically, the MSCI ESG Ratings model seeks to answer the following key questions about companies:

- What are the most significant ESG risks and opportunities facing a company and its industry?
- How exposed is the company to those key risks and/or opportunities?
- How well is the company managing key risks and opportunities?
- What is the overall picture for the company and how does it compare to its global industry peers?

For sovereign issuers, issuer-level ESG scores identify a country's exposure to and management of environmental, social, and governance (ESG) risk factors, and explain how these factors might impact the long-term sustainability of its economy. More specifically, the MSCI ESG Ratings model seeks to answer the following key questions about countries:

- What ESG risks are countries exposed to based on their natural, financial, and social resource availability and their political governance structures?
- How does the country being rated actually manage and enable its resources?
- Is that country's management and performance commensurate with its ESG risk exposure?

For further details on the MSCI ESG Fund Ratings methodology please refer to <https://www.msci.com/esg-fund-ratings>.

(h) Data sources and processing

The Management Company uses MSCI ESG Fund ratings, scores and metrics, sourced from MSCI Inc.'s subsidiary, MSCI ESG Research, to attain the ESG characteristics promoted by the Fund. MSCI ESG Research is a recognized independent provider of ESG data, reports and ratings based on published methodologies and available to clients on a subscription basis. The process applied by MSCI ESG Research includes multiple steps to review the quality of the analysis as well as the consistency with approved methodology and the ratings signal. Formal in-depth quality-review processes take place at each stage of analysis, including automated and manual quality checks of data, oversight of ratings and reports by industry leads and regional team leads.



MSCI ESG Fund ratings and scores are derived from MSCI ESG Manager platform, which also offers access to over 200 ESG-related fund metrics, organized under three themes: Sustainable Impact, Values Alignment, and ESG Risks. The Management Company does not currently estimate any ESG ratings, scores or metrics.

(i) Limitations to methodologies and data

The methodologies used by the investment team rely mainly on ratings, scores and metrics provided by MSCI ESG Research, which collects and standardizes a wide range of publicly available data from both company-reported and alternative sources. The main limitations are related to the availability of data (as some companies may not report the relevant information), quality of data (as there are no universal standards related to ESG information and third-party verification is not systematic), and the comparability of data (as not all companies publish the same indicators). Where there is a lack of available data, MSCI ESG Research may provide estimates based on their proprietary methodologies that may be subjective. MSCI ESG Research regularly updates and improves its methodologies and processes to ensure accurate assessment of an investment's ESG risks.

MSCI ESG Fund ratings, scores and metrics will only be based upon covered holdings in an underlying fund. As a result, they may not fully represent an underlying fund's ESG performance in case of a potential lack of coverage. In order to mitigate this risk, the investment team ensures that the underlying funds' ESG issuer coverage is relatively high.

(j) Due diligence

Due diligence is carried out on external asset managers and underlying funds that have passed the initial screening phase described in section (g) above. In accordance with the Management Company's ESG policy, the investment team targets high level of accountability in external asset managers' ESG processes and investment culture. The due diligence process targets a clear understanding of their responsible investment offering, ESG style applied and research capabilities. At the product level, the investment team performs qualitative and quantitative assessment of underlying funds, incorporating ESG characteristics. Emphasis is placed on the level of commitment to the strategy and how the investment process relates to sustainable investing. The investment team evaluates underlying funds based on their ESG quality score, ESG pillar scores and metrics, ESG issuer coverage, exposure to ESG leaders & laggards, carbon intensity, and values alignment exposure (controversial business involvement, global norms violations). It will also consider the underlying funds' SFDR classification.

(k) Engagement policies

Since the Fund invests primarily in externally managed funds, no engagement policies are implemented at the issuer (i.e. underlying funds' holdings) level. However, as part of the due diligence carried out on external asset managers, the investment team evaluates the engagement policies implemented by them.

(l) Designated reference benchmark

Incorporation of ESG criteria in the Fund's investment strategy is not implemented with a reference to its benchmark or a designated index, sustainability index or mainstream index.