



INFORMATION ACCORDING TO ARTICLE 10 OF REGULATION (EU) 2019/2088 ON SUSTAINABILITY-RELATED DISCLOSURES IN THE FINANCIAL SERVICES SECTOR

This document provides information required under Article 10 of Regulation (EU) 2019/2088 (“SFDR”) for financial products that promote environmental and social characteristics and qualify as products in accordance with article 8 of SFDR.

Information applies to the following Sub-Funds, managed by Alpha Asset Management M.F.M.C.:

| Sub-Fund Name | Share Class | ISIN |
|--------------------------------------|-------------|--------------|
| Alpha (LUX) Global Defensive ESG FoF | EUR | LU1544316919 |
| | EUR I | LU1508358873 |
| Alpha (LUX) Global Balanced ESG FoF | EUR | LU1544317131 |
| | EUR I | LU1508359095 |
| Alpha (LUX) Global Themes ESG FoF | EUR | LU1913447311 |
| | EUR I | LU1913447238 |

The above Sub-Funds invest primarily in units of UCITS and/or other UCIs, including ETFs (“underlying funds” or “third party funds”). Alpha Asset Management M.F.M.C. has developed an internal ESG assessment framework in selecting and monitoring investments in underlying funds, as outlined in its Environmental, Social and Governance (ESG) Policy. The Sub-Funds select underlying funds that are managed by asset managers that are UN PRI signatories and demonstrate a certain level of accountability in their ESG processes and investment culture. The Sub-Funds employ a 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 ESG Integration Framework is based on the following pillars:

Pillar 1 - Idea Generation: Identify key sustainability trends and ESG issues that play important role in the economic environment and investable universe.

Pillar 2 - ESG Due Diligence: Assessment of asset managers' ESG process and culture. We screen asset managers in terms of PRI Signatory and PRI Assessment Score awarded for their approach to responsible investing. We review their Responsible Investment offering, ESG strategies covered and research capabilities.

Pillar 3 - Fund Selection and Monitoring: Perform qualitative and quantitative analysis of third-party funds incorporating ESG characteristics. Monitor ESG credentials and strategy consistency.

Pillar 4 - Portfolio Allocation: Construct a portfolio that offers an attractive risk/reward ratio and in addition creates positive social and environment outcomes.

Pillar 5 - Active Ownership: Engage with portfolio managers to address material ESG risk and opportunities. Understand the level of commitment to the strategy, how the investment process relates to sustainable investing and how specific issues are being addressed.

As part of their investment strategy, the Sub-Funds apply 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 strategy aims to identify ESG quality and accountability in asset managers’ processes and investment culture. More specifically, the Sub-Funds select underlying funds managed by asset managers that are UN Principles for Responsible Investments (PRI) signatories and in their most recent Principles for Responsible Investment (PRI) assessment have received a module score for their overall approach to responsible investment that puts them at or above the median score of their relevant peer group. The PRI conducts the assessment every year to measure and understand the progress made by its signatories to implement and improve their responsible investment practices. For further details on the PRI Assessment methodology please refer to <https://www.unpri.org/reporting-and-assessment/how-investors-are-assessed-on-their-reporting/3066.article>.
- At the “underlying fund” level, the Sub-Funds invest at least 60% of their 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 Sub-Funds’ 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 Sub-Funds’ total assets. MSCI ESG Fund Rating is designed to assess the resilience of a fund’s aggregate holdings to long-term ESG risks, with an intuitive AAA-CCC rating and a diverse set of ESG exposure categories. Highly rated funds consist of issuers with leading or improving management of key ESG risks. For further details on the MSCI ESG Fund Ratings methodology please refer to <https://www.msci.com/esg-fund-ratings>.

We apply ESG criteria as defined by ESG data provider, *MSCI Inc.*, and use the following tools and systems to screen underlying mutual funds in terms of ESG performance: *MSCI ESG Manager*, *Bloomberg Professional Services*, Fund of Funds Division’s proprietary third-party fund database and scoring methodology.

The ESG framework will evolve over time as improved data and more research becomes available.