

APPENDIX C – SFDR Disclosures

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

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 include a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

Product name: Gematigd Offensief
Legal entity identifier: 254900AADFUF3BC5LH35

Environmental and/or social characteristics

Does this financial product have a sustainable investment objective?	
<input checked="" type="radio"/> <input type="radio"/> Yes	<input type="radio"/> <input checked="" type="radio"/> No
<input type="checkbox"/> It will make a minimum of sustainable investments with an environmental objective: ___% <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 	<input type="checkbox"/> This product 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 ___% of sustainable investments <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 type="checkbox"/> with an environmental objective in economic activities that does not qualify as environmentally sustainable under the EU Taxonomy <input type="checkbox"/> with a social objective
<input type="checkbox"/> It will make a minimum of sustainable investments with a social objective: ___%	<input checked="" type="checkbox"/> It promotes E/S characteristics, but will not make any sustainable investments



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

- The following environmental and social characteristics are promoted by the Fund Limit investments in companies that do not comply with internationally recognised standards on human rights, labour rights, the environment and anti-corruption.
- Limit investments in companies involved in controversial weapons (anti-personnel mines, biological weapons, chemical weapons, cluster munitions, depleted uranium, white phosphorus and nuclear weapons, when these are emitters linked to countries that are not signatories to the Non-Proliferation Treaty (NPT)) are restricted.
- Limit investment in countries subject to European Union (EU) arms embargoes.

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

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

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

The Fund uses the following sustainability indicators to measure the attainment of each of the environmental and social characteristics promoted by the financial product:

- Investee companies that do not respect the United Nations Global Compact principles.
- Involvement of investee companies in controversial weapons.
- Countries subject to EU arms embargoes.

These sustainability indicators are measured in the form of a percentage of investments.

● **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?**

Not applicable.

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.

● **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?**

Not applicable.

How do sustainable investments not cause significant harm to any environmental or social sustainable investment objective?

Not applicable.

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

Not applicable.

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.

Any other sustainable investments must also not significantly harm any environmental or social objectives.



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

Yes, the Fund takes into account the main negative impacts on sustainability factors through a combination of methods. The exclusions allow the Fund to avoid a range of negative impacts in advance, as the exclusion criteria relate to areas where the negative impacts are deemed too high for this Fund to invest in. In addition, for the investments it makes, the financial product aims to further mitigate or reduce adverse effects through structured engagement with issuers (where possible and feasible) and voting (where possible and feasible). Please see to the Active Shareholder Policy (<https://www.insingergilissen.nl/aanvullende-beleidsdocumenten>) for more information on voting and engagement for direct line investments. In addition, where possible and practicable, where the Fund invests in funds, these funds must commit to addressing key negative impacts and must have a formal policy on how they address key negative impacts on sustainability factors. Information on how the fund has addressed key negative impacts on sustainability factors is published in the Fund's annual report.

No



What investment strategy does this financial product follow?

The Fund offers investors the opportunity to participate in a diversified portfolio of investments in the global bond and equity markets, real estate, alternative investments and liquidity tradable in regulated and other markets. The Fund is designed to provide investors the highest possible growth in invested capital combined with broad risk diversification. The Delegated Portfolio Manager determines the weightings of the different asset classes in line with the risk profile of the financial product. Exposure to financial markets is achieved through investment funds and direct investments such as equities, real estate, alternative investments and bonds. The Delegated Portfolio Manager may decide to invest liquidity in money market funds to maximise returns on liquidity. However, there is a risk in the short term due to volatility resulting from uncertainty about economic growth or investor confidence, for example, that investments in the financial product may be worth less than the amount initially invested.

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

The Delegated Portfolio Manager will pursue an active investment policy with regard to asset allocation, maturities and currency risk, in line with the portfolio's risk profile, in order to achieve the objective of the financial product.

Risk profile

The Fund is a moderately offensive fund. This means that the Fund may invest in funds and/or directly in equities, real estate, alternative investments and bonds under the condition that the underlying exposure of the financial product's total assets in the different asset classes varies within the ranges below:

Asset class	Min	Max
Equities	30%	80%
Real Estate	0%	10%
Combined limit		80%
Investment grade bonds	0%	50%
Non-investment grade bonds	0%	10%
Non-traditional bonds	0%	10%
Combined limit		50%
Alternative investments	0%	20%
Liquidity	0%	30%

For purposes of monitoring the above ranges, each investment of the Fund is assigned to one of the above asset classes.

The Fund integrates the following environmental and social criteria into the investment process:

1. For direct line investments:
 - a. Exclusion of investments on the basis of the exclusion criteria that apply to the Fund. The exclusion criteria are as follows; shares and bonds issued by companies directly or indirectly involved in controversial weapons, bonds issued by countries under an EU arms embargo, shares and bonds issued by companies deriving more than 10% of their revenues from the extraction of thermal coal or the production of electricity from thermal coal (>10% of their revenues), shares and bonds issued by companies which are in non-compliance with the principles of the UN Global Compact, where engagement is not or no longer possible with the company.
 - b. Exclusion of investments as part of the portfolio construction process requirements that apply to the Fund. The Delegated Portfolio Manager has

4

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developed additional criteria for investments with ESG factors in the portfolio construction process, applying to all direct lines:

- Product and service sustainability score greater than or equal to 3 (internal methodology)
- Severe controversy level less than or equal to 3 (score established by an external data provider, scale from 0 to 5, 5 being severe controversies)
- Most material ESG score: equal to or greater than 2 (internal methodology establishing the most material ESG factors by industry, scale of 0 to 5, with zero representing very severe risk)
- Limitation of investments in companies with revenues above a predefined threshold in activities (products and services) deemed controversial by the manager.

- c. Dialogue with companies as part of the policy of engagement on environmental and social issues. In order to have a greater impact, the Delegated Portfolio Manager has established a partnership with an external provider specialised in engagement. This partner pays special attention to companies that are in violation of the UNGC or that are involved in severe controversies. In parallel, the Delegated Portfolio Manager also engages with fund managers.
- d. Proxy voting at shareholder meetings, including on environmental and social issues.

2. For investments in funds:

The funds in which the Fund invests are subject to an extensive due diligence process in various areas. This includes the robustness of the investment process, the people responsible for the strategy, the risk-adjusted return characteristics, the asset manager and the sustainability practices of the fund. A five-pillar approach is used to assess the funds' sustainability practices and commitments. The five pillars are intentionality, portfolio characteristics, research, active ownership and transparency. For more information, please see the link to the website in the last section of this document.

● ***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 Fund has the following binding elements:

- 1. For direct line investments:
 - a. The exclusion criteria applicable to all direct line investments.
 - b. All direct line investments in companies must comply with the principles of the UN Global Compact. Should this not be the case, discussions must be held with the companies concerned.
- 2. For funds:

- 3. Funds should have an active ownership policy with respect to investments in companies, where possible and feasible, i.e. voting activities and engagement practices for equities, and engagement for corporate bonds.

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

Not applicable.

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

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

Investments in companies should respect good governance practices. Specifically, companies should not be involved in serious controversies related to accounting and, taxation, corporate governance, business ethics and labour relations. This is assessed at the company level. Where good governance practices are not taken into account by the index providers in the construction of the index, they are assessed by the Delegated Portfolio Manager on the basis of data and research evidence provided by a specialist company.

For investments in funds, the underlying investee companies must also follow good governance practices. Where a fund does not have a formal good governance policy, the fund's holdings are assessed at company level to determine whether the companies in which it invests do in fact follow good governance practices.



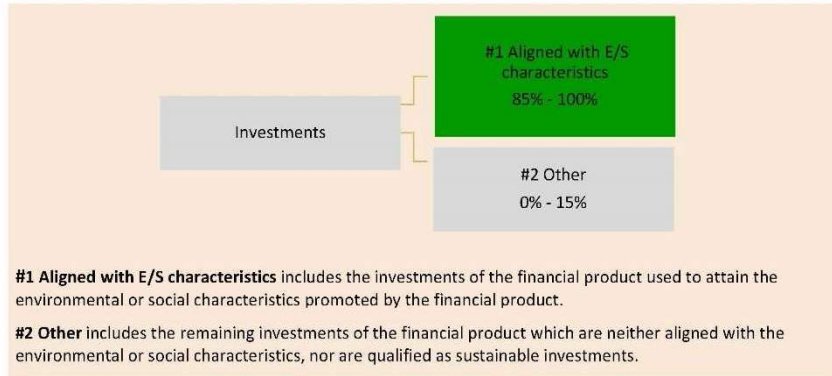
What is the asset allocation planned for this financial product?

Asset allocation describes the share of investments in specific assets.

At least 85% of the investments must be consistent with the environmental and social characteristics of the Fund. The balance of investments is used for diversification and hedging purposes and held as cash for additional liquidity. There is no target for a minimum share of sustainable investments for this Fund.

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



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

Not applicable.



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

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.

The minimum share of sustainable investments with an environmental objective aligned with the EU Taxonomy is 0%.

Where the Fund invests in environmentally sustainable economic activities aligned with the EU taxonomy, this is determined on the basis of the information disclosed by the recipient companies on their economic activities aligned with the EU taxonomy, in relation to the company's revenues. When information on the extent to which investments are part of economic activities aligned with the EU taxonomy is not directly available in the public information provided by the beneficiary companies, the Fund does its best to collect the data declared by the beneficiary companies. The Fund does not rely in its taxonomic alignment statements on equivalent information based on complementary evaluations and estimates. Indeed, at present, a significant degree of estimation would be required, which would hinder the objective of producing a prudent result based on equivalent information.

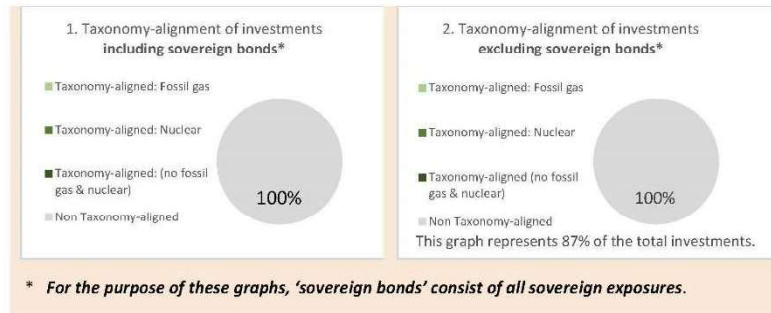
In the event that the Fund invests in funds that disclose a taxonomic alignment, the Fund does not use this information until it is able to determine at that time whether this information meets the regulatory requirements for equivalent information.

● 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

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.*

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.



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

0%

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?

Not applicable.



What is the minimum share of socially sustainable investments?

Not applicable.



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

Investments included in the category “#2 Other” relate to derivatives held for diversification and hedging purposes, and cash held for ancillary liquidity purposes. They also include funds held for diversification purposes (including ETCs and ETFs) that are not aligned with the environmental and social characteristics of the Fund. For example, funds with a strategy of investing in sovereign bonds declared in compliance with Article 6 of the SFDR and eligible commodity ETCs fall into this category. There are no minimum environmental or social safeguards for these investments.



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?

No.

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

- *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:

[Asset Management Portal \(quintet.com\)](https://www.quintet.com)