Finare Asset Management S.A.
75 boulevard
Grande-Duchesse Charlotte
L-1331 Luxembourg

FINARE ASSET MANAGEMENT S.A.

Sustainability Risks Policy

(disclosures on sustainability risks and characteristics)

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I. Introduction

The Sustainable Finance Disclosure Regulation ("SFDR") applies to Financial Market Participant ("FMP") and Financial Advisor ("FA").

FMP include banks and MiFID investment firms providing portfolio management, fund managers (AIFMs, UCITS management companies), institution for occupational retirement provision ("IORPs"), manufacturers of pension products, insurance undertaking which makes available an insurance-based investment products ("IBIPs"), Pan-European personal pension product (PEPP) provider, manager of a qualifying venture capital fund registered in accordance with Article 14 of Regulation (EU) No 345/2013 and manager of a qualifying social entrepreneurship fund registered in accordance with Article 15 of Regulation (EU) No 346/2013.

FA include banks and MiFID investment firms providing investment advice, AIFMs/UCITS management companies providing investment advice, insurance intermediaries or insurance undertakings providing insurance advice in relation to IBIPs.

This Policy is made in compliance with article 3 of EU Regulation 2019/2088 of the European Parliament and of the Council of 27 November 2019 on sustainability-related disclosures in the financial services sector, the SFDR.

Its objective is to explain how sustainability risks are integrated into investment decision- making and investment advice activities.

In the course of its daily activities and in line with SFDR definitions, the Company acts as an FMP when providing Tailor Made Discretionary Management and Managed Funds Portfolio which are part of discretionary portfolio management services, and as an FA when or if providing Financial Advisory and Advisory Portfolio Management.

II. Information on sustainability risks integration in the Company

In addition to the traditional risks of investing (market risk, currency risk, interest rate risk, etc.), sustainability risks are becoming increasingly important and should be taken into consideration in any investment.

In this Policy, sustainability risks are defined in more details and it is explained how the Company deals with sustainability risks when making investment decisions in the context of discretionary portfolio management solutions (Tailor Made Discretionary management and Managed Funds Portfolio) and when providing investment advice in the context of the following investment advisory solutions: Financial Advisory Account (“FAA”) and Advisory Portfolio Management (“APM”).

1. What are sustainability risks?

A sustainability risk means an environmental, social or governance event or condition that, if it occurs, could cause an actual or a potential material negative impact on the value of the investment. Such events may concern inter alia damage from climate change, scarcity of natural resources, pollution, poor working conditions, corruption and/or poor governance.

In addition to the large variety of impacts, the scope of sustainability risks is wide because not only individual companies but entire sectors can be negatively affected by sustainability risks. For example, if a company does not adapt its business model properly to the energy transition or is faced with a physical climate risk such as rising sea levels, this can have negative consequences for the operations and profitability of a company or even endanger the survival of the company and also, from an overall societal vision, have detrimental consequences on environment.

Sustainability factors are often referred to ESG criteria which stands for environmental (“E”), social (“S”), and governance (“G”). ESG events and conditions can be of influence on all types of investments, including, among others, equities, corporate bonds, government bonds, investment funds and derivatives. There is not a single exhaustive list of ESG factors. Those are often interlinked, and it can be challenging to classify an ESG factor as only an environmental, social or governance one.
Though on a broad and general basis ESG factors may be split as such:

- **Environmental** factors related to the conservation of the natural world like carbon emission energy efficiency, waste management, pollution, biodiversity or water scarcity;
- **Social** factors related to consideration of people, relationships and social cohesion: labor standards, relations with workforce and the community, gender and diversity, education, child care.
- **Governance** factors related to best-practices and standards for running a company like board composition and independence, management and audit structure, remuneration, compliance policy related to bribery and corruption, whistleblower schemes, fiscal practices.

ESG factors represent important information to assess investment risk and opportunities and have an impact on the financial outlook of a company and therefore its value. Integrating these factors results in better-informed investment decisions which could result in higher risk-adjusted returns.

The magnitude of sustainability risks is difficult to quantify. If sustainability risks materialize this is likely to have negative consequences for the value of investments.

For example: Companies active in the mining of thermal coal could be impacted by a (increase of) taxation on carbon by governments, to reduce greenhouse gasses. This could have a negative consequence of market value on these companies.

2. How does the Company deal with sustainability risks?

The Company aims to follow a top-down investment policy with sustainability considerations.

The Company's policies, programs and targets on sustainability-related risks and opportunities aim to encourage sustainable investing, identify sustainability risks and to manage these risks by integrating them in the investment decision making process and investment advice processes.

III. The Company's approach and investment solutions

The Company follows the same approach in terms of integration of sustainability risks for both discretionary portfolio management and investment advice. However, the Company differentiates the way in which sustainability risks are integrated into investment decisions and investment advices depending type of investments: direct line investments versus investments through investment funds or Exchange Traded Funds (ETFs).

The Company serves many different clients, who all have different needs and interests on both financials and/or on sustainability features. To accommodate these different preferences, the level of integration of ESG factors can differ per investment solution provided by the Company's Group. The diagram below shows how the Company's investment solutions differentiate on the integration of ESG factors between its investment's solutions.

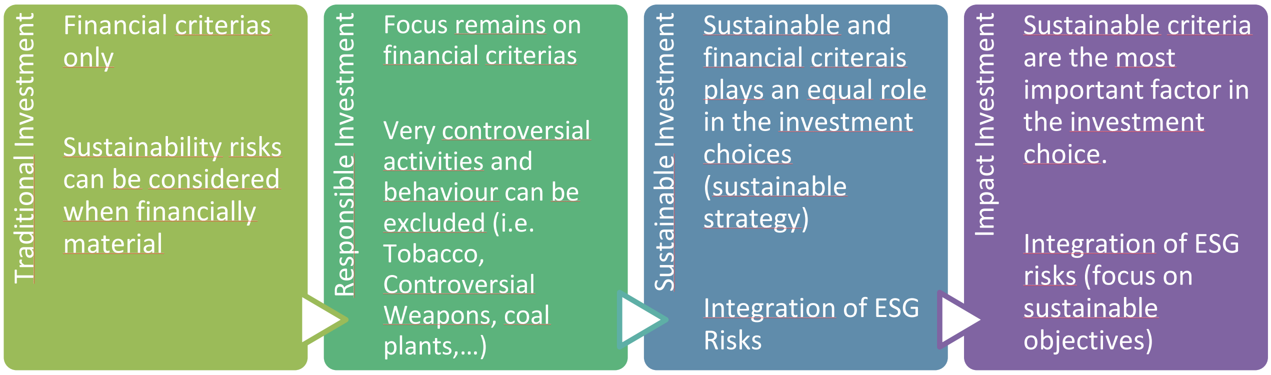

Figure 1: The Company

Considering ESG factors and risks as described above, as of today, the Company offers Traditional investments for discretionary and RTO / advisory mandates.

IV. Discretionary portfolio management and advisory services

The Company has its own responsibility when it comes to the integration of sustainability risks within the decision-making process and investment advice.

Within discretionary portfolio management and when providing investment advice, the Company selects direct investments, such as equities and bonds (government and corporate bonds) and /or investment funds.

1. Direct investments

1.1. Investments in equities and corporate bonds

For direct investments in equities and corporate bonds, the Company applies the following methods to integrate and mitigate sustainability risks.

Exclusions

The Company excludes companies with a negative exposure to the below mentioned sustainability factors. These companies run the risk of becoming stranded assets or have a business model that the Company considers to be unsustainable.

The Company excludes investment decisions and investment advices into the following companies:

- Producers of cluster munitions, manufacturers of controversial weapons, tobacco producers and companies that generate electricity through coal power plants or that are involved in the mining of coal;
- Companies that seriously violate United Nations guidelines for multinational corporations. These guidelines are covered in the ten principles of the United Nations Global Compact and cover human rights, the environment, labor, and anti-corruption.
- Companies that demonstrate controversial behavior according to the standards of research agency as available through its Bloomberg license or other data Vendors providing high-quality, analytical ESG research, ratings and data to institutional investors and companies.

Assessing non-financial information

To integrate sustainability risks in the decision-making and investment advice processes, the Company looks beyond the financial data of the companies by also assessing the company's sustainability policy. Companies that do not have a sustainability policy are considered more exposed to sustainability risks.

1.2. Other products (government bonds, derivatives, structured notes)

The Company limits its investment decision / advice to bonds of OECD countries.

In principle, for structured notes the Company applies the same exclusion lists as for direct lines. The structured notes are nevertheless limited in our portfolio.

Derivatives can be an important factor in portfolio risk management. The disadvantages of derivatives are the lack of transparency regarding their products, their dependence on third parties and the conflicting positions that may be taken. For these reasons, we prefer to restrict the use of derivatives to a minimum.

2. Investment funds (if applicable)

The Company is acting an Investment Manager for UCITs Funds.

For each individual (Sub-) Fund sustainability risks can be considered in both their investment philosophy as well as in their selection of individual financial instruments. Every investment fund should have its own policy in that respect. More information on the sustainability risk integration process at the level of the investment fund can be found in the investment fund's own policy, which forms part of this Policy as an appendix

When the Company selects investment funds, it distinguishes between regular investment funds, i.e. investment funds that do not specifically focus on ESG-characteristics or that do not have a sustainable objective, and sustainable investment funds (investment fund promoting ESG characteristics among others, or has sustainable investment as its objective). Investment funds which do not integrate any kind of sustainability- considerations (such as ESG characteristics or a sustainable objective) into its investment process are not eligible to be included in the universe of sustainable investment funds.

For some of its investments funds, the Company does not currently take sustainability risks into account.
For the selection of sustainable investment funds, sustainability risks have a prominent role. An exhaustive screening on the sustainability criteria is applied.

a) **Quantitative assessment (collection of information)**, i.e. a numerical assessment of a wide range of factors.
For this purpose, the Company gather data from its data suppliers and assess it in respect to ESG factors.

b) **Qualitative assessment**. For this, the Company engages in discussions toward its sustainable investment universe in order to form an overall impression of the role that sustainability plays in the target investment.

Exclusions

In addition, for sustainable investment funds, the following exclusions apply:

- Investment funds with underlying investments that do not fit the Company's sustainable universe such as producers of controversial weapons and cluster munition for purchase;

- Mention of the fund or the underlying investments on the European sanction list. This is a consolidated list of countries and companies, engaged in or suspected of money laundering or terrorism financing activities.;
- Investment funds that invest in companies that demonstrate controversial behavior according to the standards of the main research agencies available through our Bloomberg infrastructure or other data vendors providing high-quality, analytical ESG research, ratings and data to institutional investors and companies.

  For its sustainable investment fund universe, the Company does not select investment funds which invest in companies that exhibit seriously controversial behavior (i.e. behaviors included in different exclusion lists applicable by the Company). When a company in a portfolio becomes entangled in serious controversy, we will contact the asset manager.

Integration of sustainability factors in Line with the SFDR

Following the publication of the SFDR Draft regulatory technical standard (RTS) financial materiality of the investment remain the predominant metrics while including environment or social characteristics or a combination. The RTS imply sound good governance practices by the targeted investment.

As described above the Company takes in consideration the clients needs and the company philosophy toward sustainable investments that act in a sustainable way toward the environment, society and all its stakeholders are likely to be more able to deal with a variety of issues in the future of their business or endeavors.

Altogether, the Company distinguishes three kinds of ESG strategies: Responsible Investment, sustainability focused strategies and impact strategies.

- Responsible Investment strategies use ESG information to improve investment decisions. It is focused on the integration of risks and opportunities in the selection process with the goal of improving corporate behavior and long-term investment returns. This is an exclusion list-based strategy.
- Sustainability focused strategies build from the same basis as the ESG-integrated strategies but add an ex-ante focus on stocks that score better on ESG and environmental footprints than the

- benchmark. These funds are meant for investors that either believe that good ESG performance and a lower environmental footprint will lead to better performance (in the long run) or want to apply a reputational or values perspective in their investment portfolios. This strategy will be in line with Article 8 of the SFDR.
- Impact strategies invest in companies helping solve problems related to specific sustainability themes, or to the achievement of one or more of the SDGs. They differ from sustainability focused strategies in that they contain biases towards certain sectors or industries that have more exposure to sustainable development. These strategies are meant for investors wanting to make a positive impact on society, and/or those who want to have a clear exposure to certain sustainable development areas, and who believe that in doing so they can generate appropriate investment returns. This strategy will be in line with Article 9 of the SFDR.

In this chapter we describe how we apply the sustainability research in our investment strategies to make sure we identify and manage long-term risks and opportunities.

Quantitative and qualitative Metrics for the Company sustainable strategies

First, the Company applies a top-down approach for defining the appropriate universe of eligible assets.

Secondly, depending on the asset class the Company is assessing and approaching the following selection criteria:

All sustainable equity strategies integrate ESG at different stages of the investment process. We use sustainability performance rankings to focus our fundamental analysis on companies that have demonstrated superior sustainability performance compared to their peers. We then analyze the impact of financially material ESG factors to a company's competitive position and value drivers. We believe that this enhances our ability to understand existing and potential risks and opportunities of a company. If ESG risks and opportunities are significant, the ESG analysis could impact a stock's fair value and the portfolio allocation decision. Throughout the investment process, we strive for a low environmental impact, as measured by GHG emissions, energy consumption, water use and waste generation.

It is also to be noted that most of our research providers are upgrading their recommendations and analysis toward ESG related thematics, as the data availability grows, our capacities will follow.

For fixed income strategies ESG factors play an important role in the investment process, including climate related risks, both in country analysis and credit analysis. We deem it essential for a well-informed investment decision to consider those ESG factors that have the potential to materially impact the financial performance of the issuer, including risks stemming from climate change. This perfectly matches the basic need to avoid the losers in credit management, as many credit events in the past can be attributed to issues such as poorly designed governance frameworks, environmental issues, or weak health & safety standards.

For UCI's selection, Sustainable related Strategies shall focus on Article 8 and 9 of the SFDR.
Impact Strategies shall focus on Article 9 of the SFDR.
Our data providers as well as the UCI's distributor display the SFDR article of each targeted UCI's.

Environmental, Social and Governance (ESG) factors are systematically integrated in the investment process, by using the ESG scores from The ESG integration aims for a total ESG score or "purity score" of the portfolio higher than the index.

Our fundamental and quantitative research already addresses certain aspects of the Environmental impact risks, but the quality of climate-related data available remain key, as more companies report and data providers improve their offerings, we continually improve the insights we gain from such data.