

Product name: 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: Sustainable Dividends Value Fund
Legal entity identifier: 72450023IAQ5F5T9BV46

This document provides you with information about this fund in relation to the Sustainable Finance Disclosure Regulation. It is not marketing material. The information is required by law to help you understand the sustainability characteristics and/or objectives and risks of this fund. You are advised to read it in conjunction with other relevant documentation on this fund so you can make an informed decision about whether to invest.

(b) No sustainable investment objective

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

Where fund aims to make one or more sustainable investments explain how the indicators for adverse impacts in Table 1 of Annex I, and any relevant indicators in Tables 2 and 3 of that Annex I, are taken into account?

The fund does not consider sustainability factors as referred to in the SFDR Delegated Act. Instead, the fund takes sustainability factors into account according to its own sustainability policy. Pre-investment, several sustainability factors are considered via the fundamental analysis part of the investment selection process. In these analyses the fund investigates both the product that the company produces or service that the company delivers, as well as the production process.

As part of the selection process, environmental, social and corporate governance issues are analysed. Strong awareness of ESG factors by the management of a company demonstrates a desire to mitigate company risks, related to ESG. The fund manager believes that ESG factors may influence a company's intrinsic value. The ESG orientation of company management indicates whether ESG criteria are incorporated into the corporate processes.

Post-investment, the following tools are used to evaluate and influence the sustainability score for the investments in the fund:

- Via voting the fund can help to steer company behaviour towards better environmental and social decision making.
- Via mail and meetings management of the fund engages with companies in order to better understand and influence company behaviour on both ESG and financial factors.
- Via our analysis of the annual social- and financial reports of companies we get a better understanding of the improvement of a company's score on their own ESG related targets.

Are the sustainable investments aligned with the 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 sustainable investments are not explicitly aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights.

(c) Environmental or social characteristics of the financial product

What are the environmental or social characteristics that the financial products promotes?

The fund has the following E/S characteristics:

1. The fund promotes certain minimum environmental and social safeguards through applying exclusion criteria with regards to products and business practices that Sustainable Dividends believes are detrimental to society and incompatible with sustainable investment strategies.
2. The fund promotes adherence to and conducting business activities in accordance with the United Nations Universal Declaration of Human Rights, the International Labor Organization's (ILO) labor standards, the United Nations Guiding Principles for Business and Human Rights (UNGPs), the United Nations Global Compact (UNGC) and the OECD Guidelines for Multinational Enterprises, by scrutinizing companies that violate these principles.
3. The fund promotes good governance and sustainable corporate practices through proxy voting, which contributes to long-term shareholder value creation. This includes taking an active stance on social and environmental topics through Sustainable Dividends' proxy voting policy.
4. The fund limits investing in companies with an elevated sustainability risk based on ESG-risk scores.

(d) Investment strategy

What is the investment strategy used to meet the environmental or social characteristics promoted by the financial product?

The Sustainable Dividends Value Fund is an actively managed fund that invests in equities of companies that are domiciled in Europe. The selection of these stocks is based on fundamental analysis. The strategy integrates sustainability indicators on a continuous basis as part of the stock selection process. When investigating the environmental score of companies the fund invests in, we take into account the following factors:

- CO2 output, direct and indirect
- Energy use
- Recycling
- Water use
- Other use of resources
- Importance of ESG in investments
- The progress factor

When determining the social score of companies the fund invests in, we take into account the following factors:

- Care for clients
- Care for employees
- Education of employees
- Social projects, charitable giving
- Free product versions for underprivileged
- Male and female inclusion
- Other inclusion and equality

All these factors are checked at least annually for the companies that fund has invested in. The list of factors is also reviewed annually and can be adjusted whenever management deems other or additional factors will lead to a better understanding of the governance score of companies we invest in.

What is the policy to assess good governance practices of the investee companies, including with respect to sound management structures, employee relations, remuneration of staff and tax compliance?

When investigating potential investments in the fund Sustainable Dividends takes into account several governance factors:

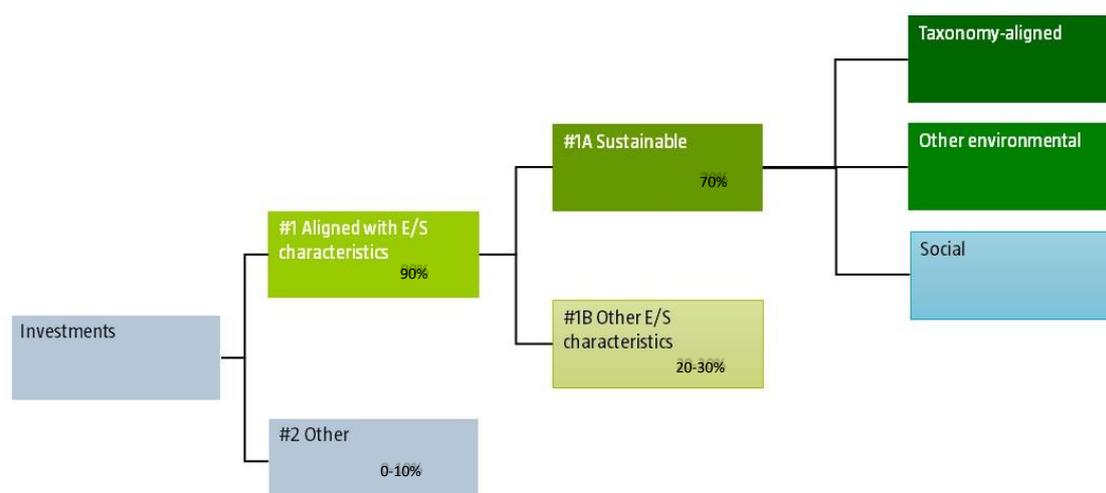
- Management quality
- Goals: Focus and ambition, intentions
- Organisation, checks and balances
- Board quality
- Transparency and communication
- Lawsuits
- Concrete goal setting, measurable
- Company culture
- External validation

These factors are checked at least annually for the companies that fund has invested in. The list of factors is also reviewed annually and can be adjusted whenever management deems other or additional factors will lead to a better understanding of the governance score of companies we invest in.

(e) Proportion of investments

Minimum Sustainable Investment: 70%

Asset allocation table



(f) Monitoring of environmental or social characteristics

How are the environmental or social characteristics promoted by the financial product and the sustainability indicators used to measure the attainment of each of those environmental or social characteristics promoted by the financial product monitored throughout the lifecycle of the financial product and what are the related internal or external control mechanisms?

1. Monthly checks take place on the stocks in the fund by the compliance and risk manager. ESG-scores are revised at least annually by the portfolio management team in the investment cases that are the basis for our portfolio management decisions. If there are relevant ESG updates or inputs from interaction with companies, then investment cases are updated accordingly by the portfolio management team.
2. Engagement results – if applicable – are discussed within the Sustainable Dividends team.
3. The proxy voting policy is reviewed annually, including voting principles in relation to ESG-topics.

(g) Methodologies

What are the methodologies to measure how the social or environmental characteristics promoted by the financial product are met?

Sustainable Dividends maintains the methodology of our proprietary analytical ESG framework in our internal handbook.

We assess all our investments internally and sometimes externally on Environmental, Social and Governance (“ESG”) factors. We do this in a clear manner and based on evidence-based data as much as possible. However, there is one more important step to take beforehand, because these are the questions we ask at the basis of our decision to invest in a company:

1. What does the company do? Does their service or product play a role in achieving a more sustainable world? Does it help us as humanity forward by offering smart solutions?

As a fund manager, we answer these questions with a qualitative assessment of the so-called product score of the company. This is reflected in a grade that we give on a scale from 1 to 3. A score of 1 being positive, a score of 2 being average and 3 is negative.

2. What is the ESG process score? Our ESG assessment comes into play in the second instance. The scoring method is identical, and the input is more data-driven. Sources for this are our research of published company materials and the interviews that we have with the companies that we are considering for inclusion in our portfolio. In this process, we maintain a portfolio shortlist that meet our financial criteria of around 30 to 40 different investments

These are assessed for: “Environmental” criteria (the “E”, 50% weight), “Social” criteria (the “S”, 25% weight) and finally, “Governance” criteria (the “G”, also 25% weight).

In the final instance, we regularly test our findings against the judgment of external ESG rating agencies if and when those are available. We have access to their reports via databases and we will investigate further in the event of any conflicting conclusions.

(h) Data sources and processing

How are the data sources used to attain each of the environmental or social characteristics promoted by the financial product? What measures are taken to ensure data quality? How is data processed? What is the proportion of data that are estimated?

The fund uses the following data sources:

1. Annual and interim reports produced by the companies we invest in. If available, we use dedicated Sustainability Reports.
2. Websites of the companies we invest in.
3. Direct contact with company representatives via mail, telephone calls, Teams meetings or face-to-face meetings.

The fund’s ESG-scores are based on internal calculations based on the process described in paragraph (g).

(i) Limitations to methodologies and data

What are potential limitations to the methodologies or data sources and how do such limitations not affect how the environmental or social characteristics promoted by the financial product are met?

The primary limitation to the methodology or data source is the lack of corporate disclosure. Like many other financial market participants, we struggle to find adequate information on the principal adverse indicators. However, engagement with the companies most of the time does help us to get the required information. Our environmental objectives are predominantly linked to more mature themes, specifically carbon, water and waste. The level of disclosure is increasing every year within these areas, something that we monitor for each individual portfolio company.

Since our source for the data stems from the companies themselves it is obvious that if somehow the data presented by them is false, incomplete or otherwise inadequate this will lead us to potential false conclusions in our investment process. A lot of the presented data can be interpreted in different qualitative ways, on absolute, relative or momentum terms.

(j) Due diligence

What due diligence is carried out on the underlying assets of the financial product (including the internal and external controls)?

Sustainable Dividends has incorporated the sustainability aspects of the investment strategy into adequate investment due diligence processes and procedures for the selection and monitoring of investments, amongst others taking into account Sustainable Dividends' risk appetite and risk management policies. Specific details on investment due diligence are available in Sustainable Dividends' Investment Handbook. Scoring tables that evaluate ESG scores are available in excel format. If conflicting data points are found or data is missing, we engage with the companies.

(k) Engagement policies

What is the engagement policy applied, in the case that engagement is part of the environmental or social investment strategy (including any management procedures applicable to sustainability-related controversies in investee companies)?

The holdings of the fund are subject to the selection process of Sustainable Dividends. An important step in this selection process is contact via the management or Investor Relations team of the companies involved. Via this contact we will ask questions on ESG related topics that are relevant for the specific (potential) investment of the fund. The information gained will be updated in our investment cases that guide our portfolio management process.

(l) Designated reference benchmark

Has an index has been designated as a reference benchmark to meet the environmental or social characteristics promoted by the financial product? If yes, how that index is aligned with the environmental or social characteristics promoted by the financial product, and where can one find information with regards to input data, methodologies used to select those data, the rebalancing methodologies and index calculations?

There is no reference benchmark designated for the purpose of attaining the environmental or social characteristics promoted by the fund.