Website Product Disclosure of DISCRETIONARY MANAGEMENT MANDATE - TAILOR-MADE (ART. 8)

a) 'Summary';

This financial product promotes environmental or social characteristics, but does not have as its objective sustainable investments. However, the financial product partially intends to make sustainable investments that will not cause significant harm to any environmental or social objectives.

The following environmental and social characteristics are promoted by the financial product:

- Limit investments in companies that do not adhere to internationally recognised standards related to 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 in the case of issuers linked to countries that are not signatories to the Non-Proliferation Treaty (NPT)).
- Limit investments in securities issued by countries subject to European Union (EU) arms embargoes.
- A minimum proportion of sustainable investments.

The financial product applies various environmental and social considerations in the investment process for single lines, such as exclusions, engagement. The sustainable investments made by the third party funds that the financial product invests in need to meet a number of requirements, including various criteria related to assessing there is no significant harm to any environmental or social objectives. To ensure this, Quintet reviews how third party funds determine whether a sustainable instrument does not cause significant harm and the specific methods they employ, such as exclusions or setting any thresholds at the issuer or instrument level.

Funds making sustainable investments are required to have policies in place regarding their own research and investment process to ensure that sustainable investments do not cause significant harm. This should be assessed by taking into account indicators for adverse impacts on sustainability factors.

The financial product invests indirectly via third party funds (Active mutual funds, IMFs and ETFs) and interest rate products. Interest rate products include, among others, bonds, money market instruments and structured products based on interest rate products.

The financial product has direct exposures to investee companies as well as to third-party funds; the allocation between the two is unconstrained and can change at any given time.

In order to ensure the adequate consideration of environmental and social characteristics of the product, Quintet group has established an exclusion list of issuers that are:

- considered to be in violation of the United Nations Global Compact (UNGC) principles (and for which engagement is not or no longer considered feasible); or
- involved in controversial weapons (anti-personnel mines, biological weapons, chemical weapons, cluster munitions, depleted uranium, white phosphorus, and nuclear weapons when related to involvement by corporate issuers in relation to countries that are not a signatory of the Non-Proliferation Treaty (NPT)); or

- sovereigns that are subject to EU arms embargos.

The financial product integrates environmental and social criteria into the investment process through an extensive due diligence process on third party funds. This includes reviewing the robustness of the investment process, the people responsible for the strategy, the risk-adjusted return characteristics, the third party fund manager and the sustainability practices of the fund. The due diligence is composed of 5 pillars:

- Intentionality: explicit and intentional links to sustainable investment;
- Portfolio characteristics: sustainable characteristics among invested companies;
- Research: sufficient skills and tools, integrated into methods and processes;
- Active ownership: voting and high-quality dialogue, supported by clear policies; and
- Transparency: frequent reporting on commitment and progress towards sustainable goals.

Where investments are made in companies, these companies need to meet good governance practices, for example in relation to corporate governance, ethical business conduct, responsible accounting and tax practices and employee relations. Quintet expects all third party funds that the financial product invests in to assess whether investee companies indeed follow good governance practices. Quintet validates that third party funds consider good governance practices by assessing their formal good governance policy.

Where a third party fund does not have a formal good governance policy, the third party fund's holdings are assessed by Quintet at the company level to determine whether the companies in which the third party fund invests do in fact follow good governance practices.

After an investment is made in a third party fund, Quintet continues to interact actively with the third party fund managers and collects data on their portfolios on a regular basis to ensure compliance with the financial product’s environmental and social characteristics.

The financial product uses the following sustainability indicators to measure the attainment of each of the environmental and social characteristics promoted by the financial product, which are calculated as a percentage of investments:

- Investee companies that violate the United Nations Global Compact principles.
- Investee companies involved in controversial weapons.
- Investment instruments issued by countries subject to EU arms embargoes.
- Sustainable investments made by the financial product.

Quintet uses multiple data sources in relation to the environmental and social characteristics of the financial product. Methodologies and data related to measuring the attainment of each of the environmental or social characteristics in the form of the sustainability indicators can have limitations, such as information not being publicly available or a delay between the occurrence of an issue and that issue being identified. Various quality control and assurance mechanisms are in place to ensure the robustness and accuracy of the data used. It is not possible for Quintet to determine the proportion of estimated data used to calculate the sustainability indicators.

Quintet believes that proxy voting for equity funds and engagement for both equities and corporate bonds are crucial elements to assess and influence the behaviour of investee entities. Since the financial product invests in both single lines and funds managed by third party fund managers, these party fund managers are held to the same standards regarding active ownership as Quintet applies when it makes direct investments.

No index has been designated as a reference benchmark to meet the environmental or social characteristics promoted by the financial product.

b) 'No sustainable investment objective';

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

However, the financial product partially intends to make sustainable investments that will not cause significant harm to any environmental or social objectives.

How do the sustainable investments not significantly harm any sustainable investment objectives?

In order for single line investments (i.e. investment instruments issued by investee entities such as equities or bonds) to qualify as a sustainable investment, a number of requirements needs to be met, including various criteria related to significant harm. As a consequence, investments need to meet specific thresholds related to adverse impacts and operate in line with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights.

The sustainable investments made by the third party funds that the financial product invests in need to meet a number of requirements, including various criteria related to assessing there is no significant harm to any environmental or social objectives. To ensure this, Quintet reviews how third party funds determine whether a sustainable instrument does not cause significant harm and the specific methods they employ, such as exclusions or setting any thresholds at the issuer or instrument level.

Funds making sustainable investments are required to have policies in place regarding their own research and investment process to ensure that sustainable investments do not cause significant harm. This should be assessed by taking into account indicators for adverse impacts on sustainability factors. The way they are taken into account can differ, as the SFDR does not prescribe a specific methodology and there is no single market approach for this. Therefore, across the third party funds that the financial product invests in, different approaches are applied, which include, where possible and feasible, quantitative and/or qualitative assessments of the indicators listed in table 1 of Annex I of the Delegated Regulation 2022/1288. In addition, the way indicators are considered can depend on various factors, such as whether the specific indicator is relevant for the investment and the availability of (reliable) data. Furthermore, sustainable investments made in investee companies should be 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';

The following environmental and social characteristics are promoted by the financial product:

- Limit investments in companies that do not adhere to internationally recognised standards related to 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 in the case of issuers linked to countries that are not signatories to the Non-Proliferation Treaty (NPT)).
- Limit investments in securities issued by countries subject to European Union (EU) arms embargoes.
- Make a minimum proportion of sustainable investments in accordance with Quintet's proprietary Sustainable Investment Framework.

d) 'Investment strategy';

The financial product invests, directly or indirectly via shares and/or units of UCITS and/or other UCIs, equities, interest rate products and cash.

The financial product 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 financial product. 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 financial product. Quintet has developed additional criteria for investments with ESG factors in the portfolio construction process, applying to all direct lines, such criteria include but not limited to screens for controversies, ESG risk (at company and sector level) and compliance with international standards. For more information on the portfolio construction process and required thresholds please refer to Quintet's Responsible Investment Policy.

c. Dialogue with companies as part of the policy of engagement on environmental and social issues. In order to have a greater impact, the Investment Manager has established a partnership with an external provider specialized 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 Investment Manager also engages with fund managers.

d. Proxy voting at shareholder meetings, including on environmental and social issues. For more information, please see the link to the website in the last section of this document.

2. For investments in funds:

The financial product integrates environmental and social criteria into the investment process through an extensive due diligence process on third party funds. This includes reviewing the robustness of the investment process, the people responsible for the strategy, the risk-adjusted return characteristics, the third party fund manager and the sustainability practices of the fund. The due diligence is composed of 5 pillars:

- Intentionality: explicit and intentional links to sustainable investment;

- Portfolio characteristics: sustainable characteristics among invested companies;

- Research: sufficient skills and tools, integrated into methods and processes;
- Active ownership: voting and high-quality dialogue, supported by clear policies; and
- Transparency: frequent reporting on commitment and progress towards sustainable goals.

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

Where investments are made in companies, these companies need to meet good governance practices, for example in relation to corporate governance, ethical business conduct, responsible accounting and tax practices and employee relations. This is being assessed at the company level, for which the financial product uses specialised external data and research.

Quintet expects all third party funds that the financial product invests in to assess whether investee companies indeed follow good governance practices. Quintet validates that third party funds consider good governance practices by assessing their formal good governance policy.

Where a third party fund does not have a formal good governance policy, the third party fund's holdings are assessed by Quintet at the company level to determine whether the companies in which the third party fund invests do in fact follow good governance practices.

e) 'Proportion of investments';

What is the minimum proportion of investment aligned with the Environmental and Social characteristics that the financial product promotes?

At least 85% of the investments are aligned with the environmental and social characteristics of the financial product.

What is the minimum proportion of Sustainable Investments?

The minimum proportion of sustainable investments of the financial product is 20%. While the financial product partially intends to make sustainable investments, it does not specifically strive to make EU Taxonomy aligned investments. As such, the minimum extent of sustainable investments with an environmental objective aligned with the EU Taxonomy is 0%.

The financial product partially intends to make sustainable investments with an environmental objective that are not aligned with the EU Taxonomy, as well as sustainable investments with a social objective. The financial product does not commit to any specific individual or combination of sustainable investment objectives. Therefore, there is no committed minimum share of sustainable investments with an environmental objective not aligned with the EU Taxonomy or with a social objective.

What are other investments and what is their purpose?

Any remaining investments that are not aligned with the environmental and social characteristics of the financial product are investments for diversification and hedging purposes (including ETCs and ETFs), and cash held as ancillary liquidity. There are no minimum environmental or social safeguards for these investments.

What is the ratio of direct exposures and non-direct exposures?

The financial product has direct exposures to investee companies as well as to third-party funds; the allocation between the two is unconstrained and can change at any given time.

f) ‘Monitoring of environmental or social characteristics’;

How are the sustainability indicators used to measure the attainment of the environmental and social characteristics promoted by the financial product monitored?

The financial product uses the following sustainability indicators to measure the attainment of each of the environmental and social characteristics promoted by the financial product, which are calculated as a percentage of investments:

- Investee companies that violate the United Nations Global Compact principles.
- Investee companies involved in controversial weapons.
- Investment instruments issued by countries subject to EU arms embargoes.
- Sustainable investments made by the financial product.

When investing in single lines, the financial product’s portfolio managers ensure the instrument is not on Quintet’s exclusion list. The Risk Management department periodically reviews the financial product to ensure compliance with Quintet’s exclusion list and notifies portfolio managers if any issues arises, leading to the sale of the affected instruments.

After an investment is made in a third party fund, Quintet continues to interact actively with the third party fund managers and collects data on their portfolios on a regular basis to ensure compliance with the financial product’s environmental and social characteristics.

As Quintet cannot impose any exclusion criteria to third-party managers and the exclusion criteria applied by them can differ from those of Quintet, a principle-based approach is applied and preference is given, where possible and feasible, to third party funds that have exclusion policies in at least the same areas as those listed above.

With regard to the sustainable investments made by the financial product: Through the due diligence and selection process, Quintet ensures that the sustainable investments made via single lines and third party funds are aligned with Quintet’s own sustainable investment framework. The sustainable investment disclosures of third party funds are used in order to determine the percentage of sustainable investments which third party funds are invested in. These percentages are checked on a regular basis to ensure that the committed minimum proportion sustainable investments of the financial product is adhered to.

g) ‘Methodologies for environmental or social characteristics’;

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

The sustainability indicators that are used to measure the attainment of each of the environmental and social characteristics promoted by the financial product are based on the following methodologies:

- Adherence to the United Nations Global Compact (UNGC) principles is measured by using research provided by Sustainalytics, a specialised global ESG data provider, to assess whether companies adhere to the UNGC principles. Companies which do adhere to the UNGC principles are then linked to the investment instruments of the third party funds that the financial product has invested in. Following this, the value of the exposures to the investment instruments are added up and divided by the total value of the portfolio, in order to calculate the percentage of the total portfolio in adherence of the UNGC principles.
- Involvement of investee companies in controversial weapons is measured by using research provided by Sustainalytics. Companies that are considered to be involved in controversial weapons based on the criteria of Quintet’s Responsible Investment policy are identified and then linked to the investment instruments of the third party funds that the financial product invested in. Following this, the value of the exposures to the investment instruments are added up and divided by the total portfolio in order to calculate the percentage of holdings that have controversial weapons involvement.
- Sovereigns subject to EU arms embargos is measured by using research provided by Sustainalytics. This research identifies the central governments that are subject to the EU arms embargoes. These sovereign issuers are then then linked to the investment instruments of the third party funds that the financial product invested in. Following this, the value of the exposures to the investment instruments are added up and divided by the total value of the portfolio, in order to calculate the percentage of the total portfolio that are subject to EU arms embargoes.
- The sustainable investments percentage is measured by using Quintet’s proprietary investment framework. For investments made via single lines, Quintet uses its proprietary framework in order to identify if the single line investment is sustainable or not. Quintet uses the disclosures of the third-party funds that the financial product invested in. These percentages are then multiplied by the value of the exposures to the third party funds of the financial product and added up, in order to calculate the percentage of the total portfolio that are sustainable investments.

h) ‘Data sources and processing’;

What data are used?

Quintet uses multiple data sources in relation to the environmental and social characteristics of the financial product. These sources are described below.

For Quintet's investment decision-making and reporting related to investee entities invested in through either single lines or third-party funds, Quintet consumes data from Sustainalytics on their environmental and social characteristics, specifically, research related to UN Global Compact adherence, involvement in controversial weapons and countries that are subject to EU arms embargoes. Quintet has chosen Sustainalytics as a primary ESG data provider following an extensive market review and due diligence process. Sustainalytics has been selected because of their expertise, independence, universe scope, quality of data, and their strong research process.

In addition, Quintet also uses data from Impact Cubed related to the alignment of companies’ revenues with the United Nations Sustainable Development Goals (SDGs). This data is specifically used in Quintet’s sustainable investment framework as part of the set of criteria to identify sustainable investments when Quintet invests in corporate issuers. Impact Cubed was selected based on a rigorous due diligence process where their expertise, research, data quality, independence was evaluated.

Finally, Quintet utilises a transition themes dataset from Triodos Investment Management ('Triodos IM') as part of its sustainable investment framework. Triodos IM combines research from external data providers with their own research and analysis to identify companies that contribute to the transition themes.

Furthermore, for the sustainable investment percentages the sustainable investment disclosures made by the third party funds are used. The third party funds make use of a wide range of sources and external data providers.

How is the data quality ensured and the data processed?

Given that Quintet uses external ESG data providers, the quality assurance and quality control of the data primarily embedded in the external providers' operations. Sustainalytics has various quality assurance checks, which are done automatically, as well as various manual checks done annually, such as year-on-year subindustry data comparison checks. Their quality assurance and control processes apply to their full infrastructure: from data collection via a variety of research platforms, to data storage within multiple research, product, and aggregation databases, as well as end-of-gate checks before data reaches Quintet.

Impact Cubed's data verification and quality assurance process is primarily based on automated systems. Quality assurance algorithms are applied to all data collected and ingested. Data scientists review outliers flagged by the automated system and undertake additional spot checks leveraging a number of tools including peer comparison and company disclosures.

Triodos IM utilises data from an external data provider for their analysis. Triodos IM analysts consult relevant public disclosures as a data quality check on revenue information. They then perform analysis on companies' contribution to transition themes, the results of which are four-eyed checked by a second analyst. Finally, Triodos IM's fund data reporting team performs a sanity check to ensure data quality and completeness before external communication.

Furthermore, the third party funds are required to do rigorous due diligence and regular reviews of their data sources and providers to ensure their robustness and quality.

What is the proportion of estimated data?

For this specific data it is not possible for Quintet to determine the proportion of estimated data used to calculate the sustainability indicators. This relates to the fact that the research conducted by the data providers as well as the disclosures of the third-party fund managers, leverages a combination of information reported by issuers, multiple public sources, and their proprietary analytical frameworks.

i) 'Limitations to methodologies and data';

What are the limitations to the methodologies and data used to measure the attainment of the environmental or social characteristics promoted by the financial product?

Methodologies and data related to measuring the attainment of each of the environmental or social characteristics in the form of the sustainability indicators mentioned above can have limitations.

As issuers are not likely to self-declare, for example, that they are operating in violation of international norms or that they are involved in controversial weapons, ESG data providers need to review a range of sources and conduct their own analysis. The primary limitation is that certain company-specific information may have not (yet) reached the public domain and is therefore not considered by ESG data providers. In addition, once information has become public, it can take some time before all relevant evidence has been analysed and evaluated. Consequently, there may be a delay between the occurrence of an issue and that issue being identified by Sustainalytics, incorporated in their research, and subsequently reflected in the sustainability indicators of this financial product. The same applies to the disclosures made by third party fund managers, who in their turn also rely on their external ESG data providers.

Quintet's proprietary sustainable investment framework utilises data and research from Sustainalytics, Impact Cubed and Triodos IM. Such data is subject to the same limitations described in the previous paragraph. Therefore the identification of sustainable investments based on this framework may not immediately reflect issues or changes that occur at the company, but is subject to such issues and changes being captured in the analysis done by the data providers.

How do these limitations not affect how the environmental or social characteristics promoted by the financial product are met?

Given the strong and systematic research process underpinning the data, Quintet believes that despite the abovementioned limitations the data used to measure the environmental and social characteristics of the financial product are sufficiently reliable to provide a meaningful representation of the attainment of the environmental and social characteristics that the financial product promotes.

j) 'Due diligence';

For single lines, the due diligence process is conducted by Quintet's Equity and Fixed Income teams. Both teams ensure that issuers selected are in line with the environmental and social characteristics of the financial product and Quintet's Responsible Investment Policy.

For third party funds, the due diligence process is conducted by the Quintet Fund Solutions team, working closely together with Quintet's ESG & Sustainable Investing team. All funds selected have to demonstrate sufficient responsible practices. This includes understanding environmental, social and governance (ESG) factors as well as a willingness to engage with the companies they invest in. Sustainable funds must fulfil not only investment risk-adjusted return criteria but also a more rigorous assessment of sustainability.

The due diligence process is composed of the five following pillars:

- Intentionality: explicit and intentional links to sustainable investment;
- Portfolio characteristics: sustainable characteristics among invested companies;
- Research: sufficient skills and tools, integrated into methods and processes;
- Active ownership: voting and high-quality dialogue, supported by clear policies; and
- Transparency: frequent reporting on commitment and progress towards sustainable goals.

Through the due diligence and selection process, Quintet ensures that the sustainable investments made by third party funds are aligned with Quintet's own sustainable investment framework. The sustainable investment disclosures of third party funds are used in order to determine the percentage of sustainable investments which third party funds are invested in. These percentages are checked on a regular basis to ensure that the committed minimum proportion sustainable investments of the financial product is adhered to.

More details on the due diligence process of the financial product can be found here.

k) 'Engagement policies';

Quintet has an Active Ownership policy which involves monitoring the investments we make, identifying environmental, social and governance (ESG) issues, strategic problems, or opportunities for improvement, engaging with investment managers or management teams, and other efforts to encourage positive change for the long-term benefit of our clients and the world.

Quintet has instructed its engagement partner EOS at Federated Hermes to give special attention to companies that violate the principles of the UN Global Compact, or that are involved in significant ESG controversies. The engagement priorities are focused on the most material drivers of long-term value, with four priority themes: climate change, human and labour rights, human capital management and board effectiveness and ethical culture.

Quintet regards exclusions as a last resort for companies in violation of the UNGC principles, when active ownership has proven unsuccessful, or is infeasible, and further investment would be incompatible with our principles and the best interests of our clients.

Quintet believes that proxy voting for equity funds and engagement for both equities and corporate bonds are crucial elements to assess and influence the behaviour of investee entities. Since the financial product only invests in funds managed by third party fund managers, these party fund managers are held to the same standards regarding active ownership as Quintet applies when it makes direct investments. Engagement takes place with these party fund managers to ensure that, where possible and feasible, they pursue engagement and voting activities.

l) 'Designated reference benchmark'.

No index has been designated as a reference benchmark to meet the environmental or social characteristics promoted by the financial product

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Change log

Version	**Publication date**	**Item**
1.0	31/12/2022	Initial version
2.0	31/12/2023	Added environmental and social characteristics and sustainability indicators, methodologies and monitoring of indicators
		Revised minimum share of environmental and social sustainable investments
		Added references and information about new data providers: Impact Cubed and Triodos IM
3.0	30/06/2025	Update of third party fund due diligence and additional sustainability characteristics.