

Website product disclosure for financial products that promote environmental or social characteristics. Please refer to the Sub-Fund Supplement to the Prospectus and respective annex for full details.

Sub Fund Name

Sub Fund Name: Architas Flexible Bond

Legal Entity Identifier: 549300T7WFOHI7RYZQ57

(a) Summary

The below information is the Summary required under Articles 24 to 49 of Commission Delegated Regulation (EU) 2022/1288.

(b) No sustainable investment objective

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

(c) Environmental or social characteristics of the financial product

The Sub-Fund intends to hold at least 80% of its Net Asset Value in Eligible CIS which are classified as either Article 8 (funds that promote E/S characteristics) or Article 9 (funds that have a sustainable investment objective) in line with the SFDR. No index has been designated for the Sub-Fund as a reference benchmark for the purposes of the SFDR.

The Sub-Fund is actively managed and is not subject to any limitation on the portion of its assets that may be exposed, through investment in Eligible CIS, to any one E/S characteristic or any one sustainable investment objective.

(d) Investment strategy

Architas Flexible Bond Fund is actively managed. In order to achieve its objective, Architas Flexible Bond will invest in Eligible CIS and may make direct investments. The Eligible CIS in which Architas Flexible Bond will invest will have a range of underlying investments which may reflect either direct investment in, or exposure to, fixed-income securities, money market instruments, derivatives, financial indices and/or currencies. Some of the Eligible CIS in which Architas Flexible Bond will invest will be passively managed whereas others will be actively managed.

The Investment Manager will conduct an independent ESG due diligence process in respect of each target Eligible CIS (which is proprietary to the Investment Manager) and covers governance policies of the fund managers.

(e) Proportion of investments

It is intended that at least 80% of the investments of the Sub-Fund will be in underlying funds that promote E/S characteristics (Article 8 funds) and / or investment funds that have a sustainable investment objective (Article 9 funds).

(f) Monitoring of environmental or social characteristic

The underlying funds pursue an investment strategy that factors in certain environmental and / or social characteristics in the manner contemplated by Article 8 of the SFDR but does not have as its objective a sustainable investment as such term is understood in accordance with the SFDR. The Sub-Fund intends to hold at least 80% of its Net Asset Value in Eligible CIS which are classified as either Article 8 (funds that promote E/S characteristics) or Article 9 (funds that have a sustainable investment objective) in line with the SFDR.

The sustainability indicator for the Sub-Fund is:

- The percentage of investments invested in Article 8 or Article 9 under SFDR. Daily automated monitoring undertaken by the Manager to ensure the 80% threshold is maintained.

The environmental and social characteristics the Fund of Fund seeks to promote are monitored via a periodic ESG due diligence assessment of each underlying fund. The assessment includes completion of the Manager's proprietary ESG questionnaire at the initial selection process which covers:

- ESG Policy and governance
- ESG integration in investments
- Engagement and stewardship
- Risk and reporting.

Using collected information, the Manager will form a view on the robustness of the ESG process (including peer comparison) and compute its aggregated ESG score. Any Eligible CIS which scores below average will be flagged for further review; this could result in removal from approved buy lists. The same process is repeated at regular intervals thereafter to verify that each underlying fund continues to promote environmental and/or social characteristics.

(g) Methodologies

The methodologies used to measure how the environmental and social characteristics are met are:

- the daily check that the sustainability indicator for the Sub-Fund, i.e. the percentage of investments invested in Article 8 or 9 under SFDR continues to be 80% or higher.
- the review of the results of the ESG due diligence assessments.

(h) Data sources and processing

Architas uses the following data sources: proprietary qualitative ESG scoring, TRUCOST (ESG Data Provider) and Morningstar (fund transparency to obtain complete inventories and underlying funds EETs). The collection and matching of ESG data with the underlying assets, as well as the calculation of regulatory data (SFDR, EU TAXONOMY) are performed by an external aggregator specialized in sustainable finance - Weefin. All data produced by Weefin is checked internally by ESG/SFDR Analyst of Data Reporting team.

(i) Limitations to methodologies and data

Currently, the ESG data market is still developing. ESG Data Provider TRUCOST regularly updates its database, which allows us to enrich our analyses, internal methodologies and to complete our regulatory calculations (SFDR, EU TAXONOMY).

The ESG data used in the investment process are based on ESG methodologies which rely in part on third party data. They are subjective and may change over time. Despite several initiatives, the lack of harmonized definitions can make ESG criteria heterogeneous. As such, the different investment strategies that use ESG criteria are difficult to compare with each other. Strategies that incorporate ESG criteria may use ESG data that appear similar, but which should be distinguished because their calculation method may be different.

One of the main limitations of this approach is related to the limited availability of data relevant to assess ESG risks and opportunities: such data is not yet systematically disclosed by issuers, and when disclosed may follow various methodologies. The investor should be aware that most of the ESG information is based on historical data and that they may not reflect the future ESG performance or risks of the investments.

Limitations related to the current availability of reliable ESG data should not affect our financial products as we remain very cautious in the use of this data.

In addition, all our internal methodologies as well as those of our aggregator Weefin and internal calculations related to ES are analyzed and validated by the Risk Department.

(j) Due diligence

A proprietary, qualitative ESG Due Diligence assessment is undertaken for both investments and delegate Investment Managers, for new investments and as part of regular monitoring - and focuses on both firm level and fund/product level assessments taking into account ESG risks and opportunities. It focuses on multiple questions in 4 main sections: ESG Policy and governance, ESG Integration in investment, Engagement and Stewardship and Risk and Reporting. This is completed through a dedicated questionnaire of the Manager to be completed by the Investment Manager followed by face-to-face due diligence meeting(s). Based on the information gathered, the sector specialists form a view on the robustness of the ESG process (including peer comparison) and present findings back to the investment team, where an ESG score is awarded to new investments or updated if part of regular monitoring. The ESG function is responsible for maintaining a qualitative scoring system with a minimum ESG Score Threshold based on type of fund, under which the fund is flagged for further review if it scores below the ESG Score Threshold; this could result in removal from approved buy lists.

Architas' responsible investment policy can be found here: https://ie.architas.com/globalassets/ireland/policies/arc5481-what-responsible-investing-means-to-us_2103_eng_final.pdf

(k) Engagement policies

Due to the types of funds managed by AMMEL (multi manager funds and fund of funds) it has not published an Engagement Policy. It has made the required disclosures under the Shareholders Rights Directive here: <https://ie.architas.com/globalassets/ireland/policies/ammel-shareholders-rights-directive-disclosure.pdf>

Website product disclosure for financial products that promote environmental or social characteristics. Please refer to the Sub-Fund Supplement to the Prospectus and respective annex for full details.

Sub Fund Name

Sub Fund Name: Architas Flexible Equity

Legal Entity Identifier: 549300JDVS6OLB82DF02

(a) Summary

The below information is the Summary required under Articles 24 to 49 of Commission Delegated Regulation (EU) 2022/1288.

(b) No sustainable investment objective

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

(c) Environmental or social characteristics of the financial product

The Sub-Fund intends to hold at least 80% of its Net Asset Value in Eligible CIS which are classified as either Article 8 (funds that promote E/S characteristics) or Article 9 (funds that have a sustainable investment objective) in line with the SFDR. No index has been designated for the Sub-Fund as a reference benchmark for the purposes of the SFDR.

The Sub-Fund is actively managed and is not subject to any limitation on the portion of its assets that may be exposed, through investment in Eligible CIS, to any one E/S characteristic or any one sustainable investment objective.

(d) Investment strategy

Architas Flexible Equity Fund is actively managed. In order to achieve its objective, Architas Flexible Equity will invest in Eligible CIS and may make direct investments. The Eligible CIS in which Architas Flexible Equity will invest will have a range of underlying investments which may reflect either direct investment in, or exposure to, equities and/or equity-related securities, money market instruments, derivatives, financial indices and/or currencies. Some of the Eligible CIS in which Architas Flexible Equity will invest will be passively managed whereas others will be actively managed.

The Investment Manager will conduct an independent ESG due diligence process in respect of each target Eligible CIS (which is proprietary to the Investment Manager) and covers governance policies of the fund managers.

(e) Proportion of investments

It is intended that at least 80% of the investments of the Sub-Fund will be in underlying funds that promote E/S characteristics (Article 8 funds) and / or investment funds that have a sustainable investment objective (Article 9 funds).

(f) Monitoring of environmental or social characteristic

The underlying funds pursue an investment strategy that factors in certain environmental and / or social characteristics in the manner contemplated by Article 8 of the SFDR but does not have as its objective a sustainable investment as such term is understood in accordance with the SFDR. The Sub-Fund intends to hold at least 80% of its Net Asset Value in Eligible CIS which are classified as either Article 8 (funds that promote E/S characteristics) or Article 9 (funds that have a sustainable investment objective) in line with the SFDR.

The sustainability indicator for the Sub-Fund is:

- The percentage of investments invested in Article 8 or Article 9 under SFDR. Daily automated monitoring undertaken by the Manager to ensure the 80% threshold is maintained.

The environmental and social characteristics the Fund of Fund seeks to promote are monitored via a periodic ESG due diligence assessment of each underlying fund. The assessment includes completion of the Manager's proprietary ESG questionnaire at the initial selection process which covers:

- ESG Policy and governance
 - ESG integration in investments
 - Engagement and stewardship
 - Risk and reporting.
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Using collected information, the Manager will form a view on the robustness of the ESG process (including peer comparison) and compute its aggregated ESG score. Any Eligible CIS which scores below average will be flagged for further review; this could result in removal from approved buy lists. The same process is repeated at regular intervals thereafter to verify that each underlying fund continues to promote environmental and/or social characteristics.

(g) Methodologies

The methodologies used to measure how the environmental and social characteristics are met are:

- the daily check that the sustainability indicator for the Sub-Fund, i.e. the percentage of investments invested in Article 8 or 9 under SFDR continues to be 80% or higher.
- the review of the results of the ESG due diligence assessments.

(h) Data sources and processing

Architas uses the following data sources: proprietary qualitative ESG scoring, TRUCOST (ESG Data Provider) and Morningstar (fund transparency to obtain complete inventories and underlying funds EETs). The collection and matching of ESG data with the underlying assets, as well as the calculation of regulatory data (SFDR, EU TAXONOMY) are performed by an external aggregator specialized in sustainable finance - Weefin. All data produced by Weefin is checked internally by ESG/SFDR Analyst of Data Reporting team.

(i) Limitations to methodologies and data

Currently, the ESG data market is still developing. ESG Data Provider TRUCOST regularly updates its database, which allows us to enrich our analyses, internal methodologies and to complete our regulatory calculations (SFDR, EU TAXONOMY).

The ESG data used in the investment process are based on ESG methodologies which rely in part on third party data. They are subjective and may change over time. Despite several initiatives, the lack of harmonized definitions can make ESG criteria heterogeneous. As such, the different investment strategies that use ESG criteria are difficult to compare with each other. Strategies that incorporate ESG criteria may use ESG data that appear similar, but which should be distinguished because their calculation method may be different.

One of the main limitations of this approach is related to the limited availability of data relevant to assess ESG risks and opportunities: such data is not yet systematically disclosed by issuers, and when disclosed may follow various methodologies. The investor should be aware that most of the ESG information is based on historical data and that they may not reflect the future ESG performance or risks of the investments.

Limitations related to the current availability of reliable ESG data should not affect our financial products as we remain very cautious in the use of this data.

In addition, all our internal methodologies as well as those of our aggregator Weefin and internal calculations related to ES are analyzed and validated by the Risk Department.

(j) Due diligence

A proprietary, qualitative ESG Due Diligence assessment is undertaken for both investments and delegate Investment Managers, for new investments and as part of regular monitoring - and focuses on both firm level and fund/product level assessments taking into account ESG risks and opportunities. It focuses on multiple questions in 4 main sections: ESG Policy and governance, ESG Integration in investment, Engagement and Stewardship and Risk and Reporting. This is completed through a dedicated questionnaire of the Manager to be completed by the Investment Manager followed by face-to-face due diligence meeting(s). Based on the information gathered, the sector specialists form a view on the robustness of the ESG process (including peer comparison) and present findings back to the investment team, where an ESG score is awarded to new investments or updated if part of regular monitoring. The ESG function is responsible for maintaining a qualitative scoring system with a minimum ESG Score Threshold based on type of fund, under which the fund is flagged for further review if it scores below the ESG Score Threshold; this could result in removal from approved buy lists.

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(k) Engagement policies

Due to the types of funds managed by AMMEL (multi manager funds and fund of funds) it has not published an Engagement Policy. It has made the required disclosures under the Shareholders Rights Directive here: <https://ie.architas.com/globalassets/ireland/policies/ammel-shareholders-rights-directive-disclosure.pdf>

Website product disclosure for financial products that promote environmental or social characteristics. Please refer to the Sub-Fund Supplement to the Prospectus and respective annex for full details.

Sub Fund Name

Sub Fund Name: Architas Multi-Asset Balanced

Legal Entity Identifier: 549300ICRL1B7288IG30

(a) Summary

The below information is the Summary required under Articles 24 to 49 of Commission Delegated Regulation (EU) 2022/1288.

(b) No sustainable investment objective

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

(c) Environmental or social characteristics of the financial product

The Sub-Fund intends to hold at least 80% of its Net Asset Value in Eligible CIS which are classified as either Article 8 (funds that promote E/S characteristics) or Article 9 (funds that have a sustainable investment objective) in line with the SFDR. No index has been designated for the Sub-Fund as a reference benchmark for the purposes of the SFDR.

The Sub-Fund is actively managed and is not subject to any limitation on the portion of its assets that may be exposed, through investment in Eligible CIS, to any one E/S characteristic or any one sustainable investment objective.

(d) Investment strategy

Architas Multi-Asset Balanced is actively managed. In order to achieve its objective, Architas Multi-Asset Balanced will invest in Eligible CIS and may make direct investments (as described below). Some of the Eligible CIS in which Architas Multi-Asset Balanced will invest will be passively managed whereas others will be actively managed. The Eligible CIS in which Architas Multi-Asset Balanced will invest will have a range of underlying investments which may reflect either direct investment in, or exposure to, fixed-income securities, equities and/or equity-related securities, money market instruments, commodities, real estate, derivatives, financial indices and/or currencies.

The Investment Manager will conduct an independent ESG due diligence process in respect of each target Eligible CIS (which is proprietary to the Investment Manager) and covers governance policies of the fund managers.

(e) Proportion of investments

It is intended that at least 80% of the investments of the Sub-Fund will be in underlying funds that promote E/S characteristics (Article 8 funds) and / or investment funds that have a sustainable investment objective (Article 9 funds).

(f) Monitoring of environmental or social characteristic

The underlying funds pursue an investment strategy that factors in certain environmental and / or social characteristics in the manner contemplated by Article 8 of the SFDR but does not have as its objective a sustainable investment as such term is understood in accordance with the SFDR. The Sub-Fund intends to hold at least 80% of its Net Asset Value in Eligible CIS which are classified as either Article 8 (funds that promote E/S characteristics) or Article 9 (funds that have a sustainable investment objective) in line with the SFDR.

The sustainability indicator for the Sub-Fund is:

- The percentage of investments invested in Article 8 or Article 9 under SFDR. Daily automated monitoring undertaken by the Manager to ensure the 80% threshold is maintained.

The environmental and social characteristics the Fund of Fund seeks to promote are monitored via a periodic ESG due diligence assessment of each underlying fund. The assessment includes completion of the Manager's proprietary ESG questionnaire at the initial selection process which covers:

- ESG Policy and governance
- ESG integration in investments
- Engagement and stewardship
- Risk and reporting.

Using collected information, the Manager will form a view on the robustness of the ESG process (including peer comparison) and compute its aggregated ESG score. Any Eligible CIS which scores below average will be flagged for further review; this could result in removal from approved buy lists. The same process is repeated at regular intervals thereafter to verify that each underlying fund continues to promote environmental and/or social characteristics.

(g) Methodologies

The methodologies used to measure how the environmental and social characteristics are met are:

- the daily check that the sustainability indicator for the Sub-Fund, i.e. the percentage of investments invested in Article 8 or 9 under SFDR continues to be 80% or higher.
- the review of the results of the ESG due diligence assessments.

(h) Data sources and processing

Architas uses the following data sources: proprietary qualitative ESG scoring, TRUCOST (ESG Data Provider) and Morningstar (fund transparency to obtain complete inventories and underlying funds EETs). The collection and matching of ESG data with the underlying assets, as well as the calculation of regulatory data (SFDR, EU TAXONOMY) are performed by an external aggregator specialized in sustainable finance - Weefin. All data produced by Weefin is checked internally by ESG/SFDR Analyst of Data Reporting team.

(i) Limitations to methodologies and data

Currently, the ESG data market is still developing. ESG Data Provider TRUCOST regularly updates its database, which allows us to enrich our analyses, internal methodologies and to complete our regulatory calculations (SFDR, EU TAXONOMY).

The ESG data used in the investment process are based on ESG methodologies which rely in part on third party data. They are subjective and may change over time. Despite several initiatives, the lack of harmonized definitions can make ESG criteria heterogeneous. As such, the different investment strategies that use ESG criteria are difficult to compare with each other. Strategies that incorporate ESG criteria may use ESG data that appear similar, but which should be distinguished because their calculation method may be different.

One of the main limitations of this approach is related to the limited availability of data relevant to assess ESG risks and opportunities: such data is not yet systematically disclosed by issuers, and when disclosed may follow various methodologies. The investor should be aware that most of the ESG information is based on historical data and that they may not reflect the future ESG performance or risks of the investments.

Limitations related to the current availability of reliable ESG data should not affect our financial products as we remain very cautious in the use of this data.

In addition, all our internal methodologies as well as those of our aggregator Weefin and internal calculations related to ES are analyzed and validated by the Risk Department.

(j) Due diligence

A proprietary, qualitative ESG Due Diligence assessment is undertaken for both investments and delegate Investment Managers, for new investments and as part of regular monitoring - and focuses on both firm level and fund/product level assessments taking into account ESG risks and opportunities. It focuses on multiple questions in 4 main sections: ESG Policy and governance, ESG Integration in investment, Engagement and Stewardship and Risk and Reporting. This is completed through a dedicated questionnaire of the Manager to be completed by the Investment Manager followed by face-to-face due diligence meeting(s). Based on the information gathered, the sector specialists form a view on the robustness of the ESG process (including peer comparison) and present findings back to the investment team, where an ESG score is awarded to new investments or updated if part of regular monitoring. The ESG function is responsible for maintaining a qualitative scoring system with a minimum ESG Score Threshold based on type of fund, under which the fund is flagged for further review if it scores below the ESG Score Threshold; this could result in removal from approved buy lists.

Architas' responsible investment policy can be found here: https://ie.architas.com/globalassets/ireland/policies/arc5481-what-responsible-investing-means-to-us_2103_eng_final.pdf

(k) Engagement policies

Due to the types of funds managed by AMMEL (multi manager funds and fund of funds) it has not published an Engagement Policy. It has made the required disclosures under the Shareholders Rights Directive here: <https://ie.architas.com/globalassets/ireland/policies/ammel-shareholders-rights-directive-disclosure.pdf>

Website product disclosure for financial products that have sustainable investments as their objective. Please refer to the Sub-Fund Supplement to the Prospectus and respective annex for full details.

Sub Fund Name

Sub Fund name: E.P.I.C. Global Multi-Asset Fund

Legal entity identifier: 213800URZYJNTSALWT60

(a) Summary

The below information is the Summary required under Articles 24 to 49 of Commission Delegated Regulation (EU) 2022/1288.

(b) No significant harm to the sustainable investment objective

When investing in Eligible CIS, the Manager will invest in funds which are classified as Article 9 in line with the SFDR. The Manager also conducts independent environmental, social and governance (“ESG”) due diligence, designed to assess Eligible CIS’s ESG integration capabilities. The due diligence relies on a detailed proprietary ESG questionnaire, followed by face-to-face due diligence meeting(s) with the Eligible CIS’s manager and cover:

- ESG policy and governance
- Integration of ESG consideration in investment decision process
- Engagement and voting
- Monitoring and Reporting

Using collected information, the Manager will form a view on the robustness of the ESG process (including peer comparison) and compute its aggregated ESG score. Any Eligible CIS which score below average will be flagged for further review; this could result in removal from approved buy lists.

The obligation to do no significant harm is monitored through the positive evolution of the relevant PAIs over time.

Principal adverse indicators will be factored into the investment process as appropriate.

Further information will be available in the annual report.

We evaluate human rights issues which may include alignment with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights.

As part of the ESG due diligence process, we evaluate each underlying fund manager’s approach to issues concerning human rights through the exclusion policies applied by each fund manager.

Further information will be available in the periodic report.

(c) Sustainable investment objective of the financial product

The investment objective of the Sub-Fund is to provide a return for investors over the medium to long term based on a combination of capital growth and income through exposure to a diversified and actively managed portfolio of global securities with a focus on Sustainable Investments.

“Sustainable investments” are investments 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. Environmental objectives includes both economic activities that contribute to at least one of the environmental objectives as provided for in the Taxonomy Regulation ((EU) 2020/852) on the establishment of a framework to facilitate sustainable investment and economic activities with environmental objectives that do not qualify as environmentally sustainable under the Taxonomy Regulation.

While the fund has sustainable investment as its investment objective and commits to hold 100% of its Net Asset Value (excluding cash) in investments that the Manager believes are Sustainable Investments, the fund is not allocating a specific minimum threshold between environmental and/or social sustainable investments as this will depend on the availability of any given sustainable investment.

For the avoidance of doubt, when investing in underlying funds classified as article 9, the Manager considers such funds as sustainable investments.

(d) Investment strategy

The E.P.I.C. Global Multi-Asset Fund intends to hold 100% of its Net Asset Value (excluding cash) in Eligible CIS and direct investments that the Manager believes are Sustainable Investments. Direct investments are not expected to exceed 10% of the E.P.I.C. Global Multi-Asset Fund’s Net Asset Value. The Manager will utilise its extensive research and market insight to seek out opportunities for outperformance through asset allocation decisions as determined by the Manager in its discretion.

When investing in Eligible CIS, the Manager will invest in funds which are classified as Article 9 in line with the SFDR.

The Eligible CIS in which E.P.I.C. Global Multi-Asset Fund will invest will have a range of underlying investments which may reflect either direct investment in, or exposure to, fixed-income securities, equities and/or equity-related securities, money market instruments, derivatives, financial indices and/or currencies. Some of the Eligible CIS in which E.P.I.C. Global Multi-Asset Fund will invest will be passively managed whereas others will be actively managed. Some of the Eligible CIS may be leveraged from time to time. E.P.I.C. Global Multi-Asset Fund is not subject to any limitation on the portion of its assets that may be exposed, through direct investment or investment in Eligible CIS, to any one country, region, sector or any market capitalisation.

In addition to Eligible CIS, E.P.I.C. Global Multi-Asset Fund may also, subject to the indicative asset allocations shown above, invest directly in equities (such as common or preferred stocks), units or shares of Real Estate Investment Trusts (“REITS”) and equity related securities (such as American Depositary Receipts (“ADRs”) and Global Depositary Receipts (“GDRs)). Direct investments are not expected to exceed 10% of the E.P.I.C. Global Multi-Asset Fund’s Net Asset Value.

The Manager conducts independent environmental, social and governance (“ESG”) due diligence, designed to assess Eligible CIS’s ESG integration capabilities. The due diligence relies on a detailed proprietary ESG questionnaire, followed by face-to-face due diligence meeting(s) with the Eligible CIS’s manager and covers governance policies of the Investment Managers.

When selecting direct investments, the Manager will follow an impact investment strategy which considers an issuer’s corporate governance practices. The Manager will consider governance factors in respect of its consideration of Sustainable Investments – such governance factors include sound management structures, executive remuneration, employee relations, remuneration of staff and tax compliance, and reputational issues for companies such as weak labour practices.

(e) Proportion of investments

The Sub-Fund intends to hold 90% of its Net Asset Value in Eligible CIS and direct investments that the Manager believes are Sustainable Investments.

(f) Monitoring of sustainable investment objective

The investment objective of the Sub-Fund is to provide long-term growth of capital with a medium to high volatility level from a diversified and actively managed portfolio of securities with a focus on Sustainable Investments. While the fund has sustainable investment as its investment objective and commits to hold 100% of its Net Asset Value (excluding cash) in investments that the Manager believes are Sustainable Investments, the fund is not allocating a specific minimum threshold between environmental and/or social sustainable investments as this will depend on the availability of any given sustainable investment.

For the avoidance of doubt, when investing in underlying funds classified as article 9, the Manager considers such funds as sustainable investments.

The sustainability indicator for the Sub-Fund is:

- The percentage of investments invested in Article 9 under SFDR. Daily automated monitoring undertaken by the Manager to ensure the 100% threshold is maintained.

The Manager conducts independent environmental, social and governance (“ESG”) due diligence, designed to assess Eligible CIS’s ESG integration capabilities. The due diligence relies on a detailed proprietary ESG questionnaire, followed by face-to-face due diligence meeting(s) with the Eligible CIS’s manager and cover:

- ESG Policy and governance
- ESG Integration
- Engagement and stewardship
- Risk and Reporting

Using collected information, the Manager will form a view on the robustness of the ESG process (including peer comparison) and compute its aggregated ESG score. Any Eligible CIS which score below average will be flagged for further review; this could result in removal from approved buy lists. The same process is repeated at regular intervals thereafter to verify that each underlying fund continues to promote environmental and/or social characteristics.

(g) Methodologies

The methodologies used to measure the attainment of the sustainable investment objective and the sustainability indicators to measure the attainment of that sustainable investment objective are:

- the daily check that the sustainability indicator for the Sub-Fund, i.e. the percentage of investments invested in Article 9 under SFDR continues to be the 100% or higher.
- the review of the results of the ESG due diligence assessments.

(h) Data sources and processing

Architas uses the following data sources: proprietary qualitative ESG scoring, TRUCOST (ESG Data Provider) and Morningstar (fund transparency to obtain complete inventories and underlying funds EETs). The collection and matching of ESG data with the underlying assets, as well as the calculation of regulatory data (SFDR, EU TAXONOMY) are performed by an external aggregator

specialized in sustainable finance - Weefin. All data produced by Weefin is checked internally by ESG/SFDR Analyst of Data Reporting team.

(i) Limitations to methodologies and data

Currently, the ESG data market is still developing. ESG Data Provider TRUCOST regularly updates its database, which allows us to enrich our analyses, internal methodologies and to complete our regulatory calculations (SFDR, EU TAXONOMY).

The ESG data used in the investment process are based on ESG methodologies which rely in part on third party data. They are subjective and may change over time. Despite several initiatives, the lack of harmonized definitions can make ESG criteria heterogeneous. As such, the different investment strategies that use ESG criteria are difficult to compare with each other. Strategies that incorporate ESG criteria may use ESG data that appear similar, but which should be distinguished because their calculation method may be different.

One of the main limitations of this approach is related to the limited availability of data relevant to assess ESG risks and opportunities: such data is not yet systematically disclosed by issuers, and when disclosed may follow various methodologies. The investor should be aware that most of the ESG information is based on historical data and that they may not reflect the future ESG performance or risks of the investments.

Limitations related to the current availability of reliable ESG data should not affect our financial products as we remain very cautious in the use of this data.

In addition, all our internal methodologies as well as those of our aggregator Weefin and internal calculations related to ES are analyzed and validated by the Risk Department.

(j) Due diligence

A proprietary, qualitative ESG Due Diligence assessment is undertaken for both investments and delegate Investment Managers, for new investments and as part of regular monitoring - and focuses on both firm level and fund/product level assessments taking into account ESG risks and opportunities. It focuses on multiple questions in 4 main sections: ESG Policy and governance, ESG Integration in investment, Engagement and Stewardship and Risk and Reporting. This is completed through a dedicated questionnaire of the Manager to be completed by the Investment Manager followed by face-to-face due diligence meeting(s). Based on the information gathered, the sector specialists form a view on the robustness of the ESG process (including peer comparison) and present findings back to the investment team, where an ESG score is awarded to new investments or updated if part of regular monitoring. The ESG function is responsible for maintaining a qualitative scoring system with a minimum ESG Score Threshold based on type of fund, under which the fund is flagged for further review if it scores below the ESG Score Threshold; this could result in removal from approved buy lists.

Architas' responsible investment policy can be found here: https://ie.architas.com/globalassets/ireland/policies/arc5481-what-responsible-investing-means-to-us_2103_eng_final.pdf

(k) Engagement policies

Due to the types of funds managed by AMMEL (multi manager funds and fund of funds) it has not published an Engagement Policy. It has made the required disclosures under the Shareholders Rights Directive here: <https://ie.architas.com/globalassets/ireland/policies/ammel-shareholders-rights-directive-disclosure.pdf>

Website product disclosure for financial products that have sustainable investments as their objective. Please refer to the Sub-Fund Supplement to the Prospectus and respective annex for full details.

Sub Fund Name

Sub Fund name: E.P.I.C. Global Equity Opportunities Fund

Legal entity identifier: 213800NZSFBLVTZLKH92

(a) Summary

The below information is the Summary required under Articles 24 to 49 of Commission Delegated Regulation (EU) 2022/1288.

(b) No significant harm to the sustainable investment objective

When investing in Eligible CIS, the Manager will invest in funds which are classified as Article 9 in line with the SFDR. The Manager also conducts independent environmental, social and governance (“ESG”) due diligence, designed to assess Eligible CIS’s ESG integration capabilities. The due diligence relies on a detailed proprietary ESG questionnaire, followed by face-to-face due diligence meeting(s) with the Eligible CIS’s manager and cover:

- ESG policy and governance
- ESG Integration
- Engagement and stewardship
- Risk and Reporting

Using collected information, the Manager will form a view on the robustness of the ESG process (including peer comparison) and compute its aggregated ESG score. Any Eligible CIS which score below average will be flagged for further review; this could result in removal from approved buy lists.

The obligation to do no significant harm is monitored through the positive evolution of the relevant PAIs over time.

Principal adverse indicators will be factored into the investment process as appropriate.

Further information will be available in the annual report.

We evaluate human rights issues which may include alignment with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights.

As part of the ESG due diligence process, we evaluate each underlying fund manager’s approach to issues concerning human rights through the exclusion policies applied by each fund manager.

Further information will be available in the periodic report.

(c) Sustainable investment objective of the financial product

The investment objective of the Sub-Fund is to provide long-term growth of capital with a medium to high volatility level from a diversified and actively managed portfolio of securities with a focus on Sustainable Investments.

“Sustainable investments” are investments 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. Environmental objectives includes both economic activities that contribute to at least one of the environmental objectives as provided for in the Taxonomy Regulation ((EU) 2020/852) on the establishment of a framework to facilitate sustainable investment and economic activities with environmental objectives that do not qualify as environmentally sustainable under the Taxonomy Regulation.

While the fund has sustainable investment as its investment objective and commits to hold 100% of its Net Asset Value (excluding cash) in investments that the Manager believes are Sustainable Investments, the fund is not allocating a specific minimum threshold between environmental and/or social sustainable investments as this will depend on the availability of any given sustainable investment.

For the avoidance of doubt, when investing in underlying funds classified as article 9, the Manager considers such funds as sustainable investments.

(d) Investment strategy

The E.P.I.C. Global Equity Opportunities Fund intends to hold 100% of its Net Asset Value (excluding cash) in Eligible CIS and direct investments that the Manager believes are Sustainable Investments. Direct investments are not expected to exceed 10% of the E.P.I.C. Global Equity Opportunities Fund’s Net Asset Value.

When investing in Eligible CIS, the Manager will invest in funds which are classified as Article 9 in line with the SFDR.

The Eligible CIS in which E.P.I.C. Global Equity Opportunities Fund will invest will have a range of underlying investments which may reflect either direct investment in, or exposure to, equities and/or equity-related securities, money market instruments, derivatives, financial indices and/or currencies. Some of the Eligible CIS in which E.P.I.C. Global Equity Opportunities Fund will invest will be passively managed whereas others will be actively managed. Some of the Eligible CIS may be leveraged from time to time. E.P.I.C. Global Equity Opportunities Fund is not subject to any limitation on the portion of its assets that may be exposed, through direct investment or investment in Eligible CIS, to any one country, region, sector or any market capitalisation.

In addition to Eligible CIS, E.P.I.C. Global Equity Opportunities Fund may also invest directly in equities (such as common or preferred stocks), units or shares of Real Estate Investment Trusts (“REITS”) and equity related-securities (such as American Depositary Receipts (“ADRs”) and Global Depositary Receipts (“GDRs)). Direct investments are not expected to exceed 10% of the E.P.I.C. Global Equity Opportunities Fund’s Net Asset Value.

The Manager conducts independent environmental, social and governance (“ESG”) due diligence, designed to assess Eligible CIS’s ESG integration capabilities. The due diligence relies on a detailed proprietary ESG questionnaire, followed by face-to-face due diligence meeting(s) with the Eligible CIS’s manager and covers governance policies of the Investment Managers.

When selecting direct investments, the Manager will follow an impact investment strategy which considers an issuer’s corporate governance practices. The Manager will consider governance factors in respect of its consideration of Sustainable Investments – such governance factors include sound management structures, executive remuneration, employee relations, remuneration of staff and tax compliance, and reputational issues for companies such as weak labour practices.

(e) Proportion of investments

The Sub-Fund intends to hold 90% of its Net Asset Value in Eligible CIS and direct investments that the Manager believes are Sustainable Investments.

(f) Monitoring of sustainable investment objective

The investment objective of the Sub-Fund is to provide long-term growth of capital with a medium to high volatility level from a diversified and actively managed portfolio of securities with a focus on Sustainable Investments. While the fund has sustainable investment as its investment objective and commits to hold 100% of its Net Asset Value (excluding cash) in investments that the Manager believes are Sustainable Investments, the fund is not allocating a specific minimum threshold between environmental and/or social sustainable investments as this will depend on the availability of any given sustainable investment.

For the avoidance of doubt, when investing in underlying funds classified as article 9, the Manager considers such funds as sustainable investments.

The sustainability indicator for the Sub-Fund is:

- The percentage of investments invested in Article 9 under SFDR. Daily automated monitoring undertaken by the Manager to ensure the 100% threshold is maintained.

The Manager conducts independent environmental, social and governance (“ESG”) due diligence, designed to assess Eligible CIS’s ESG integration capabilities. The due diligence relies on a detailed proprietary ESG questionnaire, followed by face-to-face due diligence meeting(s) with the Eligible CIS’s manager and cover:

- ESG Policy and governance
- ESG Integration
- Engagement and stewardship
- Risk and Reporting

Using collected information, the Manager will form a view on the robustness of the ESG process (including peer comparison) and compute its aggregated ESG score. Any Eligible CIS which score below average will be flagged for further review; this could result in removal from approved buy lists. The same process is repeated at regular intervals thereafter to verify that each underlying fund continues to promote environmental and/or social characteristics.

(g) Methodologies

The methodologies used to measure the attainment of the sustainable investment objective and the sustainability indicators to measure the attainment of that sustainable investment objective are:

- the daily check that the sustainability indicator for the Sub-Fund, i.e. the percentage of investments invested in Article 9 under SFDR continues to be the 100% or higher.
- the review of the results of the ESG due diligence assessments.

(h) Data sources and processing

Architas uses the following data sources: proprietary qualitative ESG scoring, TRUCOST (ESG Data Provider) and Morningstar (fund transparency to obtain complete inventories and underlying funds EETs). The collection and matching of ESG data with the underlying assets, as well as the calculation of regulatory data (SFDR, EU TAXONOMY) are performed by an external aggregator

specialized in sustainable finance - Weefin. All data produced by Weefin is checked internally by ESG/SFDR Analyst of Data Reporting team.

(i) Limitations to methodologies and data

Currently, the ESG data market is still developing. ESG Data Provider TRUCOST regularly updates its database, which allows us to enrich our analyses, internal methodologies and to complete our regulatory calculations (SFDR, EU TAXONOMY).

The ESG data used in the investment process are based on ESG methodologies which rely in part on third party data. They are subjective and may change over time. Despite several initiatives, the lack of harmonized definitions can make ESG criteria heterogeneous. As such, the different investment strategies that use ESG criteria are difficult to compare with each other. Strategies that incorporate ESG criteria may use ESG data that appear similar, but which should be distinguished because their calculation method may be different.

One of the main limitations of this approach is related to the limited availability of data relevant to assess ESG risks and opportunities: such data is not yet systematically disclosed by issuers, and when disclosed may follow various methodologies. The investor should be aware that most of the ESG information is based on historical data and that they may not reflect the future ESG performance or risks of the investments.

Limitations related to the current availability of reliable ESG data should not affect our financial products as we remain very cautious in the use of this data.

In addition, all our internal methodologies as well as those of our aggregator Weefin and internal calculations related to ES are analyzed and validated by the Risk Department.

(j) Due diligence

A proprietary, qualitative ESG Due Diligence assessment is undertaken for both investments and delegate Investment Managers, for new investments and as part of regular monitoring - and focuses on both firm level and fund/product level assessments taking into account ESG risks and opportunities. It focuses on multiple questions in 4 main sections: ESG Policy and governance, ESG Integration in investment, Engagement and Stewardship and Risk and Reporting. This is completed through a dedicated questionnaire of the Manager to be completed by the Investment Manager followed by face-to-face due diligence meeting(s). Based on the information gathered, the sector specialists form a view on the robustness of the ESG process (including peer comparison) and present findings back to the investment team, where an ESG score is awarded to new investments or updated if part of regular monitoring. The ESG function is responsible for maintaining a qualitative scoring system with a minimum ESG Score Threshold based on type of fund, under which the fund is flagged for further review if it scores below the ESG Score Threshold; this could result in removal from approved buy lists.

Architas' responsible investment policy can be found here: https://ie.architas.com/globalassets/ireland/policies/arc5481-what-responsible-investing-means-to-us_2103_eng_final.pdf

(k) Engagement policies

Due to the types of funds managed by AMMEL (multi manager funds and fund of funds) it has not published an Engagement Policy. It has made the required disclosures under the Shareholders Rights Directive here: <https://ie.architas.com/globalassets/ireland/policies/ammel-shareholders-rights-directive-disclosure.pdf>
