



Brussels, 31.10.2022
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ANNEXES 1 to 4

ANNEXES

to the

COMMISSION DELEGATED REGULATION (EU) .../...

amending and correcting the regulatory technical standards laid down in Delegated Regulation (EU) 2022/1288 as regards the content and presentation of information in relation to disclosures in precontractual documents and periodic reports for financial products investing in environmentally sustainable economic activities

Periodic 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: L&P Model Portfolio for Discretionary Investment Clients

Legal entity identifier: N/A

Environmental and/or social characteristics

Did this financial product have a sustainable investment objective?

<input checked="" type="radio"/> <input type="radio"/> <input type="checkbox"/> Yes	<input type="radio"/> <input type="radio"/> <input checked="" type="checkbox"/> No
<input type="checkbox"/> It made sustainable investments with an environmental objective: ___% <ul style="list-style-type: none"> <input type="checkbox"/> in economic activities that qualify as environmentally sustainable under the EU Taxonomy <input type="checkbox"/> in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy <input type="checkbox"/> It made sustainable investments with a social objective: ___%	<input checked="" type="checkbox"/> It promoted Environmental/Social (E/S) characteristics and while it did not have as its objective a sustainable investment, it had a proportion of <u>46.8%</u> of sustainable investments <ul style="list-style-type: none"> <input checked="" type="checkbox"/> with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy <input checked="" type="checkbox"/> with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy <input checked="" type="checkbox"/> with a social objective <input type="checkbox"/> It promoted E/S characteristics, but did not make any sustainable investments

Sustainable investment means an investment in an economic activity that contributes to an environmental or social objective, provided that the investment does not significantly harm any environmental or social objective and that the investee companies follow

The **EU Taxonomy** is a classification system laid down in Regulation (EU) 2020/852, establishing a list of **environmentally sustainable economic activities**. That Regulation does not include a list of socially sustainable economic activities. Sustainable investments with an environmental objective might



To what extent were the environmental and/or social characteristics promoted by this financial product met?

The Model Portfolio promoted the following environmental and social characteristics:

Environmental Characteristics

- (a) *climate change mitigation: the Model Portfolio promoted this characteristic through its investments in existing renewable energy plants and existing forestry plantations (which sequestered carbon from the atmosphere). Such investments were made both directly (investment in the securities of issuers who operate renewable plants and plantations) and indirectly (investment in Portfolio Funds which, in turn, invested in these sectors);*

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

- (b) climate change adaptation: the Model Portfolio invested in issuers of securities/Portfolio Funds that invested in forestry plantations, issuers and Portfolio Funds which commenced construction of new renewable energy plants and issuers or Portfolio Funds which carried out afforestation and reforestation. Such investments were made directly (investment in the securities of issuers who carry out such activities) and indirectly (investment in Portfolio Funds which, in turn, invested in these sectors).
- (c) the sustainable use and protection of water and marine resources: the Model Portfolio invested in issuers of securities and Portfolio Funds in the forestry sector where the underlying forest plantations contained rivers and lakes - each of these issuers had a specific water protection plan for the protection of these water areas within their plantations;
- (d) the transition to a circular economy: the Model Portfolio invested in issuers that invested in waste water treatment, recycling and use of farm and animal waste to generate electricity;
- (e) the protection and restoration of biodiversity and ecosystems: the Model Portfolio invested in issuers that abided by the Forest Stewardship Council standards in regard to biodiversity and ecosystems protection.

Social Characteristics:

- (a) the Model Portfolio invested in a basket of investments that targetted the creation of employment to a greater extent than that available from investing in global equity markets, as measured by reference to developed-world global equity market (the "Reference Index");
- (b) the Model Portfolio made investments that provided a direct economic, environmental and/or social impact to communities based in developing markets, through the provision of financial credit, or the provision of renewable electricity to homes.

● **How did the sustainability indicators perform?**

The portfolio performed well in all sustainability indicators, leading to no violations within the binding criteria. For a further breakdown of sustainability indicator performance, please see the table below (compiled from information on all investments where such information was available):

Category	Indicator	2024 Metric	2025 Metric
<i>Climate Change Mitigation</i>	<i>GHG Emissions (Scopes 1,2, and 3, tCO2e/€m)</i>	151	119
	<i>Carbon Footprint (Portfolio Emissions per €1 million invested) (tCO2e/€m)</i>	151	116
	<i>Carbon Sequestered via Carbon Sinks (Portfolio Emissions per €1 million invested) (tCO2e/€m)</i>	-141	-123
	<i>Net Carbon Footprint. Scope 1+2+3 (tCO2e per €1 million invested)</i>	6	-4
	<i>GHG Intensity of Investee Companies (tCO2e per €1m of revenue)</i>	318	281
	<i>Share of investments in companies active in the fossil fuel sector (% involved)</i>	3.97%	1.70%
	<i>Share of non-renewable energy consumption and production (% of portfolio)</i>	39.60%	29.50%
	<i>Energy consumption intensity per high impact climate sector (GWh per million EUR of revenue of investee companies, per high impact climate sector)</i>	1.78	1
	<i>Climate Change Adaptation</i>	<i># of trees planted per €1m invested</i>	426
<i>tCO2e avoided via energy efficiency or renewable energy investments per €1m invested</i>		133	105
<i>tCO2e sequestered by forestry investments per annum per €1m invested</i>		-141	-123
<i>The sustainable use and protection of water and marine resources:</i>	<i>Total water emissions (tonnes of emissions to water) per €1m invested</i>	0.01	0
<i>Transition to a circular economy</i>	<i>Hazardous waste ratio (tonnes of hazardous waste produced) per €1m invested</i>	0.33	0.17

	<i>Tonnes of material recycled or used in waste to energy, or litres of waste water treated, per €1m invested</i>	0	0
<i>The Protection and Restoration of Biodiversity and Ecosystems</i>	<i>Share of holdings with activities negatively affecting biodiversity-sensitive areas per €1m invested</i>	2.80%	1.90%
	<i>Areas of conservation of natural forest within forestry plantations per €1m invested</i>	370 acres	370 acres
<i>Investment in economically or socially disadvantaged communities:</i>	<i>Number of global citizens, particularly those in developing or frontier market countries, directly receiving an economic, environmental or social impact from Model Portfolio's investment activities, per €1m invested</i>	149	92
<i>Investment that contributes to tackling inequality or that fosters social cohesion:</i>	<i>the ratio of the employment created per €1m investment by the Model Portfolio to exceed the employment created per €1m investment into the Reference Index</i>	1.44	1.40
	<i>Violations of the UN Global Compact Principles and OECD Guidelines for Multinational Organisations</i>	0.00%	0.00%
	<i>% of portfolio with lack of processes to monitor compliance with the UN Global Compact Principles and OECD Guidelines for Multinational Organisations</i>	0.50%	0%
	<i>Unadjusted gender pay gap</i>	6.50%	6.80%
	<i>Board gender diversity</i>	31.80%	21.60%
	<i>Exposure to controversial weapons (anti-personnel mines, cluster munitions, chemical weapons and biological weapons)</i>	0.00%	0.00%
	<i>Percentage of the Model Portfolio's portfolio that is invested in underlying issuers that have been found to have inappropriate practices in:</i>	0%	0%
	<i>1. Prevention of fraud and bribery; and</i>		

Asset allocation describes the share of investments in specific assets.

	<i>2. Composition of board of directors (diversity and independence).</i>		
<i>Real Estate Metrics</i>	<i>Exposure to Fossil Fuels Through Real Estate Assets</i>	<i>0%</i>	<i>0%</i>
	<i>Exposure to Energy-inefficient Real Estate Assets</i>	<i>0.80%</i>	<i>0%</i>
<i>Sovereign Metrics</i>	<i>GHG Intensity</i>	<i>263.39</i>	<i>153.40</i>
	<i>Investee Countries Subject to Social Violations</i>	<i>1</i>	<i>0</i>

● **...and compared to previous periods?**

Compared to other periods the sustainability indicators performed in line with the Investment Managers expectations.. Please see table above for direct metric comparisons.

● **What were the objectives of the sustainable investments that the financial product partially made and how did the sustainable investment contribute to such objectives?**

The Model Portfolio invested in a minimum of 15% of its assets into sustainable investments, investing 46.8% into sustainable investments during the period under review.

The environmental sustainable investment objectives of the Model Portfolio were as follows:

- (a) climate change mitigation;*
- (b) climate change adaption;*
- (c) the sustainable use and protection of water and marine resources;*
- (d) the transition to a circular economy; and*
- (e) the protection and restoration of biodiversity and ecosystems.*

The socially sustainable investment objectives of the Model Portfolio were as follows:

- (a) investment in economically or socially disadvantaged communities; and*
- (b) investment that contributes to tackling inequality or that fosters social cohesion through the provision of financial credit, or the provision of renewable electricity to homes.*

The financial product produced the sustainability metrics shown in the answer to “How did the Sustainability Indicators Perform?” All investments were considered as part of the response to that question.

● **How did the sustainable investments that the financial product partially made not cause significant harm to any environmental or social sustainable investment objective?**

Principal adverse impacts are the most significant negative impacts of investment decisions on sustainability factors relating to environmental, social and employee matters, respect for human rights, anti-corruption and anti-bribery matters.

The list includes the investments constituting **the greatest proportion of investments** of the financial product during the reference period which is From October 2023 to December 31, 2023.

Before every investment decision, the Investment Manager monitored the investments performance against each of the environmental and social objectives noted in SFDR to ensure compliance with Do No Significant Harm principles.

— — — *How were the indicators for adverse impacts on sustainability factors taken into account?*

The Model Portfolio used the indicators for adverse impacts as its sustainability indicators, thereby ensuring that all necessary adverse impacts are taken into account when making investment decisions. The indicators for adverse impacts on sustainability factors were taken into account by the Investment Manager on a look-through basis, engaging with underlying fund managers or issuers to ensure that the Model Portfolio is in receipt of detailed, product-level reporting. This information was collated by the Investment Manager in respect of each investment of the Model Portfolio, before being analysed and used to produce an overall metric for the Model Portfolio as against each indicator applicable to investee companies as set out in Annex I of SFDR (please see Table 1 of the Annex for the full list of in-scope relevant indicators, available here:

https://ec.europa.eu/finance/docs/level-2-measures/C_2022_1931_1_EN_annexe_acte_autonome_part1_v6.pdf.

In this way, the impacts on sustainability factors for each of the Model Portfolio's sustainable investment are taken into account, informing the engagement required with the underlying issuers on sustainability-related issues, in order to reduce or mitigate their impact, as required.

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

As above, the Model Portfolio utilised the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights as part of its social sustainability indicators, thereby ensuring that all necessary adverse impacts were taken into account.



How did this financial product consider principal adverse impacts on sustainability factors?

The Investment Manager took the principal adverse impacts on sustainability factors into account when making investment decisions. This was done through the monitoring and screening of PAI's impacts on sustainability indicators which closely align with the PAI's before investment decisions were made.



What were the top investments of this financial product?

Largest investments	Sector	% Assets	Country
Cantor Impact Infrastructure Fund	Infrastructure Fund	18.4%	Ireland
Fisher Investments Global ESG Values Fund	Equity Fund	16.3%	Ireland
Setanta Ethical Global Equity Fund	Equity Fund	15.7%	Ireland
Quadruga Aqua UCITS Fund	Hedge Fund	9.3%	Ireland
Cash	n/a	6.1%	n/a
CFAM Technology Fund	Equity Fund	6.0%	Ireland
New Haven Social Housing Fund	Housing Fund	6.0%	Ireland
Vivienne Investiss Breat EUR	Hedge Fund	5.3%	Ireland
Irish Forestry Unit Trust	Forestry Fund	5.0%	Ireland
Deutsche Euro Government Bond ETF	ETF	2.4%	Germany
North American Forestry Investment Trust	Forestry Fund	1.5%	USA
Tullynamoyle Wind Farm Loan Note	Renewable Energy	1.3%	Ireland
Global Renewable Energy Fund	Renewable Energy	1.3%	Ireland
GERMANY (FED REP) 2.3% BDS 15/02/2033 EUR0.01	Sovereign	1.2%	Germany
AUSTRIA (REP OF) 2.9% SNR 23/05/2029 EUR1000	Sovereign	1.2%	Austria

What was the proportion of sustainability-related investments?

The fund made substantial investments regarding to those that are sustainable, dedicating a large portion of its holdings (46.8%) to sustainable investments.

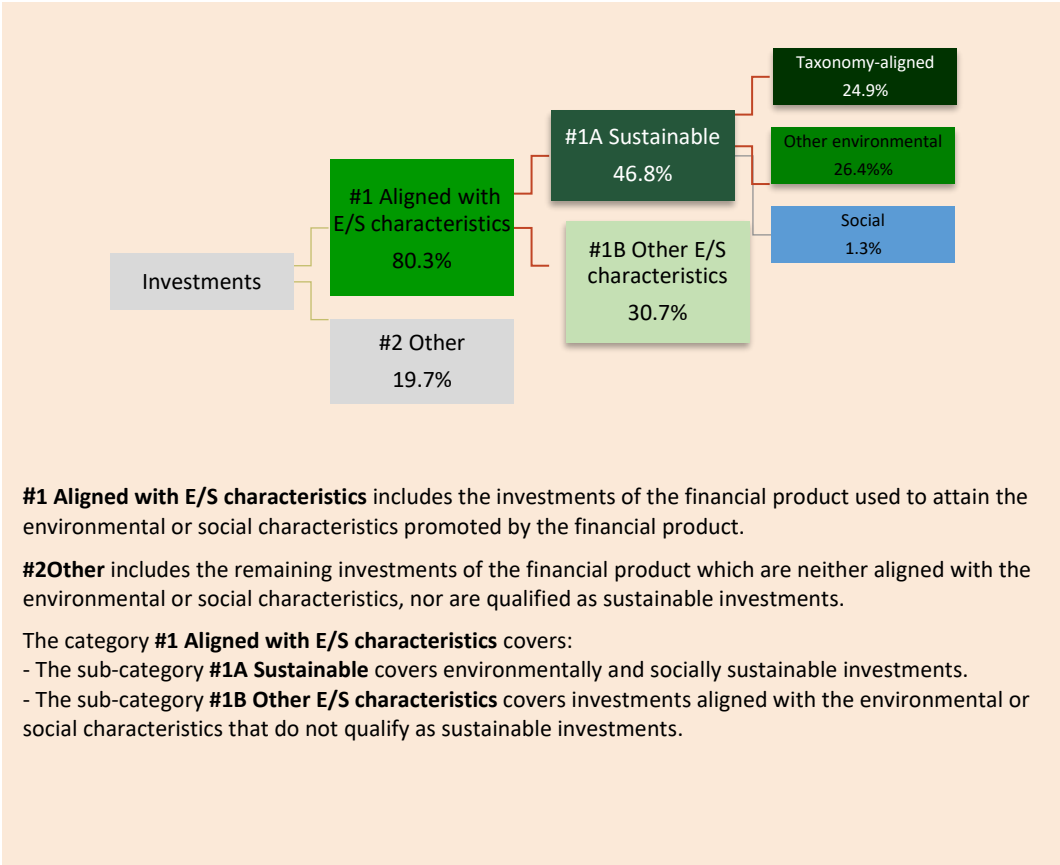


● **What was the asset allocation?**

To comply with the EU Taxonomy, the criteria for **fossil gas** include limitations on emissions and switching to fully renewable power or low-carbon fuels by the end of 2035. For **nuclear energy**, the criteria include comprehensive safety and waste management rules.

Enabling activities directly enable other activities to make a substantial contribution to an environmental objective.

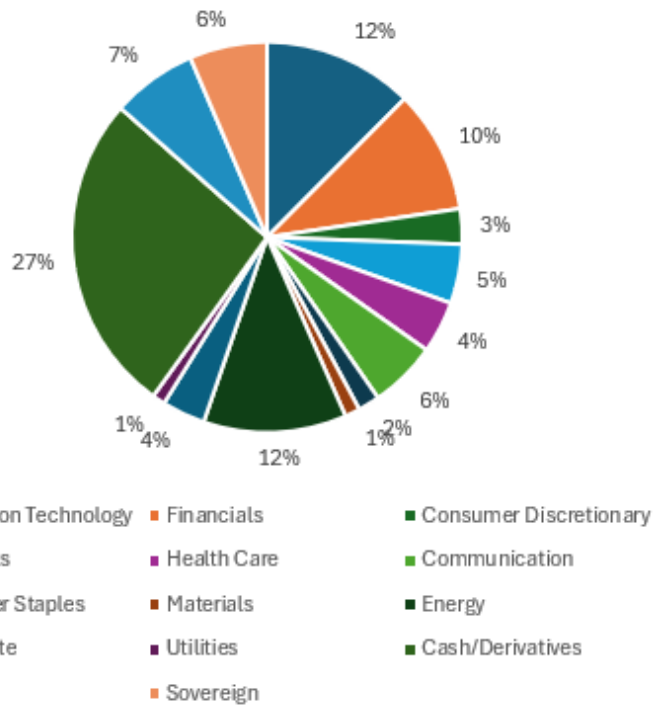
Transitional activities are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.



In which economic sectors were the investments made?

The Model Portfolio's investment strategy made investments in all sectors through the use of investing in underlying funds. This includes investment in Communication Services, Consumer Discretionary, Consumer Staples, Energy, Financials, Health Care, Industrials, Information Technology, Materials, Real Estate, and Utilities. Additionally, the fund made investments in a variety of asset classes including equities, infrastructure, forestry, and hedge funds. The Model Portfolio also invested directly in issuers that operate in similar economic sectors. All exposure to various investment areas are listed below:

Portfolio Asset Class Breakdown



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

Did the financial product invest in fossil gas and/or nuclear energy related activities complying with the EU Taxonomy¹²?

Yes:

In fossil gas In nuclear energy

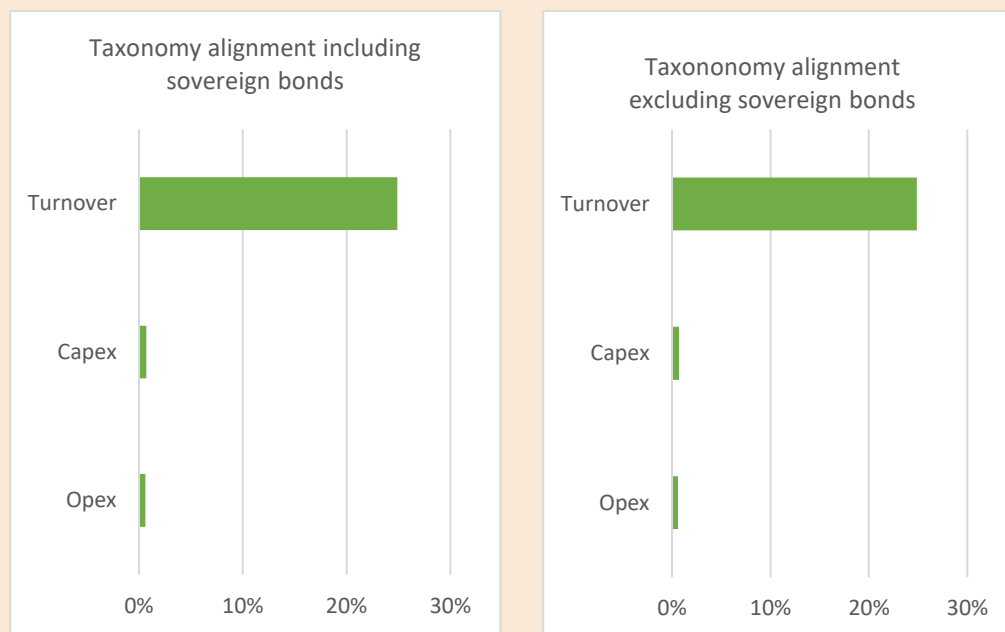
No

¹² Fossil gas and/or nuclear related activities will only comply with the EU Taxonomy where they contribute to limiting climate change (“climate change mitigation”) and do not significantly harm any EU Taxonomy objective - see explanatory note in the left-hand margin. The full criteria for fossil gas and nuclear energy economic activities that comply with the EU Taxonomy are laid down in Commission Delegated Regulation (EU) 2022/1214.

Taxonomy-aligned activities are expressed as a share of:

- **turnover** reflecting the share of revenue from green activities of investee companies.
- **capital expenditure** (CapEx) showing the green investments made by investee companies, e.g. for a transition to a green economy.
- **operational expenditure** (OpEx) reflecting green operational activities of investee companies.

The graphs below show in green the percentage of investments that were aligned with the EU Taxonomy. As there is no appropriate methodology to determine the taxonomy-alignment of sovereign bonds*, the first graph shows the Taxonomy alignment in relation to all the investments of the financial product including sovereign bonds, while the second graph shows the Taxonomy alignment only in relation to the investments of the financial product other than sovereign bonds.




● **What was the share of investments made in transitional and enabling activities?**

Not applicable, the Model Portfolio does not commit to making a minimum investment in transitional or enabling activities.

● **How did the percentage of investments that were aligned with the EU Taxonomy compare with previous reference periods?**

Relative to other holdings the EU taxonomy alignment was 25%, compared to 28% in the prior reporting period. The Investment Manager expects this figure to be due to underlying holdings in broad global ETF's slightly varying in weight to EU Taxonomy activities.

 are sustainable investments with an environmental objective that **do not take into account** the criteria for environmentally sustainable economic activities under Regulation (EU) 2020/852.



What was the share of sustainable investments with an environmental objective not aligned with the EU Taxonomy?

26.4% The product invested in sustainable investments that promoted the prior mentioned environmentally sustainable criteria, which may or may not overlap with EU Taxonomy aligned criteria. It is expected over time that this cohort of investments will become more and more in line with the EU Taxonomy as more criteria are outlined and reporting from investee funds becomes more standardised and available.



What was the share of socially sustainable investments?

1.3% The Model Portfolio invested in socially sustainable investments that met the following objectives:

- (a) investment in economically or socially disadvantaged communities; and

(b) investment that contributes to tackling inequality or that fosters social cohesion.



What investments were included under “other”, what was their purpose and were there any minimum environmental or social safeguards?

Investment included under “#2 Other” comprise:

- *those investments that are dedicated to meeting the Model Portfolio’s investment objective but which are not aligned with the environmental or social characteristics promoted by the Model Portfolio. The Investment Manager nevertheless assesses these investments to ensure they follow good governance practices and follow the ESG-related binding elements of the investment strategy mentioned above, including assessment, and exclusions as minimum safeguards; and*
- *assets used for cash management and hedging purposes which consisted of ETFs, derivatives, cash and other cash equivalents. No environmental or social safeguards applies to these holdings.*

The Model Portfolio’s portfolio contained investments that were dedicated to meeting the investment objectives, but were not classified as sustainable or contributing to the promoted sustainability characteristics. These assets were required to meet the ‘Do No Significant Harm’ principles. The Model Portfolio also held funds, cash and foreign exchange derivatives that were dedicated to meeting the investment objectives or providing risk reduction for the product, but did not advance the promoted sustainability characteristics of the Portfolio.

In a similar manner, the investments in “#2” Other excluded investment in issuers with material involvement in the following areas

- *production of alcoholic beverages;*
- *provision of gambling services;*
- *pornography;*
- *production of controversial weapons;*
- *production or maintenance of nuclear weapons; and*
- *manufacturing of tobacco products.*
- *Furthermore, the Model Portfolio did not invest in issuers with a material involvement in the extraction or burning of fossil fuels, except in the instance where such assets were either aligned with the EU Taxonomy or could demonstrate a substantial contribution to greenhouse gas reduction, and/or made a substantial contribution to the transition to a net zero-carbon economy.*



What actions have been taken to meet the environmental and/or social characteristics during the reference period?

The Model Portfolio utilised its sustainability indicators and binding elements as an integral part of its investment selection process. Investments were considered for the manner in which they advanced the Model Portfolio’s investment objective, but simultaneously for the manner in which they will advance the Portfolio’s sustainability indicators, and the metrics produced under each indicator (so determining the “Impact” on the world that the Portfolio will achieve). The Model Portfolio selection process also integrated its binding elements, ensuring that investments which did not meet the promoted E/S characteristics were screened out from the investment universe. Additionally, companies alignment with global norms (such as the The United Nations Guiding

Principals (UNGPs), International Labour Organizations (ILO) standards, United Nations Global Compact (UNGC) or Organization for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises) were monitored through a third party.



How did this financial product perform compared to the reference benchmark?

N/A – The Model Portfolio did not compare itself to a reference benchmark for measuring E/S characteristics.

- **How does the reference benchmark differ from a broad market index?**

Not applicable, the Model Portfolio did not use a Reference Benchmark Index.

- **How did this financial product perform with regard to the sustainability indicators to determine the alignment of the reference benchmark with the environmental or social characteristics promoted?**

N/A the Model Portfolio did not use a Reference Benchmark .

- **How did this financial product perform compared with the reference benchmark?**

Not applicable, there is no reference benchmark.

- **How did this financial product perform compared with the broad market index?**

Not applicable

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