

# Pre-Contractual Sustainability Disclosures for Setanta Active Multi-Asset 3

December 2024

Version 24/1



## Introduction

**Product Name:** Setanta Active Multi Asset 3 (“the Fund”)

**Legal Entity Identifier:** YYV6S3OE6EWZYI2FFW31

### **Status under the EU Sustainable Finance Disclosure Regulation (SFDR)**

This Fund has been classified as meeting the provisions set out in Article 8 of the EU SFDR by investing in a range of investments.

### **Investment Objective**

The SAMA 3 Fund offers diversified exposure, including equities, bonds, property, alternatives and cash, with a bias towards bond investments. This Fund seeks to provide a lower level of risk and return when compared to the other funds in the Setanta active multi-asset fund range.



## Environmental and/or social characteristics

### Does this financial product have a sustainable investment objective?

Yes

It will make a minimum of **sustainable investments with an environmental objective: \_\_\_%**

in economic activities that qualify as environmentally sustainable under the EU Taxonomy

in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy

It will make a minimum of **sustainable investments with a social objective: \_\_\_%**

No

It promotes **Environmental/Social (E/S) characteristics** and while it does not have as its objective a sustainable investment, it will have a minimum proportion of \_\_\_% of sustainable investments

with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy

with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy

with a social objective

It promotes E/S characteristics, but **will 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 good governance practices.

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 lay down a list of socially sustainable economic activities.

Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.



## What environmental and/or social characteristics are promoted by this financial product?

When you invest in this financial product (“Fund”), your assets are invested into the Setanta Multi Asset 3 Fund (“SAMA 3”). SAMA 3 subsequently invests in a variety of other unit linked funds (the “underlying unit linked funds”). This approach allows us to invest in different types of assets, such as active equity, passive equity, property, credit (corporate and government bonds) and cash, while benefiting from the expertise and performance of the investment managers of these underlying unit linked funds.

The Fund is managed by Setanta Asset Management Limited (“Setanta”). Setanta has appointed Irish Life Investment Managers Limited (“ILIM”) to sub-manage the underlying unit linked funds which invest in the following asset types: passive equity, property, and credit.

SAMA 3 invests in the following underlying unit linked funds<sup>1</sup>:

**Table A: Underlying unit linked funds within SAMA 3**

Name	Asset type	SFDR Classification
ILA Setanta Global Equity ESG Fund	Active Equity	Article 8
Emerging Market Local Debt Fund	Credit	Article 8
Euro 5-10 Year Fixed Interest Fund	Credit	Article 6
Indexed 1-5 Year Bond Fund	Credit	Article 6
New World Indexed EUR Corporate Bond Fund	Credit	Article 8
New World Indexed High Yield Bond Fund	Credit	Article 8
New World Indexed Emerging Market Equity Fund	Passive Equity	Article 8
Indexed Global Infrastructure Equity Fund	Passive Equity	Article 6
Indexed Global REIT Fund	Passive Equity	Article 6
Indexed Listed Private Equity Fund	Passive Equity	Article 6
ILA Irish Property	Property	Article 8
Irish Residential Property Fund	Property	Article 8

The Fund is 100% invested in SAMA 3. The aim is that at least 75% (excluding neutral assets) and 50% (including neutral assets) of the total assets held by SAMA 3 are invested in underlying unit linked funds that are classified as Article 8/9 in accordance with the Sustainable Finance Disclosure regulation (“SFDR”). Assets such as cash and government bonds are deemed to be neutral assets.

Since SAMA 3 is 100% invested in the underlying unit linked funds, the environmental and/or social characteristics which are promoted by SAMA 3 are those that are promoted by the underlying unit linked funds. The environmental and/or social characteristics promoted by the underlying unit linked funds are as follows:

- The underlying unit linked funds that invest in active equity assets, apply exclusionary criteria in addition to sustainability stewardship and a bottom-up assessment of sustainability factors.
- The underlying unit linked funds that invest in passive equity, property and credit, aim to lower the ESG metrics of their portfolios compared to their chosen benchmark

(see the Investment Strategy section of this document for more information on both).

## What sustainability indicators are used to measure the attainment of each of the environmental or social characteristics promoted by this financial product?

For SAMA 3, Setanta measures the allocation of the assets held by SAMA 3 to underlying unit linked funds that are classified as Article 8/9 in accordance with the SFDR. The aim is that SAMA 3 will allocate at least 75% (excluding neutral assets) and 50% (including neutral assets) of its total assets to underlying unit linked funds that are classified as Article 8/9 in accordance with the SFDR. Assets such as cash and government bonds are deemed to be neutral assets.

Please refer to the website of the relevant investment manager and the investment strategy section of this document for more detail on the sustainability indicators used by the underlying unit linked funds to measure the attainment of the environmental and social characteristics which they promote.

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

<sup>1</sup>For more detail on the underlying unit linked funds, their strategies and their SFDR disclosures (if article 8 or 9), please refer to the relevant investment manager’s website. Additional information is also available on request.

**What are the objectives of the sustainable investments that the financial product partially intends to make and how does the sustainable investment contribute to such objectives?**

N/A

Whilst this Fund promotes environmental and social characteristics within the meaning of Article 8 of the SFDR, it is not specifically designed to make “**sustainable investments**” as defined under SFDR or to make investments which qualify as “**environmentally sustainable**” under the EU Taxonomy.

**How do the sustainable investments that the financial product partially intends to make, not cause significant harm to any environmental or social sustainable investment objective?**

N/A – The Fund does not intend to make sustainable investments or investments aligned with the EU Taxonomy

**How have the indicators for adverse impacts on sustainability factors been taken into account?**

N/A - The Fund does not intend to make sustainable investments or investments aligned with the EU Taxonomy

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

N/A - The Fund does not intend to make sustainable investments or investments aligned with the EU Taxonomy

The EU Taxonomy sets out a “do no significant harm” principle by which Taxonomy-aligned investments should not significantly harm EU Taxonomy objectives and is accompanied by specific EU criteria.

The “do no significant harm” principle applies only to those investments underlying the financial product that take into account the EU criteria for environmentally sustainable economic activities. The investments underlying the remaining portion of this financial product do not take into account the EU criteria for environmentally sustainable economic activities.

Any other sustainable investments must also not significantly harm any environmental or social objectives.



**Does this financial product consider principal adverse impacts on sustainability factors?**

Yes  No

Since SAMA 3 is 100% invested in the underlying unit linked funds, the principal adverse impacts on sustainability factors (“PAIs”) which are considered by SAMA 3 are those that are considered by the underlying unit linked funds.

The PAIs that are considered by the underlying unit linked funds will vary by asset type. The following is a list of the PAIs that are considered by the underlying unit linked funds by asset type:

**Equities and Corporate Bonds**

**PAI #1** - GHG Emissions

**PAI #2** - Carbon Footprint

**PAI #3** - GHG intensity of investee companies.

**PAI #4** - Exposure to companies active in the fossil fuel sector.

**PAI #5** - Share of non-renewable energy consumption and production.

**PAI #9** - Hazardous waste and radioactive waste ratio.

**PAI #10** - Violations of UN Global Compact principles and Organisation for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises

**PAI #11** - Lack of Processes and Compliance Mechanisms to Monitor Compliance with UN Global Compact Principles and OECD Guidelines for Multinational Enterprises

**PAI #14** - Exposure to controversial weapons (anti-personnel mines, cluster munitions, chemical weapons and biological weapons)

**PAI #4** of Additional climate and other environmental-related indicators - Investments in companies without carbon emission reduction initiatives

**Property**

**PAI #17** - Exposure to fossil fuels through real estate assets

**PAI #18** - Exposure to energy-inefficient real estate assets

**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.



## What investment strategy does this financial product follow?

The Fund offers diversified exposure by investing in a range of different asset types, including equities, property, credit (corporate and government bonds) and cash. The Fund seeks to provide a lower level of risk and return when compared to the other funds in the Setanta Active Multi Asset fund range.

The following are the core principles of the Fund's investment strategy:

### > An asset mix that reflects the investment objectives

The Fund's exposures to different asset types have been designed to meet specific risk and return requirements. These exposures may vary over time, for example, the underlying unit linked funds may change or the investment strategy of the underlying unit linked funds may change in line with the views of the relevant investment manager. For more information on the risk and return profile of the Fund see the quarterly reports for the SAMA fund range available [here](#).

### > Consistent decision making

The design of the Fund reflects a particular investment objective and attitude to risk. For more information on the investment objective of the Fund including its attitude to risk see the quarterly reports for the SAMA fund range available [here](#).

### > Broad diversification

The Fund is broadly diversified across a range of growth assets such as equities and alternatives, and defensive assets like bonds and cash. Excess returns are driven by stock selection and active asset allocation.

The Fund is 100% invested in SAMA 3. The aim is that at least 75% (excluding neutral assets\*) and 50% (including neutral assets\*) of the total assets held by SAMA 3 are invested in underlying unit linked funds that are classified as Article 8/9 in accordance with the SFDR. Assets such as cash and government bonds are deemed to be neutral assets.

The following is a summary of the investment strategies of the underlying unit linked funds:

### **Active equity**

The underlying unit linked funds that have an active equity strategy apply the following revenue-based screening criteria<sup>2</sup>:

- > No armaments from production and/or distribution > 10% revenue
- > No outlawed weapons production or involvement (0% of revenue)
- > No tobacco production > 5% of revenue
- > No coal or unconventional fossil fuel production > 10%<sup>3</sup> of revenue
- > No violations of UN Global Compact

The investment strategy of these underlying unit linked funds is to have a lower exposure to companies involved in these industries than their chosen benchmark.

Investee companies with greater than 30% revenues from fossil fuels<sup>4</sup> are placed on a grey list for further examination to assess the credibility of their decarbonisation agenda.

Investee companies also undergo a sustainability assessment. The sustainability assessment considers the decarbonisation progress of each investee company, as well as fossil fuel exposure (incorporating the grey list mentioned above), ESG controversies and a subset of the principle adverse impact indicators (see the PAI section of this document for more detail).

Investee companies are also subject to Setanta's sustainability engagement program. Sustainability engagement is supported by Setanta's dedicated engagement analyst, working closely with the portfolio management team. Additionally, Setanta applies its sustainability voting principles. These principles serve as a framework for exercising voting rights in connection to environmental-themed voting proposals.

**The investment strategy** guides investment decisions based on factors such as investment objectives and risk tolerance.

<sup>2</sup>All screening criteria is based on data obtained from Morningstar Sustainalytics. For more information on how this data is applied please see the Website Disclosure for Setanta Active Multi Asset 3.

<sup>3</sup>The unconventional fuel activities covered by this exclusion are arctic exploration, tar sands (also known as oil sands) and shale oil extraction (also known as fracking). The specific activities focused on are exploration and production. For more information on how this criteria is applied please see the Website Disclosure for Setanta Active Multi Asset 3.

<sup>4</sup>Data on fossil fuel revenues of investee companies is obtained from Morningstar Sustainalytics. This measurement applies to conventional fossil fuel activities (i.e., oil and gas) as well as coal and unconventional fossil fuel. The specific activities focused on are exploration and production, refining, transportation, and other fossil fuel services. For more information on how this criteria is applied please see the Website Disclosure for Setanta Active Multi Asset 3.



### **Passive equity, property and credit**

The underlying unit linked funds that have strategies that relate to passive equity, property and credit apply the following approaches as relevant depending on the assets type:

I). Investee companies which exhibit poor behaviour (UN Global Compact Violators) and those involved in activities such as the manufacturing of Controversial Weapons and Tobacco are excluded from investment<sup>5</sup>.

II). Security level ESG risk ratings<sup>6</sup> and principal adverse impacts (PAI) are considered within the equity and corporate bond investments with the aim of reducing the characteristics at an aggregate level compared to the benchmarks applied by relevant underlying unit linked funds. Investee companies that rank favourably across these metrics are overweighted whilst those that don't are underweighted. The desire to maintain high levels of diversification within these underlying unit linked funds means that those investee companies that score unfavourably<sup>7</sup> may not be excluded from the portfolio entirely. The investment manager of the relevant underlying unit linked fund may instead engage with such investee companies to encourage them to embrace sustainable practices.

III). An active ownership approach is adopted across the equity portions of the underlying unit linked funds through the exercise of voting rights and constructive engagement with investee companies (either directly, or collaboratively with other like-minded investors). This is done to support and encourage investee companies to adopt positive sustainable behaviours.

### **What are the binding elements of the investment strategy used to select the investments to attain each of the environmental or social characteristics promoted by this financial**

The Fund is 100% invested in SAMA 3. The aim is that at least 75% (excluding neutral assets\*) and 50% (including neutral assets\*) of the total assets held by SAMA 3 are invested in underlying unit linked funds that are classified as Article 8/9 in accordance with the SFDR. Assets such as cash and government bonds are deemed to be neutral assets.

For more detail on the binding elements of the investment strategies of the underlying unit linked funds, please refer to the website of the relevant investment manager and the investment strategy section of this document.

### **What is the committed minimum rate to reduce the scope of the investments considered prior to the application of that investment strategy?**

N/A - There is no committed minimum rate to reduce the scope of the investments considered prior to the application of that investment strategy.

**The investment strategy** guides investment decisions based on factors such as investment objectives and risk tolerance.

<sup>5</sup>Exclusions are based on data obtained from Morningstar Sustainalytics. For more information on how this data is applied please see the Website Disclosure for Setanta Active Multi Asset 3.

<sup>6</sup>Based on data obtained from Morningstar Sustainalytics.

<sup>7</sup>Based on data obtained from Morningstar Sustainalytics

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

Since SAMA 3 is 100% invested in the underlying unit linked funds, the policies applied to assess good governance in investee companies are those that are applied by the underlying unit linked funds where relevant, depending on the type of assets held.

The policies applied by the underlying unit linked funds to assess good governance practices of the investee companies are as follows:

**Active equity:** Governance risk is taken into account when evaluating potential investments. Companies that demonstrate weak governance and have a history of governance issues are excluded, because there is an expectation that they will produce poorer returns.

Corporate governance structures will differ by company and will be influenced by factors such as culture, geography, and industry among other things.

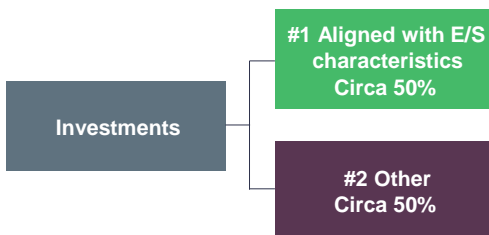
The approach to evaluating corporate governance places significant emphasis on the historic performance of management and the board of directors across several areas such as strategy, capital allocation and executive recruitment & retention. During this analysis, classic corporate governance factors, such as accountability and alignment, are considered where relevant.

**Passive equity, property and corporate bonds:** Assessments on governance practices is based on data obtained from independent third-party data providers including ESG risk scores, alignment with the UN Global Compact and involvement in severe controversies.

**Good governance** practices include sound management structures, employee relations, remuneration of staff and tax compliance.

### What is the asset allocation planned for this financial product?

At least 50% of the total assets held by SAMA 3 are allocated to strategies which promote environmental and/or social characteristics (i.e., underlying unit linked funds that are classified as Article 8/9 in accordance with the SFDR) and 50% are allocated to “other” investments.



**#1 Aligned with E/S characteristics** includes the investments of the financial product used to attain the environmental or social characteristics promoted by the financial product.

**#2 Other** includes the remaining investments of the financial product which are neither aligned with the environmental or social characteristics, nor are qualified as sustainable investments.

The underlying unit linked funds invest in a mix of assets such as equities, property, and credit (corporate and government bonds). The underlying unit linked funds may also invest in ancillary liquid assets (i.e., cash and cash equivalents) and derivatives for efficient portfolio management purposes, hedging and liquidity. For more information on the asset allocations of the underlying unit linked funds (if article 8 or 9), please refer to their pre-contractual disclosures on the relevant investment manager's website.

### How does the use of derivatives attain the environmental or social characteristics promoted by the financial product?

Although derivatives can be used in the investment strategies of the underlying unit linked funds, derivatives are not used to attain the environmental or social characteristics promoted by the Fund.

**Asset allocation** describes the share of investments in specific assets.

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.







### To what minimum extent are sustainable investments with an environmental objective aligned with the EU Taxonomy?

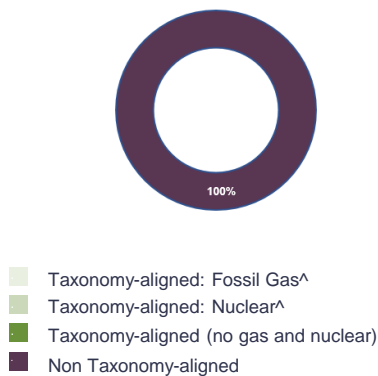
Whilst this Fund promotes environmental and social characteristic within the meaning of Article 8 of the SFDR, it is expected that the minimum proportion of investments aligned with the EU Taxonomy criteria will be 0% of the net assets of the Fund.

**Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy? (A)**

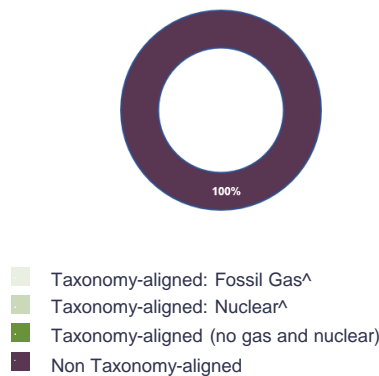
Yes
  In fossil gas<sup>^</sup>
 In nuclear energy<sup>^</sup>
  
 No

The two graphs below show in green the minimum percentage of investments that are 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.

1. Taxonomy-alignment of investments including sovereign bonds\*



2. Taxonomy-alignment of investments excluding sovereign bonds\*



\*For the purpose of these graphs, 'sovereign bonds' consist of all sovereign exposures.  
<sup>^</sup>Data relating to Taxonomy aligned Fossil Gas and Nuclear is not currently available. Data relating to these activities will be populated once the data becomes available.

**What is the minimum share of investments in transitional and enabling activities?**

0.0%



### What is the minimum share of investments with an environmental objective that are not aligned with the EU Taxonomy?

N/A - This Fund does not intend to make investments aligned with the EU Taxonomy.



### What is the minimum share of socially sustainable investments?

N/A - The Fund does not intend to make any socially sustainable investments.

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.

**Transactional 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.



are sustainable investments with an environmental objective that **do not take into account the criteria** for environmentally sustainable economic activities under the EU Taxonomy.

(A) 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.



## What investments are included under “#2 Other”, what is their purpose and are there any minimum environmental or social safeguards?

For SAMA 3, the investments included in #2 Other are underlying unit linked funds which are classified as Article 6 in accordance with the SFDR (see table on page 4 of this document).

In relation to the underlying unit linked funds, the investment included under #2 Other may include ancillary liquid assets (i.e., cash and cash equivalents) and derivatives for efficient portfolio management purposes, hedging and liquidity. These investments form part of the strategies of the underlying unit linked funds and are a vital part of the risk/return framework of these strategies as well as meeting the liquidity needs of the underlying unit linked funds and in turn the Fund, i.e., to service inflows (outflows) to (from) the relevant underlying unit linked fund. The investments underlying unit linked funds which are included in #2 Other may also contain a small number of quoted equities and/or bonds. For more information on the asset allocations of the underlying unit linked funds (if article 8 or 9), please refer to their pre-contractual disclosures on the relevant investment manager’s website.

Setanta applies its normal investment research process to the investment which fall into the #2 Other category. Where relevant this process includes applying ESG considerations which meet certain minimum environmental and social safeguards.



## Is a specific index designated as a reference benchmark to determine whether this financial product is aligned with the environmental and/or social characteristics that it promotes?

N/A - The Fund follows a multi asset strategy and does not have a reference benchmark.

### How is the reference benchmark continuously aligned with each of the environmental or social characteristics promoted by the financial product?

N/A - The Fund follows a multi asset strategy and does not have a reference benchmark..

### How is the alignment of the investment strategy with the methodology of the index ensured on a continuous basis?

N/A - The Fund follows a multi asset strategy and does not have a reference benchmark or a designated index.

### How does the designated index differ from a relevant broad market index?

N/A - The Fund does not have a broad market benchmark.

### Where can the methodology used for the calculation of the designated index be found?

N/A - The Fund follows a multi asset strategy and does not have a reference benchmark or a designated index.

## Where can I find more product specific information online?

More product-specific information can be found on the website

<https://setanta-asset.com/responsible-investing/>

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

## DISCLAIMERS

This disclosure is being made in accordance with the Sustainable Finance Disclosure Regulation (SFDR). This document does not constitute investment advice and has not been prepared based on the financial needs or objectives of any particular person and does not take account of the specific needs or circumstances of any person. No assurance, warranty or representation is given that the Fund will meet any or all of your expectations regarding “green”, “ESG”, “sustainable”, “responsible”, or other equivalent terms.

You should seek personal investment advice as to the suitability of any investment decision or strategy to your own needs and circumstances. Past performance may not be a reliable guide to future performance. Investments may go down as well as up. Funds may be affected by changes in currency exchange rates.

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This document references data, ratings and measurements which have been obtained from third party data providers (“Third Party Data”). In addition, such Third Party Data may form the basis of our own calculations. While reasonable endeavours are taken to ensure the Third Party Data is accurate, it is important to note that third party data providers assume no responsibility for inaccuracies, errors, inconsistencies or omissions in their data and cannot be held liable for any damage arising from our use of their data. We cannot guarantee the accuracy, completeness or reliability of the Third Party Data.

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The information, data and indicators for certain issuers/exposures or asset classes may be limited due to a lack of availability or quality of such information, data and indicators.

The sustainability related objectives of the Fund are based on Setanta’s current expectations and beliefs concerning future developments and their potential effects on the Fund. Such predictions, projections and beliefs are based on current expectations and assumptions and, as a result, are subject to uncertainties. They are not intended to serve, and must not be relied on, as a guarantee, an assurance, a prediction or a definitive statement of fact. Setanta can give no assurance that it will be able to achieve the sustainability related objectives of the Fund.

As an investment manager, our primary purpose is to provide our clients with solutions to meet their investment needs and to deliver on the promises we make to them. The sustainability related objectives of the Fund may need to change or be recalibrated to meet other strategic objectives and the reasonable expectations of our clients, including expectations around financial performance. This may include prioritizing other strategic objectives over the environmental and social characteristics promoted by the Fund in pursuit of fulfilling our primary purpose of delivering long term sustainable returns in line with our clients’ investment objectives.

Setanta Asset Management Limited is regulated by the Central Bank of Ireland, New Wapping Street, North Wall Quay, Dublin 1 Ireland

Irish Life Investment Managers Limited is regulated by the Central Bank of Ireland.