ARISTEA SICAV

Société d'investissement à capital variable
Luxembourg

ESG Disclosure

October 2025

Contents

ARISTEA SICAV – MIXED ALLOCATION | website template

Legal entity identifier: 549300MXCYTT3YHMSY93

a) Summary

Banor Capital Limited (the “Investment Manager”, “Banor” or “we”) includes Environmental, Social and Governance (“ESG”) considerations into its investment process applied to Mixed Allocation (the “Sub-Fund”) by (i) using a best in class approach to identify those companies and/or issuers with the best practice and standards in terms of ESG characteristics, (ii) holding minimum amount of rated instruments and (iii) negative screening by excluding issuers involved in controversial activities.

The Investment Manager relies on the indicators used by the selected rating agency, to screen the ESG risks that are the most material according to the sector or industry.

The Sub-Fund promotes environmental or social characteristics, but does not have as its objective sustainable investment. The Sub-Fund is committed to invest a minimum amount of 50% of its assets in securities with an ESG rating.

b) No sustainable investment objective

This Sub-Fund promotes environmental or social characteristics, but does not have as its objective sustainable investment.

c) Environmental or social characteristics of the financial product

Banor includes ESG considerations into its investment process applied at the level of the Sub-Fund by (i) using a best in class approach to identify those companies and/or issuers with the best practice and standards in terms of ESG characteristics, (ii) holding minimum amount of rated instruments and (iii) negative screening by excluding issuers involved in controversial activities.

Such approach supports the promotion of environmental and social characteristics notably by excluding from the portfolio, all companies whose revenues come mainly from the sales of nuclear weapons and landmines, from gambling, from sales of electricity produced by coal-fired power stations.

In addition, the Investment Manager selects a dedicated proportion of the portfolio companies by using the ESG scoring generated from MSCI, Sustainalytics, Bloomberg or FactSet. The Investment Manager selects and reviews the rating agency every year and maintain this information up-to-date in Responsible Investment Policy available on the website of the Investment Manager.

By reviewing the rating agency every year, the Investment Manager aims to diversify the ESG investment universe and mitigate the potential risk rising from an inconsistency of data provided by the different rating agencies.

d) Investment strategy

The investment strategy applies an exclusion list (1) and will use a “best-in-class” approach to identify those issuers and/or companies with the best practice (2).

1. Exclusion list

We apply a strict exclusion list, identifying companies whose revenues come mainly from the sales of nuclear weapons or landmines, from gambling, from sales of electricity produced by coal-fired power stations. In that respect, the Investment Manager refers to publicly available lists of companies which are allegedly exposed to activities detrimental for the environment and human rights.

2. Best in class

When selecting investments, we adopt a best-in-class approach which seeks to invest in securities of companies with low sustainability risks while avoiding those with high sustainability risks, reducing the investment universe further. The Sub-Fund is committed to invest a minimum amount of 50% of its assets in securities with an ESG rating.

For these investments to be in the investment universe of the Sub-Fund, a minimum score, from an industry leading ESG data provider will be required to achieve eligibility. We provide below details of the data providers we consider as industry experts and our acceptable minimum scoring criteria from each provider:

- MSCI: B or above
- Sustainalytics: Below 40 risk score
- Bloomberg: 2 and above
- ISS (FactSet) C- and above

As such, all companies in line with the above minimum scoring criteria will be accepted. The Investment Manager considers companies below these scoring thresholds as not aligned with the environmental and social characteristics promoted by the Sub-Fund.

When an investee company is downgraded or included in excluded sector after the acquisition of the company, the Investment Manager may be required to keep the company in the portfolio to (i) comply with the applicable regulations, (ii) if the investment is used for liquidity purposes or (iii) if the Investment Manager believes that the ESG scoring may improve due to engagement. Any divestment will be decided in the best interest of investors.

Binding Elements of the Investment Strategy

The Sub-Fund’s binding elements of the investment strategy are the following:

- The exclusion list is systematically applied to exclude companies whose revenues come mainly from the sales of nuclear weapons, from gambling, from sales of electricity produced by coal-fired power stations.
- Only the corporates that meet the minimum scoring threshold below will be considered for investment:
  - MSCI: B or above
  - Sustainalytics: Below 40 risk score
  - Bloomberg: 2 and above
  - ISS (FactSet) C- and above

Good Governance

In order to assess good governance practices, the Investment Manager believes that a sound corporate governance structure is essential for creating long-term shareholders value. As the investee companies are selected through the best-in-class process, referring to ESG ratings provided by MSCI, Sustainalytics, Bloomberg or ISS, the Investment Manager relies on the governance scoring generated by the rating agencies.

MSCI governance assessment relies on key issues being: corporate governance (board composition, remuneration, ownership structure and accounting system) and corporate behaviour (business ethics and tax transparency).

Sustainalytics integrates the corporate governance indicators into the ESG scoring system, which include, in addition to the corporate governance indicators (board composition, executive compensation, shareholder rights, and transparency), the governance assessment also refers the ESG indicators of the shareholders of the investee companies.

Bloomberg developed to governance scoring system: the BESG Governance Pillar Score and the BESG Board Composition Theme Score. Whereas the BESG Governance Pillar Score assesses the overall sound governance of a company, the BESG Board Composition Theme Score focuses on the governance factors of the board of a company, such as the diversity, tenure, overboarding and independence.

FactSet corporate governance assessment is divided into distinct packages that provide comprehensive insights into thousands of companies. The coverage of each package differs slightly given the nature of the content included. Coverage of the corporate governance-focused packages, coincide with corporate governance provisions reported in public sources, such as EDGAR filings and articles of incorporation, while the coverage of the corporate activism package coincides with activist activity reported in SEC filings. U.S. companies constitute the majority of those included in this feed, although FactSet continues to expand coverage in other regions.

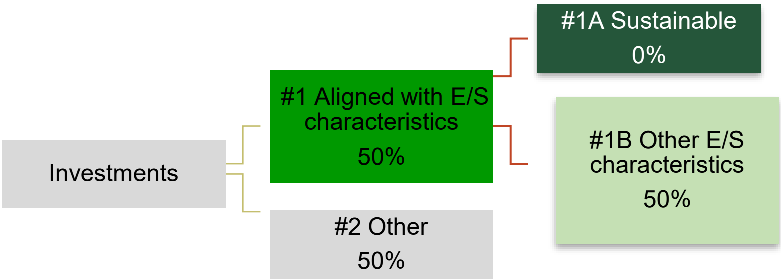
The Sub-Fund considers the scores of the investee companies accordingly and monitors the score throughout the life of the investment.

Principal Adverse Impacts

Although the Investment Manager is committed to incorporating environmental, social and governance factors into its investment decisions, it believes that, considering its current investment strategy and processes, the collection and consideration of Principal Adverse Impacts ("PAI") are not relevant to achieve the promotion of environmental and social characteristics promoted by the Sub-Fund.

e) Proportion of investments

A minimum of 50% of the investments underlying the Sub-Fund are promoting environmental and social characteristics and are subject to the best-in-class strategy of the Sub-Fund (**#1 Aligned with E/S characteristics**) and up to 50% invested in Other (**#2 Other**). Included in "#2 Others", are debt securities (bonds), liquidity, money market instruments, derivative instruments and equities. These investments are not used to promote environmental or social characteristics and are not selected with the ESG binding rating described in the section (d) "Investment strategy". The minimum safeguards are applied to these investments through the exclusion list referred to in the section (d) "Investment strategy". The exclusion list applies to all investments, including the investments which are not aligned with the environmental and social characteristics promoted by the Sub-Fund.



#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.

#2Other 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 category **#1 Aligned with E/S characteristics** covers:

- The sub-category **#1A Sustainable** covers sustainable investments with environmental or social objectives.
- The sub-category **#1B Other E/S characteristics** covers investments aligned with the environmental or social characteristics that do not qualify as sustainable investments.

f) Monitoring of environmental or social characteristics

The Investment Manager selects a dedicated proportion of the portfolio companies by using the ESG scoring generated from MSCI, Sustainalytics, Bloomberg or FactSet. We select and review the rating agency every year and maintain this information up-to-date in Responsible Investment Policy available on the website of the Investment Manager.

By reviewing the rating agency every year, we aim to diversify the ESG investment universe and mitigate the potential risk rising from an inconsistency of data provided by the different rating agencies.

g) Methodologies for environmental or social characteristics

The Investment Manager relies on the indicators used by the selected rating agency, to screen the ESG risks that are the most material according to the sector or industry.

In that context, environmental factors typically include GHG emissions, energy management, waste production, ecological/human health risks, carbon dependency and climate change risks and social factors relate to the respect of human rights, data security and privacy, labour market conditions and practices, employee health and safety, diversity and inclusion, subjective well-being indicators and poverty. Also screened are governance factors such as business ethics, competitive behaviours, management of legal and regulatory environment, risk management.

When the MSCI ESG Rating is used to select the companies and measure the attainment of each of the environmental and/or social characteristic promoted by this financial product a country's exposure to and management of environmental, social and governance risk factors are assessed and explain how these factors might impact the long-term sustainability of its economy.

The rating methodology used for the MSCI ESG Rating is based on a series of risk factors and sub-factors, including:

- environmental risks: natural resource (energy security, water resources, productive land and mineral resources-, environmental externalities and vulnerability (vulnerability to environmental events, environmental performance);
- social risks: human capital (higher education and technology readiness, knowledge capital, basic needs, human capital performance), economic environment; and
- governance risk: financial governance (financial capital, financial management), political governance (institutions, judicial and penal system, governance effectiveness);

When the Sustainalytics Rating is used to select the companies and measure the attainment of each of the environmental and/or social characteristic promoted as above mentioned, the rating methodology used for the Sustainalytics Rating is based on a series of factors, including:

- environmental factor: Sustainalytics considers a company's impact on the environment in terms of its carbon footprint, water usage, waste management, and other related factors. The ratings also look at the company's environmental policies and management practices;
- social factor: the social dimension of the Sustainalytics ratings looks at a company's impact on society, including factors such as labour practices, human rights, product safety, and community relations. The ratings also consider the company's social policies and management practices; and
- governance factor: Sustainalytics evaluates a company's governance structure and practices, including factors such as board composition, executive compensation, shareholder rights, and transparency. The ratings also consider the company's ethical and legal compliance.

When the Bloomberg ESG Rating is used to select the companies and measure the attainment of each of the environmental and/or social characteristic promoted as above mentioned, the rating methodology used for the Bloomberg Rating is based on a series of factors, including:

- environmental factor: the Bloomberg ESG ratings consider a company's impact on the environment, including factors such as greenhouse gas emissions, energy efficiency, water usage, waste management, and environmental policies;
- social factor: the social dimension of the Bloomberg ESG ratings looks at a company's impact on society, including factors such as labour practices, human rights, product safety, and community relations. The ratings also consider the company's social policies and management practices; and
- governance factor: the Bloomberg ESG ratings evaluate a company's governance structure and practices, including factors such as board composition (such as diversity, tenure, overboarding and independence), executive compensation, shareholder rights, and transparency. The ratings also consider the company's ethical and legal compliance.

When the FactSet ESG Rating is used to select the companies and measure the attainment of each of the environmental and/or social characteristic promoted as above mentioned, the rating methodology used for the FactSet ESG Rating is based on a series of factors, including:

- environmental factor: the FactSet ESG ratings consider a company's impact on the environment, including factors such as greenhouse gas emissions, energy efficiency, water usage, waste management, and environmental policies. The ratings also evaluate the company's environmental performance in relation to its industry peers;

- social factor: the social dimension of the FactSet ESG ratings looks at a company's impact on society, including factors such as labour practices, human rights, product safety, and community relations. The ratings also consider the company's social policies and management practices; and
- governance factor: the FactSet ESG ratings evaluate a company's governance structure and practices, including factors such as board composition, executive compensation, shareholder rights, and transparency. The ratings also consider the company's ethical and legal compliance.

For investments to be in the investment universe of the Sub-Fund, a minimum score, from an industry leading ESG data provider will be required to achieve eligibility. We provide below details of the data providers we consider as industry experts and our acceptable minimum scoring criteria from each provider:

- MSCI: B or above
- Sustainalytics: Below 40 risk score
- Bloomberg: 2 and above
- ISS (FactSet) C- and above

As such, all companies in line with the above minimum scoring criteria will be accepted. The Investment Manager considers companies below these scoring thresholds as not aligned with the environmental and social characteristics promoted by the Sub-Fund.

When an investee company is downgraded or included in excluded sector after the acquisition of the company, the Investment Manager may be required to keep the company in the portfolio to (i) comply with the applicable regulations, (ii) if the investment is used for liquidity purposes or (iii) if the Investment Manager believes that the ESG scoring may improve due to engagement. Any divestment will be decided in the best interest of investors.

h) Data sources and processing

Data sources: We use the ESG scoring generated from MSCI, Sustainalytics, Bloomberg or FactSet as described above. All processes in place are detailed above under the section "*Methodologies for environmental or social characteristics*".

Data quality: The external data providers and other data sources are assessed on an ongoing basis for data quality, coverage and other attributes.

Data processing: As described above, the data used derives from external data providers that provide data on issuer level.

Data estimation: Although we prioritise reported data over estimated data, we do rely to some extent on estimations and on estimated data provided by our external data providers where reported data is not available or of adequate quality.

i) Limitations to methodologies and data

Proportion of data received from external data providers may be estimated data, and this may be seen as a limitation to the methodologies and data sources. Information is mainly based on historical data and may not reflect the future ESG performance or risks of the investments.

To mitigate the limitations to data sources, we have ensured to have solid due diligence measures in place in relation to external data providers.

j) Due diligence

When selecting investments Banor includes environmental, social and governance considerations into its investment process applied at the level of the Sub-Fund by (i) using a best in class approach to identify those companies and/or issuers with the best practice and standards in terms of ESG characteristics, (ii) holding minimum amount of rated instruments and (iii) negative screening by excluding issuers involved in controversial activities.

For additional information, please refer to sections (d) "Investment strategy" and (g) "Methodologies for environmental or social characteristics" above.

k) Engagement policies

Engagement is not part of the environmental or social investment strategy of the Sub-Fund.

l) Designated reference benchmark

The Sub-Fund has not designated an index as a reference benchmark for the purpose of attaining the environmental or social characteristics promoted by the Sub-Fund.

ARISTEA SICAV – FIM GEM Debt Fund | website template

Legal entity identifier: 549300IPG5A4H1JBBQ81

a) Summary

FIM Partners UK Ltd (the "Investment Manager", "Banor" or "we") includes Environmental, Social and Governance ("ESG") considerations into its investment process applied to Fim Gem Debt Fund (the "Sub-Fund") by (i) using a best in class approach to identify those companies and/or issuers with the best practice and standards in terms of ESG characteristics, (ii) negative screening (iii) quantitative screening and (iv) post-screening.

The Sub-Fund promotes environmental or social characteristics, but does not have as its objective sustainable investment. The Sub-Fund is committed to invest a minimum amount of 80% of its assets in securities with an ESG rating.

b) No sustainable investment objective

This Sub-Fund promotes environmental or social characteristics, but does not have as its objective sustainable investment.

c) Environmental or social characteristics of the financial product

Banor aims at generating positive risk adjusted returns with responsibility through fundamental analysis, operational excellence, and by integrating environmental, social and governance (ESG) issues into the investment processes.

The Sub-Fund promotes overall environmental and social sustainability by investing in companies and issuers that have the best ESG practices using a "best-in-class" approach. This approach is informed by our evaluation process which includes an identification and assessment of the sustainability risks relating to each company and issuer by means of our proprietary ESG framework. The framework includes country, sector and value-based exclusions in order to restrict investing in companies and issuers that are in countries that face international sanctions, as well as exclude investing in sectors that have a negative impact on environmental and social factors, as follows:

Unless specifically noted in terms of revenue threshold (in parentheses), these sectors are automatically excluded from our investment universe:

- Tobacco Production (5%)/Distribution (5%)
- Alcohol Production (5%)/Distribution (5%)
- Gambling
- Adult Entertainment including Pornography
- Illegal & Nuclear Weapons, including but not limited to Cluster munitions, Anti-personnel mines, Biological Weapons, Chemical Weapons, depleted uranium munitions and Non-detectable fragments, incendiary and blinding weapons
- Coal Mining
- Coal (25%), with the exception of companies that have clear strategies to transition to a lower-carbon economy and have no plans to increase their coal-based capacity
- Radioactive materials

- Unbonded asbestos fibres
- Any product or activity deemed illegal under applicable local or national laws or regulations or subject to internationally agreed phase-outs or bans as defined in global conventions and agreements

A reference benchmark has not been designated for attaining the environmental or social characteristics promoted by the financial product.

d) Investment strategy

The Sub-Fund promotes environmental and social characteristics within the scope of Article 8 of SFDR. The strategy focuses on providing the investors with capital growth by investing, directly or indirectly, in fixed income products exposed to global emerging markets and frontier markets. In addition, the Investment Manager will use a "best-in-class" approach to identify those issuers and/or companies with the best practice and standards in terms of ESG characteristics for inclusion in the Sub-Fund's portfolio. This approach is informed by our evaluation process which includes an identification and assessment of the sustainability risks relating to each company and issuer by means of our proprietary ESG framework, which is based on three cumulative and complementary layers:

i. Negative screening aimed at excluding investments with a high long term sustainability risk, such as countries on international sanctions lists, as well as investments in financial instruments issued by companies whose revenues come mainly from the sales of tobacco, from alcohol, from illegal and nuclear weapons, from gambling, from adult entertainment;
ii. Quantitative screening and scoring model whereby investments are analyzed through several return horizons using techniques which systematically score them according to E, S and G indicators. Generally, the Investment Manager will not invest in corporates which do not meet the minimum scoring threshold of 50 out of 100 in our proprietary ESG scorecard, unless it is expected that the score will improve in the near future. The Scorecard assesses companies through a range of sector-specific ESG questions and unique data points while taking into account material risks for each sector and weighing the score accordingly. For sovereigns, opportunities in the worst performing countries will be restricted from investment;
iii. Post-screening in-depth analysis via the use of an events calendar and high frequency socioeconomic data. Any number of factors may trigger a requirement for a deeper analysis, which may focus on the overall ESG picture, one pillar, or on one specific issue.

The foregoing exclusionary and scoring approach contribute to a reduction in sustainability risks and improvement on expected returns. Through scoring and through an exclusionary approach of certain sectors, exposure to specific risk factors is eliminated. Moreover, the analysis on single issuers will increase the discount rate for companies with a higher-than-average sustainability risk, requesting a higher expected return to be added in the portfolio and adjusting the corresponding weight. The combination of both will contribute to improved expected returns and reduce sustainability risks.

Binding Elements of the Investment Strategy

The Investment Manager is bound by the fact that the investments are excluded based on the exclusion criteria defined in the section C, headed "Environmental or social characteristics of the financial product?" and as indicated below:

Unless specifically noted in terms of revenue threshold (in parentheses), these sectors are automatically excluded from our investment universe:

- Tobacco Production (5%)/Distribution (5%)
- Alcohol Production (5%)/Distribution (5%)
- Gambling
- Adult Entertainment including Pornography
- Illegal & Nuclear Weapons, including but not limited to Cluster munitions, Anti-personnel mines, Biological Weapons, Chemical Weapons, depleted uranium munitions and Non-detectable fragments, incendiary and blinding weapons
- Coal Mining
- Coal (25%), with the exception of companies that have clear strategies to transition to a lower-carbon economy and have no plans to increase their coal-based capacity
- Radioactive materials
- Unbonded asbestos fibres
- Any product or activity deemed illegal under applicable local or national laws or regulations or subject to internationally agreed phase-outs or bans as defined in global conventions and agreements

In summary, the binding constraints are based on the UN and US Sanctions lists, sector restrictions as outlined above as well as the bottom decile of Investment Manager's ESG Scorecard, all of which are hardcoded in the compliance system.

Good Governance

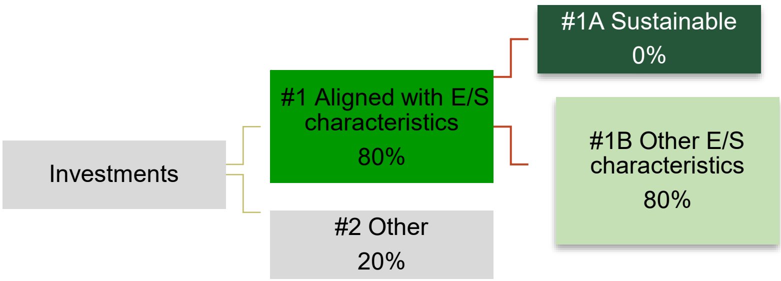
Good governance practices of investee companies are assessed through our above-mentioned proprietary ESG scorecard. Our scorecard takes into account material risks for each sector and weighs the scoring accordingly. The minimum scoring threshold for inclusion in the fund is 50 out of 100, which is a measure of the general ESG Score. The scorecard assesses companies through a range of sector-specific ESG questions and unique KPI data points.

Specific indicators on governance include independent and diversified boards, adherence to good corporate governance codes, lawsuits, fines or incidents of non-compliance, and risk management systems.

For sovereigns, relevant indicators include corruption, regulatory and legal protections, transparency, competition and other rule of law metrics.

e) Proportion of investments

A minimum of 80% of the investments underlying the Sub-Fund are promoting environmental and social characteristics and are subject to the best-in-class strategy of the Sub-Fund (**#1 Aligned with E/S characteristics**) and up to 20% invested in Other (**#2 Other**). Included in "#2 Others", are cash and cash equivalents may be held as ancillary liquidity or for risk balancing purposes. The Sub-Fund may use derivatives and other techniques for the purposes set out in the prospectus. This category may also include securities for which relevant data is not available. Thus, these investments do not have any minimum environmental or social safeguards in place.



#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.

#2Other 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 category **#1 Aligned with E/S characteristics** covers:

- The sub-category #**1A Sustainable** covers sustainable investments with environmental or social objectives.

- The sub-category **#1B Other E/S characteristics** covers investments aligned with the environmental or social characteristics that do not qualify as sustainable investments.

f) Monitoring of environmental or social characteristics

In order to properly monitor, measure and control how the E/S characteristics and the sustainability indicators of the investments are performing, the Fund has established a set of environmental, social and governance KPIs.

There are several sustainability indicators integrated in the quantitative investment process for stock selection. Where the relevant data is available, these sustainability indicators aim at capturing a range of topics including, but not limited to, the following:

- Environmental factors such as GHG emissions, energy management, waste production, ecological/human health risks, carbon dependency, and climate change risks;
- Social factors such as respect of human rights, data security and privacy, labour market conditions and practices, employee health and safety, diversity and inclusion, subjective well-being indicators, and poverty;
- Governance factors such as corruption, regulatory and legal protections, transparency, competition and other rule of law metrics.

g) Methodologies for environmental or social characteristics

The Investment Manager selects a dedicated proportion of the portfolio companies by using a propietary ESG scoring. The minimum scoring threshold for inclusion in the Sub-Fund is 50 out of 100, which is a measure of the general ESG Score. The scorecard assesses companies through a range of sector-specific ESG questions and unique KPI data points.

In addition, the Investment Manager will use a “best-in-class” approach to identify those issuers and/or companies with the best practice and standards in terms of ESG characteristics for inclusion in the Sub-Fund’s portfolio. This approach is informed by our evaluation process which includes an identification and assessment of the sustainability risks relating to each company and issuer by means of our proprietary ESG framework, which is based on three cumulative and complementary layers:

I. Negative screening aimed at excluding investments with a high long term sustainability risk, such as countries on international sanctions lists, as well as investments in financial instruments issued by companies whose revenues come mainly from the sales of tobacco, from alcohol, from illegal and nuclear weapons, from gambling, from adult entertainment;
II. Quantitative screening and scoring model whereby investments are analyzed through several return horizons using techniques which systematically score them according to E, S and G indicators. Generally, the Investment Manager will not invest in corporates which do not meet the minimum scoring threshold of 50 out of 100 in our proprietary ESG scorecard, unless it is expected that the score will improve in the near future. The Scorecard assesses companies through a range of sector-specific ESG questions and unique data points while taking into account material risks for each sector and weighing the score accordingly. For sovereigns, opportunities in the worst performing countries will be restricted from investment;
III. Post-screening in-depth analysis via the use of an events calendar and high frequency socioeconomic data. Any number of factors may trigger a requirement for a deeper analysis, which may focus on the overall ESG picture, one pillar, or on one specific issue.

The foregoing exclusionary and scoring approach contribute to a reduction in sustainability risks and improvement on expected returns.

Through scoring and through an exclusionary approach of certain sectors, exposure to specific risk factors is eliminated. Moreover, the analysis on single issuers will increase the discount rate for companies with a higher-than-average sustainability risk, requesting a higher expected return to be added in the portfolio and adjusting the corresponding weight. The combination of both will contribute to improved expected returns and reduce sustainability risks.

h) Data sources and processing

Data sources: We use proprietary ESG scoring. All processes in place are detailed above under the section "*Methodologies for environmental or social characteristics*".

Data quality: Data sources are assessed on an ongoing basis for data quality, coverage and other attributes.

Data processing: As described above, the data used derive from proprietary ESG scoring system and provide data on issuer level.

Data estimation: Although we prioritise reported data over estimated data, we do rely to some extent on estimations where reported data is not available or of adequate quality.

i) Limitations to methodologies and data

Proportion of data may be estimated data, and this may be seen as a limitation to the methodologies and data sources. Information is mainly based on historical data and may not reflect the future ESG performance or risks of the investments.

To mitigate the limitations to data sources, we have ensured to have solid due diligence measures in place in relation to collating data.

j) Due diligence

When selecting investments Banor includes environmental, social and governance considerations into its investment process applied at the level of the Sub-Fund by (i) using a best in class approach to identify those companies and/or issuers with the best practice and standards in terms of ESG characteristics, (ii) negative screening (iii) quantitative screening and (iv) post-screening.

For additional information, please refer to sections (d) “Investment strategy” and (g) “Methodologies for environmental or social characteristics” above.

k) Engagement policies

Engagement is not part of the environmental or social investment strategy of the Sub-Fund.

l) Designated reference benchmark

The Sub-Fund has not designated an index as a reference benchmark for the purpose of attaining the environmental or social characteristics promoted by the Sub-Fund.

ARISTEA SICAV – SHORT TERM | website template

Legal entity identifier: 5493008K4849BSUNMF19

a) Summary

Banor Capital Limited (the "Investment Manager", "Banor" or "we") includes Environmental, Social and Governance ("ESG") considerations into its investment process applied to Short Term (the "Sub-Fund") by (i) using a best in class approach to identify those companies and/or issuers with the best practice and standards in terms of ESG characteristics, (ii) holding minimum amount of rated instruments and (iii) negative screening by excluding issuers involved in controversial activities.

The Investment Manager relies on the indicators used by the selected rating agency, to screen the ESG risks that are the most material according to the sector or industry.

The Sub-Fund promotes environmental or social characteristics, but does not have as its objective sustainable investment. The Sub-Fund is committed to invest a minimum amount of 50% of its assets in securities with an ESG rating.

b) No sustainable investment objective

This Sub-Fund promotes environmental or social characteristics, but does not have as its objective sustainable investment.

c) Environmental or social characteristics of the financial product

Banor includes ESG considerations into its investment process applied at the level of the Sub-Fund by (i) using a best in class approach to identify those companies and/or issuers with the best practice and standards in terms of ESG characteristics, (ii) holding minimum amount of rated instruments and (iii) negative screening by excluding issuers involved in controversial activities.

Such approach supports the promotion of environmental and social characteristics notably by excluding from the portfolio, all companies whose revenues come mainly from the sales of nuclear weapons and landmines, from gambling, from sales of electricity produced by coal-fired power stations.

In addition, the Investment Manager selects a dedicated proportion of the portfolio companies by using the ESG scoring generated from MSCI, Sustainalytics, Bloomberg or FactSet. The Investment Manager selects and reviews the rating agency every year and maintain this information up to date in Responsible Investment Policy available on the website of the Investment Manager.

By reviewing the rating agency every year, the Investment Manager aims to diversify the ESG investment universe and mitigate the potential risk rising from an inconsistency of data provided by the different rating agencies.

d) Investment strategy

The investment strategy applies an exclusion list (1) and will use a "best-in-class" approach to identify those issuers and/or companies with the best practice (2).

1. Exclusion list

We apply a strict exclusion list, identifying companies whose revenues come mainly from the sales of nuclear weapons or landmines, from gambling, from sales of electricity produced by coal-fired power stations. In that respect, the Investment Manager refers to publicly available lists of companies which are allegedly exposed to activities detrimental for the environment and human rights.

2. Best-in-class

When selecting investments, we adopt a best-in-class approach which seeks to invest in securities of companies with low sustainability risks while avoiding those with high sustainability risks, reducing the investment universe further. The Sub-Fund is committed to invest a minimum amount of 50% of its assets in securities with an ESG rating.

For these investments to be in the investment universe of the Sub-Fund, a minimum score, from an industry leading ESG data provider will be required to achieve eligibility. We provide below details of the data providers we consider as industry experts and our acceptable minimum scoring criteria from each provider:

- MSCI: B or above
- Sustainalytics: Below 40 risk score
- Bloomberg: 2 and above
- ISS (FactSet) C- and above

As such, all companies in line with the above minimum scoring criteria will be accepted. The Investment Manager considers companies below these scoring thresholds as not aligned with the environmental and social characteristics promoted by the Sub-Fund.

When an investee company is downgraded or included in excluded sector after the acquisition of the company, the Investment Manager may be required to keep the company in the portfolio to (i) comply with the applicable regulations, (ii) if the investment is used for liquidity purposes or (iii) if the Investment Manager believes that the ESG scoring may improve due to engagement. Any divestment will be decided in the best interest of investors.

<u>Binding Elements of the Investment Strategy</u>

The Sub-Fund's binding elements of the investment strategy are the following:

- The exclusion list is systematically applied to exclude companies whose revenues come mainly from the sales of nuclear weapons, from gambling, from sales of electricity produced by coal-fired power stations.
- Only the corporates that meet the minimum scoring threshold below will be considered for investment:
    - MSCI: B or above
    - Sustainalytics: Below 40 risk score

- Bloomberg: 2 and above
- ISS (FactSet) C- and above

Good Governance

In order to assess good governance practices, the Investment Manager believes that a sound corporate governance structure is essential for creating long-term shareholders value. As the investee companies are selected through the best-in-class process, referring to ESG ratings provided by MSCI, Sustainalytics, Bloomberg or ISS, the Investment Manager relies on the governance scoring generated by the rating agencies.

MSCI governance assessment relies on key issues being: corporate governance (board composition, remuneration, ownership structure and accounting system) and corporate behaviour (business ethics and tax transparency).

Sustainalytics integrates the corporate governance indicators into the ESG scoring system, which include, in addition to the corporate governance indicators (board composition, executive compensation, shareholder rights, and transparency), the governance assessment also refers the ESG indicators of the shareholders of the investee companies.

Bloomberg developed to governance scoring system: the BESG Governance Pillar Score and the BESG Board Composition Theme Score. Whereas the BESG Governance Pillar Score assesses the overall sound governance of a company, the BESG Board Composition Theme Score focuses on the governance factors of the board of a company, such as the diversity, tenure, overboarding and independence.

FactSet corporate governance assessment is divided into distinct packages that provide comprehensive insights into thousands of companies. The coverage of each package differs slightly given the nature of the content included. Coverage of the corporate governance-focused packages, coincide with corporate governance provisions reported in public sources, such as EDGAR filings and articles of incorporation, while the coverage of the corporate activism package coincides with activist activity reported in SEC filings. U.S. companies constitute the majority of those included in this feed, although FactSet continues to expand coverage in other regions.

The Sub-Fund considers the scores of the investee companies accordingly and monitors the score throughout the life of the investment.

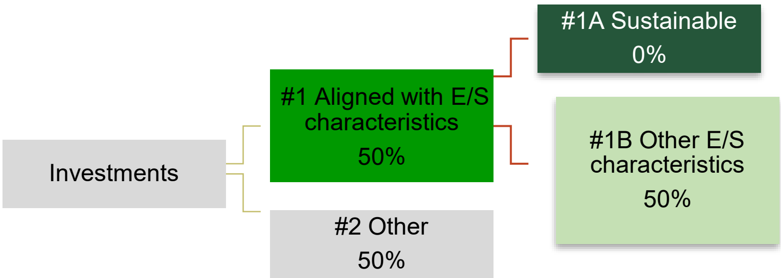
Principal Adverse Impacts

Although the Investment Manager is committed to incorporating environmental, social and governance factors into its investment decisions, it believes that, considering its current investment strategy and processes, the collection and consideration of Principal Adverse Impacts (“PAI”) are not relevant to achieve the promotion of environmental and social characteristics promoted by the Sub-Fund.

e) Proportion of investments

A minimum of 50% of the investments underlying the Sub-Fund are promoting environmental and social characteristics and are subject to the best-in-class strategy of the Sub-Fund (**#1 Aligned with E/S characteristics**) and up to 50% invested in Other (**#2 Other**). Included in “#2 Others”, are debt securities (bonds), liquidity, money market instruments, derivative instruments and equities. These investments are not used to promote environmental or social characteristics and are not selected with the ESG binding rating described in the section (d)

"Investment strategy". The minimum safeguards are applied to these investments through the exclusion list referred to in the section (d) "Investment strategy". The exclusion list applies to all investments, including the investments which are not aligned with the environmental and social characteristics promoted by the Sub-Fund.



#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 category **#1 Aligned with E/S characteristics** covers:

- The sub-category **#1A Sustainable** covers sustainable investments with environmental or social objectives.
- The sub-category **#1B Other E/S characteristics** covers investments aligned with the environmental or social characteristics that do not qualify as sustainable investments.

f) Monitoring of environmental or social characteristics

The Investment Manager selects a dedicated proportion of the portfolio companies by using the ESG scoring generated from MSCI, Sustainalytics, Bloomberg or FactSet. We select and review the rating agency every year and maintain this information up-to-date in Responsible Investment Policy available on the website of the Investment Manager.

By reviewing the rating agency every year, we aim to diversify the ESG investment universe and mitigate the potential risk rising from an inconsistency of data provided by the different rating agencies.

g) Methodologies for environmental or social characteristics

The Investment Manager relies on the indicators used by the selected rating agency, to screen the ESG risks that are the most material according to the sector or industry.

In that context, environmental factors typically include GHG emissions, energy management, waste production, ecological/human health risks, carbon dependency and climate change risks and social factors relate to the respect of human rights, data security and privacy, labour market conditions and practices, employee health and safety, diversity and inclusion, subjective well-being indicators and poverty. Also screened are governance factors such as business ethics, competitive behaviours, management of legal and regulatory environment, risk management.

When the MSCI ESG Rating is used to select the companies and measure the attainment of each of the environmental and/or social characteristic promoted by this financial product a country’s exposure to and management of environmental, social and governance risk factors are assessed and explain how these factors might impact the long-term sustainability of its economy.

The rating methodology used for the MSCI ESG Rating is based on a series of risk factors and sub-factors, including:

- environmental risks: natural resource (energy security, water resources, productive land and mineral resources-, environmental externalities and vulnerability (vulnerability to environmental events, environmental performance);
- social risks: human capital (higher education and technology readiness, knowledge capital, basic needs, human capital performance), economic environment; and
- governance risk: financial governance (financial capital, financial management), political governance (institutions, judicial and penal system, governance effectiveness);

When the Sustainalytics Rating is used to select the companies and measure the attainment of each of the environmental and/or social characteristic promoted as above mentioned, the rating methodology used for the Sustainalytics Rating is based on a series of factors, including:

- environmental factor: Sustainalytics considers a company's impact on the environment in terms of its carbon footprint, water usage, waste management, and other related factors. The ratings also look at the company's environmental policies and management practices;
- social factor: the social dimension of the Sustainalytics ratings looks at a company's impact on society, including factors such as labour practices, human rights, product safety, and community relations. The ratings also consider the company's social policies and management practices; and
- governance factor: Sustainalytics evaluates a company's governance structure and practices, including factors such as board composition, executive compensation, shareholder rights, and transparency. The ratings also consider the company's ethical and legal compliance.

When the Bloomberg ESG Rating is used to select the companies and measure the attainment of each of the environmental and/or social characteristic promoted as above mentioned, the rating methodology used for the Bloomberg Rating is based on a series of factors, including:

- environmental factor: the Bloomberg ESG ratings consider a company's impact on the environment, including factors such as greenhouse gas emissions, energy efficiency, water usage, waste management, and environmental policies;
- social factor: the social dimension of the Bloomberg ESG ratings looks at a company's impact on society, including factors such as labour practices, human rights, product safety, and community relations. The ratings also consider the company's social policies and management practices; and
- governance factor: the Bloomberg ESG ratings evaluate a company's governance structure and practices, including factors such as board composition (such as diversity, tenure, overboarding and independence), executive compensation, shareholder rights, and transparency. The ratings also consider the company's ethical and legal compliance.

When the FactSet ESG Rating is used to select the companies and measure the attainment of each of the environmental and/or social characteristic promoted as above mentioned, the rating methodology used for the FactSet ESG Rating is based on a series of factors, including:

- environmental factor: the FactSet ESG ratings consider a company's impact on the environment, including factors such as greenhouse gas emissions, energy efficiency, water usage, waste management, and environmental policies. The ratings also evaluate the company's environmental performance in relation to its industry peers;

- social factor: the social dimension of the FactSet ESG ratings looks at a company's impact on society, including factors such as labour practices, human rights, product safety, and community relations. The ratings also consider the company's social policies and management practices; and
- governance factor: the FactSet ESG ratings evaluate a company's governance structure and practices, including factors such as board composition, executive compensation, shareholder rights, and transparency. The ratings also consider the company's ethical and legal compliance.

For investments to be in the investment universe of the Sub-Fund, a minimum score, from an industry leading ESG data provider will be required to achieve eligibility. We provide below details of the data providers we consider as industry experts and our acceptable minimum scoring criteria from each provider:

- MSCI: B or above
- Sustainalytics: Below 40 risk score
- Bloomberg: 2 and above
- ISS (FactSet) C- and above

As such, all companies in line with the above minimum scoring criteria will be accepted. The Investment Manager considers companies below these scoring thresholds as not aligned with the environmental and social characteristics promoted by the Sub-Fund.

When an investee company is downgraded or included in excluded sector after the acquisition of the company, the Investment Manager may be required to keep the company in the portfolio to (i) comply with the applicable regulations, (ii) if the investment is used for liquidity purposes or (iii) if the Investment Manager believes that the ESG scoring may improve due to engagement. Any divestment will be decided in the best interest of investors.

h) Data sources and processing

Data sources: We use the ESG scoring generated from MSCI, Sustainalytics, Bloomberg or FactSet as described above. All processes in place are detailed above under the section "*Methodologies for environmental or social characteristics*".

Data quality: The external data providers and other data sources are assessed on an ongoing basis for data quality, coverage and other attributes.

Data processing: As described above, the data used derives from external data providers that provide data on issuer level.

Data estimation: Although we prioritise reported data over estimated data, we do rely to some extent on estimations and on estimated data provided by our external data providers where reported data is not available or of adequate quality.

i) Limitations to methodologies and data

Proportion of data received from external data providers may be estimated data, and this may be seen as a limitation to the methodologies and data sources. Information is mainly based on historical data and may not reflect the future ESG performance or risks of the investments.

To mitigate the limitations to data sources, we have ensured to have solid due diligence measures in place in relation to external data providers.

j) Due diligence

When selecting investments Banor includes environmental, social and governance considerations into its investment process applied at the level of the Sub-Fund by (i) using a best in class approach to identify those companies and/or issuers with the best practice and standards in terms of ESG characteristics, (ii) holding minimum amount of rated instruments and (iii) negative screening by excluding issuers involved in controversial activities.

For additional information, please refer to sections (d) “Investment strategy” and (g) “Methodologies for environmental or social characteristics” above.

k) Engagement policies

Engagement is not part of the environmental or social investment strategy of the Sub-Fund.

l) Designated reference benchmark

The Sub-Fund has not designated an index as a reference benchmark for the purpose of attaining the environmental or social characteristics promoted by the Sub-Fund.

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a) Summary

Banor Capital Limited (the “Investment Manager”, “Banor” or “we”) includes Environmental, Social and Governance (“ESG”) considerations into its investment process applied to Financial Capital (the “Sub-Fund”) by (i) using a best in class approach to identify those companies and/or issuers with the best practice and standards in terms of ESG characteristics, (ii) holding minimum amount of rated instruments and (iii) negative screening by excluding issuers involved in controversial activities.

The Investment Manager relies on the indicators used by the selected rating agency, to screen the ESG risks that are the most material according to the sector or industry.

The Sub-Fund promotes environmental or social characteristics, but does not have as its objective sustainable investment. The Sub-Fund is committed to invest a minimum amount of 50% of its assets in securities with an ESG rating.

b) No sustainable investment objective

This Sub-Fund promotes environmental or social characteristics, but does not have as its objective sustainable investment.

c) Environmental or social characteristics of the financial product

Banor includes ESG considerations into its investment process applied at the level of the Sub-Fund by (i) using a best in class approach to identify those companies and/or issuers with the best practice and standards in terms of ESG characteristics, (ii) holding minimum amount of rated instruments and (iii) negative screening by excluding issuers involved in controversial activities.

Such approach supports the promotion of environmental and social characteristics notably by excluding from the portfolio, all companies whose revenues come mainly from the sales of nuclear weapons and landmines, from gambling, from sales of electricity produced by coal-fired power stations.

In addition, the Investment Manager selects a dedicated proportion of the portfolio companies by using the ESG scoring generated from MSCI, Sustainalytics, Bloomberg or FactSet. The Investment Manager selects and reviews the rating agency every year and maintain this information up to date in Responsible Investment Policy available on the website of the Investment Manager.

By reviewing the rating agency every year, the Investment Manager aims to diversify the ESG investment universe and mitigate the potential risk rising from an inconsistency of data provided by the different rating agencies.

d) Investment strategy

The investment strategy applies an exclusion list (1) and will use a "best-in-class" approach to identify those issuers and/or companies with the best practice (2).

1. Exclusion list

We apply a strict exclusion list, identifying companies whose revenues come mainly from the sales of nuclear weapons or landmines, from gambling, from sales of electricity produced by coal-fired power stations. In that respect, the Investment Manager refers to publicly available lists of companies which are allegedly exposed to activities detrimental for the environment and human rights.

2. Best-in-class

When selecting investments, we adopt a best-in-class approach which seeks to invest in securities of companies with low sustainability risks while avoiding those with high sustainability risks, reducing the investment universe further. The Sub-Fund is committed to invest a minimum amount of 50% of its assets in securities with an ESG rating.

For these investments to be in the investment universe of the Sub-Fund, a minimum score, from an industry leading ESG data provider will be required to achieve eligibility. We provide below details of the data providers we consider as industry experts and our acceptable minimum scoring criteria from each provider:

- MSCI: B or above
- Sustainalytics: Below 40 risk score
- Bloomberg: 2 and above
- ISS (FactSet) C- and above

As such, all companies in line with the above minimum scoring criteria will be accepted. The Investment Manager considers companies below these scoring thresholds as not aligned with the environmental and social characteristics promoted by the Sub-Fund.

When an investee company is downgraded or included in excluded sector after the acquisition of the company, the Investment Manager may be required to keep the company in the portfolio to (i) comply with the applicable regulations, (ii) if the investment is used for liquidity purposes or (iii) if the Investment Manager believes that the ESG scoring may improve due to engagement. Any divestment will be decided in the best interest of investors.

<u>Binding Elements of the Investment Strategy</u>

The Sub-Fund's binding elements of the investment strategy are the following:

- The exclusion list is systematically applied to exclude companies whose revenues come mainly from the sales of nuclear weapons, from gambling, from sales of electricity produced by coal-fired power stations.
- Only the corporates that meet the minimum scoring threshold below will be considered for investment:
    - MSCI: B or above
    - Sustainalytics: Below 40 risk score

- Bloomberg: 2 and above
- ISS (FactSet) C- and above

Good Governance

In order to assess good governance practices, the Investment Manager believes that a sound corporate governance structure is essential for creating long-term shareholders value. As the investee companies are selected through the best-in-class process, referring to ESG ratings provided by MSCI, Sustainalytics, Bloomberg or ISS, the Investment Manager relies on the governance scoring generated by the rating agencies.

MSCI governance assessment relies on key issues being: corporate governance (board composition, remuneration, ownership structure and accounting system) and corporate behaviour (business ethics and tax transparency).

Sustainalytics integrates the corporate governance indicators into the ESG scoring system, which include, in addition to the corporate governance indicators (board composition, executive compensation, shareholder rights, and transparency), the governance assessment also refers the ESG indicators of the shareholders of the investee companies.

Bloomberg developed to governance scoring system: the BESG Governance Pillar Score and the BESG Board Composition Theme Score. Whereas the BESG Governance Pillar Score assesses the overall sound governance of a company, the BESG Board Composition Theme Score focuses on the governance factors of the board of a company, such as the diversity, tenure, overboarding and independence.

FactSet corporate governance assessment is divided into distinct packages that provide comprehensive insights into thousands of companies. The coverage of each package differs slightly given the nature of the content included. Coverage of the corporate governance-focused packages, coincide with corporate governance provisions reported in public sources, such as EDGAR filings and articles of incorporation, while the coverage of the corporate activism package coincides with activist activity reported in SEC filings. U.S. companies constitute the majority of those included in this feed, although FactSet continues to expand coverage in other regions.

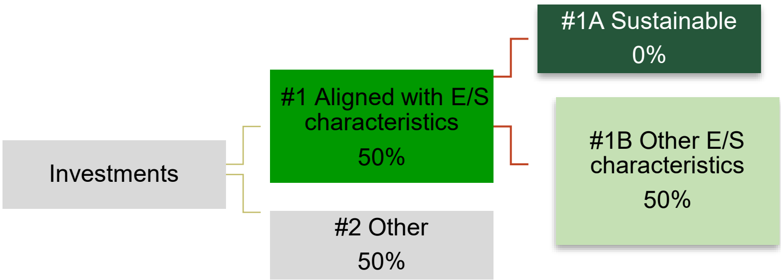
The Sub-Fund considers the scores of the investee companies accordingly and monitors the score throughout the life of the investment.

Principal Adverse Impacts

Although the Investment Manager is committed to incorporating environmental, social and governance factors into its investment decisions, it believes that, considering its current investment strategy and processes, the collection and consideration of Principal Adverse Impacts ("PAI") are not relevant to achieve the promotion of environmental and social characteristics promoted by the Sub-Fund.

e) Proportion of investments

A minimum of 50% of the investments underlying the Sub-Fund are promoting environmental and social characteristics and are subject to the best-in-class strategy of the Sub-Fund (**#1 Aligned with E/S characteristics**) and up to 50% invested in Other (**#2 Other**). Included in "#2 Others", are debt securities (bonds), liquidity, money market instruments, derivative instruments and equities. These investments are not used to promote environmental or social characteristics and are not selected with the ESG binding rating described in the section (d) “Investment strategy”. The minimum safeguards are applied to these investments through the exclusion list referred to in the section (d) “Investment strategy”. The exclusion list applies to all investments, including the investments which are not aligned with the environmental and social characteristics promoted by the Sub-Fund.



#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 category **#1 Aligned with E/S characteristics** covers:

- The sub-category **#1A Sustainable** covers sustainable investments with environmental or social objectives.
- The sub-category **#1B Other E/S characteristics** covers investments aligned with the environmental or social characteristics that do not qualify as sustainable investments.

f) Monitoring of environmental or social characteristics

The Investment Manager selects a dedicated proportion of the portfolio companies by using the ESG scoring generated from MSCI, Sustainalytics, Bloomberg or FactSet. We select and review the rating agency every year and maintain this information up-to-date in Responsible Investment Policy available on the website of the Investment Manager.

By reviewing the rating agency every year, we aim to diversify the ESG investment universe and mitigate the potential risk rising from an inconsistency of data provided by the different rating agencies.

g) Methodologies for environmental or social characteristics

The Investment Manager relies on the indicators used by the selected rating agency, to screen the ESG risks that are the most material according to the sector or industry.

In that context, environmental factors typically include GHG emissions, energy management, waste production, ecological/human health risks, carbon dependency and climate change risks and social factors relate to the respect of human rights, data security and privacy, labour market conditions and practices, employee health and safety, diversity and inclusion, subjective well-being indicators and poverty. Also screened are governance factors such as business ethics, competitive behaviours, management of legal and regulatory environment, risk management.

When the MSCI ESG Rating is used to select the companies and measure the attainment of each of the environmental and/or social characteristic promoted by this financial product a country's exposure to and management of environmental, social and governance risk factors are assessed and explain how these factors might impact the long-term sustainability of its economy.

The rating methodology used for the MSCI ESG Rating is based on a series of risk factors and sub-factors, including:

- environmental risks: natural resource (energy security, water resources, productive land and mineral resources-, environmental externalities and vulnerability (vulnerability to environmental events, environmental performance);
- social risks: human capital (higher education and technology readiness, knowledge capital, basic needs, human capital performance), economic environment; and
- governance risk: financial governance (financial capital, financial management), political governance (institutions, judicial and penal system, governance effectiveness);

When the Sustainalytics Rating is used to select the companies and measure the attainment of each of the environmental and/or social characteristic promoted as above mentioned, the rating methodology used for the Sustainalytics Rating is based on a series of factors, including:

- environmental factor: Sustainalytics considers a company's impact on the environment in terms of its carbon footprint, water usage, waste management, and other related factors. The ratings also look at the company's environmental policies and management practices;
- social factor: the social dimension of the Sustainalytics ratings looks at a company's impact on society, including factors such as labour practices, human rights, product safety, and community relations. The ratings also consider the company's social policies and management practices; and
- governance factor: Sustainalytics evaluates a company's governance structure and practices, including factors such as board composition, executive compensation, shareholder rights, and transparency. The ratings also consider the company's ethical and legal compliance.

When the Bloomberg ESG Rating is used to select the companies and measure the attainment of each of the environmental and/or social characteristic promoted as above mentioned, the rating methodology used for the Bloomberg Rating is based on a series of factors, including:

- environmental factor: the Bloomberg ESG ratings consider a company's impact on the environment, including factors such as greenhouse gas emissions, energy efficiency, water usage, waste management, and environmental policies;
- social factor: the social dimension of the Bloomberg ESG ratings looks at a company's impact on society, including factors such as labour practices, human rights, product safety, and community relations. The ratings also consider the company's social policies and management practices; and
- governance factor: the Bloomberg ESG ratings evaluate a company's governance structure and practices, including factors such as board composition (such as diversity, tenure, overboarding and independence), executive compensation, shareholder rights, and transparency. The ratings also consider the company's ethical and legal compliance.

When the FactSet ESG Rating is used to select the companies and measure the attainment of each of the environmental and/or social characteristic promoted as above mentioned, the rating methodology used for the FactSet ESG Rating is based on a series of factors, including:

- environmental factor: the FactSet ESG ratings consider a company's impact on the environment, including factors such as greenhouse gas emissions, energy efficiency, water usage, waste management, and environmental policies. The ratings also evaluate the company's environmental performance in relation to its industry peers;

- social factor: the social dimension of the FactSet ESG ratings looks at a company's impact on society, including factors such as labour practices, human rights, product safety, and community relations. The ratings also consider the company's social policies and management practices; and
- governance factor: the FactSet ESG ratings evaluate a company's governance structure and practices, including factors such as board composition, executive compensation, shareholder rights, and transparency. The ratings also consider the company's ethical and legal compliance.

For investments to be in the investment universe of the Sub-Fund, a minimum score, from an industry leading ESG data provider will be required to achieve eligibility. We provide below details of the data providers we consider as industry experts and our acceptable minimum scoring criteria from each provider:

- MSCI: B or above
- Sustainalytics: Below 40 risk score
- Bloomberg: 2 and above
- ISS (FactSet) C- and above

As such, all companies in line with the above minimum scoring criteria will be accepted. The Investment Manager considers companies below these scoring thresholds as not aligned with the environmental and social characteristics promoted by the Sub-Fund.

When an investee company is downgraded or included in excluded sector after the acquisition of the company, the Investment Manager may be required to keep the company in the portfolio to (i) comply with the applicable regulations, (ii) if the investment is used for liquidity purposes or (iii) if the Investment Manager believes that the ESG scoring may improve due to engagement. Any divestment will be decided in the best interest of investors.

h) Data sources and processing

Data sources: We use the ESG scoring generated from MSCI, Sustainalytics, Bloomberg or FactSet as described above. All processes in place are detailed above under the section "*Methodologies for environmental or social characteristics*".

Data quality: The external data providers and other data sources are assessed on an ongoing basis for data quality, coverage and other attributes.

Data processing: As described above, the data used derives from external data providers that provide data on issuer level.

Data estimation: Although we prioritise reported data over estimated data, we do rely to some extent on estimations and on estimated data provided by our external data providers where reported data is not available or of adequate quality.

i) Limitations to methodologies and data

Proportion of data received from external data providers may be estimated data, and this may be seen as a limitation to the methodologies and data sources. Information is mainly based on historical data and may not reflect the future ESG performance or risks of the investments.

To mitigate the limitations to data sources, we have ensured to have solid due diligence measures in place in relation to external data providers.

j) Due diligence

When selecting investments Banor includes environmental, social and governance considerations into its investment process applied at the level of the Sub-Fund by (i) using a best in class approach to identify those companies and/or issuers with the best practice and standards in terms of ESG characteristics, (ii) holding minimum amount of rated instruments and (iii) negative screening by excluding issuers involved in controversial activities.

For additional information, please refer to sections (d) “Investment strategy” and (g) “Methodologies for environmental or social characteristics” above.

k) Engagement policies

Engagement is not part of the environmental or social investment strategy of the Sub-Fund.

l) Designated reference benchmark

The Sub-Fund has not designated an index as a reference benchmark for the purpose of attaining the environmental or social characteristics promoted by the Sub-Fund.