

# LifeGoals.

## Website Disclosures

LifeGoals – Aggressive ESG

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## A. Executive Summary

The Portfolio promotes environmental and social characteristics but does not have a sustainable investment objective. While the Portfolio does not commit to investing in Sustainable Investments, such investments may be included in the portfolio.

The Portfolio invests exclusively in exchange-traded funds (ETFs) classified as Article 8 or Article 9 under the Sustainable Finance Disclosure Regulation (SFDR) for its equity and bond allocations.

The Portfolio seeks consistency in ESG exclusions across its investments. The Portfolio applies exclusionary screens to avoid investments with negative environmental or social impacts. It excludes issuers involved in Controversial Weapons, Thermal Coal Mining and Power Generation, Tobacco and those failing to comply with the UN Global Compact Principles. For sovereign bonds, the Portfolio only invests in issuers that are not subject to United Nations Security Council Trade Sanctions.

Compliance with these criteria is monitored using external ESG data sources, underlying ETF provider information, and third-party analysis.

The Portfolio does not use a designated reference benchmark to attain its ESG characteristics.

### Proportion of Investments

A minimum of **80% of total assets** is allocated to Article 8 or Article 9 ETFs, ensuring ESG alignment. The remaining **20%** may include non-Article 8 ETFs where classification limitations exist (e.g., gold ETFs) or other holdings such as derivatives, cash, cash equivalents and sovereign fixed income securities for investment, liquidity, or hedging purposes.

The Portfolio does not commit to holding Sustainable Investments or making investments in transitional and enabling activities, though such investments may be present in the portfolio.

### Monitoring and Data Sources

The Fund Manager ensures at least **80% ESG-aligned investments** through continuous monitoring, periodic reviews, and integration of ESG data from LSEG and MSCI. Compliance checks assess adherence to minimum ESG thresholds:

- **LSEG ESG Score:** Minimum of 60 if available

### Limitations and Due Diligence

The Portfolio relies on data from ETF providers, LSEG, and MSCI, which may have limitations such as outdated or inconsistent ESG reporting. Due diligence is conducted at the ETF level to ensure alignment with ESG criteria, but the Portfolio does not directly control the engagement activities of ETF providers.

## **Engagement and Benchmark**

The Portfolio does not actively engage with underlying issuers, relying on ETF providers for stewardship. No specific index is designated as a reference benchmark for measuring ESG characteristics.

### **B. No sustainable investment objective**

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

The Portfolio does not commit to investing in Sustainable Investments, however, they may form part of the portfolio.

### **C. Environmental or social characteristics of the financial product**

The portfolio seeks to promote the following environmental and social characteristics by excluding:

- Issuers involved in activities deemed to have negative environmental and/or social outcomes
- Issuers deemed to have violated the principles of the United Nations Global Compact (or equivalent)
- Governments that are subject to United Nations Security Council Trade sanctions

These characteristics are promoted by investing in underlying ETFs which have exclusion criteria on the following:

- Controversial Weapons
- Thermal Coal Mining and Power Generation
- Tobacco
- Issuers that are deemed to have failed to comply with the UN Global Compact Principles
- Governments that are subject to United Nations Security Council Trade sanctions

### **D. Investment strategy**

The Portfolio will invest exclusively in ESG-focused exchange-traded funds (ETFs) that are classified as Article 8 or Article 9 under the SFDR for its equity and bond allocations, as outlined in its Strategic Asset Allocation.

The investment strategy does not impose a specific minimum exclusion threshold but instead restricts the universe of eligible investments through a structured screening process, which evaluates potential underlying ETFs based on the following criteria:

- Classification as an Article 8 or Article 9 fund
- Alignment with LifeGoals Financial Services Ltd's exclusionary policies
- ESG scoring
- Principal Adverse Impacts (PAI) integration

This structured approach ensures that the Portfolio maintains a high level of ESG integrity while also meeting its broader investment objectives.

Given that the Portfolio invests in various ETFs managed by different asset managers, the Investment Manager seeks to ensure consistency in exclusionary criteria across all underlying funds.

To this end, the Portfolio excludes investments in ETFs with exposure exceeding defined thresholds to issuers involved in the following activities:

1. **Controversial Weapons** – Companies involved in the manufacturing of controversial weapons or components of controversial weapons such as AntiPersonnel Mines, Biological and Chemical Weapons, Blinding Laser Weapons, Cluster Munitions, Depleted Uranium, Incendiary Weapons and Nuclear Weapons. (Revenue Threshold 0%)
2. **Thermal Coal Mining and Power Generation** – Companies deriving 20% or more revenue from thermal coal mining or thermal coal power generation
3. **Tobacco** – Companies that are classified as producers of tobacco
4. **UN Global Compact** – Companies that have failed to comply with the United Nations Global Compact principles. This takes the form of either companies that are marked as non-compliant or companies that are involved in very severe controversies.
5. **UNSC Trade Sanctions** – Governments that are subject to United Nations Security Council Trade sanctions

To assess compliance with these exclusionary criteria, the Investment Manager utilizes data from third party Asset Managers and external ESG research providers. While best efforts are made to ensure alignment, the Portfolio may have limited indirect exposure to restricted activities due to the diversified nature of underlying ETFs. In such cases, the Investment Manager monitors holdings and, where feasible, seeks to mitigate exposures in line with the Portfolio's ESG policy.

### **Consideration of Principal Adverse Impacts (PAIs)**

The portfolio does not directly assess PAIs but relies on the methodologies of the underlying ETFs. The Portfolio considers Principal Adverse Impacts (PAIs) as part of its ESG investment framework by investing in Article 8 or 9 underlying ETFs that consider PAIs. Since the Portfolio exclusively invests in ETFs managed by third-party asset managers, the evaluation of PAIs is conducted at the individual ETF level. Preference is given to ETFs that consider PAIs in accordance with the SFDR framework, demonstrate robust and transparent ESG data quality, and integrate mitigation strategies such as exclusions, engagement policies, or other ESG-driven investment processes.

## **ESG Ratings Considerations**

The Portfolio integrates ESG ratings into its investment selection framework to ensure that underlying ETFs meet a minimum standard of sustainability performance. The Investment Manager primarily relies on LSEG ESG scores and/or MSCI ESG ratings, applying the following minimum thresholds where relevant data is available:

- **LSEG ESG Score:** A minimum score of 60.

These ESG ratings serve as a quantitative measure of an ETF's sustainability characteristics, reflecting factors such as environmental impact, social responsibility, and corporate governance practices. The Investment Manager assesses whether underlying ETFs meet or exceed these minimum thresholds and may exclude funds that do not align with the Portfolio's ESG objectives. Once an underlying ETF violates the minimum score, a leniency period will be provided to the ETF provider to resolve the discrepancy, with the duration of this period determined by the severity of the issue.

Given that the Portfolio invests in regional ETFs, ESG ratings naturally vary across different geographic markets. Developed market ETFs typically achieve higher ESG ratings due to stricter regulatory environments, greater corporate transparency, and more established sustainability practices. In contrast, emerging market ETFs may have lower ESG scores due to factors such as limited ESG disclosure, differing regulatory standards, and varying levels of corporate governance maturity.

To address these differences, the Investment Manager evaluates the ESG characteristics of each ETF in the context of its respective region, ensuring that the Portfolio maintains a high overall ESG standard while allowing for regional diversification. This approach balances the need for strong sustainability performance with the Portfolio's broader investment objectives.

## **E. Proportion of Investments**

A minimum of 80% of the Portfolio's assets will be allocated to underlying ETFs classified as Article 8 or Article 9 under SFDR.

The remaining 20% of the Portfolio's total assets may be allocated to other investments, which could include ESG-aligned holdings or ETFs that do not meet Article 8 classification due to industry limitations. For example, the Portfolio may hold ETFs that provide exposure to asset classes such as gold, which currently lack Article 8 classification.

The Portfolio does not currently commit to investing more than 0% of its assets in Sustainable Investments with an environmental objective aligned with the EU Taxonomy; however, such investments may form part of the portfolio. The Portfolio also does not commit to making investments in transitional and enabling activities, though these may be included in the portfolio.

These non-Article 8 investments may also include derivatives, cash and near-cash instruments, shares or units of collective investment schemes (CIS), and fixed income transferable securities (also known as debt securities) issued by governments and agencies worldwide.

These holdings may serve investment purposes in pursuit of the Portfolio's broader objectives, as well as liquidity management and hedging.

No other holdings outside the 80% ESG-aligned allocation are considered against minimum environmental or social safeguards.

## **F. Monitoring of environmental or social characteristics**

The Portfolio's adherence to its stated environmental and social characteristics is monitored through a structured compliance framework that ensures investments remain aligned with the Portfolio's ESG criteria. Given that the Portfolio invests exclusively in underlying ETFs, its monitoring process focuses on the ESG alignment of these ETFs rather than individual security selection.

### **ESG Screening and Compliance Framework**

The Fund Manager is responsible for ensuring that at least 80% of the Portfolio's total assets remain invested in underlying ETFs classified as Article 8 or Article 9 under SFDR. Compliance with this requirement is reviewed on an ongoing basis, with periodic assessments of the ESG characteristics of the Portfolio's holdings. This 80% refers to the direct holdings of the portfolio and does not account for the underlying exposures within the ETFs.

The Portfolio's investment guidelines, including ESG criteria, are systematically integrated into the portfolio monitoring process. Periodic reviews are conducted to verify adherence to stated ESG exclusions (yearly) and minimum ESG rating thresholds (quarterly). For elements that cannot be automatically coded due to data limitations or system constraints, a manual review process is established to ensure alignment with the Portfolio's ESG commitments.

### **Monitoring of ESG Characteristics**

The Portfolio relies on external data sources, including ESG ratings from LSEG and MSCI, to assess the ESG alignment of its underlying ETFs. These ratings are monitored regularly to ensure that the Portfolio's holdings continue to meet the requirements outlined above.

Given the Portfolio's regional ETF allocations, ESG ratings may differ between developed and emerging market exposures, with developed market ETFs generally exhibiting higher ESG scores. The Fund Manager evaluates the overall ESG profile of the portfolio to ensure compliance with its environmental and social commitments.

## **Exclusion Criteria Oversight**

Since the Portfolio invests across multiple ETFs managed by different asset managers, alignment with its exclusion criteria (Controversial Weapons, Thermal Coal Mining and Power Generation, Tobacco, and UN Global Compact, UNSC Trade Sanctions) is assessed by reviewing the methodologies of the underlying ETFs. The Fund Manager ensures that, to the extent feasible, the exclusions applied across the Portfolio's investments are consistent with its stated policies.

## **Compliance Review and Reporting**

Compliance with ESG requirements is assessed through both pre-investment due diligence and ongoing monitoring. Regular reporting is conducted to verify that the portfolio remains aligned with the Portfolio's ESG characteristics. Any identified exceptions are reviewed by the Fund Manager, and appropriate actions are taken to ensure continued adherence to the Portfolio's ESG commitments.

## **G. Methodologies**

The Portfolio applies a set of exclusionary screens, as detailed in 'Section C – Environmental or social characteristics' above.

## **H. Data Sources and Processing**

### **Data Sources**

The Portfolio monitors the information provided by underlying ETF providers, including their websites, fund documentation, and data available through LSEG. External data sources, primarily LSEG and/or MSCI, help guide the integration of ESG insights into our investment process. We rely on these sources to assess ESG characteristics and risks across the ETFs we invest in.

### **Data Processing**

We use the data provided by ETF issuers and third-party ESG data providers in our investment approach. As we do not generate ESG data internally, we rely on the accuracy and timeliness of the information made available by these external sources.

### **Limitations to Methodology and Data**

A key limitation is the reliance on information from ETF providers, which may be subject to inaccuracies or delays in updates. If an ETF provider reports incorrect or outdated ESG data, this would impact our assessment. Additionally, ESG data and reporting frameworks continue to evolve, leading to potential inconsistencies across different providers. We mitigate these risks by monitoring developments in ESG data methodologies and considering multiple data sources where feasible.

## **I. Due Diligence**

As the Portfolio invests in underlying ETFs, due diligence focuses on ensuring that selected ETFs align with the Portfolio's ESG characteristics. This includes reviewing fund documentation and available ESG information provided by ETF issuers.

## **J. Engagement Policies**

The Portfolio does not actively engage with the investee companies. Any engagement is undertaken by the ETF providers themselves, and we rely on their stewardship policies and actions regarding ESG matters.

## **L. Designated reference benchmark**

There is no 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.