

Sustainability related disclosures pursuant to Article 10 of Regulation (EU) 2019/2088 in conjunction with Article 24 of Delegated Regulation (EU) 2022/1288

The subject of this document is mandatory information on the environmental and/or social characteristics of this fund. It is not promotional material. This information is required by law in order to transparently explain the environmental and/or social characteristics promoted by the fund.

UII - Montrusco Bolton US Equity Fund

ISIN / WKN: LU2606334659 / A3EB0W; LU2606334733 / A3EB0X; LU2606335201 / A3EB02; LU2721464894 / A3E1X2

The fund is managed by Universal-Investment-Luxembourg S.A. (the "management company")

a) "Summary"

No sustainable investment objective

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

Environmental or social characteristics of the financial product

This (Sub)Fund promotes environmental and social characteristics within the meaning of Article 8 of the Disclosure Regulation.

The Sub-Fund aims at limiting its investment's negative impacts on environmental and social characteristics. The environmental characteristics which the Sub-Fund is considering are GHG Emissions Scope 1 and 2. The Sub-Fund also considers human rights as part of its consideration of social characteristics.

Investment strategy

The fundamental investment objective of the Sub-Fund is to achieve long-term growth of capital through the investment of its assets mainly in the equity markets around the world and considering ESG criteria.

The Sub-Fund is actively managed.

The Sub-Fund's investment strategy considers ESG factors into its investment process, mostly through exclusions.

The Sub-Fund invests in exchange traded equities.

Proportion of investments

The asset allocation of the (Sub)Fund and the extent to which the (Sub)Fund has direct or indirect exposures in investee entities can be found in the investment strategy and the investment principles.

The Sub-fund may hold cash (Residual to the trading process). Currency Exposure:

Unhedged and minimal impact on alpha historically.

Use of Derivatives for efficient portfolio management:

Financial Derivative Instruments (FDI) dealt in on a Regulated Market or dealt in over the counter (OTC) can only be used for hedging purposes.

Note: Among possible techniques for efficient portfolio management, the Sub-Fund currently only uses derivative transactions, which can be entered into for hedging purposes only.

For other investments that do not fall under the (Sub)Fund's sustainability strategy, it is ensured that these are not used contrary to the overall sustainability strategy. Insofar as derivatives may be acquired, it is ensured that the underlying references of the derivatives are compliant with the sustainability strategy. If the derivative references an index, it is ensured that the index has sustainability characteristics. Due to the financial instruments available on the market, there may be deviations in the sustainability characteristics of the underlying reference index from the (Sub)Fund characteristics. Any derivatives whose underlying references could be classified as not being aligned to the sustainability strategy, as well as currency holdings that do not match the (Sub)Fund currency or that are not denominated in EUR, USD, GBP, CHF, JPY, AUD, NZD, CAD, NOK or SEK may not be included as a significant component in the (Sub)Fund. The use of derivatives to offset negative market fluctuations is not included. In addition, investments may be specifically excluded from the sustainability strategy that are not subject to an explicit review of minimum environmental and/or social safeguards.

Monitoring of environmental or social characteristics

Initially, the environmental and/or social features and the sustainability indicators promoted by the (Sub)Fund are checked in a qualitative manner by the ESG Office of Universal-Investment. Compliance with the investment limits, based on the individual sustainability strategy, is measured and monitored daily by Investment Controlling of the Management Company and additionally by the portfolio manager for outsourced portfolio management mandates. Internal controls are carried out by portfolio management and risk controlling.

Methodologies for environmental or social characteristics

The asset manager uses MSCI to perform screenings on its portfolio holdings to make sure that its responsible investment policy is respected. Each company considered for investment must pass the exclusions criteria in MSCI ESG Manager's screening tool to confirm that it is either not involved in excluded activities or respects the revenue threshold set for each category.

The asset manager also screens for norm-based exclusions with MSCI ESG Manager's screening tool. The asset manager uses the following criteria: "UN Global Compact Alignment", "OECD Alignment", and "ILO Alignment - Fundamental Principles and rights at Work". With this screening, the companies either: "Pass", "Fail", or are on "Watchlist". Companies that "Fail" are excluded from the investment universe of the Sub-Fund.

The asset manager also excludes companies that are in Major Sanctioned Countries. The list of current sanctions imposed by Canada under the United Nations Act (UNA), the Special Economic Measures Act (SEMA) and the Justice for Victims of Corrupt Foreign Officials Act (JVCFOA) are all used by the asset manager as references.

The country exclusions are saved in Eze Software, the order management and compliance system used by the investment manager. Every quarter, the asset manager checks the list of current sanctions imposed by Canada and compares it to the list of countries saved as exclusions in Eze



Software. If a country is newly sanctioned, the asset manager will add it to the Eze Software database.

Additionnally, a report is provided to the Canadian Securities Administrators monthly which disclosed that Montrusco Bolton has not entered into any transaction regarding money laundering and/or Terrorist financing and that the list of securities that are held in its portfolios were compared with the names of the companies included on the sanctions lists of the OFAC (Office of Foreign Assets Control) of the United States Department of the Treasury.

Data sources and processing

MSCI and Bloomberg

Limitations to methodologies and data

In some cases, data availability is still limited. Therefore, the asset manager uses different data providers to minimize these limitations and to fill possible data gaps.

Due diligence

Through the establishment and application of written policies and procedures effective arrangements are in place to ensure that investment decisions made on behalf of the (Sub)Fund are consistent with its objectives, investment strategy and, where applicable, risk limits.

Engagement policies

As far as possible for the fund holdings, the engagement policy of the Management Company is exercised in the form of voting.

Designated reference benchmark

This (Sub)Fund has not designated an index as reference benchmark to meet the environmental and/or social characteristics promoted by the (Sub)Fund.

b) "No sustainable investment objective"

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

c) "Environmental or social characteristics of the financial product"

This (Sub)Fund promotes environmental and social characteristics within the meaning of Article 8 of the Disclosure Regulation. The Sub-Fund aims at limiting its investment's negative impacts on environmental and social characteristics. The environmental characteristics which the Sub-Fund is considering are GHG Emissions Scope 1 and 2. The Sub-Fund also considers human rights as part of its consideration of social characteristics.

d) "Investment strategy"

The fundamental investment objective of the Sub-Fund is to achieve long-term growth of capital through the investment of its assets mainly in the equity markets around the world and considering ESG criteria.

The Sub-Fund is actively managed.

The Sub-Fund's investment strategy considers ESG factors into its investment process, mostly through exclusions.

The Sub-Fund invests in exchange traded equities.

The asset manager's goal is to invest in companies that demonstrate good corporate governance practices. This is achieved by identifying and excluding companies that violate international standards, using MSCI's ESG Manager screening tool, that is also used on a quarterly basis to monitor compliance of portfolio complanies. The international norms that are considered in the screening tool are the UN Global Compact Principles, the International Labour Organization's (ILO) Conventions, and the OECD Guidelines for Multinational Enterprises.

e) "Proportion of investments"



The asset allocation of the (Sub)Fund and the extent to which the (Sub)Fund has direct or indirect exposures in investee entities can be found in the investment strategy and the investment principles.

The Sub-fund may hold cash (Residual to the trading process). Currency Exposure:

Unhedged and minimal impact on alpha historically.

Use of Derivatives for efficient portfolio management:

Financial Derivative Instruments (FDI) dealt in on a Regulated Market or dealt in over the counter (OTC) can only be used for hedging purposes.

Note: Among possible techniques for efficient portfolio management, the Sub-Fund currently only uses derivative transactions, which can be entered into for hedging purposes only.

For other investments that do not fall under the (Sub)Fund's sustainability strategy, it is ensured that these are not used contrary to the overall sustainability strategy. Insofar as derivatives may be acquired, it is ensured that the underlying references of the derivatives are compliant with the sustainability strategy. If the derivative references an index, it is ensured that the index has sustainability characteristics. Due to the financial instruments available on the market, there may be deviations in the sustainability characteristics of the underlying reference index from the (Sub)Fund characteristics. Any derivatives whose underlying references could be classified as not being aligned to the sustainability strategy, as well as currency holdings that do not match the (Sub)Fund currency or that are not denominated in EUR, USD, GBP, CHF, JPY, AUD, NZD, CAD, NOK or SEK may not be included as a significant component in the (Sub)Fund. The use of derivatives to offset negative market fluctuations is not included. In addition, investments may be specifically excluded from the sustainability strategy that are not subject to an explicit review of minimum environmental and/or social safeguards.

f) "Monitoring of environmental or social characteristics"

The environmental and/or social characteristics promoted by the (Sub)Fund and the sustainability indicators used to measure the fulfilment of these environmental and/or social characteristics are subject to an initial qualitative review by the ESG Office of Universal Investment against the strategy pursued

- (a) upon the launch of a (Sub)Fund to be classified as an Article 8 fund under the Disclosure Regulation,
- (b) upon a fund transfer from another management company or
- (c) upon a change of classification of an Article 6 fund into an Article 8 fund.

The individual sustainability strategy of the (Sub)Fund is contractually agreed and disclosed in pre-contractual documents of the (Sub)Fund. Compliance with the investment limits, based on the individual sustainability strategy, is measured and monitored daily by the Investment Controlling department of the Management Company and additionally the portfolio manager in the case of outsourced portfolio management mandates. MSCI data as well as the Portfolio Manager's own research or data from third-party providers are used, whereby the portfolio manager's research is checked by Investment Controlling.

The control of outsourced portfolio management companies takes place initially when the portfolio managers are appointed and on an ongoing basis, e.g. by means of specific ESG reports.

g) "Methodologies for environmental or social characteristics"

The asset manager uses MSCI to perform screenings on its portfolio holdings to make sure that its responsible investment policy is respected. Each company considered for investment must pass the exclusions criteria in MSCI ESG Manager's screening tool to confirm that it is either not involved in excluded activities or respects the revenue threshold set for each category.

The asset manager also screens for norm-based exclusions with MSCI ESG Manager's screening tool. The asset manager uses the following criteria: "UN Global Compact Alignment", "OECD Alignment", and "ILO Alignment - Fundamental Principles and rights at Work". With this screening, the companies either: "Pass", "Fail", or are on "Watchlist". Companies that "Fail" are excluded from the investment universe of the Sub-Fund.

The asset manager also excludes companies that are in Major Sanctioned Countries. The list of current sanctions imposed by Canada under the United Nations Act (UNA), the Special Economic Measures Act (SEMA) and the Justice for Victims of Corrupt Foreign Officials Act (JVCFOA) are all used by the asset manager as references.

The country exclusions are saved in Eze Software, the order management and compliance system used by the investment manager. Every quarter, the asset manager checks the list of current sanctions imposed by Canada and compares it to the list of countries saved as exclusions in Eze Software. If a country is newly sanctioned, the asset manager will add it to the Eze Software database.

Additionnally, a report is provided to the Canadian Securities Administrators monthly which disclosed that Montrusco Bolton has not entered into any transaction regarding money laundering and/or Terrorist financing and that the list of securities that are held in its portfolios were compared with the names of the companies included on the sanctions lists of the OFAC (Office of Foreign Assets Control) of the United States Department of the Treasury.

h) "Data sources and processing"

MSCI and Bloomberg

MSCI is the primary source for ESG research, analysis and compliance verifications. MSCI is used pre-investment and during the



investment period. The asset manager relies on MSCI for norms-based screening, business involvement screening and monitoring controversies. MSCI is also used to extract ESG Rating reports and Climate Risk reports.

Bloomberg data is also used to complement the the asset manager's analysis.

The asset manager also excludes companies that are in Major Sanctioned Countries. The list of current sanctions imposed by Canada under the United Nations Act (UNA), the Special Economic Measures Act (SEMA) and the Justice for Victims of Corrupt Foreign Officials Act (JVCFOA) are all used by the asset manager as references.

The asset manager uses the services of different external specialists to support its investing activities by providing input when carrying out all its responsible investment efforts.

i) "Limitations to methodologies and data"

In some cases, data availability is still limited. Therefore, the asset manager uses different data providers to minimize these limitations and to fill possible data gaps.

j) "Due diligence"

The (Sub)Fund's underlying assets are managed by the Management Company exclusively in the interest of the investors and in accordance with strict statutory and regulatory requirements.

Before the assets are acquired, portfolio management checks whether the asset can be acquired in accordance with the legal and contractual requirements. Effective arrangements are in place through the establishment and application of written policies and procedures to ensure that investment decisions made on behalf of the (Sub)Fund are consistent with its objectives, investment strategy, the investment principles and, where applicable, risk limits. After the assets have been acquired, a further corresponding daily check is carried out by the investment controlling department of the Management Company and on an ongoing basis by the portfolio manager. The internal control of these due diligence obligations is carried out in the risk controlling department as the second line of defence and at a downstream level by the internal audit department as the third line of defence.

The control of outsourced portfolio managers is carried out by means of ISAE or comparable reports. These reports are evaluated by subject matter experts of the Management Company within the framework of outsourcing controlling. Before commencing business activities in new products or new markets, including the acquisition of assets, the Management Company ensures that the associated risks and the impact on the overall risk profile of the (Sub)Fund are appropriately captured, measured, monitored and managed.

When complying with their respective duties, the Management Company, the portfolio manager, in case the investment decision making is outsourced, or, if applicable, an appointed investment advisor, take into account sustainability risks.

The (Sub)Fund's underlying assets are under the independent supervision, safekeeping and monitoring of the depositary.

k) "Engagement policies"

As far as possible for the fund holdings, the engagement policy of the Management Company is exercised in the form of voting. In order to safeguard the interests of the investors in the managed (Sub)Funds and to fulfil the associated responsibility, the Management Company shall exercise the investor and creditor rights from the investments held in the managed (Sub)Funds in the interests of the investors. The decision-making criterion for the exercise or non-exercise of voting rights for the Management company shall be the interests of the investors and the integrity of the market as well as the benefit for the investment fund concerned.

The Management Company shall base its domestic voting on voting guidelines ("Voting Guidelines"). These Voting Guidelines shall be considered as the basis for the responsible management of the capital and the rights of the investors.

For votes abroad, the Management Company shall use to the respective country-specific guidelines of Glass Lewis, which take into account the local framework conditions. In addition, the Glass Lewis Guidelines "Environmental, Social & Governance (ESG) Initiatives " are applied to the specific country guidelines and are used as a matter of priority. The application of these guidelines ensures that the voting criteria are country-specific and based on transparent and sustainable corporate governance policies as well as other environmental and social criteria aimed at the long-term success of the companies held by investment funds (so-called portfolio companies).

These voting standards used are based on the interests of the (Sub)Funds managed by the Management Company and are therefore in principle applied to all (Sub)Funds, unless it is necessary to deviate from these voting guidelines for individual (Sub)Funds in the interest of investors, market integrity or the benefit for the respective investment fund.

The Management Company shall publish the principles of its participation policy and an annual participation report on its website.

The portfolio manager, if the portfolio management is delegated, or an appointed investment adviser, if applicable, may take further action to meet environmental and/or social characteristics as part of their corporate engagement activities. However, this engagement is not done on behalf of the (Sub)Fund.



This (Sub)Fund has not designated an index as reference benchmark to meet the environmental and/or social characteristics promoted by the (Sub)Fund.

m) "Status and document version"

Version	Datum	Beschreibung
2.0	27.01.2025	Zweite Version