

**Pre-contractual disclosure for the financial products referred to in Article 8, paragraphs 1, 2 and 2a, of Regulation (EU) 2019/2088 and Article 6, first paragraph, of Regulation (EU) 2020/852**

**Product name:** LifeGoals Conservative ESG

**Legal entity identifier:**549300SPHL8RYOF0YC13

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

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

## Environmental and/or social characteristics

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

**Yes**
  **No**

<input type="checkbox"/> It will make a minimum of <b>sustainable investments with an environmental objective: ___%</b> <ul style="list-style-type: none"> <li><input type="checkbox"/> in economic activities that qualify as environmentally sustainable under the EU Taxonomy</li> <li><input type="checkbox"/> in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy</li> </ul> <input type="checkbox"/> It will make a minimum of <b>sustainable investments with a social objective: ___%</b>	<input type="checkbox"/> It <b>promotes Environmental/Social (E/S) characteristics</b> and while it does not have as its objective a sustainable investment, it will have a minimum proportion of ___% of sustainable investments <ul style="list-style-type: none"> <li><input type="checkbox"/> with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy</li> <li><input type="checkbox"/> with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy</li> <li><input type="checkbox"/> with a social objective</li> </ul> <input checked="" type="checkbox"/> It promotes E/S characteristics, but <b>will not make any sustainable investments</b>
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**What environmental and/or social characteristics are promoted by this financial product?**



The Fund promotes environmental and/or social characteristics by investing in underlying ETFs that incorporate ESG criteria in their investment process. These ETFs promote environmental and/or social characteristics through their selection and weighting methodologies, while also applying specific exclusions based on ESG considerations.

Specifically, the Fund’s investments that promote environmental and/or social characteristics exclude investments in:

- Issuers involved in activities identified as having materially negative environmental and/or social impacts.
- Issuers that are deemed to have violated the principles of the United Nations Global Compact (or equivalent international standards).
- Issuers involved in very severe ESG-related controversies.
- Sovereign issuers subject to United Nations Security Council Trade Sanctions

A reference benchmark has not been designated for the purpose of attaining the environmental or social characteristics promoted by the Fund.

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

The Fund assesses the attainment of its environmental and social characteristics by evaluating the documentation provided by the underlying ETF providers. This includes the investment policies, exclusion criteria, and benchmark methodologies of the ETFs in which the Fund invests.

The sustainability indicators used include:

- Confirmation that underlying ETFs exclude issuers involved in Controversial Weapons, Thermal Coal Mining and Power Generation, and Tobacco, either directly or through their benchmark methodologies.
- Verification that underlying ETFs exclude issuers deemed to have failed to comply with the UN Global Compact Principles.
- Verification that investments in sovereign bonds exclude issuers that are subject to United Nations Security Council Trade Sanctions.
- LSEG/MSCI ESG ratings and scoring methodologies in assessing the ESG characteristics of its investments.

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

Not applicable as the Fund does not commit to investing in sustainable investments.

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

Not applicable as the Fund does not commit to investing in sustainable investments.

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



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

Not applicable as the Fund does not commit to investing in sustainable investments.

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

Not applicable as the Fund does not commit to investing in sustainable investments.

*The EU Taxonomy sets out a “do not significant harm” principle by which Taxonomy-aligned investments should not significantly harm EU Taxonomy objectives and is accompanied by specific EU criteria.*

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

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



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

- Yes  
 No

This financial product considers principal adverse impacts (PAIs) on sustainability factors by considering the ESG policies and methodologies of the underlying ETFs in which it invests. The fund does not directly evaluate PAIs at the issuer level but ensures that selected ETFs integrate PAI considerations as part of their investment process.

**What investment strategy does this financial product follow?**

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

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

The Fund is passively managed and seeks to promote environmental and social characteristics by investing exclusively in ETFs classified as Article 8 or Article 9 under the Sustainable Finance Disclosure Regulation (SFDR) for its equity and bond allocations. The Fund commits to investing at least 80% of its assets in ETFs that promote environmental or social characteristics, ensuring a high degree of ESG integration across its portfolio.

The investment process follows a structured approach:

- Verification that the ETF is classified as an Article 8 or Article 9 product under SFDR.
- Assessment of the ETF's alignment with LifeGoals Financial Services Ltd's exclusionary policies.
- Evaluation of the ETF's ESG scoring and underlying sustainability data.
- Assessment of the fund manager's commitment to ESG integration.
- Review of the fund manager's commitment to Principal Adverse Impacts (PAIs)

The Fund continuously monitors market developments to enhance the ESG characteristics it promotes. As the ESG investment landscape evolves, the Fund remains engaged with ETF providers to assess new opportunities that align with its sustainability objectives.

While the Fund commits to investing at least 80% of its assets in ETFs that promote environmental or social characteristics, it does not commit to a 100% allocation. This is primarily due to the limited availability of ESG-aligned offerings in certain asset classes, such as Gold, which currently do not have widely recognized ESG alternatives. However, the Fund prioritizes investments that meet its ESG screening criteria wherever feasible.

The Fund does not directly assess or select individual issuers but instead relies on the ESG methodologies and screening processes implemented by the underlying ETF providers. As a result, the Fund's ESG characteristics are determined by the composition and policies of the selected ETFs.

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

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 Fund commits to investing at least 80% of its assets in ETFs that promote environmental or social characteristics, it does not commit to a 100% allocation. This is primarily due to the limited availability of ESG-aligned offerings in certain asset classes, such as gold, which currently do not have widely recognized ESG alternatives. However, the Fund prioritizes investments that meet its ESG screening criteria wherever feasible.

Taxonomy-aligned activities are expressed as a share of:

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

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

The investment strategy does not impose a specific minimum exclusion threshold but instead restricts the universe of eligible investments through a structured screening process.

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

The Fund does not directly assess the governance practices of individual issuers but instead relies on the methodologies of the underlying ETFs in which it invests. The underlying ETFs typically incorporate good governance checks through the methodology of their respective Benchmark Index.

For the portion of the portfolio promoting environmental and/or social characteristics, the Fund invests exclusively in ETFs classified as Article 8 or 9, and it therefore ensures that governance considerations are integrated at the index level, but it does not directly engage with individual issuers or impose additional governance screening beyond what is applied by the ETF providers.

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

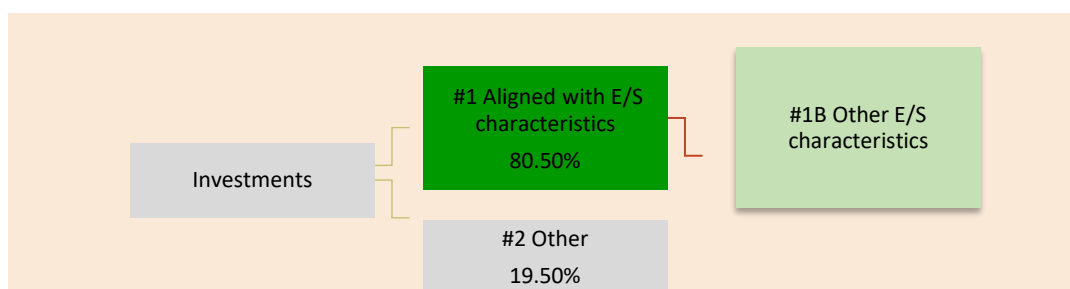


The Fund commits to investing in equity and bond ETFs classified as Article 8 or Article 9 under the SFDR. While the underlying ETFs may have a minimum proportion of sustainable investments, the Fund itself does not commit to a minimum proportion.

At least 80% of the Fund's assets will be allocated to ETFs that promote environmental and/or social characteristics. The remaining 20% 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 Fund may invest in ETFs providing exposure to asset classes such as gold, which currently lack Article 8 classification.

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

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



**#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 fund does not make use of derivatives



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

Not applicable as the Fund does not commit to investing in sustainable investments.

**Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy<sup>1</sup>?**



Yes:



In fossil gas



In nuclear energy

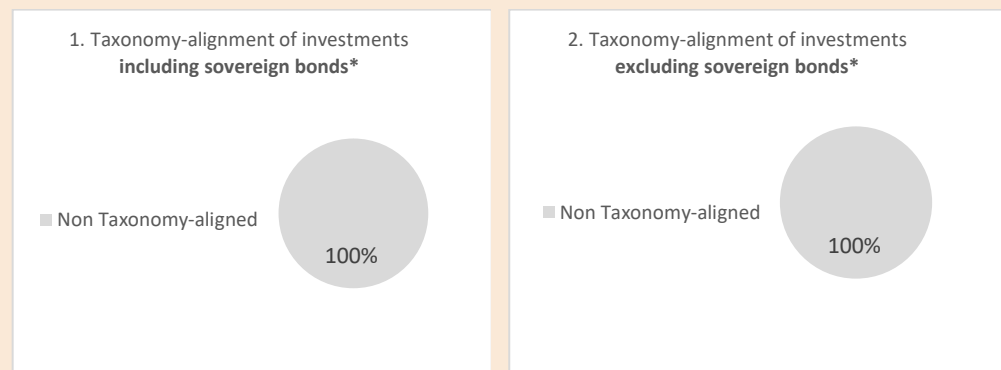


No

The Fund does not currently commit to invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy.

To comply with the EU Taxonomy, the criteria for **fossil gas** include limitations on emissions and switching to renewable power or low-carbon fuels by the end of 2035. For **nuclear energy**, the criteria include comprehensive safety and waste management rules. **Enabling activities** directly enable other activities to make a substantial contribution to an environmental objective. **Transitional activities** are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.

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



\* For the purpose of these graphs, 'sovereign bonds' consist of all sovereign exposures.

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

<sup>1</sup> Fossil gas and/or nuclear related activities will only comply with the EU Taxonomy where they contribute to limiting climate change ("climate change mitigation") and do not significantly harm any EU Taxonomy objective - see explanatory note in the left hand margin. The full criteria for fossil gas and nuclear energy economic activities that comply with the EU Taxonomy are laid down in Commission Delegated Regulation (EU) 2022/1214.

This Fund does not currently commit to investing more than 0% of its assets in investments in transitional and enabling activities within the meaning of the Taxonomy Regulation.



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

Not applicable as the Fund does not commit to investing in sustainable investments with an environmental objective.



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

Not applicable as the Fund does not commit to investing in socially sustainable investments.



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

Other holdings 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 Fund may invest in ETFs providing exposure to asset classes such as Gold, which currently lack Article 8 classification.




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

No, the Fund does not designate a specific index as a reference benchmark to determine alignment with the environmental and/or social characteristics it promotes.

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

Not applicable as the Fund does not designate a specific index as a reference benchmark to determine alignment with the environmental and/or social characteristics it promotes.

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

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

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

Not applicable as the Fund does not designate a specific index as a reference benchmark to determine alignment with the environmental and/or social characteristics it promotes.

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

Not applicable as the Fund does not designate a specific index as a reference benchmark to determine alignment with the environmental and/or social characteristics it promotes.

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

Not applicable as the Fund does not designate a specific index as a reference benchmark to determine alignment with the environmental and/or social characteristics it promotes.

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

**More product-specific information can be found on the website:**



[www.lifegoals.eu](http://www.lifegoals.eu)