This document provides you with information about this Sub-Fund in relation to the Sustainable Finance Disclosure Regulation. It is not marketing material. The information is required by law to help you understand the sustainability characteristics and/or objectives and risks of this Sub-Fund. You are advised to read it in conjunction with other relevant documentation on this Sub-Fund so you can make an informed decision about whether to invest.

**Summary Sustainability-Related Disclosure**

**Harmony Portfolios Sustainable Growth Fund**

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

**The Sub-Fund has the following E/S characteristics:**

* The Sub-Fund promotes certain minimum environmental and social safeguards through applying exclusion criteria with regards to products and business practices that the Sub-Fund believes are detrimental to society and incompatible with sustainable investment strategies.
* The Sub-Fund intends to be guided by the UNPRI in determining actions and behaviours that are consistent with an integrated ESG (i.e., Environmental, Social and corporate Governance) approach, whilst supplementing that with research and suggestions from industry level bodies. The Sub-Fund recognises the Sustainable Development Goals (SDGs) and their many underlying targets as providing a more specific guide to the actions and behaviours where the issuers of underlying investments in the Sub-Fund are expected to be making positive contributions.
* The Sub-Fund aims for a better sustainability profile compared to relevant broad market indices (which vary by asset class) for most asset class exposures by integrating ESG factors. For the assessment, areas like corporate strategy, corporate governance, transparency as well as the product and service range of a company are considered.

**Investment Strategy**

The Sub-Fund aims for a better sustainability profile compared to relevant broad market indices for most asset class exposures by integrating ESG (i.e., Environmental, Social and corporate Governance) factors. For the assessment, areas like corporate strategy, corporate governance, transparency as well as the product and service range of a company are considered.

The investment strategy is achieved through an actively managed diversified portfolio that invests, via other collective investment schemes, or other similar schemes as well as via transferable securities, across a broad range of asset classes and currencies in varying proportions over time.

**Planned asset allocation**

The Sub-Fund plans to make a minimum amount of 25% sustainable investments. At least 85% of investments are aligned with the E/S characteristics. The exception being investments in the category “other” which may include cash, cash equivalents, derivatives, investments in government bonds, alternative strategies and collective investment schemes investing in commodities.

**Monitoring and due diligence**

The Sub-Fund has incorporated the sustainability aspects of the investment strategies by implementing appropriate investment due diligence processes and procedures for the selection and monitoring of investments. The portfolio managers and analysts are primarily responsible for conducting investment due diligence on their strategies on an ongoing basis

Where available, we monitor ESG scores and SDG alignment of the Sub-Funds’ investments and investigate any unexpected exposures to controversial or excluded activities.

**Data sources, methodologies, and limitations**

The Sub-Fund uses several sources for gathering sustainability data.

The ESG characteristics of the Sub-Fund are measured using data from Morningstar (Sustainalytics). Where data is available, each underlying holding is screened for a variety of metrics, such as the overall environmental, governance or social score or the percentage involvements in certain categories that can lead to sustainability risks.

Other external data sources are also used to assess voting and exclusion criteria.

The underlying fund managers of the Sub-Funds’ holdings in collective investment schemes also conduct their own monitoring of portfolio investments to ensure adherence to the environmental or social characteristics they target. Each manager is entitled to choose their own data sources which are disclosed to us and their other clients separately.

The primary limitation to the methodology or data source is the lack of corporate disclosure. Like many other financial market participants, we struggle to find adequate information on the principal adverse indicators. To overcome this issue, the Sub-Fund uses multiple data providers, since each has its own respective strengths and weaknesses.

**Engagement strategy**

For the Sub-Fund’s investments in third party funds and pooled vehicles, proxy voting and engagement at the underlying investment level is delegated to the respective fund managers. They actively encourage good governance and sustainable corporate practices, which contribute to long-term shareholder value creation. The underlying fund managers report to us on a quarterly basis with data on all votes cast and cases of engagement. Where we can vote or engage, in particular for directly held securities, we follow the approach set out in our Proxy Voting and Engagement policies.