



Private Wealth Management Portfolio Management Group (“PMG”) – Goldman Sachs Multi-Asset Portfolio ESG

Sustainability-Related Disclosures

This disclosure is relevant where your discretionary account holds the Goldman Sachs Multi-Asset Portfolio ESG that is managed by our Portfolio Management Group (“PMG”).

Summary

This financial product managed by Private Wealth Management's Portfolio Management Group (“PMG” or “portfolio management team”), is a bespoke multi-asset class portfolio, globally diversified across asset classes and aiming to provide capital preservation, growth, or income as specified in the relevant account documentation. It promotes certain environmental and social characteristics by investing in a portion of assets in securities (via centrally managed strategies) and funds that incorporate revenue exclusionary thresholds and exclusions for severe violations of the UN Global Compact (the “Exclusionary Criteria”). Adherence to this Exclusionary Criteria will be based on thresholds pre-determined by the portfolio management team in its sole discretion and will be applied to data provided by one or more third-party vendor(s) on an individual security and/or portfolio level. Portfolio construction and decisions thereof may be contingent upon the good governance assessments undertaken by Goldman Sachs Asset Management (to whom portfolio management is delegated for certain Private Wealth Management strategies) as well as the manufacturers of third-party funds.

The portfolio management team within Private Wealth Management rely on third-party data providers to measure and monitor the attainment of the environment and/or social characteristics of the financial product. For example, they will use these datasets to measure the aggregated revenue exposure of the financial product to certain sectors or activities, as described in the “Exclusionary Criteria”. This financial product considers principal adverse impacts on sustainability factors (PAIs) across the environmental and/or social pillars. The financial product does not have as its objective sustainable investments and does not commit to making any sustainable investments.

The portfolio management team conducts qualitative and quantitative analysis on all assets prior to investment and on an ongoing basis to ensure the financial product is positioned to meet the Exclusionary Criteria and in line with agreed objectives. Third-party funds that are included in the financial product are subject to additional due diligence undertaken by us or Goldman Sachs Asset Management.

At least 25% of the assets in the financial product will meet the Exclusionary Criteria. Up to 75% of investments in the financial product may be held in assets that do not meet the Exclusionary Criteria and are not aligned with the environmental and social characteristics.

For this financial product, the portfolio management team will undertake post trade monitoring on a periodic basis to ensure alignment with the binding environmental or social (“E/S”) characteristics. The portfolio management team will utilize third-party data to monitor alignment with these binding E/S characteristics and perform evaluations against the Exclusionary Criteria that have been implemented. The portfolio management team will rely on third-party data that it believes to be reliable, but it does not guarantee the accuracy of such third-party data.

Private Wealth Management, in its sole discretion, may disapply data provided by third-party vendors where it deems the data to be inaccurate or inappropriate. In some cases, data on specific companies may not be available and/or limited and alternate data sources may be explored.

Private Wealth Management does not directly undertake traditional shareholder engagement activities due to the nature of its business offering, however, Private Wealth Management leverages the significant and global capabilities of the Goldman Sachs Asset Management’s Global Stewardship Team (“Global Stewardship Team”) for effective and meaningful engagement with investee companies and stakeholders. Furthermore, Private Wealth Management leverages the engagement capabilities of third-party manager included in the financial product, and the review of their engagement practices is a part of the due diligence process that is undertaken by Goldman Sachs Asset Management’s external manager selection business.

An index has not been designated as a reference benchmark to determine whether this financial product is aligned with the environmental or social characteristics that it promotes.

A statement has been issued to confirm that the environmental or social characteristics promoted, as set out in the Article 8 disclosure, have been met over the reporting period.

No Sustainable Investment Objective

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

Environmental or Social Characteristics of the Portfolio

This financial product promotes environmental or social characteristics, but does not have as its objective sustainable investment. The portfolio management team will utilize third-party data to monitor alignment with and perform evaluations against the revenue-based exclusions and exclusions for severe violations of the UN Global Compact (the “Exclusionary Criteria”).

These revenue-based exclusions on an individual security level and/or portfolio level include but not are limited to:

- activities related to nuclear or controversial weapons;
- manufacturing of alcoholic beverages or tobacco products;
- activities related to gambling;
- civilian firearms;

- adult entertainment;
- thermal coal mining;
- oil sands;
- for-profit prisons; and
- nuclear power.

The financial product will also seek to identify and exclude from its investment universe companies in severe violation of the United Nations Global Compact ten principles (which are widely recognised corporate sustainability principles that meet fundamental responsibilities in the areas of human rights, labour, environment, and anti-corruption).

Adherence to this Exclusionary Criteria will be based on thresholds pre-determined by the portfolio management team in its sole discretion and will be applied to data provided by one or more third-party vendor(s). The portfolio management team will rely on third-party data that it believes to be reliable, but it does not guarantee the accuracy of such third-party data. Private Wealth Management, in its sole discretion, retains the right to disapply data provided by third-party vendors where it deems the data to be inaccurate or inappropriate. In some cases, data on specific companies may not be available. Potential omissions from the Exclusionary Criteria may include but are not limited to newly listed companies to which a third-party vendor may not yet have data mapped. In the course of gathering data, vendors may make certain value judgements. Private Wealth Management does not verify those judgements, nor quantify their impact upon its analysis. The portfolio management team in its sole discretion may periodically update its screening process, amend the type of activities that are excluded for investment or revise the thresholds applicable to any such activities.

Investment Strategy

The financial product is a multi-asset class portfolio, globally diversified across asset classes and aiming to provide capital preservation, growth, or income as specified in the relevant account documentation. It promotes certain E/S characteristics by investing a portion of assets in securities (via centrally managed strategies) and funds that meet the Exclusionary Criteria outlined above. By applying the Exclusionary Criteria, the financial product expects to exclude a large number of open-ended funds and ETFs domiciled in Europe and certain issuers of individual securities.

The financial product may also invest in bonds and derivatives which do not meet the Exclusionary Criteria outlined above.

PAIs are taken into account through the application of the Exclusionary Criteria. The financial product considers the following PAI:

- Exposure to controversial weapons (anti-personnel mines, cluster munitions, chemical weapons and biological weapons)

The portfolio management team conducts qualitative and quantitative analysis on all assets prior to investment and on an ongoing basis to ensure the financial product is positioned to meet the Exclusionary Criteria and in line with agreed objectives. Third-party funds are

subject to additional due diligence by us or Goldman Sachs Asset Management, as described below.

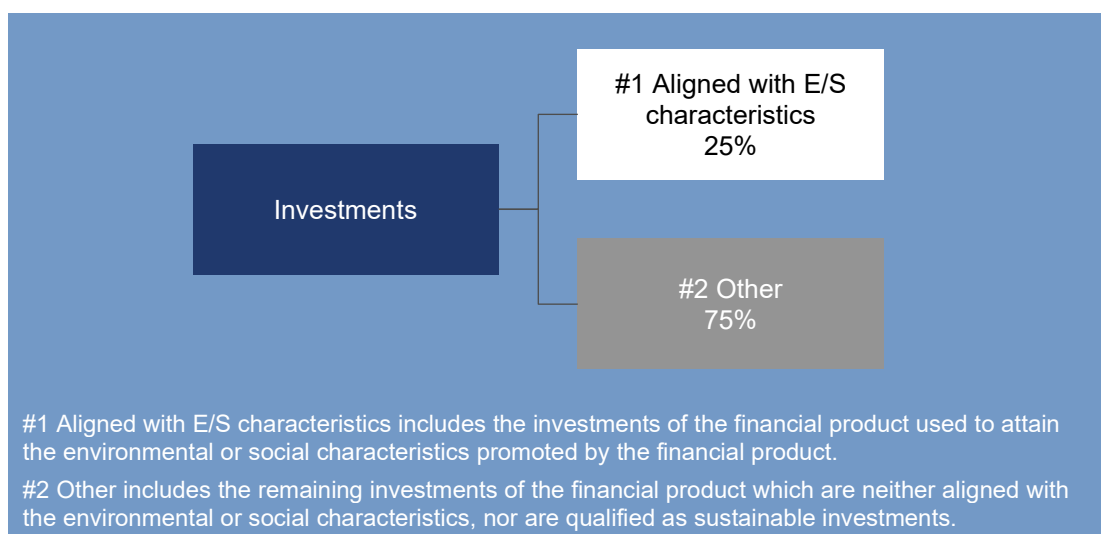
Third-party funds due diligence: We use a multi-step approach, including an ESG due diligence questionnaire, review of manager's ESG materials, third-party data tools (where applicable) and engagements with the managers, and focus on the following pillars:

- *Firm Ethos*: The prioritization and incorporation of ESG principles into the management of the Firm's business
- *Investment Philosophy*: The degree to which the manager emphasizes ESG as a material aspect of investment analysis and decision-making
- *Investment Process*: The degree to which ESG factors are formally incorporated into the investment research and decision-making process. The investment process review includes analysing third-party funds to ensure that the financial product meets the Exclusionary Criteria outlined above.
- *Team & Resources*: The level of team and research resources dedicated to ESG and overall depth and quality of expertise
- *Engagement*: The level of emphasis on stewardship and active ownership with portfolio companies on ESG issues and degree to which this is reflected in activities and outcomes

When assessing good governance for the financial product, the portfolio management team are reliant on the good governance considerations and assessment undertaken by Goldman Sachs Asset Management (to whom portfolio management is delegated for certain Private Wealth Management strategies) as well as the manufacturers of third-party funds. As it considers portfolio construction, PMG will consider the article classification of the products contained within the financial product and will limit investment to products that are classified as Article 8 and 9, exclusive of funds investing exclusively in currencies, government, supranational and agency bonds given the inapplicability of good governance assessments to such investments.

Proportion of Investments

At least 25% of the assets in the financial product will meet the Exclusionary Criteria (as outlined above). Up to 75% of investments in the financial product may be held in assets that do not meet the Exclusionary Criteria (as outlined above). The financial product does not commit to make any sustainable investments.



Investments included under “#2 Other” will consist of government bonds issued by G10 countries and agency (national or supranational) bonds. Such investments are not subject to any minimum environmental or social safeguards. These investments may be used to achieve the investment objective of the financial product but may not promote the environmental or social characteristics of the financial product and will not qualify as sustainable investments. The percentage shown is expected to be the maximum which may be held in these instruments but the actual percentage may vary from time to time.

Monitoring of Environmental or Social Characteristics

For this financial product, the portfolio management team will undertake post trade monitoring on a periodic basis to ensure alignment with the Exclusionary Criteria that have been outlined above. The portfolio management team will utilize third-party data to monitor alignment with and perform evaluations against the Exclusionary Criteria that have been implemented.

Any breaches, non-alignment, or errors in respect of the portfolio management activity identified during the periodic review will be promptly escalated to the respective business supervisor as well as Private Wealth Management Compliance. The portfolio management team will endeavour to ensure realignment of the financial product as soon as reasonably practicable and in consideration of various factors including consideration of client’s best interest and other financial impacts.

Methodologies

The financial product promotes environmental and social characteristics by applying the Exclusionary Criteria (as outlined above).

These revenue-based exclusions on an individual security level and/or portfolio level include but not are limited to the percentage of companies deriving revenues from:

- activities related to nuclear or controversial weapons;
- manufacturing of alcoholic beverages or tobacco products;

- activities related to gambling;
- civilian firearms;
- adult entertainment;
- thermal coal mining; oil sands;
- for-profit prisons; and
- nuclear power.

The financial product will also seek to identify and exclude from its investment universe companies in severe violation of the United Nations Global Compact ten principles (which are widely recognised corporate sustainability principles that meet fundamental responsibilities in the areas of human rights, labour, environment, and anti-corruption).

Data Sources and Processing

The portfolio management team within Private Wealth Management rely on third-party data providers to measure and monitor whether the financial product has attained the E/S characteristics. For example, they will use these datasets to measure the aggregated revenue exposure of the financial product to certain sectors or activities, as described in the Exclusionary Criteria.

Private Wealth Management may ensure data quality by liaising closely with the different data providers and by conducting due diligence on the external data providers in order to confirm that their methodologies are reliable. Due to gaps in data coverage, there may be circumstance in which data that is utilized to assessment with the environmental and/or social characteristics may be estimated data. Such circumstances will be assessed accordingly and replaced, where feasible and available, by data procured from alternate third-party data sources or data obtained by other means.

Limitations to Methodologies and Data

Adherence to this Exclusionary Criteria will be based on thresholds pre-determined by the portfolio management team in its sole discretion and will be applied to data provided by one or more third-party vendor(s). The portfolio management team will rely on third-party data that it believes to be reliable, but it does not guarantee the accuracy of such third-party data.

Private Wealth Management, in its sole discretion, retains the right to disapply data provided by third-party vendors where it deems the data to be inaccurate or inappropriate. In some cases, data on specific companies may not be available. Potential omissions from the Exclusionary Criteria may include but are not limited to newly listed companies to which a third-party vendor may not yet have data mapped. We expect that any such limitations would only apply to a very minor subset of the financial product. It is not expected that any such limitations would have a material impact on the achievement of the E/S characteristics of the financial product. In the event of such circumstances, the portfolio management team may estimate or seek alternative data sources for missing ESG data if the portfolio management team determines that such approaches can provide useful and appropriate assessments.

In the course of gathering data, vendors may make certain value judgements. Private Wealth Management does not verify those judgements, nor quantify their impact upon its analysis.

The portfolio management team in its sole discretion may periodically update its screening process, amend the type of activities that are excluded for investment or revise the thresholds applicable to any such activities.

Due Diligence

The portfolio management team conducts qualitative and quantitative analysis on all assets prior to investment and on an ongoing basis to ensure the financial product is positioned to meet the Exclusionary Criteria and in line with agreed objectives. Third-party funds are subject to additional due diligence, undertaken by us or Goldman Sachs Asset Management, as described below.

We use a multi-step approach, including an ESG due diligence questionnaire, review of manager's ESG materials, third-party data tools (where applicable) and engagements with the managers, and focus on the following pillars:

- *Firm Ethos*: The prioritization and incorporation of ESG principles into the management of the Firm's business.
- *Investment Philosophy*: The degree to which the manager emphasizes ESG as a material aspect of investment analysis and decision-making
- *Investment Process*: The degree to which ESG factors are formally incorporated into the investment research and decision-making process. The investment process review includes analysing third-party funds to ensure that the financial product meets the Exclusionary Criteria outlined above.
- *Team & Resources*: The level of team and research resources dedicated to ESG and overall depth and quality of expertise
- *Engagement*: The level of emphasis on stewardship and active ownership with portfolio companies on ESG issues and degree to which this is reflected in activities and outcomes.

Engagement Policies

Private Wealth Management has published an [engagement policy](#) in accordance with the requirements of Directive (EU) 2017/828 and its implementing measures (the Shareholder Rights Directive II) that provides further details on Private Wealth Management's engagement approach.

Private Wealth Management does not directly undertake traditional shareholder engagement activities due to the nature of its business offering, however, Private Wealth Management does fully support the principle of collaborative engagement. Where Private Wealth Management provides certain discretionary services directly to clients, it does not currently conduct dialogues with investee companies as it does not hold significant positions. Instead, Private Wealth Management leverages the significant and global capabilities of the Goldman Sachs Asset Management Global Stewardship Team ("Global Stewardship Team") for effective and meaningful engagement with investee companies and stakeholders.

Private Wealth Management relies upon the Global Stewardship Team for firm-wide strategic engagement and proxy voting, and on analysts within the Goldman Sachs Asset Management fundamental equity and fixed income teams for additional, security specific



analysis and engagement. Information on the Global Stewardship team, their activities and the annual Stewardship Reports can be found [here](#).

Furthermore, Private Wealth Management leverages the engagement capabilities of third-party managers included in the financial product, and the review of their engagement practices is a part of the due diligence process that is undertaken by Goldman Sachs Asset Management's external manager selection business.

Designated Reference Benchmark

An index has not been designated as a reference benchmark to determine whether the financial product is aligned with the environmental or social characteristics that it promotes.

The Summary section of this document is available in select European languages [here](#).