

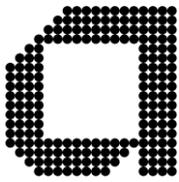
Sustainability-related disclosures for [Standard Life Ireland MyFolio Active ESG III]

This document provides you with a summary of sustainability-related information available on our website about this financial product. It is prepared in relation to Article 10 of the Sustainable Finance Disclosure Regulation (EU) 2019/2088. The information disclosed is required by law to help you understand the sustainability characteristics and/or objectives and risks of this financial product.

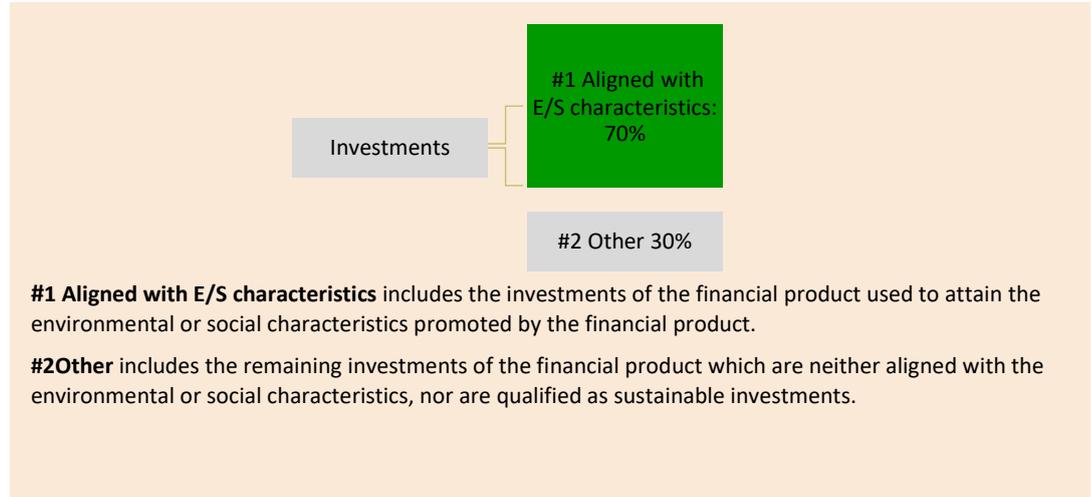
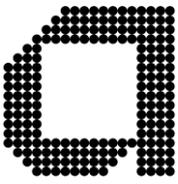
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Summary	
	<p>The Fund of Fund is subject to article 8 of the European Union's (EU) 2019/2088 Sustainable Finance Disclosure Regulation ("SFDR") and thus it promotes environmental or social characteristics but does not have a sustainable investment objective.</p> <p>The Fund of Fund has an expected minimum of 0% in Sustainable Investments.</p> <p>The Fund of Fund has not set a minimum proportion of investment in Taxonomy aligned economic activities.</p> <p>The Fund of Fund contains funds that have been identified through an established research process which takes into consideration both environmental, social and governance risks and opportunities.</p> <p>The nominated manager will seek to identify funds that explicitly consider and embed positive ESG factors when making investments. This will typically result in funds exhibiting positive ESG scores, relative to a comparator benchmark, and also evidencing an active approach to governance and engagement.</p> <p>The type of sustainability funds the nominated manager will use within MyFolio Active can be classified into two groupings:</p> <p>Enhanced Passive Sustainable Funds: Cost considerations and desire to provide sufficient diversification, lead MyFolio Active to use enhanced passive funds. These funds are designed to have a low tracking error versus a standard benchmark for the relevant asset class, whilst being tilted based on ESG criteria. The nominated manager would expect such holdings to display positive ESG characteristics, relative to a market capitalisation benchmark in areas such as carbon intensity and overall provider ESG score / rating.</p> <p>Active Sustainable Funds: The nominated manager will look to utilise actively managed funds that have ESG and sustainability as a clear and embedded feature of their investment approach.</p> <p>Non-Aligned Funds: Non-Aligned funds are those which the nominated manager define as having no specific ESG or sustainability criteria within their investment objective or process. In order to meet the long-term volatility objectives of the MyFolio Active range there will be a requirement to invest in Non-Aligned funds in some asset classes. These are currently Developed Global Government Bonds (nominal and index linked), Cash and Money Market Instruments. The use of Non-Aligned funds is required because there are certain asset classes that are crucial to optimal portfolio construction but where the universe of sustainable fund options is underdeveloped or ESG strategies difficult to apply. As the asset classes in which Non-Aligned funds will be used are historically the most defensive of those available within MyFolio Active they are a key requirement to build prudent, lower risk portfolios. These funds do not have minimum regulatory standard requirement.</p> <p>In order to ensure that the overall MyFolio Active funds remain consistent with both their ESG and risk objectives, limits will be applied for exposure to funds categorised as Non-Aligned Neutral at each risk level, with higher thresholds at risk levels where Defensive assets (where options with ESG criteria are rarer) play a more prominent role.</p> <p>The nominated manager considers the quality of management teams and analyses the environmental, social and governance opportunities and risks impacting the funds and appraise how well these are managed. The nominated manager assigns a fund ESG score to articulate the quality attributes of each fund. This enables the portfolio managers to exclude funds with material ESG risks and positively skew the portfolio towards ESG opportunities and to build well-diversified, risk adjusted portfolios.</p> <p>To further complement the fund research, the nominated manager also uses third party ESG analysis which is primarily a quantitative assessment to identify environmental, social and governance risks and question management on the implementation of environmental, social and governance factors.</p> <p>Due diligence for each of the underlying funds held by the Fund of Fund are detailed in the underlying fund Investment Approach document, published at www.abrdn.com, under Fund Centre.</p> <p>The Fund of Fund's ESG screening and binding commitments determine that Environmental or Social characteristics of holdings are met and are part of the overall portfolio construction. In addition, the nominated manager considers Principal Adverse Impact Indicators (PAIs) within the investment process for the Fund of Fund, which is detailed in the Q&A below.</p> <p>Monitoring of the underlying funds environmental and social characteristics are carried out by the nominated manager through systematic oversight and independently through Aberdeen's ESG Governance teams.</p>



<p>No sustainable investment objective</p>	<p>To promote the environmental and social characteristics, the Fund of Fund applies ESG assessment criteria, ESG screening criteria and promotes good governance including social factors.</p> <p>The Fund of Fund has an expected minimum of 0% in Sustainable Investments although underlying funds held by the Fund of Fund may have.</p>
<p>Environmental or social characteristics of the financial product</p>	<p>To promote the environmental and social characteristics, the Fund of Fund applies ESG assessment criteria, ESG screening criteria and promotes good governance including social factors. Through regular meetings with the managers of the underlying funds and monthly collation of holdings data, the Fund of Fund considers the quality of fund management teams and analyses the environmental, social and governance (ESG) characteristics of the fund and appraises how well these are managed.</p> <p>To further complement the fund research, the nominated manager also uses third party ESG analysis which is primarily a quantitative assessment to identify environmental, social and governance risks and question management on the implementation of environmental, social and governance factors.</p> <p>The nominated manager has access to portfolio underlying holdings allowing us to monitor funds and their constituents to ensure the portfolio delivers its E/S and Governance standards.</p> <p>This Fund of Fund has a financial benchmark that is used for portfolio construction but does not incorporate any sustainable criteria and is not selected for the purpose of attaining these characteristics. This financial benchmark is used as a comparator for Fund performance and as a comparison for the Fund's binding commitments.</p>
<p>Investment strategy</p>	<p>The Fund of Fund contains funds that have been identified through an established research process which takes into consideration both environmental, social and governance risks and opportunities. For the underlying funds, ESG analysis is a key element of our overall research process:</p> <ul style="list-style-type: none"> • The nominated manager considers the quality of management teams and analyses the environmental, social and governance opportunities and risks impacting the funds and appraise how well these are managed. • The nominated manager assigns a fund ESG score to articulate the quality attributes of each fund. • This enables the portfolio managers to exclude funds with material ESG risks and positively skew the portfolio towards ESG opportunities and to build well-diversified, risk adjusted portfolios. <p>We also consider the quality of its management team and analyse the environmental, social and governance (ESG) opportunities and risks impacting the business and appraise how well these are managed. We assign a proprietary score to articulate the quality attributes of each company, one of which is the ESG Quality rating. This enables the portfolio managers to exclude companies with material ESG risks and positively skew the portfolio towards ESG opportunities and to build well-diversified, risk- adjusted portfolios.</p> <p>For this Fund of Fund, the investee funds need to follow good governance. To make sure all funds held follow good governance practices, Aberdeen regularly monitors and assess funds' active engagement policy and how they evidence adherence to the policy as part of the nominated manager's due diligence.</p> <p>This is monitored through bi-annual due diligence confirming; the regulators which the fund is recognised with, the reporting status the fund & share classes have applied for/granted and countries registered for sale. Furthermore, due diligence considers fund specific issues such as subscription limits, use of leverage and counterparty risk.</p> <p>In order to ensure that the overall MyFolio Active funds remain consistent with both their sustainability and risk objectives, limits will be applied for exposure to funds categorised as Non-Aligned Neutral at each risk level, with higher thresholds at risk levels where Defensive assets (where options with ESG or sustainable criteria are rarer) play a more prominent role.</p>
<p>Proportion of investments</p>	<p>A minimum of 70% of the Fund's assets are aligned with E/S characteristics. The Fund invests a maximum of 30% of assets in the "Other" category, which include cash, money market instruments, derivatives and Developed Global Government Bonds (nominal and index linked).</p>



#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.

#2 Other includes the remaining investments of the financial product which are neither aligned with the environmental or social characteristics, nor are qualified as sustainable investments.

Monitoring of environmental or social characteristics

First line

Our investment teams have the primary responsibility for implementing the investment strategy.

Our sustainable investing governance committees support investment desks with regards to the implementation of the framework as well as understanding the regulatory environment.

The Multi-asset Investment desk is supported by Multi-asset ESG team, who further monitor compliance to ESG criteria set out in the fund documentation.

Second line

The Investment risk team reviews the sustainability analytics within the funds where data is available and considers these risks in the overall assessment of a fund's risk profile. Any outliers or concerns are discussed with the investment team on a regular basis.

Compliance

Aberdeen's Compliance function reviews a range of the underlying funds' legal and regulatory documents to ensure they comply with regulations. Compliance also reviews marketing communications, including fund and non-fund specific material, to ensure marketing material and ESG related statements are clear, fair and non-misleading.

Aberdeen's EMEA Compliance function plays a key role in monitoring ESG related investment limits and adherence to the binding commitments of the underlying funds that have environmental or social characteristics (in line with SFDR Article 8) and funds that have sustainable investment objectives (in line with SFDR Article 9). Through the ESG Regulatory & Standards Taskforce, Compliance feeds all sustainability-related regulatory developments and new requirements to relevant first line stakeholders to ensure these are duly considered and integrated into Aberdeen's investment approach and adequately reflected in our disclosures. In this taskforce, Compliance teams from all jurisdictions in which Aberdeen operates are represented.

Finally, a dedicated Monitoring & Oversight team operates a risk-based programme to provide assurance to senior management over the effectiveness of controls to ensure regulatory compliance. The outcome of the reviews is reported to the relevant entity boards and other governance forums, including the Risk and Capital Committee, Group Audit Committee and Executive Leadership Team Controls meeting. Assurance activities include both thematic reviews of risk or regulatory topics and focused reviews on specific regulatory or customer outcomes.

Third line

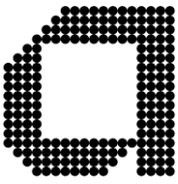
Aberdeen's Internal Audit function conducts internal audits including of sustainability rule implementation as part of its internal audit agenda.

Methodologies

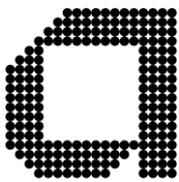
To promote the environmental and social characteristics, the Fund of Fund applies ESG assessment criteria, ESG screening criteria and promotes good governance including social factors. Through regular meetings with the managers of the underlying funds and monthly collation of holdings data, the Fund of Fund considers the quality of fund management teams and analyses the environmental, social and governance (ESG) characteristics of the fund and appraises how well these are managed.

To further complement the fund research, the nominated manager also uses third party ESG analysis which is primarily a quantitative assessment to identify environmental, social and governance risks and question management on the implementation of environmental, social and governance factors.

The nominated manager has access to portfolio underlying holdings allowing us to monitor funds and their constituents to ensure the portfolio delivers its E/S and Governance standards.



	<p>The underlying funds consider Principal Adverse Impacts (PAI) on sustainability factors. Principal Adverse Impact Indicators are metrics that measure the negative effects on environmental and social matters. The nominated manager assesses underlying funds to ensure that they consider PAIs within the investment process. This may influence whether an investment is made in the underlying fund. Underlying funds may also use PAIs as an engagement tool for example where there is no policy in place and this would be beneficial, or where carbon emissions are considered to be high, Aberdeen may engage to seek the creation of a long-term target and reduction plan. Aberdeen assess PAIs by using, amongst others, the PAI indicators referred to in the SFDR Delegated Regulation; however, dependent on data availability, quality and relevance to the investments not all SFDR PAI indicators may be considered. Where Funds consider PAIs, information on that consideration will be made available in annual reports.</p> <p>At a Fund of Fund level, monitoring of the following PAIs on all the underlying funds is observed and ensured that at the Fund of Fund level, the following metrics are better than the aggregate benchmark:</p> <ul style="list-style-type: none"> • PAI 1: GHG emissions (scope 1 and 2) • PAI 10: Violations of the UN Global Compact (UNGC) principles and Organisation for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises • PAI 14: Exposure to controversial weapons (anti-personnel mines, cluster munitions, chemical weapons and biological weapons)
<p>Data sources and processing</p>	<p>Data Sources</p> <p>Underlying funds use several data sources to support our sustainability indicators, Sustainable Investment calculations and PAI commitments. We use a combination of publicly available information, third-party data and ratings providers, proprietary ESG scoring, primary research and directly obtained information through engagement with companies.</p> <p>The Regulatory Technical Standards (RTS) under the EU Sustainable Finance Disclosure Regulation call on financial market participants to source sustainability data in various ways, including research providers, internal analysis, commissioned studies, publicly available information, and direct engagement with companies.</p> <p>The following sources are used by Aberdeen and our third-party data providers to collect company data and form a view on sustainability products and practices:</p> <ul style="list-style-type: none"> • Company direct disclosure, including but not limited to sustainability reports, annual reports, regulatory filings, investor updates, company websites and direct engagement with company representatives. • Indirect information sources, including but not limited to government agency published data, industry and trade associations, non-governmental organization (NGO) reports and websites, trade union reports, media and periodicals, and financial data providers. <p>Where company disclosure is unavailable, we may also choose to leverage estimated metrics based on sector averages or provided by credible third parties. These datasets are built based on proprietary methodologies using the data sources mentioned above.</p> <p>Data Quality assurance process</p> <p><i>Third Party Data Sources</i></p> <p>We work with several third-party ESG data providers and use their data points both as inputs into derived analytics, such as internal ESG house scores, as well as in raw format, for example in screening. As part of our onboarding process, we ensure that these providers have appropriate quality assurance in place. On an ongoing basis we have both qualitative governance and challenge processes as well as quantitative checks to understand quality of data, data inputs and gaps where appropriate.</p> <p>Our third-party providers regularly review their data collection and assessment methodologies. They also have an internal escalation process to allow for cases that require further interpretation or an update to the relevant methodology. At Aberdeen, we expect our third-party data providers to engage with us as appropriate, providing a timely response to queries and any concerns raised about the day-to-day use of their data and assessments within our investment processes.</p> <p><i>Qualitative Assessment Process</i></p> <p>In all cases where we apply our own insights or judgment, this follows a rigorous quality assurance and oversight process.</p>
<p>Limitations to methodologies and data</p>	<p>For all data sources, the availability and quality of company disclosed data varies, typically in line with company size and the regional domicile. Smaller companies and emerging market regions are typically more challenging areas, though this has been improving over time. In some regions, corporate sustainability disclosure regulations are coming into force, which improves the information available to us, though this may not cover the full range of ESG issues and data required to form a complete view of a company's sustainability products and practices. For many companies, a blend of direct and indirect sources, estimated data, and internal insights from our research and engagement are used to form a view. Across our third-party data providers, estimated data is around 20-40%, depending on the particular data point.</p> <p>In cases where judgement is required, for example within third-party or proprietary ESG scoring, there may be instances where we reach an incorrect conclusion. For example, a media allegation or controversy may arise, highlighting that a company's remedial action on an identified ESG challenge is not as advanced as we expected. In such instances, we will investigate the issue and take appropriate action within our funds as soon as possible.</p>



	<p>Once the immediate issue is addressed, we will consider how we can improve our approach or methodologies to avoid similar issues in the future.</p> <p>Economic contributions to environmental and social objectives, which form a key component of the SFDR definition of Sustainable Investments, are not defined within the SFDR. As a result, there are varying interpretations and methodologies in use across the investment industry. The percentage of Sustainable Investments reported in funds cannot be meaningfully compared across financial market participants.</p> <p>Within our Sustainable Investment calculations, Aberdeen uses the six environmental objectives of the EU Taxonomy to inform contributions to environmental objectives and the 17 Sustainable Development Goals to inform contributions social objectives. We use both quantitative and qualitative information to arrive at these figures, both of which require a degree of interpretation or judgement on whether the economic contribution should be considered 'Sustainable' under the SFDR definition. We rely on third-party data providers to form an initial view, and any internal insights we apply follow a robust, independent oversight process, with the rationale for our conclusions clearly documented.</p> <p>Within our screening processes, we rely on third-party data providers to identify companies that do not meet our criteria, based on the parameters and scope of the exclusions that we define for our funds. If we receive information from other sources (e.g., NGO or media reports) that is inconsistent with these screening results, we will investigate this to confirm whether a company is appropriate for the fund as soon as possible. Our portfolio managers also sense check the results of the screening for their funds and highlight any inconsistencies or unexpected results that we may wish to query with our provider.</p>
<p>Due diligence</p>	<p>Due diligence for each underlying fund held by the Fund of Fund is detailed in the underlying fund's Investment Approach document, published at www.abrdn.com, under Fund Centre.</p>
<p>Engagement policies</p>	<p>At Aberdeen, we believe it is our duty to be active and engaged owners of the assets in which we invest. Our aim is to both enhance and preserve the value of our clients' investments by considering a broad range of factors that impact on the long-term success of the company. Through the engagement conducted by Aberdeen, we seek to improve the financial resilience and performance of investments, sharing insights from our ownership experiences across geographies and asset classes. Where Aberdeen believes we need to catalyse change, we will endeavour to do so through our strong stewardship capabilities.</p> <p>In Multi-asset, the engagement efforts of the underlying funds selected by the Fund of Fund are entirely conducted by the underlying managers via regular corporate access to the securities held. The Fund of Fund managers can monitor and review engagements undertaken by the underlying managers on our internal systems at any time but also at the bi-annual due diligence review point, where the Fund Selection team ensures that the underlying funds held follow good governance practices. Aberdeen regularly monitors and assesses funds' active engagement policy and how they evidence adherence to the policy as part of the nominated manager's due diligence.</p> <p>The Multi-asset Fund Selection Policy on ESG and Sustainable Investing: We engage with all funds under coverage. For active funds rated as 'insufficient ESG integration' or 'unsatisfactory' we will seek to actively engage with the manager and/or investment firm with a view to improving the score. To remain diversified and to do our fiduciary duty we may have to make allowances in certain sectors, for example government bonds and absolute return. In these instances, we will continue to engage but we accept that there are limitations. Evidence of this will be documented in the meeting note.</p> <p>Engagement addresses the following areas:</p> <ul style="list-style-type: none"> • Attitude – The fund manager should understand that ESG can have a material impact on returns and risk. • Policy – The manager should develop a policy that details their view of ESG and the ways in which they seek to integrate ESG into the fund's process. • Process – The sector analyst will document how the fund will integrate ESG with realistic timescales. <p>For passive funds, engagement at the firm level is particularly important. We will arrange meetings to discuss the firm's approach to ESG, climate, net zero, and stewardship.</p> <p>Monitoring and assessment: The data gathered from our fund providers is used to highlight areas of concern to raise at our research meetings. Engagement records are collated centrally to ensure any development is captured. We plan to evolve our ESG approach as new information and data sources become available. The Multi-asset Fund Selection Policy on ESG and Sustainable Investing is overseen by the Head of Fund Selection and the Head of Sustainability in Multi-asset. The policy is reviewed annually, or as required.</p>
<p>Designated reference benchmark</p>	<p>This Fund of Fund has a financial benchmark that is used for portfolio construction but does not incorporate any sustainable criteria and is not selected for the purpose of attaining these characteristics. This Fund of Fund has a financial benchmark that is used for portfolio construction but does not incorporate any sustainable criteria and is not selected for the purpose of attaining these characteristics.</p>