Sustainable Finance Disclosures Regulation ("SFDR")

Article 10 - Transparency of the promotion of environmental or social characteristics and of sustainable investments on websites

(Regulation (EU) 2019/2088)

First Sentier Investors

Introduction

This document sets-out the firm-level disclosures required to be made under Article 10 of SFDR by the First Sentier Investors group[1]. The group includes investment teams trading as:

- FSSA Investment Managers (https://www.fssaim.com/)
- Stewart Investors (https://www.stewartinvestors.com/)
- RQI Investors (https://www.firstsentierinvestors.com.au/au/en/adviser/our-funds/realindex-investments.html)

Amendments to this disclosure are explained in the Table at the end of this document.

Disclosures

Certain of the financial products of the First Sentier Investors group which are within the scope of SFDR:

- promote environmental or social characteristics – these products are referred to as "Article 8 products"; or
- have a sustainable investment objective - these products are referred to a "Article 9 products".

The financial products include UCITS, alternative investment funds and portfolio management services.

For each Article 8 or 9 financial product, Schedule 1 and 2 (respectively) sets-out a concise summary of:

- the environmental or social characteristics or the sustainable investment objectives of the product;
- the methodologies used to assess, measure and monitor the environmental or social characteristics or the impact of the sustainable investments selected for the financial product, including its data sources, screening criteria for the underlying assets and the relevant sustainability indicators used to measure the environmental or social characteristics or the overall sustainable impact of the financial product;
- the information referred to in Articles 8 and 9 of SFDR.

[1] *In particular, this document includes disclosures made by First Sentier Investors (Ireland) Limited and First Sentier Investors Global Umbrella Fund plc*

Information on the extent to which environmental or social characteristics are met or the overall sustainability-related impact of the financial product by means of relevant sustainability indicators will be disclosed in periodic reports as required by Article 11 SFDR.

30 November 2023

Schedule 1: disclosures relating to Article 8 financial products pursuant to Article 10 SFDR

1. FSSA Investment Managers financial products

Name	LEI
Financial market participant(s)	
First Sentier Investors Global Umbrella Fund plc	n/a
First Sentier Investors International IM Limited[2]	549300CCC4Z8M05T6N95
Financial product(s)	
FSSA All China Fund	254900FSTFJ4FRX4O843
FSSA ASEAN All Cap Fund	5493009FP6QE07BQYA98
FSSA Asian Equity Plus Fund	549300ZMXZQSOPU0T420
FSSA Asian Growth Fund	549300XJFRTRHUTLLR97
FSSA Asia Focus Fund	549300LAC4P0KXGYJG33
FSSA Asia Opportunities Fund	549300SM7XIR0BMZU550
FSSA Asia Pacific All Cap Fund	549300A1EKDFU3L8BY90
FSSA China A Shares Fund	5493003H85K45YEMYA03
FSSA China Focus Fund	549300SVCX8IKHXVNY34
FSSA China Growth Fund	5493004Q3YHN6B7BLH98
FSSA Global Emerging Markets Focus Fund	549300SL3RBSIYHE9F49
FSSA Greater China Growth Fund	54930071KVAFFNC5LG34
FSSA Hong Kong Growth Fund	549300YMO8UBPRDX6227
FSSA Indian Subcontinent Fund	549300JYC0P3BMVTQE19
FSSA Japan Equity Fund	549300BVF6Q2HF8PQC35

Summary
The Investment Manager's view is that companies with strong environmental and social characteristics merit a higher valuation multiple and are expected to outperform their peers.
The manager applies explicit exclusions to specific sectors which might have a detrimental impact to either environmental, social, or health matters.

The Fund does not have a commitment to achieving specific, non-financial outcomes, however, to measure the progress towards the environmental and social characteristics that are promoted, the manager uses measurements that include; greenhouse gas emissions, coal revenues, Roundtable Sustainable Palm Oil standards, and "No Deforestation, No Peat, No Exploitation" standards as environmental indicators. Social indicators used relate to tobacco, gambling, pornography, and weapon manufacturing.

The Fund does review and consider principal adverse impacts on all investments.

No sustainable investment objective

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

[2] Not subject to SFDR; disclosing for transparency purposes

Environmental or social characteristics of the financial product

The environmental characteristics promoted by the Fund are:

- reductions in greenhouse gas emissions (GHG), indicated through review of reported scope 1 and 2 GHG emissions;
- reduction in fossil fuel exposure and deforestation, indicated through percentage of coal revenues; and
- non-exploitation of biodiversity, indicated through adherence to Roundtable on Sustainable Palm Oil (RSPO) standards and the existence of No Deforestation, No Peat, No Exploitation (NDPE) policies.

The social characteristics promoted by the Fund are:

- protection of human health, indicated by having zero companies involved in the production of tobacco products; and
- exclusions of certain activities with adverse human rights and social impacts, indicated by number of companies which operate primarily in the gambling industry (with a 10% revenue threshold), number of companies involved in the production of pornography (zero percent threshold) and number of companies that are involved in the production or development of cluster munitions, anti-personnel mines, small arms, biological weapons, chemical weapons or uranium munitions (zero percent threshold).

Investment Strategy

FSSA seeks to invest in quality companies, buying them at a sensible price and holding them for the long term FSSA defines quality companies as those that have an effective management team, high governance standards, a long-term mind-set, strong competitive advantages and an established track record of surviving previous cycles. In addition, we look for cultural integrity and the alignment of management interests with shareholders, and we analyse ESG factors to distinguish quality companies from the rest.

ESG analysis is incorporated into all three areas of management, franchise and financials. . As part of the investment approach, FSSA looks for founders and management teams that have high governance standards and whose interests are well-aligned with minority shareholders; and franchises that have the ability to deliver sustainable and predictable returns in excess of the cost of capital.

The Investment Manager focusses on assessing each company considered for investment including how each company prioritises the potential impacts of climate change, and how it manages employee and societal relations, and its commitment to upholding human rights.

The Investment Manager will proactively engage with companies where the Investment Manager is of the view that the investee company is not making sufficient progress on the environmental and social characteristics promoted by the Fund.

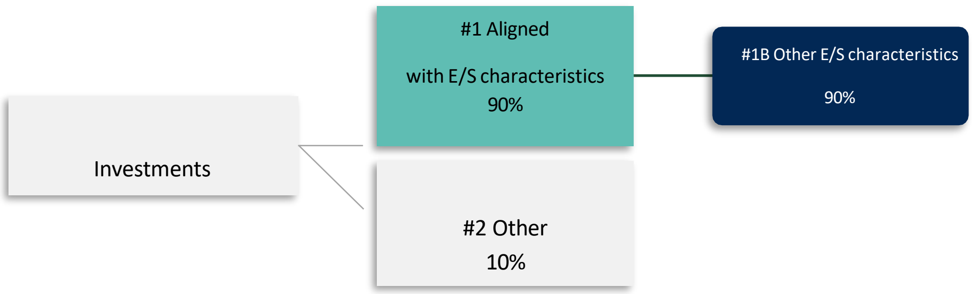
All of First Sentier Investors' (FSI) investment teams assess corporate governance practices in line with the relevant policies and guidelines. Examples are:

- Board assessment – there should be a transparent procedure for the appointment of new directors to a board. The Investment Manager expects that companies are able to demonstrate diversity of gender, age, ethnicity, thought, among other factors, and across their organisation and at board level.
- Ownership and shareholder rights - in general, the Investment Manager will not support resolutions that propose: changes to the corporate structure that curtail shareholder rights; or changes to the capital structure that could dilute shareholders' voting and/or economic rights.
- Remuneration – the Investment Manager expects remuneration structures to be simple, long-term oriented, aligned with shareholder value/return, to encourage responsible risk taking and to the extent relevant, and to embrace broader notions of 'success'.

Proportion of investments

The Fund invests primarily (at least 70% of its Net Asset Value) in equity securities or equity-related securities of companies that are listed, or have their registered offices in, or conduct a majority of their economic activity in the Asia Pacific region (excluding Japan). Such companies will be selected on the basis of their potential dividend growth and long term capital appreciation.

The Investment Manager will select investments which it believes offer the potential for dividend growth and price appreciation.



#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.

The category **#1 Aligned with E/S characteristics** covers:

- The Subcategory **#1A Sustainable** covers sustainable investments with environmental or social objectives
- The sub-category **#1B Other E/S characteristics** covers investments aligned with the environmental or social characteristics that do not qualify as sustainable investments.

Monitoring of environmental or social characteristics

The environmental and social characteristics promoted by the Fund and the sustainability indicators used to measure the attainment of each of those characteristics are monitored on an ongoing basis throughout the lifecycle of the Fund and the holding period of its respective companies.

Every member of the FSSA investment team evaluates environmental and social characteristics within their bottom-up company analysis. The team first cuts out businesses and people it won't invest it. FSSA does not use firm-level negative screening beyond its own exclusions policy. Then, the team studies company and management history and refuses to invest where there have been frequent incidents of malpractice or where business model is deemed un-investible.
The team conducts thorough due diligence on the quality of the management team and business. This includes assessing their treatment of all stakeholders, the purposefulness of their business model and the competence of the management team. Throughout this research process, there is a thorough review of the material ESG factors relevant to the given company.
Analysts rely on frequent and open-engagement with company management teams as the primary source for monitoring ESG-related information. As a team, FSSA attends 1,500+ company meetings each year. In addition to quantitative research, a company's competitors, suppliers, customers and any material environmental, social or governance issues identified through third-party data providers, expert calls and primary company documents are reviewed at these meetings. As bottom-up investors, FSSA uses external resources with caution, but when used carefully they provide an additional stream of information which complements the internal research.

Findings are shared with the broader investment team to invite questions and debate. FSSA avoids creating sector or country experts, believing that the best way to avoid mistakes is by allowing the entire team to evaluate and comment. Analysts are encouraged to visit the same company at different times. Additionally, funds are reviewed at least annually as a team which includes a review of environmental and social metrics.

FSSA reports annually on environmental and social matters aligned with applicable local, provincial and national laws in their annual ESG report and at the firm-level in the annual Responsible Investment report.

Methodologies

In addition to information received from meetings with company management, FSSA utilises information from primary company documents and third-party data providers, guidance provided by the Sustainability Accounting Standards Board (SASB) materiality map and performs manual checks for the existence of certain policies and signatory memberships to verify alignment to the environmental and social characteristics promoted by the Fund.

The Fund tracks and measures the following:

- value of GHG emissions are tracked at the Fund and team level, and the amount of GHG reduced is measured at the company level as the approach focuses on bottom-up, company-by-company reductions;
- number of companies committed to achieving net zero by 2050 and supporting data such as alignment with Science Based Targets initiative;
- compliance to stated direct coal revenues threshold;
- adherence to Roundtable on Sustainable Palm Oil (RSPO) standards;
- existence of No Deforestation, No Peat, No Exploitation (NDPE) policies;
- compliance to stated threshold on companies deemed operating primarily in the gambling industry;
- having zero companies involved in the production of tobacco products, pornography and the development of cluster munitions, anti-personnel mines, small arms, biological weapons, chemical weapons or uranium munitions.

Furthermore, FSSA uses GHG information to engage with select companies designated as most impactful to FSSA's business. The team seeks genuine absolute GHG emissions reductions in line with the individual companies' climate targets. Read more about the team's climate targets on the website:

https://www.fssaim.com/uk/en/private/sustainability/carbon-footprint.html

Data sources and processing

The data sources that are used to monitor the environmental & social characteristics of the fund are from both third party research providers and from direct engagement with investee companies. The third party data providers include but are not limited to: Sustainalytics, ISS, Reprisk and MSCI. These data services are used to inform and supplement the data gathered directly from investee companies in the fund.

Prior to procurement, data vendor services are assessed for coverage, accuracy and timeliness by FSI's ESG Impacts Committee, which is managed by FSI's Responsible Investment team. Once procured, Investment managers will report back to the data vendors where they believe information is inaccurate.

The data is processed by the RI team and made available to the investment teams and the Global Investment Committee.

The investment manager will use information sourced directly from investee companies where there are gaps in the vendors data.

Limitations to methodologies and data

Limitations to the data provided from third parties will stem from their coverage and methodologies and from limited disclosures by issuer companies. Where data is not available, third party providers may use estimation models or proxy indicators. Methodologies used by data providers may include an element of subjectivity. Whilst data is collected on an ongoing basis, in this rapidly evolving environment, data can become outdated within a short time period.

The attainment of the social and environmental characteristics is not wholly dependent on third party data considering the limitations and is informed by direct engagement with investee companies where there are such data gaps.

Due diligence

Monitoring and measuring the environmental and social characteristics is a shared responsibility across the investment team and throughout the investment lifecycle as evidenced by the team's open debate of each investee company. Bottom-up quantitative and qualitative review of our companies provides comprehensive ongoing due-diligence. Additional dedicated analysts act as another layer of review, prompting the team to consider all the necessary metrics.

FSSA also utilises additional support from FSI and, where appropriate, will work with reputable external partners to further understanding of environmental and social factors. Resources within FSI, include the team of Responsible Investment (RI) Specialists, the Global Investment Committee and ESG Impacts Committee. There are 2 members of FSSA on the ESG Impacts Committee.

FSSA will report on its ESG impacts and activities on an annual basis by midyear following the previous fiscal year.

Engagement policies

First Sentier Investors' (FSI) Responsible Investment & Stewardship Policy and Principles sets out the standard of engagement practices for all of FSI's investment teams. The policy also sets out FSI's approach to controversial sustainability- related activities.

Engaging in an active dialogue with investee companies or entities is an important activity as it provides a key opportunity to improve our understanding of their business, and to monitor material business issues including strategy, capital allocation and financials as well as their approach to environmental, social and governance matters, and enables us to influence them to improve these practices.

The breadth, depth and frequency of engagement will vary significantly based on a variety of factors including the risks and opportunities faced by the company, the opportunity and willingness to engage by the company, and the size or nature of the investment.

The policy can be found at www.firstsentierinvestors.com

Designated reference benchmark

Not applicable

2. Property Securities financial products

Name	LEI
Financial market participant(s)	
First Sentier Investors Global Umbrella Fund plc	n/a
Financial product(s)	
First Sentier Asian Property Securities Fund	549300HGNSS0MUQNS075
First Sentier Global Property Securities Fund	54930043SPJBFOE6GJ62

Summary

The manager's view is that climate change can impact the long-term value of investments.
The manager accesses and scores each investment on environmental and social criteria as part of its investment decision.

The Fund does not have a commitment to achieving specific, non-financial outcomes, however, to measure the progress towards the environmental and social characteristics that are promoted, the manager uses measurements of; greenhouse gas emissions, and waste reduction plans. Social indicators used relate to investment companies having community initiatives plans, employee diversity plans, and having no systemic breaches of the United Nations Global Compact.

The Fund aims to have a positive influence on investee companies through engagement and actively exercising its voting rights.

The Fund does review and consider principal adverse impacts on all investments.

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 financial product

The environmental characteristics promoted by the Fund are:

- green-house gas emission reduction, and
- waste reduction.

The social characteristics promoted by the Fund are:

- gender diversity and equal opportunity,
- community initiatives, and
- compliance with UN Global Compact Principles by the investee companies.

Investment strategy

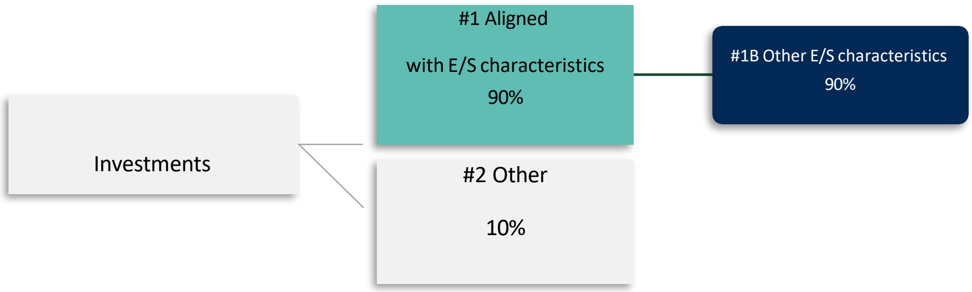
The Investment Manager is aware that climate change can impact the value of investments; the nature of property assets is inherently long term, making climate change a material issue for long term property asset valuation. The Investment Manager focusses on assessing each company considered for investment including how each company prioritises the potential impacts of climate change.

In considering the social characteristics, the Investment Manager assesses and selects companies with policies in place to align with The Ten Principles of the UN Global Compact; and to demonstrate diversity of gender, age and ethnicity across their organisation; and have a commitment to a long-term contribution to the wider community. Corporate governance characteristics such as Board independence and diverse skills and experience are assessed and rated.
The ongoing monitoring and valuing of the ESG characteristics are embedded into the investment process and the proprietary scores are taken into account in the selection, retention and realisation of investments in the Fund.

The Investment Manager will proactively engage with companies where the Investment Manager is of the view that the investee company is not making sufficient progress on the environmental and social characteristics promoted by the Fund.

Proportions of investments

The Funds invest primarily (at least 70% of its Net Asset Value) in a broad selection of equity securities or equity-related securities issued by real estate investment trusts or companies that own, develop or manage real property and which are listed, traded or dealt in on Regulated Markets.



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#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.

The category **#1 Aligned with E/S characteristics** covers:

- The Subcategory **#1A Sustainable** covers sustainable investments with environmental or social objectives
- The sub-category **#1B Other E/S characteristics** covers investments aligned with the environmental or social characteristics that do not qualify as sustainable investments.

Monitoring of environmental or social characteristics

The ongoing monitoring and evaluation of the environment and social characteristics and the sustainability indicators are embedded into the investment process and the proprietary scores are taken into account in the selection, retention and realisation of investments in the Fund. The Investment Manager is committed to provide continuous reporting and disclosures on an annual basis throughout the lifecycle of the Fund. The promoted environmental and social characteristics and the sustainability indicators can be monitored by a set of measureable metrics. Factual data are collected from investee companies' reports and the team's periodic engagements. Our engagements can be in the format of site visit, in person meeting, call or email. Our database are updated in real time and live feed to our ESG reports. In addition, the Fund's performance is also being measured against our set target over a short, medium and long term for internal purposes.

Methodologies

Environmental, social and governance (ESG) factors (which include the environmental and social characteristics promoted by the Fund) are taken into account in the selection, retention or realisation of investments in the Fund, but the extent to which any one of these factors is considered for any particular investment decision will vary at the discretion of the Investment Manager when managing the Fund, and in certain circumstances, the Investment Manager may not consider these factors to be relevant to a particular investment decision.

The Investment Manager utilises its proprietary ESG analysis for a two-stage approach to analyse the companies.

A company's commitment to carbon emission reductions is assessed in the initial screen of companies used to determine the investible universe and the exclusion of companies from the investment universe.

All company analysis include ESG issues that directly influence the company valuation framework. A higher ESG characteristic assessment leads to a higher target valuation and positive selection of that asset. An ESG characteristic assessment score of below 2 out of 5 for ESG factors will lead to a company being excluded from the investment universe.

The environmental characteristics considered as part of an ESG characteristic assessment include reduction of carbon emissions, water usage and waste management. In analysing the companies, the Investment Manager considers the measures the companies are taking to achieve and implement carbon reductions through e.g. carbon offset schemes, onsite energy reduction, renewable energy procurement as well as modernisation efforts involved in improving the ongoing operational carbon reductions and reducing embodied carbon emissions through use of green materials and end of life recycling. Equally, the nature of property assets are inherently long term, making climate change a material issue for long term property asset valuation. The Investment Manager focusses on assessing each company considered for investment including how each company prioritises the potential impacts of climate change.

In considering the social characteristics such as gender diversity, equal opportunity and community initiatives, the Investment Manager expects companies to demonstrate diversity of gender, age and ethnicity across their organisation. Corporate governance characteristics such as Board independence and diverse skills and experience are assessed and rated.

The Investment Manager will proactively engage with companies where it is of the view that the investee company is not making sufficient progress on the characteristics promoted by the Fund.

Data sources and processing

The data sources that are used to monitor the environmental & social characteristics of the fund are from both third party research providers and from direct engagement with investee companies. The third party data providers include but are not limited to: Sustainalytics, ISS, Reprisk and MSCI. These data services are used to inform and supplement the data gathered directly from investee companies in the fund.

Prior to procurement, data vendor services are assessed for coverage, accuracy and timeliness by FSI's ESG Impacts Committee, which is managed by FSI's Responsible Investment team. Once procured, Investment managers will report back to the data vendors where they believe information is inaccurate.

The data is processed by the RI team and made available to the investment teams and the Global Investment Committee.

The investment manager will use information sourced directly from investee companies where there are gaps in the vendors data.

Limitations to methodologies and data

Limitations to the data provided from third parties will stem from their coverage and methodologies and from limited disclosures by issuer companies. Where data is not available, third party providers may use estimation models or proxy indicators. Methodologies used by data providers may include an element of subjectivity. Whilst data is collected on an ongoing basis, in this rapidly evolving environment, data can become outdated within a short time period.

The attainment of the social and environmental characteristics is not wholly dependent on third party data considering the limitations and is informed by direct engagement with investee companies where there are such data gaps.

Due diligence

ESG analysis and financial analysis are constantly monitored by the team as per allocated stock coverage. Changes and updates to our stock models are made following company's events, announcements, reported results, and our engagements with the investee companies. This process is fluid, for instance a positive change made in a company's new net zero target or new sustainability initiatives means a higher ESG score is attained by the company which will lead to its inclusion in our defined screen and might be added to our portfolio; on the other hand, a deterioration of one company's corporate governance will negatively affect its ESG score and might result in disposal of that stock from our portfolio.

The score/s are changed whenever necessary to reflect a change in situation. Our stock database ensures any changes made are reflected in our live price relative ranking table.

We utilise CGI Glass Lewis, Sustainalytics and MSCI Ratings for ESG data and information. However, in-house research and company engagement are our most important sources of reference for ESG analysis.
The initial screening stage of our investment process contains an ESG rating. This is where a company's ESG issues are considered and scored according to our proprietary ESG guidelines.

Engagement with investee companies on GHG emission reduction is an important step in our ESG analysis and investment process, where specific sustainability goals and initiatives are set and implemented over the short, medium and long term by the investee companies. We also take into account a company's history as a good corporate citizen and look for evidence of any meaningful contributions it might have made which benefit society as a whole.

Engagement policies

First Sentier Investors' (FSI) Responsible Investment & Stewardship Policy and Principles sets out the standard of engagement practices for all of FSI's investment teams. The policy also sets out FSI's approach to controversial sustainability- related activities.

Engaging in an active dialogue with investee companies or entities is an important activity as it provides a key opportunity to improve our understanding of their business, and to monitor material business issues including strategy, capital allocation and financials as well as their approach to environmental, social and governance matters, and enables us to influence them to improve these practices.

The breadth, depth and frequency of engagement will vary significantly based on a variety of factors including the risks and opportunities faced by the company, the opportunity and willingness to engage by the company, and the size or nature of the investment.

The policy can be found at www.firstsentierinvestors.com

Designated reference benchmark

Not applicable

3. Listed Infrastructure financial products

Name	LEI
Financial market participant(s)	
First Sentier Investors Global Umbrella Fund plc	n/a
Financial product(s)	
First Sentier Global Listed Infrastructure Fund	549300UHIVWX4YGY6160

Summary

The manager of the Fund seeks to understand and capture sustainability risks and opportunities using a proprietary quality-ranking model. The model employed includes a range of environmental and social characteristics, which are expected to influence investment returns, in general and infrastructure securities in particular.

The Fund does not have a commitment to achieving specific, non-financial outcomes. The manager measures the carbon intensity of investee companies over rolling five year period as an indicator of environmental progress. Progress towards the social characteristics promoted by the fund (namely the protection of labour rights and the provision of safe and secure working environments) is measured against the United Nation Global Compact principles and the OECD Guidelines for Multinational Enterprises.

The manager aims to have a positive influence on investee companies through engagement and by actively exercising its voting rights.

The manager of the Fund reviews and considers principal adverse impacts on all investments.

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 financial product

The environmental characteristics promoted by the Fund are climate change mitigation, namely a reduction in carbon intensity (measured as carbon emissions per MWh) and the adoption of renewable and cleaner energy technologies.

The social characteristics promoted by the Fund are the protection of labour rights, and the provision of safe and secure working environments for all workers.

Investment strategy

The Investment Manager focusses on assessing each company considered for investment including how each company prioritises the potential impacts of climate change or social standards measured by the UN Global Compact and the OECD Guidelines for Multinational Enterprises.

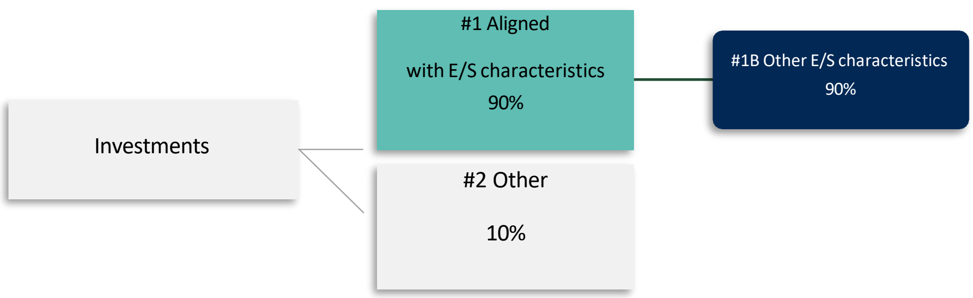
The Investment Manager will proactively engage with companies where the Investment Manager is of the view that the investee company is not making sufficient progress on the environmental and social characteristics promoted by the Fund.

All of FSI investment teams assess corporate governance practices in line with the relevant policies and guidelines. Examples are:

- Board assessment – there should be a transparent procedure for the appointment of new directors to a board. The FSI investment team considers best practice amongst investee companies to include the ability to demonstrate diversity of gender, age, ethnicity, sexuality and thought across their organisation and at board level.
- Ownership and shareholder rights - in general, FSI investment teams will not support resolutions that propose: changes to the corporate structure that curtail shareholder rights; or changes to the capital structure that could dilute shareholders' voting and/or economic rights.
- Remuneration - FSI investment teams expect remuneration structures to be simple, long-term oriented, aligned with shareholder value/return, to encourage responsible risk taking and to the extent relevant embrace broader notions of 'success'.

Proportions of investments

The Fund invests primarily (at least 70% of its Net Asset Value) in a diversified portfolio of listed Infrastructure and Infrastructure-related equity securities or equity-related securities of issuers listed, traded or dealt in on Regulated Markets worldwide. The Infrastructure sector includes, but is not limited to, utilities (e.g. water and electricity), highways and railways, airports services, marine ports and services, and oil and gas storage and transportation.



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The category #1 Aligned with E/S characteristics covers:

- The Subcategory **#1A Sustainable** covers sustainable investments with environmental or social objectives
- The sub-category **#1B Other** E/S characteristics covers investments aligned with the environmental or social characteristics that do not qualify as sustainable investments.

Monitoring of environmental or social characteristics

The Fund promotes the following Environmental characteristics:
Climate change mitigation, namely a reduction in carbon intensity and the adoption of renewable and cleaner energy technologies.

The sustainability indicators used to measure the attainment of this Environmental characteristic is a declining carbon intensity by the portfolio's utility holdings (which are responsible for the vast majority of portfolio emissions), using the measure of carbon emissions per MWh of electricity generated.

This sustainability indicator is monitored using a proprietary database which tracks utilities' carbon intensity, and looks at whether this metric is decreasing over rolling five year periods. The database also monitors a range of other climate-related statistics, including absolute carbon emissions and carbon footprint.

The Fund promotes the following Social characteristics:
The protection of labour rights and the provision of safe and secure working environments for all workers.

The sustainability indicators used to measure the attainment of these Social characteristics are alignment with the Ten Principles of the UN Global Compact, and with the OECD Guidelines for Multinational Enterprises.

This sustainability indicator is monitored by checking, on a monthly basis, whether any of the stocks that the team analyse and research were deemed to be in violation of either the UN Global Compact or the OECD Guidelines for Multinational Enterprises. To determine this we use analysis from Sustainalytics, an independent third party data provider.

Methodologies

Declining carbon intensity
Carbon intensity of the portfolio's holdings is measured in a number of ways. First, the entire portfolio is analysed in a way that is consistent with the framework provided by the Task Force on Climate-Related Financial Disclosures (TCFD), based on data from MSCI ESG. Under this approach the carbon intensity of each holding is calculated using the following formula:

- Scope 1+2 Emissions / $M Sales

This approach can be used for comparisons against a benchmark or across portfolios; as well as for portfolio decomposition and analysis. The investment team has concerns around using sales as the denominator in this formula because other factors like currency or commodity prices can have a large effect on dollars of sales, with no effect on emissions. However, this method has been recommended by the TCFD and the team supports increased comparability of investor reporting.

In addition to this, the investment team maintains a proprietary database that monitors a range of ESG metrics. These metrics include a range of climate-related statistics, including absolute carbon emissions, carbon footprint and carbon intensity (all measured at a stock, portfolio and strategy level).

Utilities typically represent around half of the portfolio by weight, and are responsible for the vast majority of portfolio-related carbon emissions. This database uses the following formula to determine carbon intensity for the portfolio's utility holdings:

- Scope 1+2 Emissions / MWh of Electricity Generated

This database displays carbon intensity of the portfolio's utilities for each of the past five years, and checks to monitor whether this metric is decreasing over rolling five year periods.

Further, the investment team tracks whether or not companies are working with the Science Based Targets initiative (a clearly-defined pathway for companies to reduce greenhouse gas emissions); whether a company is determined to be an MSCI ESG Leader or Laggard; and whether or not each company has made a net zero commitment.

Alignment with the Ten Principles of the UN Global Compact, and with the OECD Guidelines for Multinational Enterprises

Each month a report is run by the team across every stock in the team's Focus List to determine whether any of the portfolio's holdings were deemed to be in violation of either the UN Global Compact or the OECD Guidelines for Multinational Enterprises.

The reports run are based on Global Standards Screening (GSS) research from Sustainalytics, an independent third party ESG data provider. GSS research captures severe, systemic and structural violations of international norms as enshrined by the UN Global Compact Principles.

Assessments are underpinned by references to the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights, as well as their underlying conventions. GSS company assessments reflect several dimensions, including:

- Severity of impacts on stakeholders and/or the environment - scale, scope, and irremediability
- Company responsibility - accountability, exceptionality and systemic nature
- Company management - response, management systems and implementation

Breaches are reviewed and assessed by the investment team and followed by engagement with company management. Persistent or systematic breaches may lead to disinvestment by the Fund.

Data sources and processing

The data sources that are used to monitor the environmental & social characteristics of the fund are from both third party research providers and from direct engagement with investee companies. The third party data providers include but are not limited to: Sustainalytics, ISS, Reprisk and MSCI. These data services are used to inform and supplement the data gathered directly from investee companies in the fund.

Prior to procurement, data vendor services are assessed for coverage, accuracy and timeliness by FSI's ESG Impacts Committee, which is managed by FSI's Responsible Investment team. Once procured, Investment managers will report back to the data vendors where they believe information is inaccurate.

The data is processed by the RI team and made available to the investment teams and the Global Investment Committee.

The investment manager will use information sourced directly from investee companies where there are gaps in the vendors data.

Limitations to methodologies and data

Limitations to the data provided from third parties will stem from their coverage and methodologies and from limited disclosures by issuer companies. Where data is not available, third party providers may use estimation models or proxy indicators. Methodologies used by data providers may include an element of subjectivity. Whilst data is collected on an ongoing basis, in this rapidly evolving environment, data can become outdated within a short time period.

The attainment of the social and environmental characteristics is not wholly dependent on third party data considering the limitations and is informed by direct engagement with investee companies where there are such data gaps.

Due diligence

Internal

Thorough due diligence is carried out on the underlying assets of the financial product by the team's analysts and portfolio managers. We conduct extensive research on a number of fronts, including:

- company reports and financial filings
- meetings with company management and asset tours
- meetings with competitors, suppliers, customers, regulators, government officials and industry bodies
- building detailed financial models on each company covered, and
- comparing and contrasting key financial indicators of each company with its competitors.

The investment team believes the most important source of research is internally generated through regular meetings with senior management and other stakeholders including suppliers, competitors, regulators and industry bodies.

Given the investment experience across the team, companies and markets are understood intimately and the team believes that it is best positioned to form a view on the companies in the opportunity set, including their approach to ESG and the materiality of ESG issues. To supplement the team's own research, various external research services are employed such as those provided by:

- Government research studies
- industry studies
- ESG research providers, and
- broker research reports.

Stock coverage is split by sector to maximise the team's specialist knowledge and to identify global best practice. Given the experience and stability of the team, every sector has been covered by more than one analyst, providing an effective back-up framework. Team members are encouraged to contribute views on all stocks, not just those under direct coverage, and all stock calls are openly debated. Ultimate investment responsibility rests with Peter Meany as head of the team.

External

The team's internal due diligence is supported by a range of controls that operate independently from the investment team.

First, the Investment Compliance team, which sits within the company's broader Risk Management & Compliance team, maintains an independent check to ensure compliance with all portfolio construction parameters, whether they are imposed by regulation, client or internal in-house limits. Relevant in-house limits include a ban on investing in companies that have been identified as having any involvement in nuclear weapons manufacturing; as well as companies involved in the production of tobacco or tobacco-adjacent products such as e-cigarettes and vaping devices. The Investment Compliance team is responsible for monitoring funds against limits, and for escalating any breaches to the portfolio managers and the Head of Global Listed Infrastructure strategy.

In addition, the Investment Product Research & Assurance (IPRA) team is responsible for monitoring investment portfolios to ensure consistency with their stated investment style and process. They review and interpret risk and performance reports prepared by the Performance teams, and are responsible for implementing stress testing and liquidity monitoring on funds, where appropriate. The IPRA team provides an independent challenge to the fund management teams and Global Head of Investment Management. They also provide reporting and commentary on performance and risk to the Global Investment Committee and regional Committees and Boards.

Engagement policies

First Sentier Investors' (FSI) Responsible Investment & Stewardship Policy and Principles sets out the standard of engagement practices for all of FSI's investment teams. The policy also sets out FSI's approach to controversial sustainability- related activities.

Engaging in an active dialogue with investee companies or entities is an important activity as it provides a key opportunity to improve our understanding of their business, and to monitor material business issues including strategy, capital allocation and financials as well as their approach to environmental, social and governance matters, and enables us to influence them to improve these practices.

The breadth, depth and frequency of engagement will vary significantly based on a variety of factors including the risks and opportunities faced by the company, the opportunity and willingness to engage by the company, and the size or nature of the investment.

The policy can be found at www.firstsentierinvestors.com

Designated reference benchmark

Not applicable

4. Responsible Listed Infrastructure financial products

Name	LEI
Financial market participant(s)	
First Sentier Investors Global Umbrella Fund plc	n/a
Financial product(s)	
First Sentier Responsible Listed Infrastructure Fund	549300E7HMFL0HQCAU90

Summary

The manager of the Fund seeks to understand and capture sustainability risks and opportunities using a proprietary quality-ranking model and Sustainability Analysis in order to select assets that are contributing to or benefitting from sustainable development, as guided by the United Nations Sustainable Development Goals ("UN SDGs").

Typically, at least thirty-five percent of the Fund's assets will consist of sustainable investments with an environmental and/or social characteristic (unless the Fund is in the process of disinvestment). [Some sustainable investments may be EU Taxonomy- aligned, but this is not an explicit selection criteria for the Fund.] Non-sustainable investment assets will be aligned with an environmental or social UN SDG.

Progress towards the environmental characteristics promoted by the fund is measured by the carbon intensity of investee companies over five year rolling periods (noting that coal-fired generation assets must represent less than 20% of each investee company's total assets), and by the alignment of each investment with a UN SDG.

Progress towards the social characteristics promoted by the fund (namely the protection of labour rights, and the provision of safe and secure working environments) is measured against the United Nation Global Compact principles and the OECD Guidelines for Multinational Enterprises.

The Fund is committed to alignment with net zero by 2050. The Fund has also set an interim target of reducing, by 2030, its Weighted Average Carbon Intensity (WACI) to -50% below the 2019 benchmark index.

The manager of the Fund aims to have a positive influence on investee companies through engagement and by actively exercising its voting rights.

The manager of the Fund reviews and considers principal adverse impacts on all investments.

No sustainable investment objective

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

This financial product promotes environmental or social characteristics. While it does not have as its objective a sustainable investment, a minimum of 35% of the Fund will consist of sustainable investments.

In order to ensure that the Fund achieves sustainable investment success, we seek to identify whether the stocks it invests in could have a negative impact from a sustainability perspective. This encompasses areas such as environmental, social and employee matters, respect for human rights, anti-corruption and anti-bribery matters.

We commit that every company held by the Fund should be assessed for relevant adverse impacts. Given the investment experience across the team, companies and markets are understood intimately and the team believes that it is best positioned to form a view on investee companies' approaches to sustainability, and on the materiality of sustainability-related issues.

The outcomes of this assessment are reflected in the quality score which we assign to every company that we research and analyse; and in the Sustainability Analysis that we undertake.

In addition, where adverse sustainability impacts are identified, the team actively engages with the company involved, in accordance with the commitments made under First Sentier Investor's Responsible Investment and Stewardship Policy and Principles.

Where engagement is unsuccessful, the investment team considers escalating the issue by:

- wider engagement with other investors;
- writing to or meeting with the chairperson or lead independent director;
- voting against directors they feel are not providing appropriate oversight; or
- making the team's views public.

If an appropriate response is not received from the company, the team will consider divestment.

The investment team also ensures that the companies the Fund invests in are alignment with the Ten Principles of the UN Global Compact, and with the OECD Guidelines for Multinational Enterprises. The team runs a check, on a monthly basis, to determine whether any of the portfolio's holdings were deemed to be in violation of these Principles or Guidelines.

Environmental or social characteristics of the financial product

The environmental characteristics promoted by the Fund are:

- climate change mitigation (via a reduction in carbon intensity (measured as carbon emissions per MWh), the establishment of energy infrastructure required for enabling the decarbonisation of energy systems, and the production of clean and efficient fuels from renewable or carbon-neutral sources); and
- the alignment of investee companies with the United Nations' Sustainable Development Goals most relevant to infrastructure companies, namely:
    - SDG 6 : Clean Water and Sanitation
    - SDG 7: Affordable and Clean Energy
    - SDG 9: Industry, Innovation and Infrastructure
    - SDG 11: Sustainable Cities and Communities
    - SDG 12: Responsible Consumption and Production
    - SDG 13: Climate Action

The social characteristics promoted by the Fund are the protection of labour rights, and the provision of safe and secure working environments for all workers.

Investment strategy

The Investment Manager focusses on assessing each company considered for investment, including how each company prioritises the potential impacts of climate change.

The environmental elements focussed upon are company alignment with the United Nation Sustainable Development Goals relevant to infrastructure (clean water and sanitation, affordable and clean energy, industry innovation and infrastructure, and sustainable cities and communities, responsible consumption and production, and climate action).

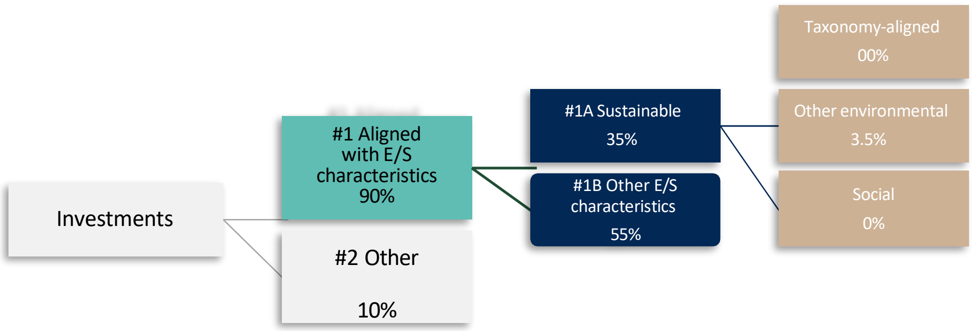
The Investment Manager will proactively engage with companies where the Investment Manager is of the view that the investee company is not making sufficient progress on the environmental and social characteristics promoted by the Fund.

All of FSI investment teams assess corporate governance practices in line with the relevant policies and guidelines. Examples are:

- Board assessment – there should be a transparent procedure for the appointment of new directors to a board. The FSI investment team considers best practice amongst investee companies to include the ability to demonstrate diversity of gender, age, ethnicity, sexuality and thought across their organisation and at board level.
- Ownership and shareholder rights - in general, FSI investment teams will not support resolutions that propose: changes to the corporate structure that curtail shareholder rights; or changes to the capital structure that could dilute shareholders' voting and/or economic rights.
- Remuneration - FSI investment teams expect remuneration structures to be simple, long-term oriented, aligned with shareholder value/return, to encourage responsible risk taking and to the extent relevant embrace broader notions of 'success'.

Proportion of investments

The Fund will seek to invest primarily (at least 70% of its Net Asset Value) in a diversified portfolio of equity securities or equity-related securities issued by companies that have substantial assets in, or derive significant revenues from, the infrastructure sector. These securities are listed, traded or dealt in on Regulated Markets worldwide. The infrastructure sector includes but is not limited to utilities (gas, water and electric), highways and railways, mobile towers and satellites, airport services, marine ports and services, and energy storage and transportation.



#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.

The category **#1** Aligned with E/S characteristics covers:

- The Subcategory **#1A Sustainable** covers sustainable investments with environmental or social objectives
- The sub-category **#1B Other** E/S characteristics covers investments aligned with the environmental or social characteristics that do not qualify as sustainable investments.

Monitoring of environmental or social characteristics

The Fund promotes the following Environmental characteristics:

Climate change mitigation, namely a reduction in carbon intensity and the adoption of renewable and cleaner energy technologies.

The sustainability indicators used to measure the attainment of this Environmental characteristic is a declining carbon intensity by the portfolio's utility holdings (which are responsible for the vast majority of portfolio emissions), using the measure of carbon emissions per MWh of electricity generated.

This sustainability indicator is monitored using a proprietary database which tracks utilities' carbon intensity, and looks at whether this metric is decreasing over rolling five year periods. The database also monitors a range of other climate-related statistics, including absolute carbon emissions and carbon footprint.

The investment team also applies a 20% limit to coal generation exposure for the Fund's holdings (as measured by the proportion of a company's overall assets that consist of coal-fired generation assets).

The alignment of investee companies with the United Nations' Sustainable Development Goals (SDGs) most relevant to infrastructure companies, namely:

- SDG 6: Clean Water and Sanitation
- SDG 7: Affordable and Clean Energy
- SDG 9: Industry, Innovation and Infrastructure
- SDG 11: Sustainable Cities and Communities
- SDG 12: Responsible Consumption and Production
- SDG 13: Climate Action

Sustainable Development Investments (SDI) taxonomy is used to determine the extent to which the capex spent by each company the investment team analyses contributes to the SDGs listed above.

Some companies' contributions towards these goals are not measurable by capex. In those cases the team analyses more appropriate data for the sector, or consider EU taxonomy alignment.

The Fund promotes the following Social characteristics:

- The protection of labour rights and the provision of safe and secure working environments for all workers.
- The sustainability indicators used to measure the attainment of these Social characteristics are alignment with the Ten Principles of the UN Global Compact, and with the OECD Guidelines for Multinational Enterprises.
- This sustainability indicator is monitored by checking, on a monthly basis, whether any of the stocks that the team analyse and research were deemed to be in violation of either the UN Global Compact or the OECD Guidelines for Multinational Enterprises. To determine this the team uses analysis from Sustainalytics, an independent third party data provider.

Methodologies

Declining carbon intensity
Carbon intensity of the portfolio's holdings is measured in a number of ways. First, the entire portfolio is analysed in a way that is consistent with the framework provided by the Task Force on Climate-Related Financial Disclosures (TCFD), based on data from MSCI ESG. Under this approach the carbon intensity of each holding is calculated using the following formula:

- Scope 1+2 Emissions / $M Sales

This approach can be used for comparisons against a benchmark or across portfolios; as well as for portfolio decomposition and analysis. The investment team has concerns around using sales as the denominator in this formula because other factors like currency or commodity prices can have a large effect on dollars of sales, with no effect on emissions. However, this method has been recommended by the TCFD and the teams supports increased comparability of investor reporting.

In addition to this, the investment team maintains a proprietary database that monitors a range of ESG metrics. These metrics include a range of climate-related statistics, including absolute carbon emissions, carbon footprint and carbon intensity (all measured at a stock, portfolio and strategy level).

Utilities typically represent around half of the portfolio by weight, and are responsible for the vast majority of portfolio-related carbon emissions. This database uses the following formula to determine carbon intensity for the portfolio's utility holdings:

- Scope 1+2 Emissions / MWh of Electricity Generated

This database displays carbon intensity of the portfolio's utilities for each of the past five years, and checks to monitor whether this metric is decreasing over rolling five year periods.

Further, the investment team tracks whether or not companies are working with the Science Based Targets initiative (a clearly-defined pathway for companies to reduce greenhouse gas emissions); whether a company is determined to be an MSCI ESG Leader or Laggard; and whether or not each company has made a net zero commitment.

20% coal exposure limit
The maximum 20% coal exposure sustainability indicator is monitored via the analysis and research carried out by the investment team, and via the financial models that they build and maintain for each company they cover.

The alignment of investee companies with the United Nations' Sustainable Development Goals most relevant to infrastructure companies, namely:

- SDG 6: Clean Water and Sanitation
- SDG 7: Affordable and Clean Energy
- SDG 9: Industry, Innovation and Infrastructure
- SDG 11: Sustainable Cities and Communities
- SDG 12: Responsible Consumption and Production
- SDG 13: Climate Action

Company alignment with the SDGs listed above is based on an assessment of the proportion of each company's capex that is spent on activities that support these goals.

Analysis on this topic is carried out by the investment team's analysts and portfolio managers, using SDI taxonomy to assess each of the companies under coverage.

Some companies' contributions towards these goals are not measurable by capex. In those cases the team analyses more appropriate data for the sector, or consider EU taxonomy alignment.

Alignment with the Ten Principles of the UN Global Compact, and with the OECD Guidelines for Multinational Enterprises

Each month a report is run by the team across every stock in the team's Focus List to determine whether any of the portfolio's holdings were deemed to be in violation of either the UN Global Compact or the OECD Guidelines for Multinational Enterprises.

The reports run are based on Global Standards Screening (GSS) research from Sustainalytics, an independent third party ESG data provider. GSS research captures severe, systemic and structural violations of international norms as enshrined by the UN Global Compact Principles.

Assessments are underpinned by references to the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights, as well as their underlying conventions. GSS company assessments reflect several dimensions, including:

- Severity of impacts on stakeholders and/or the environment - scale, scope, and irremediability
- Company responsibility - accountability, exceptionality and systemic nature
- Company management - response, management systems and implementation

Breaches are reviewed and assessed by the investment team and followed by engagement with company management. Persistent or systematic breaches may lead to disinvestment by the Fund.

Data sources and processing

The data sources that are used to monitor the environmental & social characteristics of the fund are from both third party research providers and from direct engagement with investee companies. The third party data providers include but are not limited to: Sustainalytics, ISS, Reprisk and MSCI. These data services are used to inform and supplement the data gathered directly from investee companies in the fund.

Prior to procurement, data vendor services are assessed for coverage, accuracy and timeliness by FSI's ESG Impacts Committee, which is managed by FSI's Responsible Investment team. Once procured, Investment managers will report back to the data vendors where they believe information is inaccurate.

The data is processed by the RI team and made available to the investment teams and the Global Investment Committee.

The investment manager will use information sourced directly from investee companies where there are gaps in the vendors data.

Limitations to methodologies and data

Limitations to the data provided from third parties will stem from their coverage and methodologies and from limited disclosures by issuer companies. Where data is not available, third party providers may use estimation models or proxy indicators. Methodologies used by data providers may include an element of subjectivity. Whilst data is collected on an ongoing basis, in this rapidly evolving environment, data can become outdated within a short time period.

The attainment of the social and environmental characteristics is not wholly dependent on third party data considering the limitations and is informed by direct engagement with investee companies where there are such data gaps.

Due diligence

Internal
Thorough due diligence is carried out on the underlying assets of the financial product by the team's analysts and portfolio managers. We conduct extensive research on a number of fronts, including:

- company reports and financial filings
- meetings with company management and asset tours
- meetings with competitors, suppliers, customers, regulators, government officials and industry bodies
- building detailed financial models on each company covered, and
- comparing and contrasting key financial indicators of each company with its competitors.

The investment team believes the most important source of research is internally generated through regular meetings with senior management and other stakeholders including suppliers, competitors, regulators and industry bodies.

Given the investment experience across the team, companies and markets are understood intimately and the team believes that it is best positioned to form a view on the companies in the opportunity set, including their approach to ESG and the materiality of ESG issues. To supplement the team's own research, various external research services are employed such as those provided by:

- Government research studies
- industry studies
- ESG research providers, and
- broker research reports.

Stock coverage is split by sector to maximise the team's specialist knowledge and to identify global best practice. Given the experience and stability of the team, every sector has been covered by more than one analyst, providing an effective back-up framework. Team members are encouraged to contribute views on all stocks, not just those under direct coverage, and all stock calls are openly debated. Ultimate investment responsibility rests with Peter Meany as head of the team.

External
The team's internal due diligence is supported by a range of controls that operate independently from the investment team.

First, the Investment Compliance team, which sits within the company's broader Risk Management & Compliance team, maintains an independent check to ensure compliance with all portfolio construction parameters, whether they are imposed by regulation, client or internal in-house limits. Relevant in-house limits include a ban on investing in companies that have been identified as having any involvement in nuclear weapons manufacturing; as well as companies involved in the production of tobacco or tobacco-adjacent products such as e-cigarettes and vaping devices. The Investment Compliance team is responsible for monitoring funds against limits, and for escalating any breaches to the portfolio managers and the Head of Global Listed Infrastructure strategy.

In addition, the Investment Product Research & Assurance (IPRA) team is responsible for monitoring investment portfolios to ensure consistency with their stated investment style and process. They review and interpret risk and performance reports prepared by the Performance teams, and are responsible for implementing stress testing and liquidity monitoring on funds, where appropriate. The IPRA team provides an independent challenge to the fund management teams and Global Head of Investment Management. They also provide reporting and commentary on performance and risk to the Global Investment Committee and regional Committees and Boards.

Engagement policies

First Sentier Investors' (FSI) Responsible Investment & Stewardship Policy and Principles sets out the standard of engagement practices for all of FSI's investment teams. The policy also sets out FSI's approach to controversial sustainability- related activities.

Engaging in an active dialogue with investee companies or entities is an important activity as it provides a key opportunity to improve our understanding of their business, and to monitor material business issues including strategy, capital allocation and financials as well as their approach to environmental, social and governance matters, and enables us to influence them to improve these practices.

The breadth, depth and frequency of engagement will vary significantly based on a variety of factors including the risks and opportunities faced by the company, the opportunity and willingness to engage by the company, and the size or nature of the investment.

The policy can be found at www.firstsentierinvestors.com

Designated reference benchmark

Not applicable

5. RQI Investors financial products

Name	LEI
Financial market participant(s)	
First Sentier Investors Global Umbrella Fund plc	n/a
First Sentier Investors International IM Limited[2]	549300CCC4Z8M05T6N95
Financial product(s)	
RQI Global All Country Value Fund	Unlaunched

Summary

The Investment Manager believes that higher carbon intensity is a source of market risk (increased costs/decreased revenues for companies) and of regulatory risk (potential for policies such as carbon pricing, carbon border tariffs, and stricter regulatory standards).

The Fund does not have a commitment to achieving specific, non-financial outcomes, however, to measure the progress towards the environmental and social characteristics that are promoted, the Investment Manager uses measurements of Scope 1 and Scope 2 greenhouse gas emissions. Social indicators used relate to involvement in the tobacco and controversial weapons industries.

The Fund aims to have a positive influence on investee companies through engagement and actively exercising its voting rights.

The Fund does not review and consider principal adverse impacts on all investments.

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 financial product

The environmental characteristics promoted by the Fund are:

- reductions in carbon intensity as measured by total scope 1 and 2 carbon/sales.

The social characteristics promoted by the Fund are:

- exclusions of certain activities with adverse social impacts such as tobacco and controversial weapons

Investment Strategy

The Investment Manager seeks to produce risk-adjusted returns. A quantitative (or systematic) strategy is utilised, whilst incorporating the Investment Manager's awareness of Environmental, Social and Governance ("ESG") issues. The quantitative strategy constructs a core portfolio to which a diverse range of Signals assessed against short, medium and long-term time horizons are applied, along with ESG screens and a carbon intensity overlay.

The investment process selects a liquid universe of stocks across developed and emerging markets. Only stocks issued in countries of the MSCI All Country World Index are included.

Following the creation of the investment universe, an initial core portfolio is formed by ranking the universe by accounting measures of company size. The four accounting measures used to establish the core portfolio weightings are:

- Sales/Adjusted Sales: Company sales averaged over the prior five years (adjusted for cost of goods sold)
- Cash flow: Company operating cash flows averaged over the prior five years.
- Adjusted Book Value: Company book value adjusted for intangible assets by capitalising research and development and marketing costs.
- Dividends: Total dividend distributions averaged over the prior five years, including special dividends paid in cash.

These four metrics are weighted equally to calculate a company's core portfolio weight. Five years of data is used to capture the sales, cash flow and dividends over time. As a result, the core portfolio has a tilt towards value companies (i.e. those with a lower market price relative to their accounting measures) compared to a capitalisation-weighted index.

The Investment Manager believes that markets are not perfectly efficient, meaning that there may be mispricing of companies. As a result of this mispricing, the Investment Manager applies a mathematical model-based approach to identify mispriced companies. To determine the weight of a position selected for the portfolio, the Investment Manager considers Value Signals (cheap companies may outperform expensive stocks), Momentum Signals (companies with strong price momentum may outperform companies with low price momentum) and Quality Signals (low quality companies may underperform. The Investment Manager believes that acting on the above Signals can potentially lead to returns above that of the market over a long time horizon.

Key ESG factors are embedded across the strategy, informing the Investment Manager's investment views, the risks of those views, and the final positions taken in the portfolio. The portfolio is constructed to align with the characteristics promoted by the Investment Manager relating to reductions in carbon intensity, and a negative screen applied on stocks involved in controversial munitions, and the tobacco industry. This takes the form of:

i. ESG Signals: As noted above, and in addition to the other mispricing Signals, the ESG Signals considered by the Investment Manager will include the following:
   a) Within its scoring of management quality, the Investment Manager incorporates a governance metric comprising a proprietary selection of the most material governance indicators;
   b) Carbon intensity is measured (Scope 1 and Scope 2 CO2-equivalent emissions in tonnes per million dollars of sales) and change in carbon intensity is used as an indicator of a company's productivity via their management of variable inputs;
   c) Monitoring of the reputational risk of the company by looking at ESG incidents that have occurred. The Investment Manager believes that companies with severe ESG incidents in the prior two years entail higher ESG risk and may underperform due to the high management, legal and opportunity cost of mitigation; and
   d) Gender diversity across both board and management, as empirical research by the Investment Manager demonstrates that more diverse teams result in greater profitability to a company.

Each stock is scored against each Signal and the score will impact the final weight of the stock within the portfolio.

ii. ESG screens and exclusions: The Investment Manager strictly excludes a) companies whose primary business is the manufacture of tobacco products and b) companies involved in the manufacture of certain types of controversial weapons (anti-personnel mines, cluster weapons, biological and chemical weapons, depleted uranium, certain nuclear weapons and white phosphorus munitions);

iii. Carbon intensity reduction: The Investment Manager considered a model portfolio of the Fund's strategy as at 30 June 2020 and the carbon intensity of that model portfolio set the "Carbon Baseline". The Fund will seek to maintain a maximum carbon intensity equal to (i) 70% of the Carbon Baseline by 31 December 2025 and (ii) 50% of the Carbon Baseline by 31 December 2030, in each case by reducing (including to zero) exposure to companies with relatively higher carbon intensity.

In determining the final composition of the portfolio, the Investment Manager considers the Signal score assigned to each stock, a risk model, the ESG screens and exclusions and the carbon intensity reduction targets (each as described above) and trading costs. These are combined using an optimisation process that seeks to maximise exposure to the Signals whilst maintaining risk tolerances, minimising trading costs and satisfying all exclusions and constraints. The aim of doing so is to achieve a portfolio that transfers the greatest extent of the mispricing Signals into the final portfolio.
The Investment Manager will engage with companies where the Investment Manager is of the view

that the investee company is not making sufficient progress on the environmental and social characteristics promoted by the Fund.

All of FSI's investment teams assess corporate governance practices in line with the relevant policies and guidelines. Examples are:

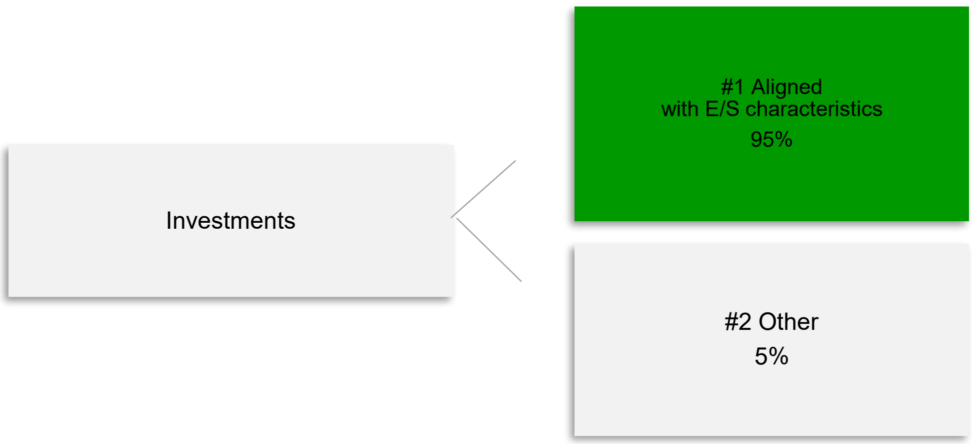
Board assessment – there should be a transparent procedure for the appointment of new directors to a board. We expect that companies are able to demonstrate diversity of gender, age, ethnicity, sexuality and thought across their organisation and at board level.

Ownership and shareholder rights - in general, we will not support resolutions that propose: changes to the corporate structure that curtail shareholder rights; or changes to the capital structure that could dilute shareholders' voting and/or economic rights.

Remuneration - we expect remuneration structures to be simple, long-term oriented, aligned with shareholder value/return, to encourage responsible risk taking and to the extent relevant embrace broader notions of 'success'.

Proportion of investments

The Fund invests primarily (at least 95% of its Net Asset Value) in a diverse portfolio of equity securities or equity-related securities which are listed, traded or dealt in on any of the Regulated Markets which have stocks in the MSCI All Country World Index.



#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

Fund exclusions, such as those of tobacco and controversial weapons, are monitored by both RQI Investors and the broader FSI Investment Compliance team. RQI Investors employs the services of a number of third-party providers including CGI Glass Lewis, Ownership Matters, MSCI, ISS, RepRisk and Sustainalytics. We utilize these sources of data to determine companies that should be excluded due to involvement in tobacco or controversial weapons, as well as to determine carbon emissions metrics.

Realindex reports annually at the firm-level in the Responsible Investment report.

Methodologies

RQI Investors employs the services of a number of third-party providers including CGI Glass Lewis, Ownership Matters, MSCI, ISS, RepRisk and Sustainalytics. We utilize these sources of data to determine companies that should be excluded due to involvement in tobacco or controversial weapons, as well as to determine carbon emissions metrics.

The Fund tracks and measures the following:

- Total scope 1 and scope 2 emissions divided by company sales
- Having zero companies involved in the production of tobacco products, or the development of cluster munitions, anti-personnel mines, small arms, biological weapons, chemical weapons or uranium munitions

Data sources and processing

Data sources are used to monitor the environmental & social characteristics of the fund. The third party data providers include but are not limited to: CGI Glass Lewis, Ownership Matters, Sustainalytics, ISS, Reprisk and MSCI.

Prior to procurement, data vendor services are assessed for coverage, accuracy and timeliness by FSI's ESG Impacts Committee, which is managed by FSI's Responsible Investment team. Once procured, Investment managers may report back to the data vendors where they believe information is inaccurate.

Limitations to methodologies and data

Limitations to the data provided from third parties will stem from their coverage and methodologies and from limited disclosures by issuer companies. Where data is not available, third party providers may use estimation models or proxy indicators. Methodologies used by data providers may include an element of subjectivity. Whilst data is collected on an ongoing basis, in this rapidly evolving environment, data can become outdated within a short time period.

Due diligence

Robust governance structures exist to monitor adherence and progress in relation to the successful implementation of ESG considerations. This governance structure includes the Responsible Investment Steering Group, which is chaired by the CEO of FSI, and the ESG Committee, where each investment team's RI representative sits.

The Responsible Investment (RI) team works with RQI Investors in order to support RQI Investors' commitment to integrating ESG issues into investment decision-making and ownership practices. The RI team sources relevant research, helps to refine processes, coordinates collaborative engagements and provides advice on technical issues. Overall responsibility for ESG integration, however, lies with RQI Investors.

Engagement policies

First Sentier Investors' (FSI) Responsible Investment & Stewardship Policy and Principles sets out the standard of engagement practices for all of FSI's investment teams. The policy also sets out FSI's approach to controversial sustainability- related activities.

Engaging in an active dialogue with investee companies or entities is an important activity as it provides a key opportunity to improve our understanding of their business, and to monitor material business issues especially their approach to environmental, social and governance matters, and enables us to influence them to improve these practices.

The policy can be found at www.firstsentierinvestors.com

RQI Investors separately has its own Corporate Governance and Proxy Voting Policy. It can be found at: https://www.firstsentierinvestors.com.au/au/en/institutional/our-funds/realindex-investments.html

RQI Investors have put in place processes to regularly engage with a few select larger holdings in our portfolios across a multi-year time frame. This engagement focuses on ESG issues including modern slavery, diversity and climate change. This is over and above where there may be stock specific material or contentious ESG issues.

Designated reference benchmark

Not applicable

Name	LEI
Financial market participant(s)	
First Sentier Investors Global Umbrella Fund plc	n/a
First Sentier Investors International IM Limited[2]	549300CCC4Z8M05T6N95
Financial product(s)	
RQI Global All Country Diversified Alpha Fund	2549000SCT1EHSSKVD75

Summary

The Investment Manager believes that higher carbon intensity is a source of market risk (increased costs/decreased revenues for companies, stranded asset risk in respect of companies with high exposure to fossil fuel reserves), of regulatory risk (potential for policies such as carbon pricing, carbon border tariffs, and stricter regulatory standards), and of reputational risk (companies involved in controversial energy extraction methods),

The Fund does not have a commitment to achieving specific, non-financial outcomes, however, to measure the progress towards the environmental and social characteristics that are promoted, the Investment Manager uses measurements of Scope 1 and Scope 2 greenhouse gas emissions, thermal coal revenues and power generation, and oil sands mining extraction. Social indicators used relate to involvement in the tobacco and controversial weapons industries, and having no systemic breaches of the United Nations Global Compact.

The Fund aims to have a positive influence on investee companies through engagement and actively exercising its voting rights.

The Fund does not review and consider principal adverse impacts on all investments.

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 financial product

The environmental characteristics promoted by the Fund are:

- Reductions in carbon intensity as measured by total scope 1 and scope 2 carbon/sales;
- Fossil fuel exposure as measured by thermal coal revenues and power generation;

- Oil sands exposure as measured by oil sands mining extraction

The social characteristics promoted by the Fund are:

- Exclusions of certain activities with adverse social impacts such as tobacco, controversial weapons, and severe and persistent UNGC violators.

Investment Strategy

The Investment Manager seeks to produce risk-adjusted returns and aims to outperform the MSCI All Country World Index. A quantitative (or systematic) strategy is utilised, whilst incorporating the Investment Manager's awareness of Environmental, Social and Governance ("ESG") issues. The quantitative strategy utilises a diverse range of Signals assessed against short, medium and long-term time horizons, along with ESG screens and a carbon intensity overlay.

The Investment Manager believes that markets are not perfectly efficient, meaning that there may be mispricing of companies. As a result of this mispricing, the Investment Manager applies a mathematical model-based approach to identify mispriced companies. To determine the weight of a position selected for the portfolio, the Investment Manager considers Value Signals (cheap companies may outperform expensive stocks), Momentum Signals (companies with strong price momentum may outperform companies with low price momentum) and Quality Signals (low quality companies may underperform).

The Investment Manager believes that acting on the above Signals can potentially lead to returns above that of the market over a long term time horizon.

Key ESG factors are embedded across the strategy, informing the Investment Manager's investment views, the risks of those views, and the final positions taken in the portfolio. The portfolio is constructed to align with the characteristics promoted by the Investment Manager relating to reductions in carbon intensity, thermal coal and oil sands exposures, and a negative screen applied on stocks involved in controversial munitions, the tobacco industry, and severe and persistent violators of the UN Global Compact. This takes the form of:

i. ESG Signals: As noted above, and in addition to the other mispricing Signals, the ESG Signals considered by the Investment Manager will include the following:
   a) Within its scoring of management quality, the Investment Manager incorporates a governance metric comprising a proprietary selection of the most material governance indicators;
   b) Carbon intensity is measured (Scope 1 and Scope 2 CO2-equivalent emissions in tonnes per million dollars of sales) and change in carbon intensity is used as an indicator of a company's productivity via their management of variable inputs;
   c) Monitoring of the reputational risk of the company by looking at ESG incidents that have occurred. The Investment Manager believes that companies with severe ESG incidents in the prior two years entail higher ESG risk and may underperform due to the high management, legal and opportunity cost of mitigation; and
   d) Gender diversity across both board and management, as empirical research by the

Investment Manager demonstrates that more diverse teams result in greater profitability to a company.

e) Each stock is scored against each Signal and the score will impact the final weight of the stock within the portfolio.

ii. ESG screens and exclusions: The Investment Manager excludes (a) companies whose primary business is the manufacture of tobacco products, (b) companies involved in the manufacture of certain types of controversial weapons (anti-personnel mines, cluster weapons, biological and chemical weapons, depleted uranium, certain nuclear weapons and white phosphorus munitions) (c) all severe and persistent violators of the UN Global Compact and (d) companies whose revenue from thermal coal production exceeds 10% of its overall revenue, or whose power generation from thermal coal production exceeds 10% of its overall power generation capacity, and e) companies whose oil sands extraction exceeds 10% of its overall mining/extraction.

iii. Carbon intensity reduction: The Fund will seek to maintain a maximum carbon intensity equal to 80% of the Benchmark's carbon intensity, by reducing (including to zero) exposure to companies with relatively higher carbon intensity.

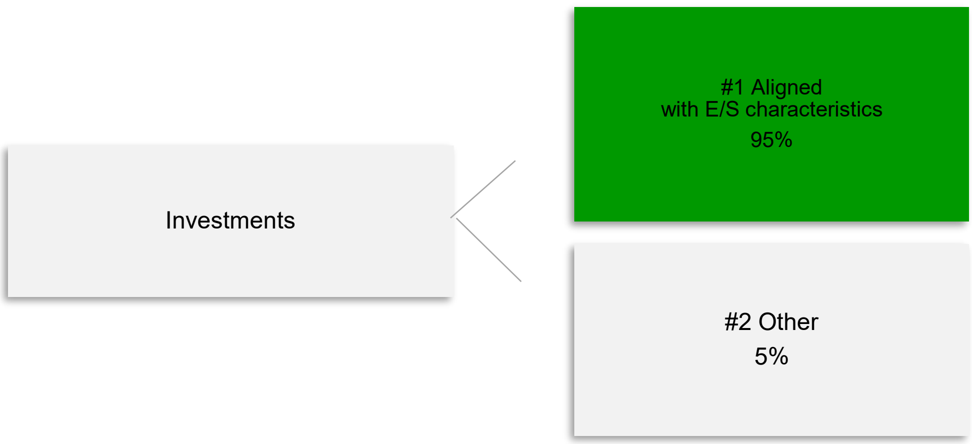
iv. In determining the final composition of the portfolio, the Investment Manager considers a number of different factors including the Signal score assigned to each stock, a risk model, the ESG screens and exclusions, the carbon intensity reduction targets (each as described above) and trading costs. These are combined using an optimisation process that seeks to maximise exposure to the Signals whilst maintaining risk tolerances, minimising trading costs and satisfying all exclusions and constraints. The aim of doing so is to achieve a portfolio that transfers the greatest extent of the mispricing Signals into the final portfolio.

The Investment Manager will engage with companies where the Investment Manager is of the view that the investee company is not making sufficient progress on the environmental and social characteristics promoted by the Fund.

All of FSI's investment teams assess corporate governance practices in line with the relevant policies and guidelines. Examples are:
Board assessment – there should be a transparent procedure for the appointment of new directors to a board. We expect that companies are able to demonstrate diversity of gender, age, ethnicity, sexuality and thought across their organisation and at board level.
Ownership and shareholder rights - in general, we will not support resolutions that propose: changes to the corporate structure that curtail shareholder rights; or changes to the capital structure that could dilute shareholders' voting and/or economic rights.
Remuneration - we expect remuneration structures to be simple, long-term oriented, aligned with shareholder value/return, to encourage responsible risk taking and to the extent relevant embrace broader notions of 'success'.

Proportion of investments

The Fund invests primarily (at least 95%) of its Net Asset Value in a diverse portfolio of equity securities or equity-related securities which form part of the MSCI All Country World Index.



#1 Aligned with E/S characteristics include 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

Fund exclusions are monitored by both RQI Investors and the broader FSI Investment Compliance team. RQI Investors employs the services of a number of a number of third-party providers including CGI Glass Lewis, Ownership Matters, MSCI, ISS, RepRisk and Sustainalytics. We utilize these sources of data to determine companies that should be excluded due to involvement in tobacco or controversial weapons, coal, oil sands, UNGC Violators, as well as to determine carbon emissions metrics.

RQI Investors reports annually at the firm-level in the Responsible Investment report.

Methodologies

RQI Investors employs the services of a number of third-party providers including CGI Glass Lewis, Ownership Matters, MSCI, ISS, RepRisk and Sustainalytics. We utilize these sources of data to determine companies that should be excluded due to involvement in specific industries, as well as to determine carbon emissions metrics.

The Fund tracks and measures the following:

- Total scope 1 and scope 2 emissions divided by company sales
- Company thermal coal revenues and power generation, as a proportion of Company overall revenue and power generation

- Company oil sands extraction, as a proportion of Company overall mining/extraction
- Having zero companies involved in the production of tobacco products, or the development of cluster munitions, anti-personnel mines, small arms, biological weapons, chemical weapons or uranium munitions
- Having zero companies that systematically violate the United Nations Global Compact as deemed non-compliant with global standards per our data vendors.

Data sources and processing

Data sources are used to monitor the environmental & social characteristics of the fund. The third party data providers include but are not limited to: CGI Glass Lewis, Ownership Matters, Sustainalytics, ISS, Reprisk and MSCI.

Prior to procurement, data vendor services are assessed for coverage, accuracy and timeliness by FSI's ESG Impacts Committee, which is managed by FSI's Responsible Investment team. Once procured, Investment managers may report back to the data vendors where they believe information is inaccurate.

Limitations to methodologies and data

Limitations to the data provided from third parties will stem from their coverage and methodologies and from limited disclosures by issuer companies. Where data is not available, third party providers may use estimation models or proxy indicators. Methodologies used by data providers may include an element of subjectivity. Whilst data is collected on an ongoing basis, in this rapidly evolving environment, data can become outdated within a short time period.

Due Diligence

Robust governance structures exist to monitor adherence and progress in relation to the successful implementation of ESG considerations. This governance structure includes the Responsible Investment Steering Group, which is chaired by the CEO of FSI, and the ESG Committee, where each investment team's RI representative sits.

The Responsible Investment (RI) team works with Realindex in order to support RQI Investors' commitment to integrating ESG issues into investment decision-making and ownership practices. The RI team sources relevant research, helps to refine processes, coordinates collaborative engagements and provides advice on technical issues. Overall responsibility for ESG integration, however, lies with RQI Investors.

Engagement policies

First Sentier Investors' (FSI) Responsible Investment & Stewardship Policy and Principles sets out the standard of engagement practices for all of FSI's investment teams. The policy also sets out FSI's approach to controversial sustainability- related activities.

Engaging in an active dialogue with investee companies or entities is an important activity as it provides a key opportunity to improve our understanding of their business, and to monitor material business issues especially their approach to environmental, social and governance matters, and enables us to influence them to improve these practices.

The policy can be found at www.firstsentierinvestors.com

RQI Investors separately has its own Corporate Governance and Proxy Voting Policy. It can be found at: https://www.firstsentierinvestors.com.au/au/en/institutional/our-funds/realindex-investments.html

RQI Investors have put in place processes to regularly engage with a few select larger holdings in our portfolios across a multi-year time frame. This engagement focuses on ESG issues including modern slavery, diversity and climate change. This is over and above where there may be stock specific material or contentious ESG issues.

Designated reference benchmark

Not applicable

Schedule 2: disclosures relating to Article 9 financial products pursuant to Article 10 SFDR

6. Stewart Investors - financial products

Name	LEI
Financial market participant(s)	
First Sentier Investors Global Umbrella Fund plc	n/a
First Sentier Investors International IM Limited[3]	549300CCC4Z8M05T6N95
Financial product(s)	
Stewart Investors Asia Pacific and Japan Sustainability Fund	549300G4DULVSULOBZ21
Stewart Investors Asia Pacific Leaders Sustainability Fund	549300VKJEPJT5Q4V960
Stewart Investors Asia Pacific Sustainability Fund	549300BZRT184DKU8I49
Stewart Investors European Sustainability Fund	254900AC9R2R60MRRP06
Stewart Investors Global Emerging Markets Ex-China Leaders Sustainability Fund	25490012JPCPAREL2Q93
Stewart Investors Global Emerging Markets Leaders Fund	549300YYD8Q6QBFGS653
Stewart Investors Global Emerging Markets Sustainability Fund	549300V44ENSGLMQBN36
Stewart Investors Indian Subcontinent Sustainability Fund	549300KV9RVYY1I3UF70
Stewart Investors Worldwide Leaders Sustainability Fund	5493003C0PDCQZH4VL30
Stewart Investors Worldwide Sustainability Fund	549300CUQ1MDVG6JSB91

Summary

The Stewart Investors (Investment Manager) Article 9 Funds have an investment objective which seeks to achieve long-term capital appreciation. In addition they have a sustainable objective to invest in companies which both contribute to, and benefit from, sustainable development, achieving positive social and environmental outcomes. All investee companies contribute to improving human development, while many also contribute to positive environmental outcomes.

This document outlines the Investment Manager's approach to meeting the Funds sustainable investment objective through rigorous bottom-up research, company engagement, adherence to their position statement on harmful and controversial products and services, group-wide exclusion policies and third-party research providers. The document also provides detail on the how the Funds sustainability objectives and outcomes are monitored and assessed, and it also details how the Investment Manager is committed to providing full transparency on investee companies, and the contribution these companies are making to sustainable development.

No significant harm to the sustainable investment objective

The Funds only invest in companies which both contribute to, and benefit from, sustainable development achieving positive social and environmental outcomes. All investee companies contribute to improving human development, and may also contribute to positive environmental outcomes.

Each Fund's exposure to harmful or controversial products, services or practices is monitored on at least a quarterly basis. For harmful products and services which are revenue-generating, the Investment Manager applies a 5% revenue threshold. In other areas where harmful or controversial activities are not attributable to revenue (for example, employee or supply chain issues) the Investment Manager uses internal analysis and research from external providers to monitor and assess companies

Where any material exposure to these harmful activities is found, the Investment Manager will:

- review the company research and investment case, noting the response where they believe it is adequate,
- engage with the company where they require further information or wish to encourage improved practices and an appropriate resolution of the issues,
- exit the Fund's position in the company where engagement has been unsuccessful, or where part of a pattern of behaviour raises concerns regarding the quality and integrity of the company's management. If an investment is held in a company that has material exposure to harmful products and services, this will be disclosed on the Stewart Investors website, and the reasons for the exception and for maintaining the holding explained. Exceptions may occur if a company is winding down a legacy commercial activity (in which case the company will be engaged and encouraged to cease the commercial activity concerned), or where the company is not increasing capital expenditure or if a company is only indirectly exposed to a harmful industry or activity, for example, a company making safety products for a wide range of industries may also have customers in the fossil fuel or defence industries.

The Investment Manager's position on harmful and controversial products and services and investment exclusions is available on the Stewart Investors website:
https://www.stewartinvestors.com/all/insights/our-position-on-harmful-and-controversial-products-and-services.html

Adverse impact indicators, relevant to each Fund investee company, are taken into account through the Investment Manager's bottom-up research, company engagement, adherence to their position statement on harmful and controversial products and services, Group-wide exclusion policies and third-party research providers.

The Investment Manager meets and liaises with companies on an on-going basis and is continuously assessing their sustainability credentials and quality. Where the Investment Manager has identified changes to company quality or sustainability positioning through either meetings, ongoing monitoring or reviewing their annual reports, the Investment Manager will re-evaluate the investment case.

In addition, Fund portfolios are assessed on an ongoing basis by external service providers including controversy monitoring, product involvement, carbon footprints and other impact measures, and breaches of social norms.

The Principle Adverse Sustainability Indicators (as prescribed under the SFDR) are incorporated into the Investment Manager's company analysis, team discussion and engagement programme. Every investment in the portfolio must do no significant harm, based on the adverse impact indicator assessment. It is possible that an investee company does no significant harm but still has some adverse sustainability impacts. In those cases, the Investment Manager shall engage with the company either directly or as part of collaborations with other investment institutions.

Depending on the nature of the issue and the response by the company, the Investment Manager's actions can range from:

- reviewing the company research and investment case, noting the response where they believe it is adequate,
- engaging with the company where they require further information or wish to encourage improved practices and an appropriate resolution of the issues,
- where engagement has been unsuccessful or where the harmful activities are part of a pattern of behaviour that raises concerns regarding the quality and integrity of the company's management, the Investment Manager will not invest or will exit the Funds' position in the company in an orderly manner having regard to the best interest of investors (as applicable).

Additionally, the Investment Manager will also include product level data on PAI indicators in each Funds SFDR periodic report.

The Investment Manager continually monitors the companies owned to understand any changes to their strategies. Each Fund portfolio is assessed quarterly by an external service provider for compliance with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights, UN global norms and exposure to high-risk sectors. The Investment Manager also receives regular updates from a controversy monitoring service. Where issues are raised by these services, the Investment Manager will review and consider as part of the investment analysis and depending on the detail may engage with the company in question, and if necessary will divest to ensure the portfolio continues to meet the principles which sit at the heart of the investment philosophy.

Sustainable investment objective of the financial product

For each Fund, the Investment Manager will invest primarily (at least 90% of Net Asset Value) in companies that both contribute to, and benefit from, sustainable development, achieving positive social and environmental sustainable outcomes. All investee companies contribute to improving human development, while many also contribute to positive environmental outcomes.

The contribution of investments to the social and environmental outcomes are assessed by reference to two framework indicators – the Investment Manager's human development pillars and Project Drawdown[1] climate change solutions.

Positive social outcomes

The Investment Manager assesses positive social outcomes by reference to the below human development pillars. Stewart Investors has developed these human development pillars by reference to, amongst other things, the UN Human Development Index.

- **Health and well-being** – improved access to and affordability of nutrition, health care, hygiene, water and sanitation
- **Physical infrastructure** – improved access to and affordability of energy and housing
- **Economic welfare** – safe employment offering a living wage and opportunities for advancement, access to finance and improved standards of living
- **Opportunity and empowerment** – improved access to and affordability of education and information technology

[1] Any reference to Project Drawdown is to describe the publicly available materials utilised by Stewart Investors in formulating its sustainability analysis. It is not intended to be, and should not be, read as constituting or implying that Project Drawdown has reviewed or otherwise endorsed the Stewart Investors sustainability assessment framework.

Positive environmental outcomes
The Investment Manager assesses positive environmental outcomes by reference to the climate solutions developed by Project Drawdown, a non-profit organisation that has mapped, measured and modelled over 90 different solutions that it believes will contribute to reaching 'drawdown', – i.e. the future point in time when levels of greenhouse gases in the atmosphere stop climbing and start to steadily decline.

Below is a list of the climate solution categories together with corresponding examples that the Investment Manager believes lead to positive environmental outcomes:

- **Food system** – sustainable farming, food production and the distribution of products and services

- **Energy** – adoption of renewable energy and other clean energy and related technologies

- **Circular** economy and industries – improved efficiency, reduced waste, and new business models for closing resource loops in linear value chains and production processes

- **Human development** – advancement of human rights and education that drive environmental conservation and sustainable use of resources

- **Transport** – efficient transport technologies and growth in fossil fuel-free transportation options

- **Buildings** – products and services which reduce the environmental footprint of the built environment, including energy efficiency, electrification, improved design, and use of alternative materials

- **Water** – less energy-intensive methods for treating, transporting and heating water

- **Conservation and restoration** – supporting deforestation-free and environmentally regenerative supply chains, operations and end-of-life impacts

There is no set weighting given to the quality indicators, human development pillars or climate solutions as part of the respective quality or sustainability assessments as the relevance of each factor will vary on a company-by-company basis according to the relevant company's business model, industry, and/or geography and, in some cases, a given factor may not be materially relevant and therefore may not be assessed in full.

In assessing whether a company "contributes to, and benefits from," sustainable development, the Investment Manager will consider whether:

- there is either a direct [2] or enabling [3] link between the activities of the company and the achievement of a positive social or environmental outcome;

- any contribution to positive social or environmental outcomes has resulted from revenue or growth drivers inherent in the company's business model, strategic initiatives that are backed by research and development or capital expenditure, or from the company's strong culture and sense of stewardship e.g. for equity and diversity; and

- the company recognises potential negative social or environmental outcomes associated with its

[2] A direct link would arise where the goods an entity produces or the services it provides are the primary means through which the positive social or environmental outcome can be achieved (e.g. solar panel manufacturers or installers).
[3] An enabling link would arise if the goods a company produces or services it provides enable other companies to contribute towards the achievement of the positive social or environmental outcome (e.g. manufacturers of critical components that are used as inputs in the manufacture of solar panels).

product or services and works towards minimising such outcomes, e.g. a company that sells affordable nutritious food products in plastic packaging, but is investigating alternative packaging options.

The Investment Manager documents and discloses its assessment and framework mapping of investee companies on its website:
https://www.stewartinvestors.com/all/how-we-invest/our-approach/portfolio-explorer

Investment strategy

The Investment Manager's investment strategy is founded on the principle of stewardship. Stewardship relates to the ability and desire of the owners and leaders of companies to make good long-term decisions on behalf of the businesses they run while effectively and ethically balancing the interest of all stakeholders. The Investment Manager takes a bottom-up (i.e. analysing individual companies rather than countries or sectors) and qualitative approach to finding and investing in companies which it believes are both of (a) good quality and (b) contribute to, and benefit from, sustainable development on the basis that its activities facilitate or encourage the realisation of positive social or environmental outcomes (described above).

The Investment Manager has a strong conviction that such companies face fewer risks and are better placed to deliver positive long-term, risk-adjusted returns (i.e. investment returns that take into account the associated risk taken in making them). The Investment Manager believes that this approach will help to preserve client capital in volatile and falling markets allowing for the steady compounding of returns through economic cycles.

The Investment Manager does not set quantitative thresholds for incorporating sustainability or ESG considerations, but rather evaluates a company's track record and business model against quality and sustainability frameworks and makes qualitative judgements.

The hallmarks of the investment strategy are an exclusive focus on companies that contribute to, and benefit from, sustainable development; a research-driven, fundamental, bottom-up approach to the selection and ongoing analysis of investments; a focus on the quality and sustainability attributes of every company; a focus on company stewardship and sound governance; a long-term investment horizon; and a commitment to engagement in order to address sustainability concerns and issues.

The Investment Manager assesses every company it is considering for investment in terms of its contribution to sustainable development, and will only invest in companies that are contributing positively to sustainable development. The Investment Manager does not set quantitative thresholds in these areas, but rather looks for evidence based on the company's track record, business model and by reference to credible sustainable development frameworks.

The Investment Manager undertakes analysis of corporate governance practices, both at a boardroom level and in operational execution, as an essential part of the investment philosophy, strategy and process – from idea generation and research through to position sizing and engagement. The analysis focuses on whether company culture, ownership and incentives combine to create a governance approach which balances the interests of all stakeholders – labour, the environment, suppliers, local communities, customers and shareholders.

Areas of focus may include but are not limited to, independence and diversity of Board directors, remuneration structures, staff turnover rates, management longevity, supplier terms like accounts payable days, capital allocation policies and practices, tax policies and practices, and whether companies behave in ways that are more than adequate for them to retain their social license to operate.

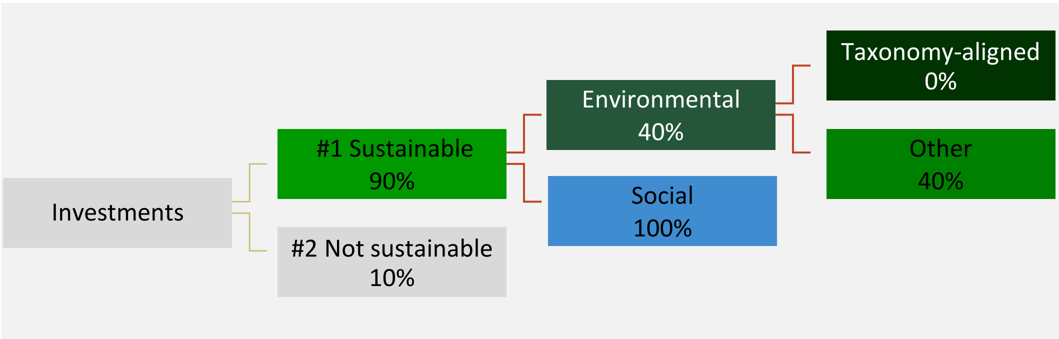
Alongside desk research, conversations and meetings take place with company owners, leaders and independent directors in order to build conviction in investee companies' governance practices. Bespoke and independent research is commissioned on sustainability topics – ranging from hazardous chemicals in paint production to conflict minerals in electronics supply chains – in order to understand how companies are living up to their social and environmental responsibilities.

Analysis performed quarterly by third-party data providers is used to assess and monitor whether investee companies comply with standards around governance best practice, global norms and controversies, and to gauge whether companies meet expectations in relation to governance.

Proportion of investments

The Funds invest primarily (at least 70% of its Net Asset Value) in a diversified portfolio of equity securities or equity-related securities of companies whose activities predominantly take place in the investment region described in the Prospectus and are listed, traded or dealt in on Regulated Markets.

The Funds invest primarily (at least 90% of its Net Asset Value) in companies which both contribute to, and benefit from, sustainable development.



#1 Sustainable covers sustainable investments with environmental or social objectives. These may be taxonomy aligned but not necessarily.

#2 Not sustainable includes investments which do not qualify as sustainable investments. These are typically cash or near cash instruments held pending investment, to meet liquidity requirements, or assets held in order to allow efficient operational exit of positions.

Monitoring of sustainable investment objective

The Investment Manager meets and liaises with companies on an on-going basis and is continuously assessing their sustainability credentials and quality. This is carried out via the Investment Manager's bottom-up research, company engagement, adherence to their position statement on harmful and controversial products and services, Group-wide exclusion policies and third-party research providers.

The contribution of investments to the social and environmental outcomes are assessed by reference to two framework indicators – the Investment Manager's human development pillars and Project Drawdown climate change solutions (described above).

Any exposure to harmful or controversial products, services or practices is monitored on at least a quarterly basis. For harmful products and services which are revenue-generating, the Investment Manager applies a 5% revenue threshold. In other areas where harmful or controversial activities are not attributable to revenue (for example, employee or supply chain issues) the Investment Manager uses internal analysis and research from external providers to monitor and assess companies.

Where any material exposure to these harmful activities is found, the Investment Manager will:

- review the company research and investment case, noting the response where they believe it is adequate,

- engage with the company where they require further information or wish to encourage improved practices and an appropriate resolution of the issues,

- exit the Fund's position in the company where engagement has been unsuccessful, or where part of a pattern of behaviour raises concerns regarding the quality and integrity of the company's management. If an investment is held in a company that has material exposure to harmful products and services, this will be disclosed on the Stewart Investors website, and the reasons for the exception and for maintaining the holding explained. Exceptions may occur if a company is winding down a legacy commercial activity (in which case the company will be engaged and encouraged to cease the commercial activity concerned), or where the company is not increasing capital expenditure or if a company is only indirectly exposed to a harmful industry or activity, for example, a company making safety products for a wide range of industries may also have customers in the fossil fuel or defence industries.

The Investment Manager's position on harmful and controversial products and services and investment exclusions is available on the Stewart Investors website –
https://www.stewartinvestors.com/all/insights/our-position-on-harmful-and-controversial-products-and-services.html

Methodologies

The Investment Manager seeks to identify and invest in companies which it believes has prospects of long-term positive financial returns and also contribute to, and benefit from, sustainable development. The Investment Manager considers that a company contributes to, and benefits from, sustainable development if its activities lead to positive social outcomes and may also contribute to positive environmental outcomes.

The contribution of Funds investments to the social and environmental outcomes are assessed by reference to two framework indicators – Stewart Investors' human development pillars and Project Drawdown's climate solutions (described above).

The Investment Manager documents and discloses its assessment and framework mapping of investee companies on the Portfolio Explorer tool on its website: https://www.stewartinvestors.com/all/how-we-invest/our-approach/portfolio-explorer.html
The Funds report on these indicators in the annual report and also on the Stewart Investors and First Sentier Investors website:https://www.stewartinvestors.com/ie/en/professional/how-we-invest/regulations-and- reports/fund-reporting.html

https://www.firstsentierinvestors.com/ie/en/professional-investor/performance/literature/sfdr-reporting.html

Data sources and processing

Companies can contribute in many different ways to a better future for people and planet. The Investment Manager has no proprietary models or 'black boxes' for assessing sustainable development, but as part of their rigorous bottom-up analysis they analyse as broad a range of quantitative and qualitative factors as possible. The Investment Manager avoids top-down scores or a focus on a handful of standardised indicators, which they believe are more often about operational efficiency than company impact. Instead, they focus on the diverse contributions each company is making.

As long-term investors, the investment team will evolve their understanding of a company and develop an investment case over multiple years in order to gather as much information and data about each company as possible. This also applies to existing holdings, where the investment team will evolve their view through ongoing research and engagement on risks and opportunities. Ongoing analysis involves desk-based research of qualitative and quantitative data, meeting management, competitors, suppliers etc. The team supplements proprietary research with third-party information. This can come from forensic accountants, macroeconomists, consultants, academics, and environmental groups, as well as more traditional analysts at investment banks. Engaging with company management on ESG issues is also an important factor and influences the level of conviction in each company. The Investment Manager also tenders research to universities, NGOs and other academic institutions to better understand complex sustainability/ESG issues. This research is often focused on a particular industry (semiconductor equipment and medical diagnostics have been recent examples) or a particular issue (e.g. palm oil and coffee supply chains, conflict minerals, smallholder farmers, lead content in paint in emerging markets and the deforestation risks within soy supply chains).

To assess the sustainable development contribution of companies, the team utilises frameworks, such as Project Drawdown for climate change solutions and their own human development pillars for key aspects of human development (developed from the UN Human Development Index). In addition, each company is mapped against the Sustainable Development Goals.

The flow of data and information about companies is continuous. Information is updated on an ongoing basis by the investment team by conducting in-depth research and writing detailed reports on companies. The team performs periodic review exercises on portfolio and focus list companies to ensure they continue to meet the investment case. These exercises are normally performed by a different analyst to the one who completed the original company report. Timing of gathering and updating company data and information is dependent on various factors such as the publication of company reports and results, investor presentations, meetings with companies and any external research subjects commissioned. The team meet and liaise with companies on an on-going basis and are continuously assessing their sustainability credentials and quality. Due to the wide range and timing of data sources and different level of disclosure from individual companies it is not possible to determine what proportion of the data used by the investment team is estimated.

In order to validate the investment team's own in-depth analysis of companies and to monitor adherence to their position statement on harmful and controversial products and services and Group-wide exclusion policies, the Investment Manager also receives regular notifications on company controversies from an external provider. They also review and include the Principal Adverse Sustainability Indicators (as prescribed under SFDR) in their company analysis.

The Investment Manager makes best efforts to ensure the data reported is accurate and reliable. This includes comparing different sources of information and using both internal and external analysis as described above. However, a significant number of companies do not disclose environmental or social metrics and targets or their disclosures are not consistent with widely adopted reporting standards such as the Greenhouse Gas Protocol in the case of climate measures. Where information is not available, the Investment Manager may use estimates from external providers such as ISS ESG in the case for climate data. Estimates require assumptions that do not match individual companies' circumstances in the real world. The Investment Manager discloses any such estimates used in reporting outputs.

The Investment Manager stores records of company research and engagements on research management and client management software. The Investment Manager publically discloses the investment rationale and sustainability positioning of each investee company on their Portfolio Explorer tool – https://www.stewartinvestors.com/all/how-we-invest/our-approach/portfolio-explorer.html - and updates the holdings on a quarterly basis.

Limitations to methodologies and data

The Investment Manager avoids top-down scores or a focus on a handful of standardised indicators, which they believe are more often about operational efficiency than company impact. Instead, they focus on the diverse contributions each company is making. Unfortunately, ESG data suffers from a multitude of flaws, and in their view, does not focus on the areas that matter. They believe that one of the main challenges is that ESG scoring methodologies tend to focus on how well companies manage their internal processes, rather than the real-world impacts of their products and services.

https://www.stewartinvestors.com/all/insights/sfg/the-problem-with-esg-scores.html

As bottom-up investors, the Investment Manager focuses on the environmental and social outcomes of each individual company. As each company is different, it is challenging to aggregate such outcomes into a single measure or standardised score which can make reporting more challenging. However, this does not impact the attainment of the sustainable investment objective. The company contributions reported by the Investment Manager are backed by evidence and collected by the investment team using their years of experience in sustainable investing. While the Investment Manager uses third-party services to assess and validate their own in-depth analysis of companies, they do not rely on third-party researchers to tell them what is sustainable. Instead, they carry out their own analysis and rigorously test it through company meetings, team discussions and specially commissioned research. The investment team then relate each contribution back to frameworks such as Project Drawdown climate change solutions and their own human development pillars adapted from the UN Human Development Index.

Due diligence

The investment team's culture is centered on the concepts of stewardship, long-termism and collaboration. The team acknowledges the privilege of managing others peoples' money and their Hippocratic Oath codifies their approach to stewardship, including a commitment to invest in a way which benefits society as a whole. Each team member must sign the Hippocratic Oath upon joining the firm.

https://www.stewartinvestors.com/all/sustainable-funds-group/how-we-invest/hippocratic-oath.html

As long-term investors, many Fund portfolio holdings have been held for years or decades. In order to refresh the investment team's analysis and identify any changes to the investment case, they undertake a significant amount of portfolio maintenance to ensure the investment case still holds.

Much of the ongoing portfolio maintenance is deliberately designed to be fluid, creative and flexible and may include company meetings, team discussions, annual report reviews and investment trips.

Where issues are more complex, the Investment Manager may commission their own research from experts in the field to better understand issues. In addition, every year they will revisit each holding to take a fresh look at the long-term valuation as well as highlighting any changes to the sustainability positioning and quality of the company.

Stewart Investors participates in, and is subject to, the governance arrangements of First Sentier Investors (FSI). FSI provides independent oversight and support. This includes the FSI Investment Product Research & Assurance function who report to the FSI Chief Risk Officer. The team are responsible for overseeing investment risks within all portfolios, including ESG risk. They review and interpret risk and performance reports, prepared by the FSI Performance teams, and are responsible for implementing stress testing and liquidity monitoring on portfolios, where appropriate. They also provide independent challenge to the investment team and provide reporting and commentary on performance and risk into the FSI Global Investment Committee and regional Committees and Boards. The investment team attends regular risk assurance review meetings which include representatives from risk assurance and performance reporting.

Engagement policies

No company is perfect and engagement and voting are key responsibilities for the Investment Manager as long-term shareholders. They believe that engagement is a means to mitigate business risks, protect against potential headwinds and improve sustainability outcomes.

Different forms of engagement:

All engagement starts with bottom-up analysis, with responsibility shared across the investment team.

Bottom-up	• Driven by company analysis and monitoring • Seeks to build positive long-term company relationships • Negative responses can lead to divestment
Thematic	• Cross-cutting issues identified through team discussion • Often supported by commissioned research • Never generic, issues relate back to company circumstances

Collaborative
- Systemic issues which are relevant for investee companies
- Includes companies outside fund portfolios
- Take both lead and supporting roles

Engagement is fully integrated into the responsibilities of the investment team and contributes invaluable insights into their understanding of each company. Direct contact with management also allows the team to influence the ESG performance of companies via discussions with management or the board of directors and through the exercising of proxy votes. The Investment Manager seeks to engage in a manner appropriate to each individual circumstance; and where such engagement does not produce the desired result, to consider other forms of engagement.

Investee companies are usually responsive to engagement, therefore, divestment as a result of a failed engagement is rare and is seen as a last resort. However, should one of the external service providers used by the Investment Manager to monitor harmful products and services raise an issue with any investee companies, they would investigate. If it is legitimate and engagement is unsuccessful the team will divest.

More information on the approach and the policy is available on the Investment Manager's website:

https://www.stewartinvestors.com/all/how-we-invest/sustainable-investing/engagement.html

https://www.stewartinvestors.com/content/dam/stewartinvestors/pdf/global/si-corporate-engagement-policy.pdf

Attainment of the sustainable investment objective

The most recent reporting on the sustainable objective and company alignment with social and environmental outcomes are available in Annex III reporting available in the Fund's Annual Financial Statement. The Investment Manager also includes Fund level PAI data, proxy voting and engagement reporting as part of this report.

https://www.firstsentierinvestors.com/content/dam/web/fsi/assets/global/annual-reports/first-sentier-investors-global-umbrella-fund-annual-report-global-english.pdf

An extraction of the reporting for the Stewart Investors Funds is also available in a standalone document - https://www.stewartinvestors.com/content/dam/web/fsi/assets/emea/policies/sfdr/SI-SFDR-periodic-disclosures-article-9-reporting.pdf

The Funds also report on social and environmental outcomes on the Stewart Investors and First Sentier Investors website:

https://www.stewartinvestors.com/ie/en/professional/how-we-invest/regulations-and-reports/fund-reporting.html

https://www.firstsentierinvestors.com/ie/en/professional-investor/performance/literature/sfdr-reporting.html

Name	LEI
Financial market participant(s)	
First Sentier Investors Global Umbrella Fund plc	n/a
Financial product(s)	
First Sentier Global Credit Sustainable Climate Fund	549300KPBVX3HYQZYB45

Summary

The Fund invests primarily in a diversified portfolio of global credit securities which are listed, traded or dealt in Regulated Markets worldwide that seek to make a positive contribution to address climate change in the manner described below.

The Fund's strategy is to earn an income and capital returns from its investments, controlling risk through careful security selection and monitoring, combined with broad diversification. The increased credit risk of credit securities compared to government debt means that these investments have the potential to deliver higher returns over the medium term compared to cash.

The Investment Manager seeks investments that have the potential to contribute positively to a positive climate change outcome in accordance with achieving the long term global warming objectives of the Paris Agreement, across three different categories, namely credit securities (a) that have emission reduction plans at a company level which align with the goals of the Paris Agreement; or (b) that are securities specifically linked to an activity or project of a company which is aligned with the goals of the Paris Agreement; or (c) issued by companies whose activities or products are necessary for society to meet the global warming objectives of the Paris Agreement.

The Investment Manager of the Fund does review and consider principal adverse impacts on all investments.

Sustainable investment objective of the financial product

The Fund aims to achieve a total investment return from income and capital appreciation, while seeking additionally to make a positive contribution to a positive climate change outcome in accordance with achieving the long-term global warming objectives of the Paris Agreement.

Environmental or social characteristics of the financial product

To determine a company's overall assigned ESG sustainability risk rating, the Investment Manager may consider, but is not necessarily limited to, the following key factors:

- Environmental: Level of GHG emissions, resilience to climate change, efforts to reduce GHG emissions, as well as waste management, water intensity and energy efficiency, relevant principal adverse indicators.

The above exclusions do not apply to: (i) investments in entities with minority investments (i.e. < 50%) in other entities or joint ventures that are involved in the above sectors; or (ii) underlying investments of any securitised debt instruments that are invested in due to nature of their structures.

- Social: Modern slavery, human capital management, safeguarding of human rights through the organisation and its supply chain, and engagement with local communities.
- Governance: Presence or absence of strong governance structures (such as an independent Board, separate Chairman and CEO roles, independent audit and remuneration committees), a company's approach and track record in business ethics, and whether there is strong oversight and accountability in managing its ESG issues.

Investment strategy

The Investment Manager seeks investments that have the potential to contribute positively to a positive climate change outcome in accordance with achieving the long term global warming objectives of the Paris Agreement, across three different categories, namely credit securities (a) that have emission reduction plans at a company level which align with the goals of the Paris Agreement; or (b) that are securities specifically linked to an activity or project of a company which is aligned with the goals of the Paris Agreement; or (c) issued by companies whose activities or products are necessary for society to meet the global warming objectives of the Paris Agreement.

In order to identify the companies and credit securities described above and to classify such securities as Sustainable Investments, the Investment Manager is bound to identify, assess and analyse carbon and climate-related outcomes through its credit research process, utilising proprietary research data and sustainability reports published by companies, third party research providers and environmental, social and/or governance ("ESG") data vendors. In particular, the Investment Manager assesses the Paris Agreement alignment of each investment, using the framework developed by the Net Zero Investment Framework Implementation Guide ("IIGCC"), which considers:

- Successful attainment of short to long term net-zero carbon targets;
- Ambition and quality of the net-zero carbon targets; and
- Capital expenditure dedicated to achieving net-zero carbon targets and tracking its progress in reducing their actual carbon emissions over time.

Higher impact companies are assessed against the following 6 alignment criteria while lower impact companies are assessed against criteria 2, 3 and 4.

1. Ambition: A long term 2050 goal consistent with achieving global net zero
2. Targets: Short-and medium-term emissions reduction target (scope 1,2 and material scope 3)
3. Emissions performance: Current emissions intensity performance (scope 1,2 and material scope 3) relative to targets
4. Disclosure: Disclosure of scope 1, 2 and material scope 3 emissions
5. Decarbonisation Strategy: A quantified plan setting out the measures that will be deployed to deliver GHG targets, proportions of revenues that are green and where relevant increases in green revenues
6. Capital Allocation Alignment: A clear demonstration that the capital expenditures of the company are consistent with achieve net zero emissions by 2050

Higher impact companies are defined as companies in the sectors with high GHG emissions in terms of absolute emissions or carbon intensity. The sectors include the following as per the Transition Pathway Initiative:

The above exclusions do not apply to: (i) investments in entities with minority investments (i.e. < 50%) in other entities or joint ventures that are involved in the above sectors; or (ii) underlying investments of any securitised debt instruments that are invested in due to nature of their structures.

- Airlines
- Aluminium
- Autos
- Cement
- Chemicals
- Coal mining
- Diversified mining
- Electricity utilities
- Oil & gas / oil & gas distribution
- Other industrials
- Pulp and paper
- Shipping
- Steel

Using the above criteria, the Investment Manager will determine where a company sits on the alignment scale. The thresholds for achieving the classifications on the scale are as follows:

- **Net zero**: A company which is already achieving the emissions intensity required by the sector and regional pathway for 2050 and whose ongoing investment plan or business model will maintain this performance.
- **Aligned**: for high impact sectors, achieving all 6 criteria. For other material sectors, achieving criteria 2, 3 and 4.
- **Aligning**: Achieving 2, 4 and some evidence (partial fulfilment) of 5.
- **Committed to aligning**: Increasingly companies are making a first step based on Criteria 1 – setting a long-term ambition to achieve net zero. These companies can be considered as 'committed to 'aligning'.
- **Not aligned** – all other companies

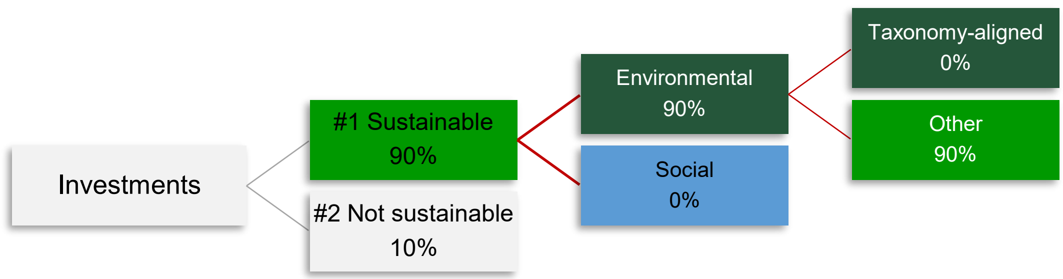
In addition, financial institutions and real estate companies may be added to the list if their financed emissions are material in the high impact sectors, by participating in lending or investing activities in these sectors.

Companies or credit securities assessed not to meet the required positive contribution to a climate change outcome in accordance with achieving the long term global warming objectives of the Paris Agreement will not be considered investable for the Fund.

The above exclusions do not apply to: (i) investments in entities with minority investments (i.e. < 50%) in other entities or joint ventures that are involved in the above sectors; or (ii) underlying investments of any securitised debt instruments that are invested in due to nature of their structures.

Proportions of investments

The Fund invests primarily in a diversified portfolio of global credit securities while seeking additionally to make a positive contribution to climate change.



#1 Sustainable covers sustainable investments with environmental or social objectives. These may be taxonomy aligned but not necessarily.
#2 Not sustainable includes investments which do not qualify as sustainable investments. . For example, these can be cash or near cash instruments.

Monitoring of environmental or social characteristics

Beyond the specific question of alignment with the goal of the Paris Agreement, the Investment Manager undertakes a detailed initial and ongoing assessment that focuses on material ESG sustainability risks that may impact a particular company, with consideration to the industries and jurisdictions in which it operates - a key part of the analysis is a determination on how well the issuer manages these risks. Every company is analysed on at least an annual basis and is assigned an ESG sustainability risk rating, which includes assessment of each issuer on a five-tier scale ranging from “very low risk” to “very high risk”. Companies assessed to have material and unmanaged ESG sustainability risks will receive a high risk” or “very high risk” rating and will not be considered investable for the Fund.

To determine a company’s overall assigned ESG sustainability risk rating, the Investment Manager may consider, but is not necessarily limited to, the following key factors:

- Environmental: Level of GHG emissions, resilience to climate change, efforts to reduce GHG emissions, as well as waste management, water intensity and energy efficiency, relevant principal adverse indicators.
- Social: Modern slavery, human capital management, safeguarding of human rights through the organisation and its supply chain, and engagement with local communities.
- Governance: Presence or absence of strong governance structures (such as an independent Board, separate Chairman and CEO roles, independent audit and remuneration committees), a company’s approach and track record in business ethics, and whether there is strong oversight and accountability in managing its ESG issues.

In addition to the two step process described above, the Investment Manager undertakes pre and post investment data analysis to ensure that a given investment qualifies as a Sustainable Investment under SFDR, including by taking into account Principal Adverse Indicators (“PAIs”) to address each company’s compliance with SFDR Do No Significant Harm (“DNSH”) requirements.

The above exclusions do not apply to: (i) investments in entities with minority investments (i.e. < 50%) in other entities or joint ventures that are involved in the above sectors; or (ii) underlying investments of any securitised debt instruments that are invested in due to nature of their structures.

The investment manager also applies exclusionary screens which excludes companies that directly earn revenue from:

1. Tobacco: Companies involved in the production of tobacco and tobacco products, this also includes e-cigarettes and vaping. The revenue threshold for Tobacco is set at 0%.
2. Gambling: Companies that own and or operate gambling establishments, manufacture specialised equipment used exclusively for gambling. The revenue threshold is 0%.
3. Adult entertainment: Companies that are involved in the production of adult entertainment and/or operate/own adult entertainment establishments. The revenue threshold is 0%.
4. Controversial Weapons: Companies involved in the production of controversial weapons (Controversial Weapons defined as: anti-personnel mines, cluster weapons, biological and chemical weapons, depleted uranium, nuclear weapons produced in support of the nuclear weapons programs of non-nuclear weapon state parties and non-signatories to the Treaty on the Non-Proliferation of Nuclear Weapons and white phosphorus. A revenue threshold of 0% will apply.
5. Conventional Weapons: companies that derive revenue from the manufacturing of assault weapons for civilian customers. A revenue threshold of 0% will apply.
6. Fossil fuel:
    - Unconventional oil, coal and gas: companies involved in the following activities arctic oil and gas, oil sands, shale energy. A revenue threshold of 0% applies.
    - Conventional Oil and Gas: exploration, extraction, refining, a revenue threshold of 0% applies. For transportation of oil and gas a revenue threshold of 5% will apply.
    - Coal: companies involved in the extraction of thermal coal, a revenue threshold of 0% applies. For transportation of coal and/or companies involved in power generation based on thermal coal, a revenue threshold of 5% will apply. The revenue threshold for power generation based on thermal coal falls to 0% from 2030 onwards.

The investment manager will also exclude companies that are deemed non-compliant with global standards by our external research provider. Global Standards refer to UN Global Compact, UN Guiding Principles for Business and Human Rights, the OECD Guidelines for ME.

If a company ceases to qualify as an investable asset, the Investment Manager will engage with the company to determine the circumstances for ceasing to qualify. If the company can resolve the matter in a reasonable time frame it may be held in the portfolio. However, if not, the security will be sold as soon as reasonably practicable, in the best interests of the investors.

Methodologies

The Fund invests primarily in a diversified portfolio of global credit securities which are listed, traded or dealt on Regulated Markets worldwide that seek to make a positive contribution to climate change.

The Investment Manager undertakes pre and post investment data analysis to ensure that a given investment qualifies as a Sustainable Investment under SFDR, including by taking into account Principal Adverse Indicators ("PAIs") to address each company's compliance with SFDR Do No Significant Harm ("DNSH") requirements.

If a company ceases to qualify as an investable asset, the Investment Manager will engage with the company to determine the circumstances for ceasing to qualify. If the company can resolve the matter in a reasonable time

The above exclusions do not apply to: (i) investments in entities with minority investments (i.e. < 50%) in other entities or joint ventures that are involved in the above sectors; or (ii) underlying investments of any securitised debt instruments that are invested in due to nature of their structures.

frame it may be held in the portfolio. However, if not, the security will be sold as soon as reasonably practicable, in the best interests of the investors.

Data sources and processing

The data sources that are used to monitor the environmental & social characteristics of the fund are from both third party research providers and from direct engagement with investee companies. The third party data providers include but are not limited to: Sustainalytics, ISS, Reprisk and MSCI. These data services are used to inform and supplement the data gathered directly from investee companies in the fund.

Prior to procurement, data vendor services are assessed for coverage, accuracy and timeliness by FSI's ESG Impacts Committee, which is managed by FSI's Responsible Investment team. Once procured, Investment managers will report back to the data vendors where they believe information is inaccurate.

Limitations to methodologies and data

Limitations to the data provided from third parties will stem from their coverage and methodologies and from limited disclosures by issuer companies. Where data is not available, third party providers may use estimation models or proxy indicators. Methodologies used by data providers may include an element of subjectivity. Whilst data is collected on an ongoing basis, in this rapidly evolving environment, data can become outdated within a short time period.

The attainment of the social and environmental characteristics is not wholly dependent on third party data considering the limitations and is informed by direct engagement with investee companies where there are such data gaps.

Due diligence

We have a large team of credit analysts, charged with the responsibility of monitoring changes in credit risk on a daily basis. We consider that ESG factors can materially affect a company's long-term performance and, in turn, its ability to service any debt repayment obligations. Our credit analysts undertake a credit risk assessment process for all investments we own. This credit risk assessment takes into account fundamental risk factors such as financial performance, strength of management, industry risks, default probabilities, and ESG risks. The credit risk assessment produces an Internal Credit Rating (ICR) and outlook, which represents our assessment of the entity's overall credit risk over the next 1 to 3 years. This ICR takes into account the entity's ESG risks through an ESG risk assessment.

In assessing an entity's ESG risk, our team identifies those Environmental, Social and Governance risks specific to that entity, which are likely to have the greatest impact on the entity's credit profile – i.e. ("material ESG risks") - and assesses how well the entity is managing these material ESG risks.

From this analysis, an ESG risk rating is assigned to the entity. Every entity analysed is assigned an ESG risk rating on a five tier scale ranging from 'very low' to 'very high'. The analyst also provides an outlook

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for an entity's ESG risk rating, which is termed the 'ESG risk trajectory', which aims to capture the likely evolution of an entity's company's ESG risk profile by assigning a "deteriorating", "stable" or "improving" rating. The ESG risk rating and its trajectory is designed to reflect our internal assessment on the probability of the identified material ESG risks adversely impacting the entity's business profile, reputation or financials of the entity. In performing the ESG risk assessment, the analysts will source relevant information from direct engagements with issuers, sustainability reports and specialist third-party research providers eg Sustainalytics, MSCI, ISS and RepRisk. At a minimum, our ESG risk assessment is reviewed once a year.

The initial screening stage of our investment process contains an ESG rating. This is where a company's ESG issues are considered and scored according to our proprietary ESG guidelines.

Engagement policies

First Sentier Investors' (FSI) Responsible Investment & Stewardship Policy and Principles sets out the standard of engagement practices for all of FSI's investment teams. The policy also sets out FSI's approach to controversial sustainability- related activities.

Engaging in an active dialogue with investee companies or entities is an important activity as it provides a key opportunity to improve our understanding of their business, and to monitor material business issues including strategy, capital allocation and financials as well as their approach to environmental, social and governance matters, and enables us to influence them to improve these practices.

The breadth, depth and frequency of engagement will vary significantly based on a variety of factors including the risks and opportunities faced by the company, the opportunity and willingness to engage by the company, and the size or nature of the investment.

The policy can be found at www.firstsentierinvestors.com

Designated reference benchmark

The Fund is actively managed meaning that the Investment Manager uses its expertise to select investments rather than tracking the allocation of the performance of a benchmark. The Fund's performance, interest rate risk and foreign exchange risk, as well as the carbon footprint of its portfolio (both in absolute and intensity terms), will reference the ICE Global Corporate Paris-Aligned Index (USD hedged). The index is based on a universe of the global investment grade corporate bond market, constructed to meet the minimum requirements of the EU Paris-aligned Benchmark Regulations (Regulation EU 2019/2089).

The above exclusions do not apply to: (i) investments in entities with minority investments (i.e. < 50%) in other entities or joint ventures that are involved in the above sectors; or (ii) underlying investments of any securitised debt instruments that are invested in due to nature of their structures.

Date of amendment	Explanation
30 April 2022	• Change to name of FSSA ASEAN All Cap Fund • FSSA Investment Managers financial products: update to characteristics and inclusion of indicators • Property Securities financial products: update to characteristics and inclusion of indicators • Listed Infrastructure financial products: update to characteristics and inclusion of indicators • European Diversified Infrastructure financial products: refinement of characteristics to make clear that good governance is not an E or S characteristic; and amendments to indicators to replace recordable and lost time injuries with a single accident frequency rate and to remove energy, water and other air emission KPIs • Stewart Investors financial products: update to characteristics and inclusion of indicators • Inclusion of ISINs for Stewart Investors European Sustainability Fund and Stewart Investors Global Emerging Markets Leaders Sustainability Fund.
01 September 2022	• Inclusion of FSSA All China Fund
30 November 2022	• Update of SFDR L2 disclosure requirements • Inclusion of the Stewart Investors Global Emerging Markets Leaders Fund under Article 9 funds • Change in the SFDR disclosures of First Sentier Responsible Listed Infrastructure Fund to categorise under Article 8.
22 September 2023	• Removal of "yet to be adopted" regulatory technical standards reference. • Asset allocation graphic for FS Responsible Listed Infrastructure Fund.
30 November 2023	• Update to reflect update to Schedule 2. • Inclusion of RQI Global All Country Value Fund and RQI All Country Diversified Alpha Fund • Inclusion of First Sentier Global Credit Sustainable Climate Fund

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