

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)

Introduction

This document set-out the disclosures required to be made under Article 10 of SFDR by the Pacific Assets Trust.

Disclosures

The document sets-out a concise summary of:

- the sustainable investment objectives of the product;
- the methodologies used to assess, measure and monitor 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 9 of SFDR.

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.

May 2023

Summary

The Company seeks to achieve long-term capital appreciation while also generating positive social and/or environmental sustainable outcomes. The Portfolio Manager employs a bottom-up investment process, investing in companies which both contribute to, and benefit from, sustainable development. This document outlines the Portfolio Manager’s approach to meeting the Company’s sustainable investment objective through rigorous bottom-up research, company engagement, adherence to their position statement on harmful and controversial products and services, parent company exclusion policies and third-party research providers. The document also provides detail on the how the Company’s sustainability objective and outcomes are monitored and assessed both internally and with the use of external frameworks, and it also details how the Portfolio 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 Company only invests in companies that are sustainable investments which contribute to a social and/or environmental objective.

The bottom-up investment process results in a portfolio composed of companies without material exposure to harmful products, services or processes. The Portfolio Manager’s Portfolio Explorer tool provides transparency on investee companies.

<https://www.stewartinvestors.com/ie/en/professional/our-strategies/pacific-assets-trust.html?tabs-anchor=Pacific%20Assets%Trust&active-tab=Portfolio%20Explorer>

The tool provides a balanced view for investee companies, highlighting the positive contributions they are making to sustainable development, but also the risks and areas for future engagement.

All harmful business activities are defined and publicly disclosed, and subject to a materiality assessment by the Portfolio Manager. The Portfolio 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>

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 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 Company's exposure to such activities is monitored on an ongoing basis through pre and post trade compliance systems.

Principal adverse impacts on sustainability factors, relevant to each investee company, are taken into account through the Portfolio Manager's bottom-up research, company engagement, adherence to their position statement on harmful and controversial products and services, parent company exclusion policies and third-party research providers.

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

Investee companies 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 are incorporated into the Portfolio Manager's company analysis, team discussion and engagement programme.

Depending on the nature of the issue and the response by the company, the Portfolio 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,
- exiting the Company'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.

The sustainable investments of the Company are aligned with OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights, including the principles and rights set out in the eight fundamental conventions identified in the Declaration of the International Labour Organisation on Fundamental Principles and Rights at Work and the International Bill of Human Rights.

The Portfolio Manager continually monitors the companies owned to understand any changes to their strategies. Each investee company is assessed 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 Portfolio Manager also receives regular updates from a controversy monitoring service. Where issues are raised by these services, the Portfolio 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

The Company seeks to achieve long-term capital appreciation by investing in companies which both contribute to, and benefit from, sustainable development, achieving positive social and environmental sustainable outcomes.

Positive social sustainability outcomes include the enablement of improved health and wellbeing; access to income-generating and enterprise opportunities; fair employment and workplace safety; access to education and learning opportunities; communication and access to information; financial inclusion; sustainable transport and mobility; better access to housing, water, sanitation and electricity; and social inclusion and reduced inequality.

Positive environmental sustainability outcomes include more careful, efficient and productive use of natural resources; reduced waste and improved waste management; the wider adoption of circular economy practices and measures; the adoption of renewable and cleaner energy technologies; reduced greenhouse gas emissions; reduced water, air and other environmental pollution; a slowing in the rate of land degradation, land use change and loss of forests and biodiversity; and measures and technologies that enable climate change adaptation and resilience.

Investment strategy

The Company only invests in companies that are sustainable investments which contribute to a social and/or environmental objective.

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 binding process for selecting and making sustainable investments is oriented towards the sustainable investment objective in the following ways:

- Idea generation is focused only on companies whose products and services help solve difficult problems, meet critical needs, and contribute to a more sustainable future.
- Company research is bottom-up and makes use of all available qualitative information and quantitative data to assess and form a judgement on the quality attributes, sustainability positioning, and context in which each company operates.
- Portfolio construction follows a bottom-up process and is done without reference to a sustainability benchmark or any other form of benchmark index.
- Ongoing monitoring focuses on company evolution, including changes in quality and sustainability attributes, the commercial and competitive landscape, the regulatory environment, the political economy context in which the company operates, and in valuation.
- Company engagement is aimed at encouraging company management teams to address sustainability issues and other investment risks and opportunities.

The Portfolio 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.

Important areas of focus are the 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.

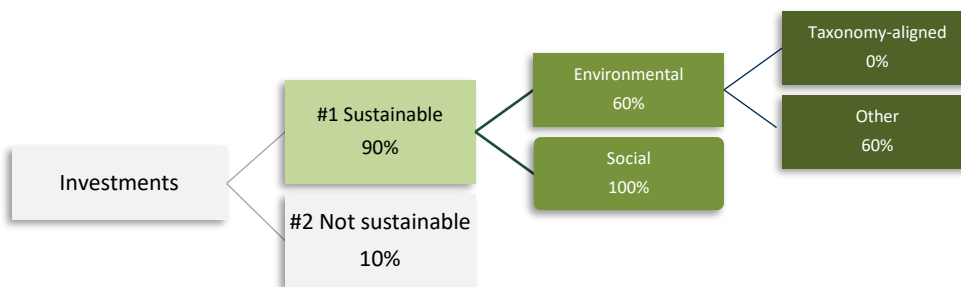
Alongside desk research, conversations and meetings take place with company owners, leaders and independent directors in order to build conviction in investee companies' governance practices. Bespoke and independent research is commissioned on sustainability topics – ranging from hazardous chemicals 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 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

Up to a maximum of 20% of the Trust's total assets (at the time of investment) may be invested in companies incorporated and/or listed outside the Asia Pacific region (as defined); at least 25% of their economic activities (at the time of investment) are within the Asia Pacific region and this proportion is expected to grow significantly over the long term.

The Company invests primarily (at least 90% of its Net Asset Value) in companies that are positioned to contribute to, and benefit from, sustainable development. Sustainable development is based on the Portfolio Manager's own philosophy.



#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.

Notes: The percentages are defined and measured on the basis that each sustainable investment must

contribute to a social objective and may also contribute to an environmental objective. The percentages will therefore not add to 100.

Monitoring of sustainable investment objective

The Portfolio Manager continually monitors the companies owned to understand any changes to their sustainability positioning and overall quality. This is carried out via the Portfolio Manager's bottom-up research, company engagement, adherence to their position statement on harmful and controversial products and services, parent company exclusion policies and third-party research providers. The contribution of the Company's investments to the social and environmental objectives are also assessed by reference to two framework indicators – the Portfolio Manager's human development pillars and Project Drawdown climate change solutions (described further in Methodologies).

The portfolio is assessed on a quarterly basis by an external service provider to ensure that every company owned meets the global norms for best business practices and raise no exceptions against the thresholds for harmful activities per the Portfolio Manager's position statement.

<https://www.stewartinvestors.com/all/insights/our-position-on-harmful-and-controversial-products-and-services.html>

Global norms are internationally agreed standards for business, including the UN Human Rights Norms for Businesses and the UN Global Compact Principles. The Portfolio Manager also receives regular updates from a controversy monitoring service. New portfolio positions are also checked ahead of initial purchase.

Where issues are raised by these services, the Portfolio 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.

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

Methodologies

The Company only invests in companies that are sustainable investments which contribute to a social and/or environmental objective. The contribution of the Company's investments to the social and environmental objectives are assessed by reference to two framework indicators – the Portfolio Manager's human development pillars and Project Drawdown climate change solutions.

Human development pillars

The Portfolio Manager has determined 10 broad pillars which they believe encapsulate the essence of human development and which can be mapped to companies. Each investee company must be contributing in a tangible way to at least one of the following pillars:

- Nutrition
- Healthcare and hygiene
- Water and sanitation
- Energy
- Housing
- Employment
- Finance
- Standard of living

- Education
- Information

Climate change solutions

Project Drawdown is a non-profit organisation, founded in 2014, which has mapped, measured and modelled over 90 different solutions to global warming, with the ultimate goal of reaching drawdown – i.e. the point in the future when emissions stop increasing and start to steadily decrease. Each Company investment is mapped by the Portfolio Manager against the c.90 solutions (which are captured in eight broader solutions of Buildings, Circular economy / industry, Conservation / restoration, Energy, Food system, Human development, Transport and Water). The Portfolio Manager’s focus is on whether the companies themselves are making a meaningful contribution and will have meaningful involvement with the delivery of any of those solutions. Where the companies in which the Company invests do contribute to any of the solutions, they will be involved in making products and delivering services directly, by enabling/supporting those solutions, or indirectly.

These frameworks, alongside the Portfolio Manager’s own bottom-up analysis, lean on measurable and reportable outcomes as evidence for determining a company’s meaningful contribution to sustainable development.

Meaningful company contribution:

1. Demonstrates a clear link to the underlying issue and solution, including whether the contribution is direct, enabling/supporting or indirect.
2. Is relevant for the company either as a revenue/growth driver, as strategic initiatives backed by research and development or capital expenditure, or a function of strong culture or behaviours and ‘how they do things’ e.g. for equality and diversity.
3. Recognises negative impacts from the company, including contradictions and risks of perverse outcomes.

Companies can contribute in many different ways to a better future for people and planet. To align with their bottom-up investment approach, the Portfolio Manager provides descriptions on their website, via their interactive Portfolio Explorer tool, on how they believe each company is contributing towards sustainable development. Click on the link below to access the tool.

<https://www.stewartinvestors.com/ie/en/professional/our-strategies/pacific-assets-trust.html?tabs-anchor=Pacific%20Assets%20Fund&active-tab=Portfolio%20Explorer>

The Portfolio Manager reports on these indicators in the Company’s annual report and also on the Stewart Investors website:

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

Data sources and processing

Companies can contribute in many different ways to a better future for people and planet. The Portfolio 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 Portfolio 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 Portfolio Manager 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 Portfolio Manager 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 Portfolio Manager 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 Portfolio 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 (palm oil and coffee supply chains, conflict minerals, smallholder farmers, lead content in paint in emerging markets or the deforestation risks within soy supply chains).

To validate the sustainable development contribution of companies, the Portfolio Manager utilises credible third-party and proprietary frameworks, such as Project Drawdown for climate change solutions, their own human development pillars for key aspects of human development (developed from the UN Human Development Index), and the access to medicines and access to nutrition indexes for assessing pharmaceutical and consumer goods companies. These frameworks support, rather than define, the Portfolio Manager's assessment of whether and to what degree companies are contributing to sustainable development outcomes. In addition, each company is mapped against the Sustainable Development Goals.

These frameworks, alongside the Portfolio Manager's bottom-up analysis, lean on measurable and reportable outcomes as evidence for determining a company's meaningful contribution to sustainable development.

The flow of data and information about companies is continuous. Information is updated on an ongoing basis by the Portfolio Manager by conducting in-depth research and writing detailed reports on companies. The Portfolio Manager performs periodic review exercises of the 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 Portfolio Manager meets and liaises 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 Portfolio Manager is estimated.

In order to validate their own in-depth analysis of companies and to monitor adherence to their position statement on harmful and controversial products and services and parent company exclusion policies, the Portfolio Manager also receives regular notifications on company controversies from RepRisk. They also analyse all the Company holdings on Sustainalytics on a quarterly basis.

The Portfolio 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 Portfolio Manager may use estimates from external providers such as MSCI in the case for climate data. Estimates require assumptions that do not match individual companies' circumstances in the real world. The Portfolio Manager discloses any such estimates used in reporting outputs.

The Portfolio Manager stores records of company research and engagements on research management and client management software. The Portfolio Manager publicly discloses the investment rationale and sustainability positioning of each investee company on their Portfolio Explorer tool – <https://www.stewartinvestors.com/ie/en/professional/our-strategies/pacific-assets-trust.html?tabs-anchor=Pacific%20Assets%Fund&active-tab=Portfolio%20Explorer> - and updates this on a quarterly basis.

Limitations to methodologies and data

The Portfolio 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 Portfolio 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 Portfolio Manager are backed by evidence and collected by the Portfolio Manager using their years of experience in sustainable investing. While the Portfolio Manager uses third-party services to 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 Portfolio Manager then relates each contribution back to credible frameworks such as Project Drawdown climate change solutions and their own human development pillars adapted from the UN Human Development Index.

Due diligence

The Portfolio Manager's culture is centred on the concepts of stewardship, long-termism and collaboration. The Portfolio Manager acknowledges the privilege of managing other 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>

Every investment decision made by the Portfolio Manager for the Company considers the sustainability positioning (risks and opportunities) of every company from the bottom-up and includes:

- Detailed company analysis
- Written investment team discussion and debate which includes challenges about the sustainability positioning of all companies
- Weekly team and strategy meetings to discuss Company decisions
- Meetings with company management and key stakeholders, from competitors to NGOs
- Commissioned research on various aspects of business quality, including understanding specific sustainability issues
- Consideration of other third-party research

The Portfolio Manager's consideration of sustainability is holistic; it includes ESG but is more than ESG. They consider financial sustainability – conservatism around the balance sheet, for example – and stewardship by management – the treatment of all stakeholders through a crisis, for example – to be as essential to the sustainability positioning of a company as the product or service the company sells.

While Stewart Investors retains control of the investment philosophy, process and all investment decisions including risk monitoring, additional independent oversight and support is provided by relevant teams at First Sentier Investors (FSI) which is the parent company of Stewart Investors. This includes the FSI Investment Product Research & Assurance function who report to the FSI Global Head of Product. The team are responsible for overseeing investment risks within all portfolios. 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 Portfolio Manager 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 Portfolio 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 Portfolio Manager.

Bottom-up	<ul style="list-style-type: none">•Driven by company analysis and monitoring•Seeks to build positive long-term company relationships•Negative responses can lead to divestment
Thematic	<ul style="list-style-type: none">•Cross-cutting issues identified through team discussion•Often supported by commissioned research•Never generic, issues relate back to company circumstances
Collaborative	<ul style="list-style-type: none">•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 Portfolio Manager and contributes invaluable insights into their understanding of each company. Direct contact with management also allows the Portfolio Manager to influence the ESG performance of companies via discussions with management or the board of directors and through the exercising of proxy votes. The Portfolio 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 Portfolio 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 Portfolio 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

Not applicable