



# First Sentier Investors Global Umbrella Fund plc 2023 Annual Report

Periodic disclosures for Stewart Investors Article 9 products



Stewart Investors

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## Risk Factors

This material is a financial promotion for the Stewart Investors Asia Pacific Leaders Sustainability Fund (VCC), Stewart Investors Asia Pacific Sustainability Fund (VCC), Stewart Investors European Sustainability Fund (VCC), Stewart Investors Global Emerging Markets Leaders Fund (VCC), Stewart Investors Global Emerging Markets Sustainability Fund (VCC), Stewart Investors Indian Subcontinent Sustainability Fund (VCC), Stewart Investors Worldwide Leaders Sustainability Fund (VCC), Stewart Investors Worldwide Sustainability Fund (VCC), intended for retail and professional clients in the UK, and for professional clients only in Switzerland, the EEA and elsewhere where lawful.

Investing involves certain risks including:

The value of investments and any income from them may go down as well as up and are not guaranteed. Investors may get back significantly less than the original amount invested.

- **Currency risk:** the Fund invests in assets which are denominated in other currencies; changes in exchange rates will affect the value of the Fund and could create losses. Currency control decisions made by governments could affect the value of the Fund's investments and could cause the Fund to defer or suspend redemptions of its shares.
- **Specific region risk:** investing in a specific region may be riskier than investing in a number of different countries or regions. Investing in a larger number of countries or regions helps spread risk.
- **Emerging market risk:** Emerging markets tend to be more sensitive to economic and political conditions than developed markets. Other factors include greater liquidity risk, restrictions on investment or transfer of assets, failed/delayed settlement and difficulties valuing securities.
- **Indian Subcontinent risk:** although India has seen rapid economic and structural development, investing there may still involve increased risks of political and governmental intervention, potentially limitations on the allocation of the Fund's capital, and legal, regulatory, economic and other risks including greater liquidity risk, restrictions on investment or transfer of assets, failed/delayed settlement and difficulties valuing securities.
- **Concentration risk:** the Fund invests in a relatively small number of companies which may be riskier than a fund that invests in a large number of companies.
- **Smaller companies risk:** investments in smaller companies may be riskier and more difficult to buy and sell than investments in larger companies

Where featured, specific securities or companies are intended as an illustration of investment strategy only, and should not be construed as investment advice or a recommendation to buy or sell any security.

All information included in this material has been sourced by Stewart Investors and is displayed as at 31 December 2023 unless otherwise specified and to the best of our knowledge is an accurate reflection as at this date.

For a full description of the terms of investment and the risks please see the Prospectus and Key Information Document.

If you are in any doubt as to the suitability of our funds for your investment needs, please seek investment advice.

Template periodic disclosure for the financial products referred to in Article 9, paragraphs 1 to 4a, of Regulation (EU) 2019/2088 and Article 5, first paragraph, of Regulation (EU) 2020/852

**Product name:**  
Stewart Investors Asia Pacific Leaders  
Sustainability Fund

**Legal entity identifier:**  
549300VKJEPJT5Q4V960

**Sustainable investment** means an investment in an economic activity that contributes to an environmental or social objective, provided that the investment does not significantly harm any environmental or social objective and that the investee companies follow good governance practices.

The **EU Taxonomy** is a classification system laid down in Regulation (EU) 2020/852 establishing a list of **environmentally sustainable economic activities**. That Regulation does not lay down a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

## Sustainable investment objective

### Did this financial product have a sustainable investment objective?

**Yes**

It made **sustainable investments with an environmental objective: 63%**

in economic activities that qualify as environmentally sustainable under the EU Taxonomy

in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy

It made **sustainable investments with a social objective: 100%**

**No**

It **promoted Environmental/Social (E/S) characteristics** and while it did not have as its objective a sustainable investment, it had a proportion of \_\_\_% of sustainable investments

with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy

with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy

with a social objective

It promoted E/S characteristics, but **did not make any sustainable investments**

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.



### To what extent was the sustainable investment objective of this financial product met?

The Fund has 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. The contribution to sustainable development is assessed under two frameworks, social and environmental.

#### 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

As at 31 December 2023, the Fund held **41** companies. **All companies (100%)** were contributing to at least one **human development pillar** and, in total, were making **118 contributions** to the pillars.

Further information about how the Investment Manager uses the human development pillars is available on the Investment Manager’s website - [stewartinvestors.com/all/how-we-invest/our-approach/human-development-pillars](https://stewartinvestors.com/all/how-we-invest/our-approach/human-development-pillars)

### **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

As at 31 December 2023, the Fund held **41** companies. **26 companies (63%)** were contributing to **climate change solutions**. These companies were contributing to **31** different solutions and, in total, were making **91 contributions** to the solutions.

Further information about how the Investment Manager uses the Project Drawdown climate solutions is available on the Investment Manager’s website – [stewartinvestors.com/all/how-we-invest/our-approach/climate-solutions](https://stewartinvestors.com/all/how-we-invest/our-approach/climate-solutions)

### Assessment

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

1. there is either a direct or enabling link between the activities of the company and the achievement of a positive social or environmental outcome;
2. 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
3. the company recognises potential negative social or environmental outcomes associated with its 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.

#### Notes:

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.

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).

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).

### ● **How did the sustainability indicators perform?**

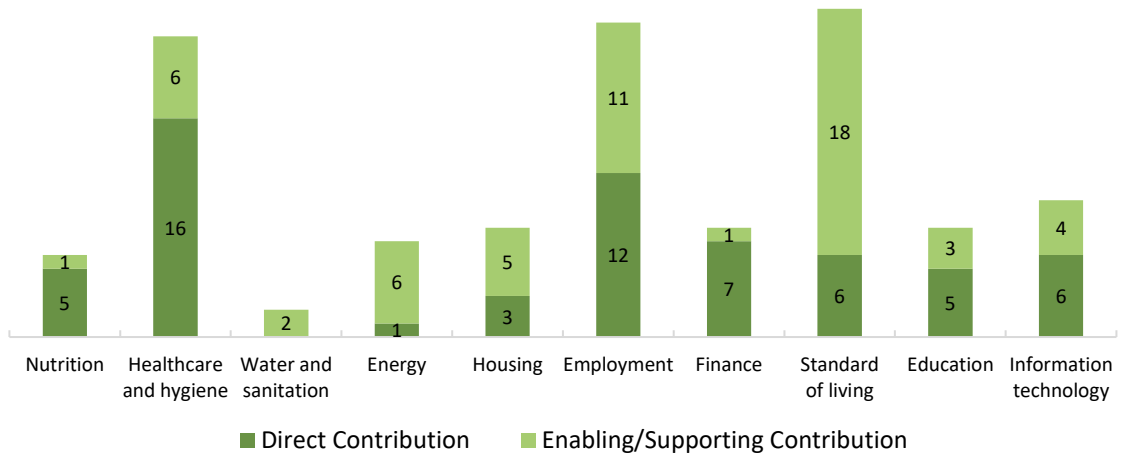
The Investment Manager’s Portfolio Explorer tool provides the contribution that each company makes to climate solutions, human development and the Sustainable Development Goals, as well as the investment rationale, key risks and areas for improvement. Click on the link below to access the tool.

[stewartinvestors.com/all/how-we-invest/our-approach/portfolio-explorer](https://stewartinvestors.com/all/how-we-invest/our-approach/portfolio-explorer)

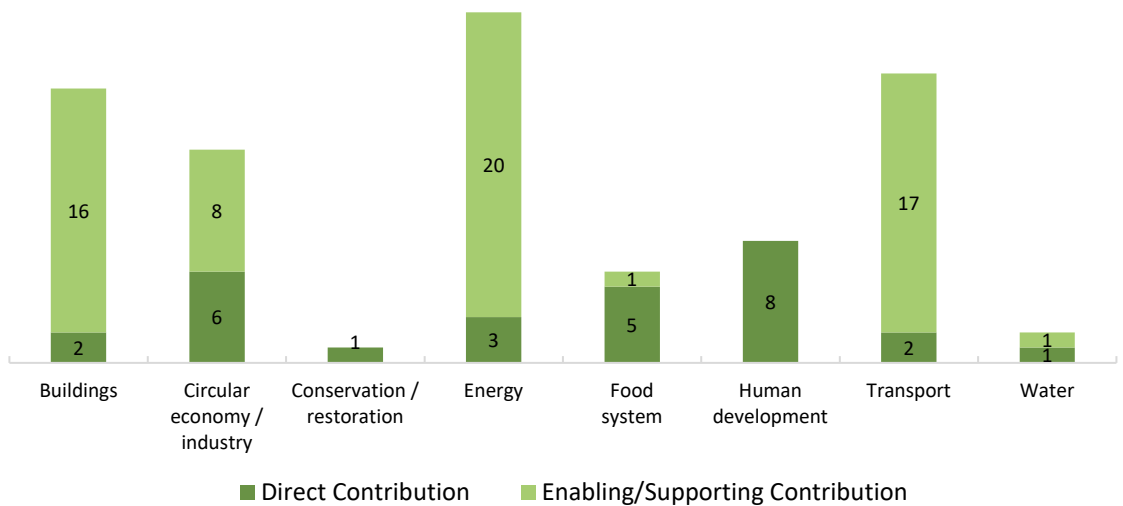
The social and environmental outcomes for the Fund as at 31 December 2023 are provided in the charts below.

**Sustainability indicators** measure how the sustainable objectives of this financial product are attained.

**Human development pillars**  
(number of companies contributing to each pillar)



**Climate change solutions**  
(number of companies contributing to each solution)



Notes: Direct Contribution - directly attributable to products, services or practices provided by that company. Enabling/Supporting Contribution - supported or made possible by products or technologies provided by that company.

● **...and compared to previous periods?**

Changes in the sustainability outcomes for the Fund year-on-year are related to bottom-up changes in the portfolio and/or changes in the sustainability profile of individual investee companies.

The social and environmental outcomes for the Fund over previous periods are provided in the tables below.

## Positive social outcomes

Human development pillars	Contribution	31-Dec-2022	31-Dec-2021
No. of companies (%)	-	39 (100%)	45 (100%)
Total number of contributions	-	111	126
Nutrition	Direct	6	6
	Enabling/Supporting	1	1
Healthcare and hygiene	Direct	13	15
	Enabling/Supporting	3	4
Water and sanitation	Direct	-	-
	Enabling/Supporting	2	2
Energy	Direct	1	2
	Enabling/Supporting	4	5
Housing	Direct	5	4
	Enabling/Supporting	5	6
Employment	Direct	13	18
	Enabling/Supporting	9	9
Finance	Direct	6	6
	Enabling/Supporting	2	3
Standard of living	Direct	4	4
	Enabling/Supporting	20	21
Education	Direct	4	5
	Enabling/Supporting	4	4
Information technology	Direct	6	8
	Enabling/Supporting	3	3

## Positive environmental outcomes

Climate solutions	Contribution	31-Dec-2022	31-Dec-2021
No. of companies (%)	-	25 (64%)	26 (58%)
Number of different solutions	-	26	26
Total number of solutions	-	79	80
Buildings	Direct	2	2
	Enabling/Supporting	15	14
	Indirect	n/a	2
Circular economy/industry	Direct	7	2
	Enabling/Supporting	7	-
	Indirect	n/a	1
Conservation/restoration	Direct	1	-
	Enabling/Supporting	-	-
	Indirect	n/a	1
Energy	Direct	3	2
	Enabling/Supporting	14	10
	Indirect	n/a	6
Food system	Direct	4	5
	Enabling/Supporting	1	1
	Indirect	n/a	-
Human development	Direct	7	7
	Enabling/Supporting	-	-
	Indirect	n/a	-
Transport	Direct	2	2
	Enabling/Supporting	14	17
	Indirect	n/a	6
Water	Direct	1	1
	Enabling/Supporting	1	1
	Indirect	n/a	-



During 2022 and following feedback from clients, the Investment Manager removed the Indirect Contribution from their climate solutions measures.

Indirect Contribution – providing generic products or services to companies making direct or enabling contributions or making operational decisions which have a material contribution.

In 2022, Project Drawdown added 11 new climate solutions to their framework. The Investment Manager considered these new solutions for their 2022 reporting measures. More detail on these changes are available on the Investment Manager’s website: [stewartinvestors.com/all/insights/climate-solutions-update](https://stewartinvestors.com/all/insights/climate-solutions-update)

● ***How did the sustainable investments not cause significant harm to any sustainable investment objective?***

The Fund only invests 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.

The 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:

[stewartinvestors.com/all/insights/our-position-on-harmful-and-controversial-products-and-services](https://stewartinvestors.com/all/insights/our-position-on-harmful-and-controversial-products-and-services)

— *How were the indicators for adverse impacts on sustainability factors taken into account?*

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 a company's quality or sustainability positioning through either meetings, ongoing monitoring and reviewing their annual reports, the Investment Manager will re-evaluate the investment case.

In addition, the Fund portfolio is 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 Principal Adverse Impacts (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 investor does no significant harm but still have 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, Stewart Investors will not invest or will exit the Funds' position in the company in a timely manner.

The Investment Manager includes product level data on Principal Adverse Impact (PAI) indicators in the question below.

**Principal adverse impacts** are the most significant negative impacts of investment decisions on sustainability factors relating to environmental, social and employee matters, respect for human rights, anti-corruption and anti-bribery matters.

Were sustainable investments aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights? Details:

The Fund's sustainable investments are aligned with these Guidelines and Principles.

The Investment Manager continually monitors the companies owned to understand any changes to the strategies. The Fund's 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.

During the reporting period the Fund held the following company which flagged against the Investment Manager's policy.

#### **Tata Consultancy Services (TCS)**

**Activity exposure:** UN Global Compact Principle 2: Businesses should make sure that they are not complicit in human rights abuses.

**Reason for exception/holding:** TCS has no direct involvement in nuclear weapons or energy, however the external research provider considers the company to be involved because its parent company, Tata Sons, owns greater than 50% of TCS.

Tata Sons involvement is due to the company owning Tata Advanced Systems which acquired Tata Power's Strategic Engineering Division. The Strategic Engineering Division provides control systems for the Indian Navy's nuclear missile submarines.

As India has not signed the Treaty on the Non-Proliferation of Nuclear Weapons, the external data provider considers Tata Sons and by extension TCS to be in support of the nuclear weapons programme of India. The Investment Manager disagrees with this assessment and does not see anything in the activities or conduct of the company to question its sustainability positioning or the investment case.



### **How did this financial product consider principal adverse impacts on sustainability factors?**

In addition to the detail described above, the Investment Manager has set a materiality threshold of 5% of revenue for direct involvement in companies materially involved in the exploration, production or generation of fossil fuel energy and a threshold of 0% for controversial weapons. Portfolio companies are checked against the thresholds each quarter by an external third-party research platform.

The below table sets out the PAI indicators for the Fund.

<b>Mandatory indicators</b>	<b>Metrics</b>	<b>2022</b>	<b>2023</b>
Exposure	(EUR m)	976	854
1. GHG Emissions	Scope 1 (tCO <sub>2</sub> eq)	2,085	2,330
	Scope 2 (tCO <sub>2</sub> eq)	4,756	5,726
	Scope 3 (tCO <sub>2</sub> eq)	267,297	234,484
	Total Emissions Scope 1+2 (tCO <sub>2</sub> eq)	6,841	8,056
	Total Emissions Scope 1+2+3 (tCO <sub>2</sub> eq)	274,138	242,540
2. Carbon Footprint	Total Emissions Scope 1+2 (tCO <sub>2</sub> eq/EURm)	7	9
	Total Emissions Scope 1+2+3 (tCO <sub>2</sub> eq/EURm)	281	284
3. GHG Intensity of Investee Companies	Scope 1+2 (tCO <sub>2</sub> eq/EURm)	39	44
	Scope 1+2+3 (tCO <sub>2</sub> eq/EURm)	1,042	1,058
4. Exposure to companies active in the fossil fuel sector	(% involvement)	0%	0%
5. Share of Non-Renewable Energy Consumption and Production	Non-Renewable Energy Consumption (%)	84%	82%
	Non-Renewable Energy Production (%)	18%	15%
6. Energy consumption intensity per high impact sector	Agriculture, Forestry & Fishing (GWh/EURm)	no data	no data
	Construction (GWh/EURm)	no data	no data
	Electricity, Gas, Steam & Air Conditioning Supply (GWh/EURm)	no data	no data
	Manufacturing (GWh/EURm)	0.12	0.15
	Mining & Quarrying (GWh/EURm)	no data	no data
	Real Estate Activities (GWh/EURm)	no data	no data
	Transportation & Storage (GWh/EURm)	no data	no data
	Water Supply, Sewerage, Waste Remediation (GWh/EURm)	no data	no data
7. Activities Negatively Affecting Biodiversity Areas	Trade & Repair of Automobiles (GWh/EURm)	no data	no data
	(% involvement)	0%	0%
8. Emissions to Water	(t/EURm)	insufficient data	no data
9. Hazardous waste ratio	(t/EURm)	138	174
10. Violations of UNGC and OECD Guidelines for Multinational Enterprises	Watch (% involvement)	0%	2%
	Breach (% involvement)	5%	4%
11. Lack of Processes & Compliance Mechanisms to Monitor Compliance with UNGC and OECD guidelines	(% involvement)	72%	55%
12. Unadjusted Gender Pay Gap	% of Male Gross Hourly Rate	insufficient data	no data
13. Board Gender Diversity	% of Female Board Members	23%	24%
14. Exposure to Controversial Weapons	(% involvement)	0%	0%

Voluntary indicators	Metrics	2022	2023
Water Usage and Recycling	% Water Withdrawal	n/a	57%
	Recycling & Reuse (cubic metres)	n/a	25,486,852
Number of Identified Cases of Severe Human Rights Issues & Incidents	Weighted number of incidents	n/a	0.2

Notes: PAI data is sourced from third-party ESG data providers. 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. Data for certain metrics may be based on limited data across the portfolio companies.



### What were the top investments of this financial product?

The list includes the investments constituting the **greatest proportion of investments** of the financial product during the reference period which is: 1 January 2023 to 31 December 2023.

Largest investments	Sector	% assets	Country
Mahindra & Mahindra	Consumer Discretionary	7.5	India
CSL	Health Care	5.6	Australia
Unicharm	Consumer Staples	5.1	Japan
Hoya	Health Care	4.7	Japan
OCBC Bank	Financials	4.2	Singapore
Kotak Mahindra Bank	Financials	4.1	India
Tata Consultancy Services	Information Technology	4.0	India
Tata Consumer Products	Consumer Staples	3.7	India
Tech Mahindra	Information Technology	3.6	India
Godrej Consumer Products	Consumer Staples	3.4	India
Marico	Consumer Staples	3.4	India
Taiwan Semiconductor	Information Technology	3.1	Taiwan
Dr. Reddy's Laboratories	Health Care	3.1	India
HDFC Bank*	Financials	3.0	India
Infineon Technologies	Information Technology	2.5	Germany

\*HDFC Limited merged with HDFC Bank. The % assets figure is the average of both holdings.

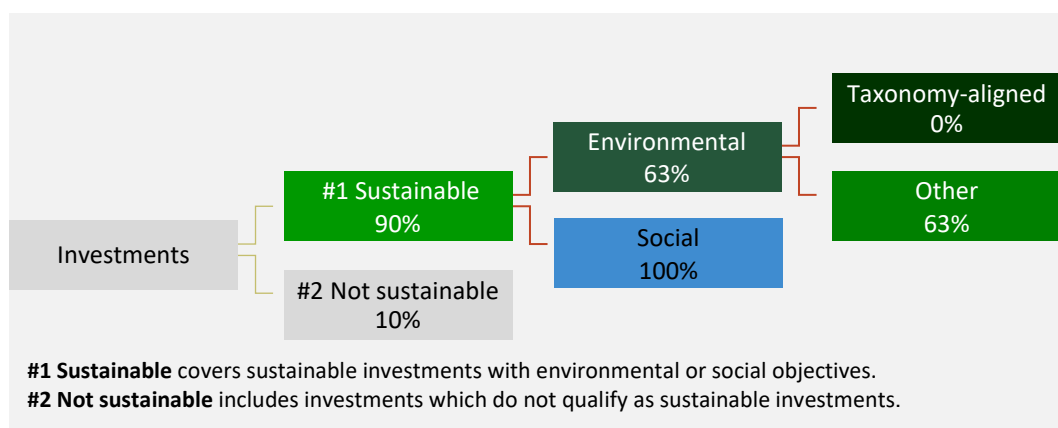
**Asset allocation** describes the share of investments in specific assets.



### What was the proportion of sustainability-related investments?

#### ● *What was the asset allocation?*

The Fund invested 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 Investment Manager's own philosophy explained in the Investment Policy of the Prospectus.



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.

● **In which economic sectors were the investments made?**

The average holdings (excluding cash) over the reporting period in Global Industry Classification Standard (GICs) sectors:

Sector	% assets
Communication Services	2.9
Consumer Discretionary	8.5
Consumer Staples	19.3
Energy	-
Financials	18.6
Health Care	19.9
Industrials	2.6
Information Technology	24.7
Materials	0.1
Real Estate	-
Utilities	-
Cash and cash equivalents	3.4

The Fund has no direct holdings in companies materially involved in the exploration, production or generation of fossil fuel energy.

The Investment Manager checks investee companies (via a third-party research platform and on a quarterly basis) for any revenues derived from exploration, mining, extraction, production, processing, storage, refining or distribution, including transportation, storage and trade, of fossil fuels. They disclose any companies above their material threshold (5% of revenues) on their website.

Additional transparency is provided by the Investment Manager in their annual report (**Annual Stewardship Review 2022** pg.16), where they disclose companies that are providing services to the fossil fuel industry directly or via their underlying subsidiaries.

To comply, with the EU Taxonomy, the criteria for **fossil gas** include limitations on emissions and switching to fully renewable power or lower-carbon fuels by the end of 2035. For **nuclear energy**, the criteria include comprehensive safety and waste management rules.

**Enabling activities** directly enable other activities to make a substantial contribution to an environmental objective

**Transitional activities are economic activities** for which low-carbon alternatives are not yet available and that have greenhouse gas emission levels corresponding to the best performance.

Taxonomy-aligned activities are expressed as a share of:

- **turnover** reflecting the share of revenue from green activities of investee companies
- **capital expenditure** (CapEx) showing the green investments made by investee companies, e.g. for a transition to a green economy.
- **operational expenditure** (OpEx) reflecting green operational activities of investee companies.

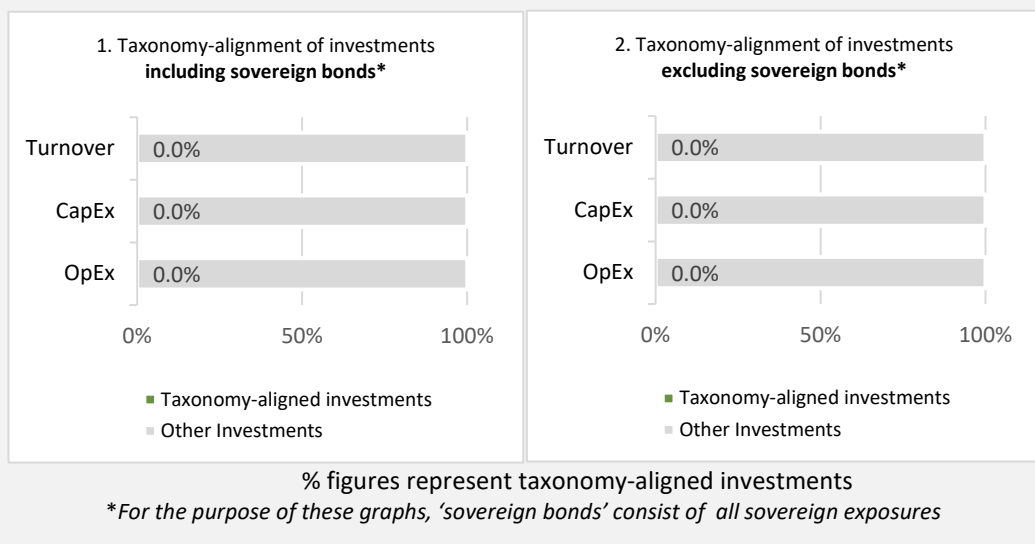


## To what extent were sustainable investments with an environmental objective aligned with the EU Taxonomy<sup>1</sup>?

### ● *Did the financial product investment in fossil gas and/or nuclear energy related activities*

- Yes
- In fossil gas     In nuclear energy
- No

*The graphs below show in green the percentage of investments that were aligned with the EU Taxonomy. As there is no appropriate methodology to determine the taxonomy-alignment of sovereign bonds\*, the first graph shows the Taxonomy alignment in relation to all the investments of the financial product including sovereign bonds, while the second graph shows the Taxonomy alignment only in relation to the investments of the financial product other than sovereign bonds.*



### ● *What was the share of investments made in transitional and enabling activities?*

The reported share of investments made in transitional and enabling activities for the Fund is **0%**.

### ● *How did the percentage of investments aligned with the EU Taxonomy compare with previous reference periods?*

The percentage of investments aligned with the EU Taxonomy for the previous reference period was **0%**.

<sup>1</sup> Fossil gas and/or nuclear related activities will only comply with the EU Taxonomy where they contribute to limiting climate change ("climate change mitigation") and do not significantly harm any EU Taxonomy objective – see explanatory notes in the left hand margin. The full criteria for fossil gas and nuclear energy economic activities that comply with the EU Taxonomy are laid down in Commission Delegated Regulation (EU) 2022/1214.



are sustainable investments with an environmental objective that **do not take into account the criteria** for environmentally sustainable economic activities under the EU Taxonomy.



### What was the share of sustainable investments with an environmental objective that were not aligned with the EU Taxonomy?

The Fund does not actively target EU Taxonomy-aligned assets.

As at 31 December 2023, the Fund held **41** companies. Based on reported turnover data, there was no alignment with the EU taxonomy from any of these companies.



### What was the share of socially sustainable investments?

**All companies** in the Fund were aligned to socially sustainable investments as defined by the Investment Manager’s human development pillars.



### What investments were included under “not sustainable”, what was their purpose and were there any minimum environmental or social safeguards?

The “#2 Not sustainable” assets are cash and near-cash assets held pending investment, to meet liquidity requirements, or assets held in order to allow efficient operational exit of positions. Cash is held by the depositary.

The Fund’s service providers for these assets are reviewed and assessed for compliance with FSI’s modern slavery policy.



### What actions have been taken to attain the sustainable investment objective during the reference period?

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. Engagement is fully integrated into the responsibilities of the investment team and contributes invaluable insights into their understanding of each company.

More information is available on the Investment Manager’s website (links below):

[Stewardship and corporate engagement policy](#)

[Engagement booklet](#)

[Proxy voting](#)

[Annual stewardship review](#)

During the reporting period, the Investment Manager met with **74%** of Fund companies.

All engagement starts with bottom-up analysis, with responsibility shared across the investment team. Over the period and across their funds, the Investment Manager engaged on issues such as:

- **Pollution, natural resource degradation, biodiversity and climate change** – packaging, plastic pellets, deforestation, sustainability of supply chains (soy, palm oil and coffee), fossil fuel versus renewables, water, waste and energy efficiency
- **Aligned remuneration and incentives** – living wage, gender pay gap and complexity of incentives
- **Animal testing/welfare** – animal testing exposure
- **Human rights and modern slavery** – conflict minerals in the supply chains of semiconductors, trafficking, forced labour and child labour in the Asia Pacific region and public health



- **Diversity, equity and inclusion** – diversity, particularly gender, in senior management and on boards
- **Addictive products** – indirect exposure to tobacco, chemicals, gaming, adult entertainment, and sugar content in food
- **Governance** – corporate strategy and legal structure

During the period the Investment Manager engaged with **72%** of Fund companies.

- Environmental issues 38%
- Social issues 24%
- Governance issues 38%

*Engagements may relate to one or multiple environmental, social or governance issues.*

Proxy voting is an extension of the Investment Manager’s engagement activities. It is not outsourced to an external provider or separate proxy voting/engagement team. The Investment Manager considers each proxy vote individually and on its own merits in the context of their knowledge about that particular company. A breakdown of voting activity for the Fund is detailed below.

**Voting activity:** 1 January 2023 to 31 December 2023

Total proposals to vote on	388
Number of meetings to vote at	57
Number of companies that held voting meetings	39
Number of votes against management proposals	20
Number of votes abstained from voting	1
Number of shareholder proposals to vote on	0
Number of shareholder proposals voted against	0
Number of shareholder proposals abstained from voting	0

**Voting rationales:** 1 January 2023 to 31 December 2023

Company	Proposal	No. of proposals	Voting decision
Foshan Haitian Flavouring Glodon Telkom Indonesia Vitasoy Yifeng Pharmacy Chain	Appointment of auditor	5	Against management recommendation
	<b>Rationale</b> The Investment Manager voted against the appointment of the auditor as they have been in place for over 10 years and the companies have given no information on intended rotation. Rotating an auditor on a relatively frequent basis (e.g. every 5-10 years) helps to ensure a fresh pair of eyes are examining the accounts, and follows best practice.		
Foshan Haitian Flavouring	Connected transactions	2	Against management recommendation
	<b>Rationale</b> The Investment Manager voted against the company's request to approve connected transactions entered between the company and related entities and their respective annual caps. They do not believe these requests are in shareholders’ interests.		

Kingmed Diagnostics	Related party transaction	1	Against management recommendation
	<b>Rationale</b> The Investment Manager voted against a related party transaction which would transfer 73% ownership of a subsidiary pharmaceutical company to the Deputy General Manager of the listco. The Investment Manager could not find any reasons behind the sale nor the valuation at which the transaction would happen.		
Midea	Renewed liability insurance	1	Abstained from voting
	<b>Rationale</b> The Investment Manager voted to abstain on the approval of a renewed liability insurance for Directors, Supervisors, and Senior Management as they did not have sufficient information on the details of the insurance policy at the time of voting.		
ResMed	Board re-election	12	Against management recommendation
	Executive remuneration		
	Appointment of auditor		
	<b>Rationale</b> The Investment Manager voted against the Board re-election as they were not able to vote against individual directors. They voted against a director who retired from the company 10 years ago and believe should step down from the Board. They also voted against the company's executive remuneration, as they believed it to be complex and measured on many adjusted metrics. Finally, they voted against the re-appointment of the auditor as they have been in place for 29 consecutive years and believe rotating an auditor on a relatively frequent basis (e.g. every 5-10 years) helps to ensure a fresh pair of eyes are examining the accounts and follows best practice.		



### How did this financial product perform compared to the reference sustainable benchmark?

A sustainable benchmark has not been designated to compare the performance for this Fund.

- **How did the reference benchmark differ from a broad market index?**  
Not applicable.
- **How did this financial product perform with regard to the sustainability indicators to determine the alignment of the reference benchmark with the sustainable investment objective?**  
Not applicable.
- **How did this financial product perform compared with the reference benchmark?**  
Not applicable.
- **How did this financial product perform compared with the broad market index?**  
Not applicable.

**Reference benchmarks** are indexes to measure whether the financial product attains the sustainable objective.

Template periodic disclosure for the financial products referred to in Article 9, paragraphs 1 to 4a, of Regulation (EU) 2019/2088 and Article 5, first paragraph, of Regulation (EU) 2020/852

Product name:

Stewart Investors Asia Pacific Sustainability Fund

Legal entity identifier:

549300BZRT184DKU8I49

## Sustainable investment objective

### Did this financial product have a sustainable investment objective?

Yes

It made **sustainable investments with an environmental objective: 62%**

in economic activities that qualify as environmentally sustainable under the EU Taxonomy

in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy

It made **sustainable investments with a social objective: 100%**

No

It **promoted Environmental/Social (E/S) characteristics** and while it did not have as its objective a sustainable investment, it had a proportion of \_\_\_% of sustainable investments

with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy

with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy

with a social objective

It promoted E/S characteristics, but **did not make any sustainable investments**

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.

### To what extent was the sustainable investment objective of this financial product met?

The Fund has 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. The contribution to sustainable development is assessed under two frameworks, social and environmental.

#### 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.

**Sustainable investment** means an investment in an economic activity that contributes to an environmental or social objective, provided that the investment does not significantly harm any environmental or social objective and that the investee companies follow good governance practices.

The **EU Taxonomy** is a classification system laid down in Regulation (EU) 2020/852 establishing a list of **environmentally sustainable economic activities**. That Regulation does not lay down a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.



- **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

As at 31 December 2023, the Fund held **65** companies. **All companies (100%)** were contributing to at least one **human development pillar** and, in total, were making **178 contributions** to the pillars.

Further information about how the Investment Manager uses the human development pillars is available on the Investment Manager’s website – [stewartinvestors.com/all/how-we-invest/our-approach/human-development-pillars](https://stewartinvestors.com/all/how-we-invest/our-approach/human-development-pillars)

### **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

As at 31 December 2023, the Fund held **65** companies. **40 companies (62%)** were contributing to **climate change solutions**. These companies were contributing to **39** different solutions and, in total, were making **129 contributions** to the solutions.

Further information about how the Investment Manager uses the Project Drawdown climate solutions is available on the Investment Manager’s website – [stewartinvestors.com/all/how-we-invest/our-approach/climate-solutions](https://stewartinvestors.com/all/how-we-invest/our-approach/climate-solutions)

### Assessment

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

1. there is either a direct or enabling link between the activities of the company and the achievement of a positive social or environmental outcome;
2. 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
3. the company recognises potential negative social or environmental outcomes associated with its 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.

#### Notes:

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.

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).

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).

#### ● **How did the sustainability indicators perform?**

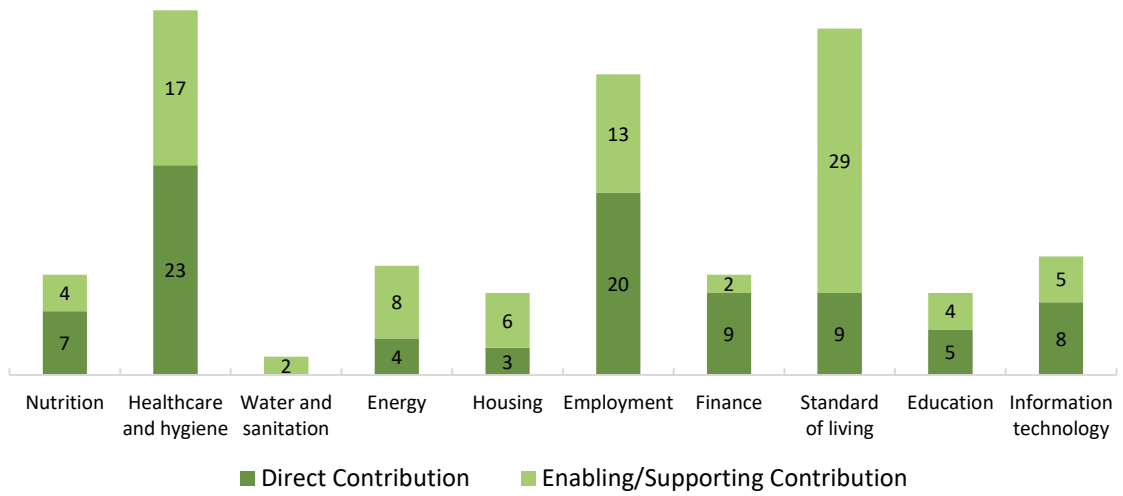
The Investment Manager’s Portfolio Explorer tool provides the contribution that each company makes to climate solutions, human development and the Sustainable Development Goals, as well as the investment rationale, key risks and areas for improvement. Click on the link below to access the tool.

[stewartinvestors.com/all/how-we-invest/our-approach/portfolio-explorer](https://stewartinvestors.com/all/how-we-invest/our-approach/portfolio-explorer)

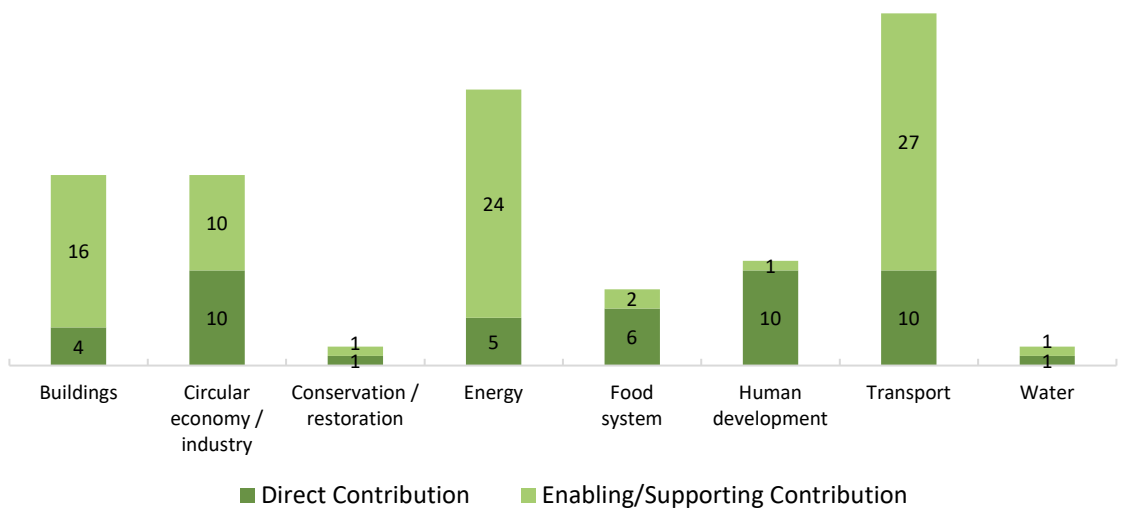
The social and environmental outcomes for the Fund as at 31 December 2023 are provided in the charts below.

**Sustainability indicators** measure how the sustainable objectives of this financial product are attained.

**Human development pillars**  
(number of companies contributing to each pillar)



**Climate change solutions**  
(number of companies contributing to each solution)



Notes: Direct Contribution - directly attributable to products, services or practices provided by that company. Enabling/Supporting Contribution - supported or made possible by products or technologies provided by that company.

● **...and compared to previous periods?**

Changes in the sustainability outcomes for the Fund year-on-year are related to bottom-up changes in the portfolio and/or changes in the sustainability profile of individual investee companies.

The social and environmental outcomes for the Fund over previous periods are provided in the tables below.

## Positive social outcomes

Human development pillars	Contribution	31-Dec-2022	31-Dec-2021
No. of companies (%)	-	61 (100%)	60 (100%)
Total number of contributions	-	161	157
Nutrition	Direct	8	6
	Enabling/Supporting	3	3
Healthcare and hygiene	Direct	20	18
	Enabling/Supporting	12	11
Water and sanitation	Direct	-	-
	Enabling/Supporting	2	2
Energy	Direct	4	4
	Enabling/Supporting	5	5
Housing	Direct	4	3
	Enabling/Supporting	6	6
Employment	Direct	22	24
	Enabling/Supporting	8	9
Finance	Direct	8	7
	Enabling/Supporting	3	4
Standard of living	Direct	8	7
	Enabling/Supporting	28	27
Education	Direct	3	4
	Enabling/Supporting	5	4
Information technology	Direct	8	9
	Enabling/Supporting	4	4

## Positive environmental outcomes

Climate solutions	Contribution	31-Dec-2022	31-Dec-2021
No. of companies (%)	-	37 (61%)	35 (58%)
Number of different solutions	-	33	29
Total number of solutions	-	110	100
Buildings	Direct	4	3
	Enabling/Supporting	16	12
	Indirect	n/a	2
Circular economy/industry	Direct	10	2
	Enabling/Supporting	8	-
	Indirect	n/a	1
Conservation/restoration	Direct	1	-
	Enabling/Supporting	2	-
	Indirect	n/a	2
Energy	Direct	5	3
	Enabling/Supporting	18	13
	Indirect	n/a	6
Food system	Direct	5	5
	Enabling/Supporting	2	2
	Indirect	n/a	-
Human development	Direct	8	7
	Enabling/Supporting	-	-
	Indirect	n/a	-
Transport	Direct	7	7
	Enabling/Supporting	22	22
	Indirect	n/a	12
Water	Direct	1	1
	Enabling/Supporting	1	-
	Indirect	n/a	-

During 2022 and following feedback from clients, the Investment Manager removed the Indirect Contribution from their climate solutions measures.

Indirect Contribution – providing generic products or services to companies making direct or enabling contributions or making operational decisions which have a material contribution.

In 2022, Project Drawdown added 11 new climate solutions to their framework. The Investment Manager considered these new solutions for their 2022 reporting measures. More detail on these changes are available on the Investment Manager’s website: [stewartinvestors.com/all/insights/climate-solutions-update](https://stewartinvestors.com/all/insights/climate-solutions-update)

● ***How did the sustainable investments not cause significant harm to any sustainable investment objective?***

The Fund only invests 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.

The 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:

[stewartinvestors.com/all/insights/our-position-on-harmful-and-controversial-products-and-services](https://stewartinvestors.com/all/insights/our-position-on-harmful-and-controversial-products-and-services)

— *How were the indicators for adverse impacts on sustainability factors taken into account?*

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 a company's quality or sustainability positioning through either meetings, ongoing monitoring and reviewing their annual reports, the Investment Manager will re-evaluate the investment case.

In addition, the Fund portfolio is 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 Principal Adverse Impacts (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 investor does no significant harm but still have 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, Stewart Investors will not invest or will exit the Funds' position in the company in a timely manner.

The Investment Manager includes product level data on Principal Adverse Impact (PAI) indicators in the question below.

**Principal adverse impacts** are the most significant negative impacts of investment decisions on sustainability factors relating to environmental, social and employee matters, respect for human rights, anti-corruption and anti-bribery matters.

Were sustainable investments aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights? Details:

The Fund's sustainable investments are aligned with these Guidelines and Principles.

The Investment Manager continually monitors the companies owned to understand any changes to the strategies. The Fund's 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.

During the reporting period the Fund held the following company which flagged against the Investment Manager's policy.

#### **Tata Consultancy Services (TCS)**

**Activity exposure:** UN Global Compact Principle 2: Businesses should make sure that they are not complicit in human rights abuses.

**Reason for exception/holding:** TCS has no direct involvement in nuclear weapons or energy, however the external research provider considers the company to be involved because its parent company, Tata Sons, owns greater than 50% of TCS.

Tata Sons involvement is due to the company owning Tata Advanced Systems which acquired Tata Power's Strategic Engineering Division. The Strategic Engineering Division provides control systems for the Indian Navy's nuclear missile submarines.

As India has not signed the Treaty on the Non-Proliferation of Nuclear Weapons, the external data provider considers Tata Sons and by extension TCS to be in support of the nuclear weapons programme of India. The Investment Manager disagrees with this assessment and does not see anything in the activities or conduct of the company to question its sustainability positioning or the investment case.



### **How did this financial product consider principal adverse impacts on sustainability factors?**

In addition to the detail described above, the Investment Manager has set a materiality threshold of 5% of revenue for direct involvement in companies materially involved in the exploration, production or generation of fossil fuel energy and a threshold of 0% for controversial weapons. Portfolio companies are checked against the thresholds each quarter by an external third-party research platform.

The below table sets out the PAI indicators for the Fund.

<b>Mandatory indicators</b>	<b>Metrics</b>	<b>2022</b>	<b>2023</b>
Exposure	(EUR m)	296	419
1. GHG Emissions	Scope 1 (tCO <sub>2</sub> eq)	1,711	3,001
	Scope 2 (tCO <sub>2</sub> eq)	3,412	4,967
	Scope 3 (tCO <sub>2</sub> eq)	178,985	174,156
	Total Emissions Scope 1+2 (tCO <sub>2</sub> eq)	5,123	7,968
	Total Emissions Scope 1+2+3 (tCO <sub>2</sub> eq)	184,109	182,124
2. Carbon Footprint	Total Emissions Scope 1+2 (tCO <sub>2</sub> eq/EURm)	17	19
	Total Emissions Scope 1+2+3 (tCO <sub>2</sub> eq/EURm)	623	435
3. GHG Intensity of Investee Companies	Scope 1+2 (tCO <sub>2</sub> eq/EURm)	66	66
	Scope 1+2+3 (tCO <sub>2</sub> eq/EURm)	1,752	1,560
4. Exposure to companies active in the fossil fuel sector	(% involvement)	0%	0%
5. Share of Non-Renewable Energy Consumption and Production	Non-Renewable Energy Consumption (%)	85%	82%
	Non-Renewable Energy Production (%)	37%	30%
6. Energy consumption intensity per high impact sector	Agriculture, Forestry & Fishing (GWh/EURm)	no data	no data
	Construction (GWh/EURm)	no data	no data
	Electricity, Gas, Steam & Air Conditioning Supply (GWh/EURm)	no data	no data
	Manufacturing (GWh/EURm)	0.13	0.13
	Mining & Quarrying (GWh/EURm)	no data	no data
	Real Estate Activities (GWh/EURm)	no data	no data
	Transportation & Storage (GWh/EURm)	no data	no data
	Water Supply, Sewerage, Waste Remediation (GWh/EURm)	no data	no data
7. Activities Negatively Affecting Biodiversity Areas	Trade & Repair of Automobiles (GWh/EURm)	no data	no data
	(% involvement)	0%	0%
8. Emissions to Water	(t/EURm)	insufficient data	no data
9. Hazardous waste ratio	(t/EURm)	24	54
10. Violations of UNGC and OECD Guidelines for Multinational Enterprises	Watch (% involvement)	0%	1%
	Breach (% involvement)	3%	3%
11. Lack of Processes & Compliance Mechanisms to Monitor Compliance with UNGC and OECD guidelines	(% involvement)	77%	64%
12. Unadjusted Gender Pay Gap	% of Male Gross Hourly Rate	insufficient data	no data
13. Board Gender Diversity	% of Female Board Members	21%	22%
14. Exposure to Controversial Weapons	(% involvement)	0%	0%

Voluntary indicators	Metrics	2022	2023
	% Water Withdrawal	n/a	59%
Water Usage and Recycling	Recycling & Reuse (cubic metres)	n/a	21,717,111
Number of Identified Cases of Severe Human Rights Issues & Incidents	Weighted number of incidents	n/a	0.1

Notes: PAI data is sourced from third-party ESG data providers. 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. Data for certain metrics may be based on limited data across the portfolio companies.



### What were the top investments of this financial product?

The list includes the investments constituting the **greatest proportion of investments** of the financial product during the reference period which is: 1 January 2023 to 31 December 2023.

Largest investments	Sector	% assets	Country
Mahindra & Mahindra	Consumer Discretionary	6.1	India
Tube Investments	Consumer Discretionary	5.3	India
CSL	Health Care	3.8	Australia
Unicharm	Consumer Staples	3.7	Japan
Tata Consultancy Services	Information Technology	3.2	India
Voltronic Power	Industrials	3.0	Taiwan
Mainfreight	Industrials	2.9	New Zealand
Tech Mahindra	Information Technology	2.9	India
Hoya	Health Care	2.5	Japan
CG Power	Industrials	2.5	India
Tata Consumer Products	Consumer Staples	2.3	India
Shenzhen Inovance	Industrials	2.0	China
Marico	Consumer Staples	2.0	India
Taiwan Semiconductor	Information Technology	1.8	Taiwan
Chroma ATE	Information Technology	1.8	Taiwan

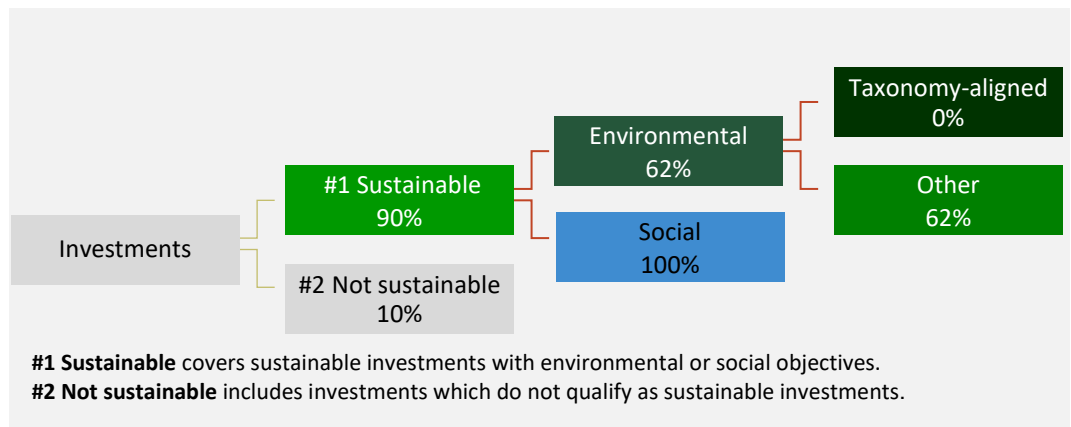


### What was the proportion of sustainability-related investments?

#### ● *What was the asset allocation?*

The Fund invested 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 Investment Manager's own philosophy explained in the Investment Policy of the Prospectus.

**Asset allocation** describes the share of investments in specific assets.



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.

● **In which economic sectors were the investments made?**

The average holdings (excluding cash) over the reporting period in Global Industry Classification Standard (GICs) sectors:

Sector	% assets
Communication Services	1.8
Consumer Discretionary	14.9
Consumer Staples	16.8
Energy	-
Financials	10.9
Health Care	16.9
Industrials	15.8
Information Technology	19.7
Materials	-
Real Estate	-
Utilities	-
Cash and cash equivalents	3.1

The Fund has no direct holdings in companies materially involved in the exploration, production or generation of fossil fuel energy.

The Investment Manager checks investee companies (via a third-party research platform and on a quarterly basis) for any revenues derived from exploration, mining, extraction, production, processing, storage, refining or distribution, including transportation, storage and trade, of fossil fuels. They disclose any companies above their material threshold (5% of revenues) on their website.

Additional transparency is provided by the Investment Manager in their annual report (**Annual Stewardship Review 2022** pg.16), where they disclose companies that are providing services to the fossil fuel industry directly or via their underlying subsidiaries.

To comply, with the EU Taxonomy, the criteria for **fossil gas** include limitations on emissions and switching to fully renewable power or lower-carbon fuels by the end of 2035. For **nuclear energy**, the criteria include comprehensive safety and waste management rules.

**Enabling activities** directly enable other activities to make a substantial contribution to an environmental objective

**Transitional activities are economic activities** for which low-carbon alternatives are not yet available and that have greenhouse gas emission levels corresponding to the best performance.



## To what extent were sustainable investments with an environmental objective aligned with the EU Taxonomy<sup>1</sup>?

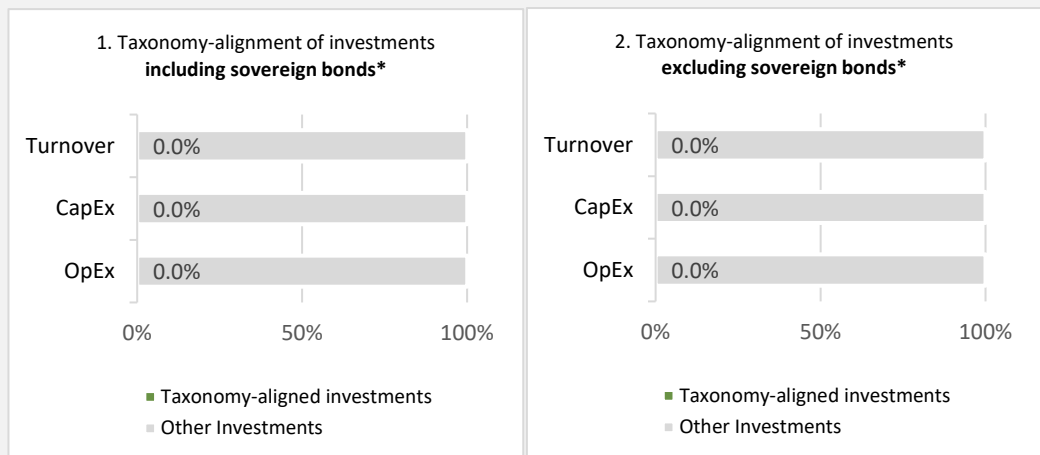
### ● **Did the financial product investment in fossil gas and/or nuclear energy related activities**

Yes

In fossil gas     In nuclear energy

No

*The graphs below show in green the percentage of investments that were aligned with the EU Taxonomy. As there is no appropriate methodology to determine the taxonomy-alignment of sovereign bonds\*, the first graph shows the Taxonomy alignment in relation to all the investments of the financial product including sovereign bonds, while the second graph shows the Taxonomy alignment only in relation to the investments of the financial product other than sovereign bonds.*



% figures represent taxonomy-aligned investments

\*For the purpose of these graphs, 'sovereign bonds' consist of all sovereign exposures

### ● **What was the share of investments made in transitional and enabling activities?**

The reported share of investments made in transitional and enabling activities for the Fund is **0%**.

### ● **How did the percentage of investments aligned with the EU Taxonomy compare with previous reference periods?**

The percentage of investments aligned with the EU Taxonomy for the previous reference period was **0%**.

<sup>1</sup> Fossil gas and/or nuclear related activities will only comply with the EU Taxonomy where they contribute to limiting climate change ("climate change mitigation") and do not significantly harm any EU Taxonomy objective – see explanatory notes in the left hand margin. The full criteria for fossil gas and nuclear energy economic activities that comply with the EU Taxonomy are laid down in Commission Delegated Regulation (EU) 2022/1214.



are sustainable investments with an environmental objective that **do not take into account the criteria** for environmentally sustainable economic activities under the EU Taxonomy.



### What was the share of sustainable investments with an environmental objective that were not aligned with the EU Taxonomy?

The Fund does not actively target EU Taxonomy-aligned assets.

As at 31 December 2023, the Fund held **65** companies. Based on reported turnover data, there was no alignment with the EU taxonomy from any of these companies.



### What was the share of socially sustainable investments?

**All companies** in the Fund were aligned to socially sustainable investments as defined by the Investment Manager’s human development pillars.



### What investments were included under “not sustainable”, what was their purpose and were there any minimum environmental or social safeguards?

The “#2 Not sustainable” assets are cash and near-cash assets held pending investment, to meet liquidity requirements, or assets held in order to allow efficient operational exit of positions. Cash is held by the depositary.

The Fund’s service providers for these assets are reviewed and assessed for compliance with FSI’s modern slavery policy.



### What actions have been taken to attain the sustainable investment objective during the reference period?

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. Engagement is fully integrated into the responsibilities of the investment team and contributes invaluable insights into their understanding of each company.

More information is available on the Investment Manager’s website (links below):

[Stewardship and corporate engagement policy](#)

[Engagement booklet](#)

[Proxy voting](#)

[Annual stewardship review](#)

During the reporting period, the Investment Manager met with **77%** of Fund companies.

All engagement starts with bottom-up analysis, with responsibility shared across the investment team. Over the period and across their funds, the Investment Manager engaged on issues such as:

- **Pollution, natural resource degradation, biodiversity and climate change** – packaging, plastic pellets, deforestation, sustainability of supply chains (soy, palm oil and coffee), fossil fuel versus renewables, water, waste and energy efficiency
- **Aligned remuneration and incentives** – living wage, gender pay gap and complexity of incentives
- **Animal testing/welfare** – animal testing exposure

- **Human rights and modern slavery** – conflict minerals in the supply chains of semiconductors, trafficking, forced labour and child labour in the Asia Pacific region and public health
- **Diversity, equity and inclusion** – diversity, particularly gender, in senior management and on boards
- **Addictive products** – indirect exposure to tobacco, chemicals, gaming, adult entertainment, and sugar content in food
- **Governance** – corporate strategy and legal structure

During the period the Investment Manager engaged with **73%** of Fund companies.

- Environmental issues 39%
- Social issues 38%
- Governance issues 23%

*Engagements may relate to one or multiple environmental, social or governance issues.*

Proxy voting is an extension of the Investment Manager’s engagement activities. It is not outsourced to an external provider or separate proxy voting/engagement team. The Investment Manager considers each proxy vote individually and on its own merits in the context of their knowledge about that particular company. A breakdown of voting activity for the Fund is detailed below.

**Voting activity: 1 January 2023 to 31 December 2023**

Total proposals to vote on	645
Number of meetings to vote at	97
Number of companies that held voting meetings	64
Number of votes against management proposals	31
Number of votes abstained from voting	2
Number of shareholder proposals to vote on	0
Number of shareholder proposals voted against	0
Number of shareholder proposals abstained from voting	0

**Voting rationales: 1 January 2023 to 31 December 2023**

Company	Proposal	No. of proposals	Voting decision
Foshan Haitian Flavouring Glodon Selamat Sempurna Telkom Indonesia Vitasoy Yifeng Pharmacy Chain	Appointment of auditor	6	Against management recommendation
	<p><b>Rationale</b> The Investment Manager voted against the appointment of the auditor as they have been in place for over 10 years and the companies have given no information on intended rotation. Rotating an auditor on a relatively frequent basis (e.g. every 5-10 years) helps to ensure a fresh pair of eyes are examining the accounts, and follows best practice.</p>		



Amoy Diagnostics	Amendments to articles	1	Against management recommendation
	<p><b>Rationale</b> The Investment Manager voted against the company's request to increase share capital and share count as they did not have sufficient information at the time of voting for the justification of these amendments to articles.</p>		
BRAC Bank	Increase in authorised share capital	1	Against management recommendation
	<p><b>Rationale</b> The Investment Manager voted against the company's request to increase authorised share capital by more than 100%, as the company had not given any justification at the time of voting.</p>		
Foshan Haitian Flavouring	Connected transactions	2	Against management recommendation
	<p><b>Rationale</b> The Investment Manager voted against the company's request to approve connected transactions entered into between the company and related entities and their respective annual caps. The Investment Manager does not believe these requests are in shareholders' interests.</p>		
Hangzhou Robam	Director election	1	Against management recommendation
	<p><b>Rationale</b> The Investment Manager voted against the election of the Chair of the Nomination Committee in support of encouraging better gender diversity. At present the company has no female directors, and believe the Chair of the Nomination Committee has an important role in facilitating a more gender diverse Board of Directors.</p>		
Kalbe Farma	Appointment of auditor and authority to set fees	1	Abstained from voting
	<p><b>Rationale</b> The Investment Manager abstained from voting on the appointment of the company's auditor and their request to set auditor fees as at the time of voting the company had not disclosed the name of the auditing firm.</p>		
Kingmed Diagnostics	Related party transactions	1	Against management recommendation
	<p><b>Rationale</b> The Investment Manager voted against a related party transaction at which would transfer 73% ownership of a subsidiary pharmaceutical company to the Deputy General Manager of the listco. The Investment Manager could not find any reasons behind the sale nor the valuation at which the transaction would happen.</p>		
Midea	Renewed liability insurance	1	Abstained from voting
	<p><b>Rationale</b> The Investment Manager voted to abstain on the approval of a renewed liability insurance for Directors, Supervisors, and Senior Management at as they did not have sufficient information on the details of the insurance policy at the time of voting.</p>		

Pentamaster	Authority to issue shares without pre-emptive rights	1	Against management recommendation
	<p><b>Rationale</b></p> <p>The Investment Manager voted against the company's request to issue shares without pre-emptive rights, as the share discount rate had not been disclosed.</p>		
Philippine Seven	Approve all other business matters	1	Against management recommendation
	<p><b>Rationale</b></p> <p>The Investment Manager voted against the company's request for management to approve all other business matters before the annual general meeting (AGM) of shareholders. The Investment Manager is an active shareholder and prefers to vote on such matters at the AGM.</p>		
ResMed	Board re-election	12	Against management recommendation
	Executive remuneration		
	Appointment of auditor		
	<p><b>Rationale</b></p> <p>The Investment Manager voted against the Board re-election as they were not able to vote against individual directors. They voted against a director who retired from the company 10 years ago and believe should step down from the Board. They also voted against the company's executive remuneration, as they believed it to be complex and measured on many adjusted metrics. Finally, they voted against the re-appointment of the auditor as they have been in place for 29 consecutive years and believe rotating an auditor on a relatively frequent basis (e.g. every 5-10 years) helps to ensure a fresh pair of eyes are examining the accounts and follows best practice.</p>		
Vinda International	Authority to issue shares without pre-emptive rights	2	Against management recommendation
	Authority to issue repurchased shares		
	<p><b>Rationale</b></p> <p>The Investment Manager voted against the company's request to issue shares without pre-emptive rights and issue repurchased shares, as the share discount rate had not been disclosed.</p>		



### How did this financial product perform compared to the reference sustainable benchmark?

A sustainable benchmark has not been designated to compare the performance for this Fund.

- **How did the reference benchmark differ from a broad market index?**

Not applicable.

**Reference benchmarks** are indexes to measure whether the financial product attains the sustainable objective.

- ***How did this financial product perform with regard to the sustainability indicators to determine the alignment of the reference benchmark with the sustainable investment objective?***

Not applicable.

- ***How did this financial product perform compared with the reference benchmark?***

Not applicable.

- ***How did this financial product perform compared with the broad market index?***

Not applicable.

Template periodic disclosure for the financial products referred to in Article 9, paragraphs 1 to 4a, of Regulation (EU) 2019/2088 and Article 5, first paragraph, of Regulation (EU) 2020/852

Product name:

Stewart Investors European Sustainability Fund

Legal entity identifier:

254900AC9R2R60MRRP06

## Sustainable investment objective

### Did this financial product have a sustainable investment objective?

Yes

It made **sustainable investments with an environmental objective: 81%**

in economic activities that qualify as environmentally sustainable under the EU Taxonomy

in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy

It made **sustainable investments with a social objective: 100%**

No

It **promoted Environmental/Social (E/S) characteristics** and while it did not have as its objective a sustainable investment, it had a proportion of \_\_\_% of sustainable investments

with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy

with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy

with a social objective

It promoted E/S characteristics, but **did not make any sustainable investments**

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.



### To what extent was the sustainable investment objective of this financial product met?

The Fund has 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. The contribution to sustainable development is assessed under two frameworks, social and environmental.

#### 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.

**Sustainable investment** means an investment in an economic activity that contributes to an environmental or social objective, provided that the investment does not significantly harm any environmental or social objective and that the investee companies follow good governance practices.

The **EU Taxonomy** is a classification system laid down in Regulation (EU) 2020/852 establishing a list of **environmentally sustainable economic activities**. That Regulation does not lay down a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

- **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

As at 31 December 2023, the Fund held **43** companies. **All companies (100%)** were contributing to at least one **human development pillar** and, in total, were making **110 contributions** to the pillars.

Further information about how the Investment Manager uses the human development pillars is available on the Investment Manager’s website – [stewartinvestors.com/all/how-we-invest/our-approach/human-development-pillars](https://stewartinvestors.com/all/how-we-invest/our-approach/human-development-pillars)

### 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

As at 31 December 2023, the Fund held **43** companies. **35 companies (81%)** were contributing to **climate change solutions**. These companies were contributing to **43** different solutions and, in total, were making **117 contributions** to the solutions.

Further information about how the Investment Manager uses the Project Drawdown climate solutions is available on the Investment Manager’s website – [stewartinvestors.com/all/how-we-invest/our-approach/climate-solutions](https://stewartinvestors.com/all/how-we-invest/our-approach/climate-solutions)

### Assessment

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

1. there is either a direct or enabling link between the activities of the company and the achievement of a positive social or environmental outcome;
2. 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
3. the company recognises potential negative social or environmental outcomes associated with its 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.

#### Notes:

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.

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).

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).

#### ● **How did the sustainability indicators perform?**

The Investment Manager’s Portfolio Explorer tool provides the contribution that each company makes to climate solutions, human development and the Sustainable Development Goals, as well as the investment rationale, key risks and areas for improvement. Click on the link below to access the tool.

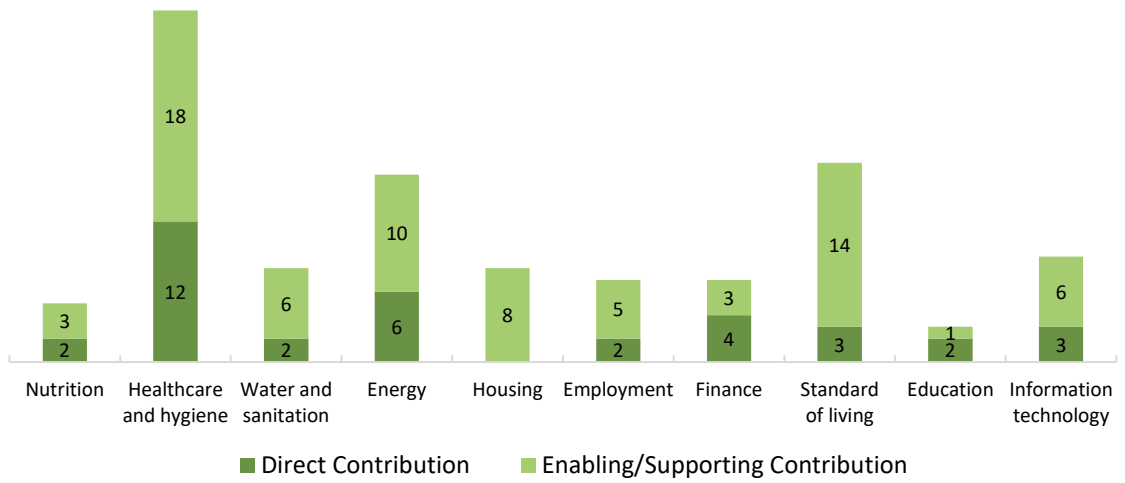
[stewartinvestors.com/all/how-we-invest/our-approach/portfolio-explorer](https://stewartinvestors.com/all/how-we-invest/our-approach/portfolio-explorer)

The social and environmental outcomes for the Fund as at 31 December 2023 are provided in the charts below.

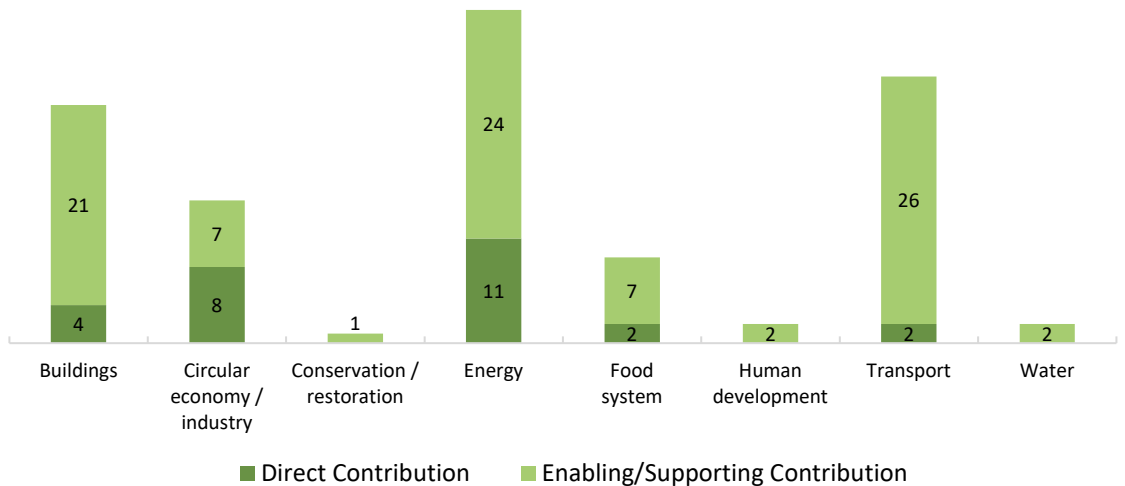
#### Sustainability

**indicators** measure how the sustainable objectives of this financial product are attained.

**Human development pillars**  
(number of companies contributing to each pillar)



**Climate change solutions**  
(number of companies contributing to each solution)



Notes: Direct Contribution - directly attributable to products, services or practices provided by that company. Enabling/Supporting Contribution - supported or made possible by products or technologies provided by that company.

● **...and compared to previous periods?**

Changes in the sustainability outcomes for the Fund year-on-year are related to bottom-up changes in the portfolio and/or changes in the sustainability profile of individual investee companies.

The social and environmental outcomes for the Fund over previous periods are provided in the tables below.

## Positive social outcomes

Human development pillars	Contribution	31-Dec-2022	31-Dec-2021
No. of companies (%)	-	41 (100%)	40 (100%)
Total number of contributions	-	99	96
Nutrition	Direct	2	2
	Enabling/Supporting	6	6
Healthcare and hygiene	Direct	14	15
	Enabling/Supporting	13	12
Water and sanitation	Direct	2	2
	Enabling/Supporting	5	5
Energy	Direct	6	7
	Enabling/Supporting	5	7
Housing	Direct	-	-
	Enabling/Supporting	5	3
Employment	Direct	2	3
	Enabling/Supporting	5	3
Finance	Direct	3	1
	Enabling/Supporting	2	2
Standard of living	Direct	3	3
	Enabling/Supporting	16	15
Education	Direct	3	2
	Enabling/Supporting	1	1
Information technology	Direct	2	2
	Enabling/Supporting	4	5

## Positive environmental outcomes

Climate solutions	Contribution	31-Dec-2022	31-Dec-2021
No. of companies (%)	-	33 (80%)	28 (70%)
Number of different solutions	-	41	31
Total number of solutions	-	103	91
Buildings	Direct	5	6
	Enabling/Supporting	18	18
	Indirect	n/a	1
Circular economy/industry	Direct	9	4
	Enabling/Supporting	6	-
	Indirect	n/a	-
Conservation/restoration	Direct	-	-
	Enabling/Supporting	1	-
	Indirect	n/a	-
Energy	Direct	13	17
	Enabling/Supporting	19	16
	Indirect	n/a	1
Food system	Direct	3	2
	Enabling/Supporting	7	5
	Indirect	n/a	-
Human development	Direct	-	-
	Enabling/Supporting	2	1
	Indirect	n/a	-
Transport	Direct	2	2
	Enabling/Supporting	15	14
	Indirect	n/a	1
Water	Direct	2	2
	Enabling/Supporting	1	1
	Indirect	n/a	-



During 2022 and following feedback from clients, the Investment Manager removed the Indirect Contribution from their climate solutions measures.

Indirect Contribution – providing generic products or services to companies making direct or enabling contributions or making operational decisions which have a material contribution.

In 2022, Project Drawdown added 11 new climate solutions to their framework. The Investment Manager considered these new solutions for their 2022 reporting measures. More detail on these changes are available on the Investment Manager’s website: [stewartinvestors.com/all/insights/climate-solutions-update](https://stewartinvestors.com/all/insights/climate-solutions-update)

● ***How did the sustainable investments not cause significant harm to any sustainable investment objective?***

The Fund only invests 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.

The 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:

[stewartinvestors.com/all/insights/our-position-on-harmful-and-controversial-products-and-services](https://stewartinvestors.com/all/insights/our-position-on-harmful-and-controversial-products-and-services)

**Principal adverse impacts** are the most significant negative impacts of investment decisions on sustainability factors relating to environmental, social and employee matters, respect for human rights, anti-corruption and anti-bribery matters.

— *How were the indicators for adverse impacts on sustainability factors taken into account?*

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 a company's quality or sustainability positioning through either meetings, ongoing monitoring and reviewing their annual reports, the Investment Manager will re-evaluate the investment case.

In addition, the Fund portfolio is 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 Principal Adverse Impacts (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 investor does no significant harm but still have 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, Stewart Investors will not invest or will exit the Funds' position in the company in a timely manner.

The Investment Manager includes product level data on Principal Adverse Impact (PAI) indicators in the question below.

Were sustainable investments aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights? Details:

The Fund's sustainable investments are aligned with these Guidelines and Principles.

The Investment Manager continually monitors the companies owned to understand any changes to the strategies. The Fund's 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.

During the reporting period the Fund held the following company which flagged against the Investment Manager's policy.

**Spirax-Sarco Engineering**

**Activity exposure >5% revenue:** Supporting Oil & Gas.

**Reason for exception/holding:** The company provides precision heat and control equipment and systems that improve energy efficiency for customers operating in the oil industry.

Revenues derived from oil and gas supporting products and services accounted for 5% of the company's overall revenue in FY2022.



**How did this financial product consider principal adverse impacts on sustainability factors?**

In addition to the detail described above, the Investment Manager has set a materiality threshold of 5% of revenue for direct involvement in companies materially involved in the exploration, production or generation of fossil fuel energy and a threshold of 0% for controversial weapons. Portfolio companies are checked against the thresholds each quarter by an external third-party research platform.

The below table sets out the PAI indicators for the Fund.

Mandatory indicators	Metrics	2022	2023
Exposure	(EUR m)	2	2
1. GHG Emissions	Scope 1 (tCO2eq)	10	13
	Scope 2 (tCO2eq)	8	9
	Scope 3 (tCO2eq)	348	2,130
	Total Emissions Scope 1+2 (tCO2eq)	18	21
	Total Emissions Scope 1+2+3 (tCO2eq)	366	2,152

2. Carbon Footprint	Total Emissions Scope 1+2 (tCO <sub>2</sub> eq/EURm)	10	10
	Total Emissions Scope 1+2+3 (tCO <sub>2</sub> eq/EURm)	195	1,037
3. GHG Intensity of Investee Companies	Scope 1+2 (tCO <sub>2</sub> eq/EURm)	27	22
	Scope 1+2+3 (tCO <sub>2</sub> eq/EURm)	743	1,454
4. Exposure to companies active in the fossil fuel sector	(% involvement)	0%	0%
5. Share of Non-Renewable Energy Consumption and Production	Non-Renewable Energy Consumption (%)	66%	66%
	Non-Renewable Energy Production (%)	0%	0%
6. Energy consumption intensity per high impact sector	Agriculture, Forestry & Fishing (GWh/EURm)	no data	no data
	Construction (GWh/EURm)	no data	no data
	Electricity, Gas, Steam & Air Conditioning Supply (GWh/EURm)	insufficient data	no data
	Manufacturing (GWh/EURm)	0.07	0.07
	Mining & Quarrying (GWh/EURm)	no data	no data
	Real Estate Activities (GWh/EURm)	no data	no data
	Transportation & Storage (GWh/EURm)	insufficient data	insufficient data
	Water Supply, Sewerage, Waste Remediation (GWh/EURm)	no data	no data
	Trade & Repair of Automobiles (GWh/EURm)	insufficient data	insufficient data
7. Activities Negatively Affecting Biodiversity Areas	(% involvement)	5%	4%
8. Emissions to Water	(t/EURm)	insufficient data	no data
9. Hazardous waste ratio	(t/EURm)	0	0
10. Violations of UNGC and OECD Guidelines for Multinational Enterprises	Watch (% involvement)	0%	0%
	Breach (% involvement)	0%	0%
11. Lack of Processes & Compliance Mechanisms to Monitor Compliance with UNGC and OECD guidelines	(% involvement)	77%	51%
12. Unadjusted Gender Pay Gap	% of Male Gross Hourly Rate	insufficient data	insufficient data
13. Board Gender Diversity	% of Female Board Members	33%	36%
14. Exposure to Controversial Weapons	(% involvement)	0%	0%
<b>Voluntary indicators</b>	<b>Metrics</b>	<b>2022</b>	<b>2023</b>
Water Usage and Recycling	% Water Withdrawal	n/a	insufficient data
	Recycling & Reuse (cubic metres)	n/a	insufficient data
Number of Identified Cases of Severe Human Rights Issues & Incidents	Weighted number of incidents	n/a	0.3

Notes: PAI data is sourced from third-party ESG data providers. 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. Data for certain metrics may be based on limited data across the portfolio companies.



## What were the top investments of this financial product?

The list includes the investments constituting the **greatest proportion of investments** of the financial product during the reference period which is: 1 January 2023 to 31 December 2023.

Largest investments	Sector	% assets	Country
Spectris	Information Technology	4.1	United Kingdom
Judges Scientific	Industrials	4.1	United Kingdom
Roche	Health Care	3.7	Switzerland
DiaSorin	Health Care	3.5	Italy
Halma	Information Technology	3.4	United Kingdom
bioMérieux	Health Care	3.3	France
DHL Group	Industrials	3.2	Germany
Atlas Copco	Industrials	3.2	Sweden
Jerónimo Martins	Consumer Staples	3.1	Portugal
Unilever	Consumer Staples	3.0	United Kingdom
Infineon Technologies	Information Technology	2.9	Germany
Beiersdorf	Consumer Staples	2.8	Germany
Teqnon	Industrials	2.6	Sweden
Adyen	Financials	2.6	Netherlands
Alfen	Industrials	2.4	Netherlands



## What was the proportion of sustainability-related investments?

### ● *What was the asset allocation?*

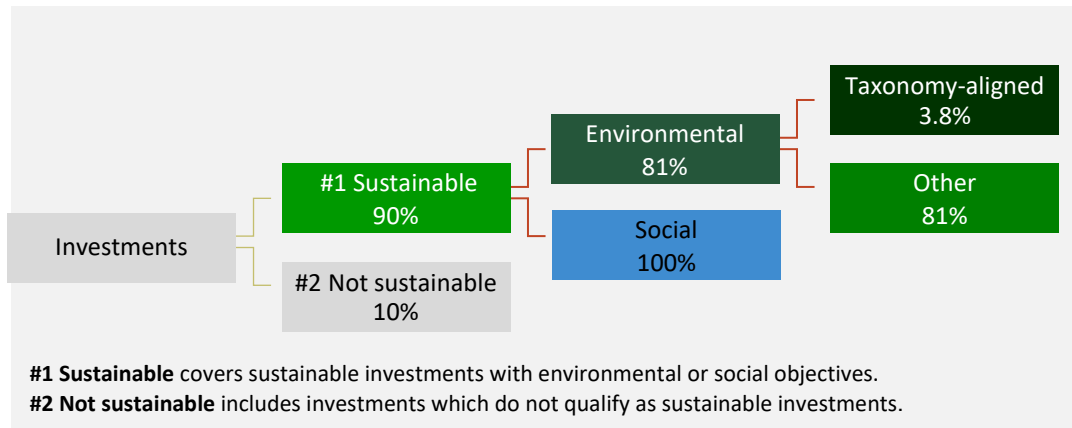
The Fund invested at least 90% of its Net Asset Value in companies that are positioned to contribute to, and benefit from, sustainable development. Sustainable development is based on the Investment Manager's own philosophy explained in the Investment Policy of the Prospectus.

**Asset allocation** describes the share of investments in specific assets.

To comply, with the EU Taxonomy, the criteria for **fossil gas** include limitations on emissions and switching to fully renewable power or lower-carbon fuels by the end of 2035. For **nuclear energy**, the criteria include comprehensive safety and waste management rules.

**Enabling activities** directly enable other activities to make a substantial contribution to an environmental objective

**Transitional activities are economic activities** for which low-carbon alternatives are not yet available and that have greenhouse gas emission levels corresponding to the best performance.



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. The 3.8% Taxonomy-aligned figure is weighted contribution based on reported turnover reflecting the share of revenue from green activities of investee companies. Separately, the 81% 'Other' figure is based on those companies contributing towards the Investment Manager's climate solutions assessment detailed above.

● **In which economic sectors were the investments made?**

The average holdings (excluding cash) over the reporting period in Global Industry Classification Standard (GICs) sectors:

Sector	% assets
Communication Services	1.9
Consumer Staples	8.9
Energy	-
Financials	9.9
Health Care	21.2
Industrials	30.5
Information Technology	19.5
Materials	3.5
Real Estate	-
Utilities	2.0
Cash and cash equivalents	2.5

The Fund has no direct holdings in companies materially involved in the exploration, production or generation of fossil fuel energy.

The Investment Manager checks investee companies (via a third-party research platform and on a quarterly basis) for any revenues derived from exploration, mining, extraction, production, processing, storage, refining or distribution, including transportation, storage and trade, of fossil fuels. They disclose any companies above their material threshold (5% of revenues) on their website.

During the period the Fund held **Spirax-Sarco Engineering** which derives 5% of revenues from products and services supporting the oil & gas industry. The company provides precision heat and control equipment and systems that improve energy efficiency for customers operating in the oil industry.

Additional transparency is provided by the Investment Manager in their annual report (**Annual Stewardship Review 2022** pg.16), where they disclose companies that are providing services to the fossil fuel industry directly or via their underlying subsidiaries.

Taxonomy-aligned activities are expressed as a share of:

- **turnover** reflecting the share of revenue from green activities of investee companies
- **capital expenditure** (CapEx) showing the green investments made by investee companies, e.g. for a transition to a green economy.
- **operational expenditure** (OpEx) reflecting green operational activities of investee companies.

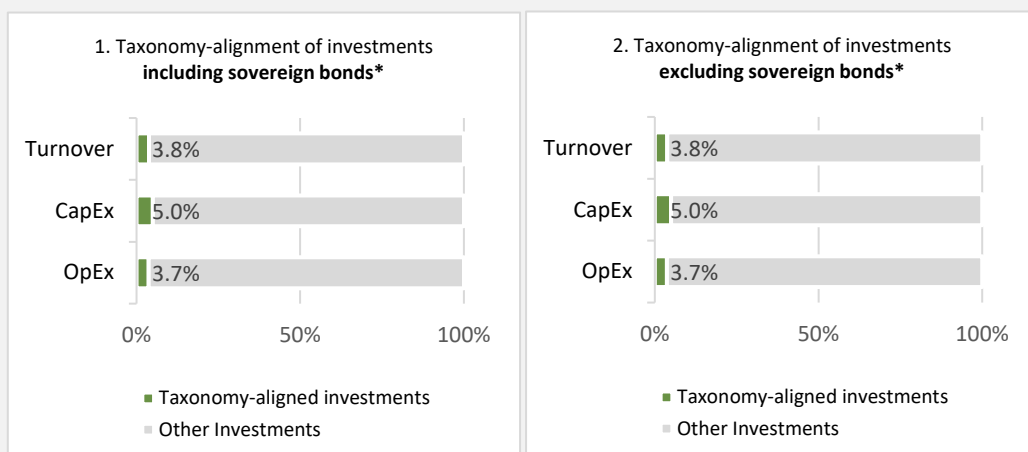


### To what extent were sustainable investments with an environmental objective aligned with the EU Taxonomy<sup>1</sup>?

**Did the financial product investment in fossil gas and/or nuclear energy related activities**

- Yes
- In fossil gas     In nuclear energy
- No

*The graphs below show in green the percentage of investments that were aligned with the EU Taxonomy. As there is no appropriate methodology to determine the taxonomy-alignment of sovereign bonds\*, the first graph shows the Taxonomy alignment in relation to all the investments of the financial product including sovereign bonds, while the second graph shows the Taxonomy alignment only in relation to the investments of the financial product other than sovereign bonds.*



% figures represent taxonomy-aligned investments

\*For the purpose of these graphs, 'sovereign bonds' consist of all sovereign exposures

**What was the share of investments made in transitional and enabling activities?**

The reported share of investments made in transitional and enabling activities for the Fund is **0%**.

**How did the percentage of investments aligned with the EU Taxonomy compare with previous reference periods?**

The percentage of investments aligned with the EU Taxonomy for the previous reference period was **0%**.

<sup>1</sup> Fossil gas and/or nuclear related activities will only comply with the EU Taxonomy where they contribute to limiting climate change ("climate change mitigation") and do not significantly harm any EU Taxonomy objective – see explanatory notes in the left hand margin. The full criteria for fossil gas and nuclear energy economic activities that comply with the EU Taxonomy are laid down in Commission Delegated Regulation (EU) 2022/1214.



### What was the share of sustainable investments with an environmental objective that were not aligned with the EU Taxonomy?

The Fund does not actively target EU Taxonomy-aligned assets.

As at 31 December 2023, the Fund held **43** companies. Based on reported turnover data, **38** of the **43** companies had **no alignment** with the EU Taxonomy.



### What was the share of socially sustainable investments?

**All companies** in the Fund were aligned to socially sustainable investments as defined by the Investment Manager’s human development pillars.



### What investments were included under “not sustainable”, what was their purpose and were there any minimum environmental or social safeguards?

The “#2 Not sustainable” assets are cash and near-cash assets held pending investment, to meet liquidity requirements, or assets held in order to allow efficient operational exit of positions. Cash is held by the depositary.

The Fund’s service providers for these assets are reviewed and assessed for compliance with FSI’s modern slavery policy.



### What actions have been taken to attain the sustainable investment objective during the reference period?

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. Engagement is fully integrated into the responsibilities of the investment team and contributes invaluable insights into their understanding of each company.

More information is available on the Investment Manager’s website (links below):

[Stewardship and corporate engagement policy](#)

[Engagement booklet](#)

[Proxy voting](#)

[Annual stewardship review](#)

During the reporting period, the Investment Manager met with **92%** of Fund companies.

All engagement starts with bottom-up analysis, with responsibility shared across the investment team. Over the period the Investment Manager engaged on issues such as:

- **Pollution, natural resource degradation, biodiversity and climate change** – packaging, plastic pellets, deforestation, sustainability of supply chains (soy, palm oil and coffee), fossil fuel versus renewables, water, waste and energy efficiency
- **Aligned remuneration and incentives** – living wage, gender pay gap and complexity of incentives
- **Animal testing/welfare** – animal testing exposure
- **Human rights and modern slavery** – conflict minerals in the supply chains of semiconductors, trafficking, forced labour and child labour in the Asia Pacific region and public health
- **Diversity, equity and inclusion** – diversity, particularly gender, in senior management and on boards



- **Addictive products** – indirect exposure to tobacco, chemicals, gaming, adult entertainment, and sugar content in food
- **Governance** – corporate strategy and legal structure

During the period the Investment Manager engaged with **40%** of Fund companies.

- Environmental issues 4%
- Social issues 26%
- Governance issues 70%

*Engagements may relate to one or multiple environmental, social or governance issues.*

Proxy voting is an extension of the Investment Manager’s engagement activities. It is not outsourced to an external provider or separate proxy voting/engagement team. The Investment Manager considers each proxy vote individually and on its own merits in the context of their knowledge about that particular company. A breakdown of voting activity for the Fund is detailed below.

**Voting activity: 1 January 2023 to 31 December 2023**

Total proposals to vote on	765
Number of meetings to vote at	42
Number of companies that held voting meetings	41
Number of votes against management proposals	12
Number of votes abstained from voting	0
Number of shareholder proposals to vote on	2
Number of shareholder proposals voted against	2
Number of shareholder proposals abstained from voting	0

**Voting rationales: 1 January 2023 to 31 December 2023**

Company	Proposal	No. of proposals	Voting decision
Beiersdorf bioMérieux Elisa Indutrade Infineon Technologies Ringkjøbing Landbobank SFS	Appointment of auditor	7	Against management recommendation
	<b>Rationale</b> The Investment Manager voted against the appointment of the auditor as they have been in place for over 10 years and the companies have given no information on intended rotation. The Investment Manager believes rotating an auditor on a relatively frequent basis (e.g. every 5-10 years) helps to ensure a fresh pair of eyes are examining the accounts and follows best practice.		
Alcon	Compensation report	3	Against management recommendation
	Board compensation		
	Executive Compensation		
	<b>Rationale</b> The Investment Manager voted against the company’s remuneration report as well as the Board and Executive remuneration, as they believe it is excessive and the company has signalled that they want to keep ratcheting.		

DiscoverIE	Final dividend	1	Against management recommendation
	<b>Rationale</b> The Investment Manager voted against the company's request to distribute dividends to shareholders as they would prefer for the cash flows to be reinvested in the company.		
Handelsbanken	Shareholder proposal: IT management software	2	Against shareholder proposal
	Shareholder proposal: formation of a integration institute		
<b>Rationale</b> The Investment Manager voted against two shareholder proposals requesting the company change their IT management software, as well as allocate funds and participate in the formation of an integration institute with operations in the Öresund region. The Investment Manager believes management are best placed to decide the day-to-day operations of the business.			
Unilever	Remuneration report	1	Against management recommendation
	<b>Rationale</b> The Investment Manager voted against the company's remuneration report as they have concerns about the magnitude of the increase in the base salary being offered to the new CEO and the lower performance hurdles being set.		



### How did this financial product perform compared to the reference sustainable benchmark?

A sustainable benchmark has not been designated to compare the performance for this Fund.

- **How did the reference benchmark differ from a broad market index?**  
Not applicable.
- **How did this financial product perform with regard to the sustainability indicators to determine the alignment of the reference benchmark with the sustainable investment objective?**  
Not applicable.
- **How did this financial product perform compared with the reference benchmark?**  
Not applicable.
- **How did this financial product perform compared with the broad market index?**  
Not applicable.

**Reference benchmarks** are indexes to measure whether the financial product attains the sustainable objective.

Template periodic disclosure for the financial products referred to in Article 9, paragraphs 1 to 4a, of Regulation (EU) 2019/2088 and Article 5, first paragraph, of Regulation (EU) 2020/852

**Product name:**  
Stewart Investors Global Emerging Markets  
Leaders Fund

**Legal entity identifier:**  
549300YYD8Q6QBFGS653

**Sustainable investment** means an investment in an economic activity that contributes to an environmental or social objective, provided that the investment does not significantly harm any environmental or social objective and that the investee companies follow good governance practices.

The **EU Taxonomy** is a classification system laid down in Regulation (EU) 2020/852 establishing a list of **environmentally sustainable economic activities**. That Regulation does not lay down a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

## Sustainable investment objective

### Did this financial product have a sustainable investment objective?

**Yes**

It made **sustainable investments with an environmental objective: 64%**

in economic activities that qualify as environmentally sustainable under the EU Taxonomy

in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy

It made **sustainable investments with a social objective: 100%**

**No**

It **promoted Environmental/Social (E/S) characteristics** and while it did not have as its objective a sustainable investment, it had a proportion of \_\_\_% of sustainable investments

with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy

with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy

with a social objective

It promoted E/S characteristics, but **did not make any sustainable investments**

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.



### To what extent was the sustainable investment objective of this financial product met?

The Fund has 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. The contribution to sustainable development is assessed under two frameworks, social and environmental.

#### 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

As at 31 December 2023, the Fund held **47** companies. **All companies (100%)** were contributing to at least one **human development pillar** and, in total, were making **133 contributions** to the pillars.

Further information about how the Investment Manager uses the human development pillars is available on the Investment Manager’s website – [stewartinvestors.com/all/how-we-invest/our-approach/human-development-pillars](https://stewartinvestors.com/all/how-we-invest/our-approach/human-development-pillars)

### 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

As at 31 December 2023, the Fund held **47** companies. **30 companies (64%)** were contributing to **climate change solutions**. These companies were contributing to **31** different solutions and, in total, were making **96 contributions** to the solutions.

Further information about how the Investment Manager uses the Project Drawdown climate solutions is available on the Investment Manager’s website – [www.stewartinvestors.com/all/how-we-invest/our-approach/climate-solutions](http://www.stewartinvestors.com/all/how-we-invest/our-approach/climate-solutions)

### Assessment

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

1. there is either a direct or enabling link between the activities of the company and the achievement of a positive social or environmental outcome;
2. 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
3. the company recognises potential negative social or environmental outcomes associated with its 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.

#### Notes:

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.

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).

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).

### ● **How did the sustainability indicators perform?**

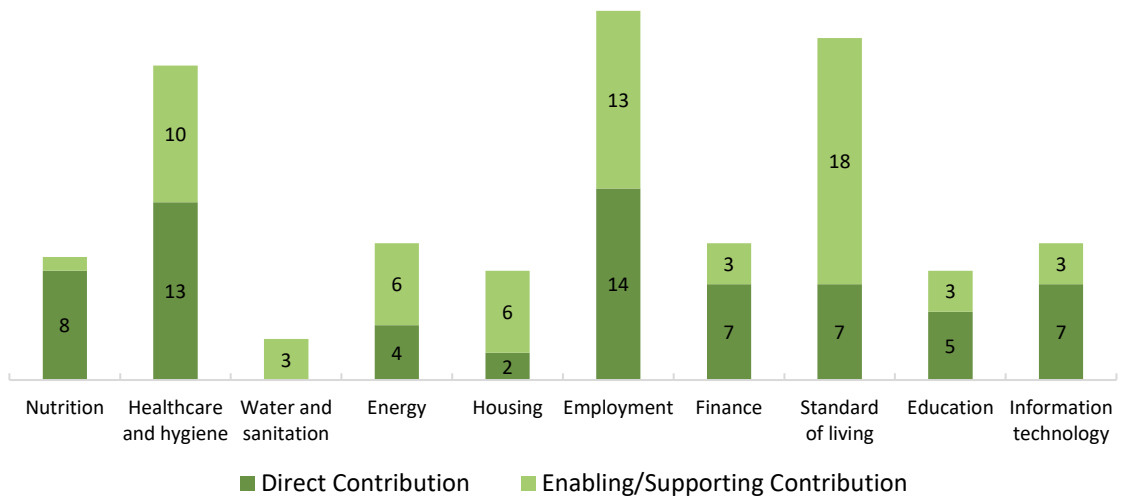
The Investment Manager’s Portfolio Explorer tool provides the contribution that each company makes to climate solutions, human development and the Sustainable Development Goals, as well as the investment rationale, key risks and areas for improvement. Click on the link below to access the tool.

[stewartinvestors.com/all/how-we-invest/our-approach/portfolio-explorer](http://stewartinvestors.com/all/how-we-invest/our-approach/portfolio-explorer)

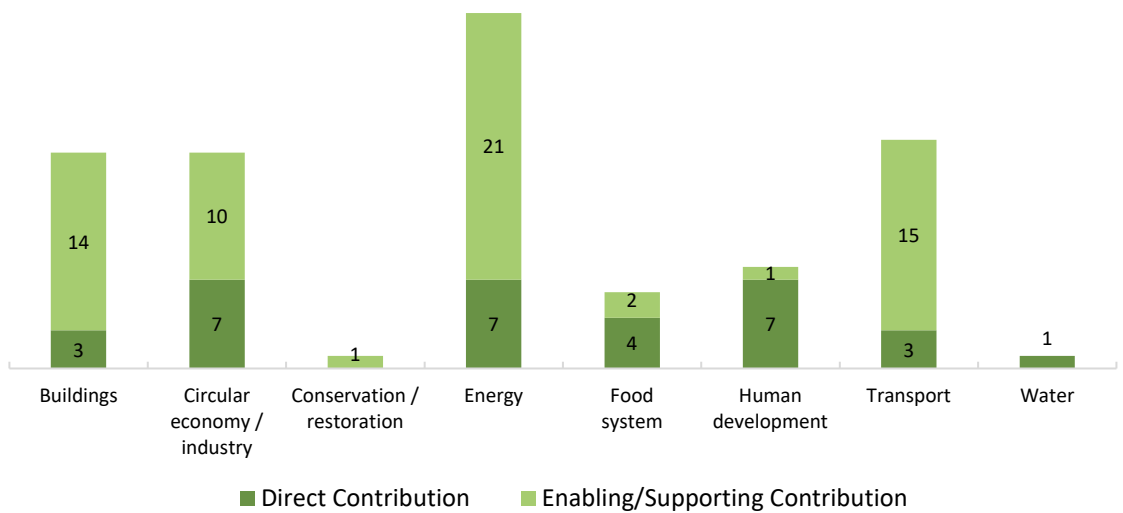
The social and environmental outcomes for the Fund as at 31 December 2023 are provided in the charts below.

**Sustainability indicators** measure how the sustainable objectives of this financial product are attained.

**Human development pillars**  
(number of companies contributing to each pillar)



**Climate change solutions**  
(number of companies contributing to each solution)



Notes: Direct Contribution - directly attributable to products, services or practices provided by that company. Enabling/Supporting Contribution - supported or made possible by products or technologies provided by that company.

● **...and compared to previous periods?**

Changes in the sustainability outcomes for the Fund year-on-year are related to bottom-up changes in the portfolio and/or changes in the sustainability profile of individual investee companies.

The social and environmental outcomes for the Fund for previous periods are provided in the tables below. The Fund transitioned to have a sustainable investment approach from 30 November 2022.

## Positive social outcomes

Human development pillars	Contribution	31-Dec-2022
No. of companies (%)	-	42 (100%)
Total number of contributions	-	117
Nutrition	Direct	7
	Enabling/Supporting	-
Healthcare and hygiene	Direct	13
	Enabling/Supporting	4
Water and sanitation	Direct	-
	Enabling/Supporting	1
Energy	Direct	3
	Enabling/Supporting	5
Housing	Direct	3
	Enabling/Supporting	6
Employment	Direct	14
	Enabling/Supporting	12
Finance	Direct	7
	Enabling/Supporting	3
Standard of living	Direct	4
	Enabling/Supporting	18
Education	Direct	4
	Enabling/Supporting	4
Information technology	Direct	7
	Enabling/Supporting	2

## Positive environmental outcomes

Climate solutions	Contribution	31-Dec-2022
No. of companies (%)	-	28 (67%)
Number of different solutions	-	28
Total number of solutions	-	82
Buildings	Direct	2
	Enabling/Supporting	10
Circular economy/industry	Direct	7
	Enabling/Supporting	9
Conservation/restoration	Direct	1
	Enabling/Supporting	1
Energy	Direct	7
	Enabling/Supporting	15
Food system	Direct	3
	Enabling/Supporting	2
Human development	Direct	9
	Enabling/Supporting	-
Transport	Direct	3
	Enabling/Supporting	12
Water	Direct	1
	Enabling/Supporting	-

**Principal adverse impacts** are the most significant negative impacts of investment decisions on sustainability factors relating to environmental, social and employee matters, respect for human rights, anti-corruption and anti-bribery matters.

### ● **How did the sustainable investments not cause significant harm to any sustainable investment objective?**

The Fund only invests 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.

**Principal adverse impacts** are the most significant negative impacts of investment decisions on sustainability factors relating to environmental, social and employee matters, respect for human rights, anti-corruption and anti-bribery matters.

The 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:

[stewartinvestors.com/all/insights/our-position-on-harmful-and-controversial-products-and-services](https://stewartinvestors.com/all/insights/our-position-on-harmful-and-controversial-products-and-services)

— *How were the indicators for adverse impacts on sustainability factors taken into account?*

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 a company's quality or sustainability positioning through either meetings, ongoing monitoring and reviewing their annual reports, the Investment Manager will re-evaluate the investment case.



In addition, the Fund portfolio is 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 Principal Adverse Impacts (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 investor does no significant harm but still have 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, Stewart Investors will not invest or will exit the Funds' position in the company in a timely manner.

The Investment Manager includes product level data on Principal Adverse Impact (PAI) indicators in the question below.

*Were sustainable investments aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights? Details:*

The Fund's sustainable investments are aligned with these Guidelines and Principles.

The Investment Manager continually monitors the companies owned to understand any changes to the strategies. The Fund's 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.

During the reporting period the Fund held the following companies which flagged against the Investment Manager's policy.

### **Tata Consultancy Services (TCS)**

**Activity exposure:** UN Global Compact Principle 2: Businesses should make sure that they are not complicit in human rights abuses.

**Reason for exception/holding:** TCS has no direct involvement in nuclear weapons or energy, however the external research provider considers the company to be involved because its parent company, Tata Sons, owns greater than 50% of TCS.

Tata Sons involvement is due to the company owning Tata Advanced Systems which acquired Tata Power's Strategic Engineering Division. The Strategic Engineering Division provides control systems for the Indian Navy's nuclear missile submarines.

As India has not signed the Treaty on the Non-Proliferation of Nuclear Weapons, the external data provider considers Tata Sons and by extension TCS to be in support of the nuclear weapons programme of India. The Investment Manager disagrees with this assessment and does not see anything in the activities or conduct of the company to question its sustainability positioning or the investment case.

### **WEG**

**Activity exposure >5% revenue:** Supporting Oil & Gas and Supporting Thermal Coal

**Reason for exception/holding:** The company manufactures and sells renewable energy solutions used in solar and wind power generation, hydroelectric power plants and biomass helping society to shift away from fossil fuel energy production. WEG also manufacture and sell energy efficient electric motors, which help their customers reduce their energy requirements and greenhouse gas emissions.

Revenues derived from oil and gas supporting products and services, and thermal coal supporting products and services accounted for an estimated 2.5% per activity (5% in total) of the company's overall revenue in FY2022, according to the external research provider.

Thermal coal exposure for supporting products and services was added by the external research provider in early 2023 and the Investment Manager contacted the company directly to check the 2.5% revenue estimates provided. Given that coal is not a strategic market segment for their products or customers, the company estimate that <1% revenues to be a more accurate reflection of their exposure.



## How did this financial product consider principal adverse impacts on sustainability factors?

In addition to the detail described above, the Investment Manager has set a materiality threshold of 5% of revenue for direct involvement in companies materially involved in the exploration, production or generation of fossil fuel energy and a threshold of 0% for controversial weapons. Portfolio companies are checked against the thresholds each quarter by an external third-party research platform.

The below table sets out the PAI indicators for the Fund.

<b>Mandatory indicators</b>	<b>Metrics</b>	<b>2022</b>	<b>2023</b>
Exposure	(EUR m)	44	47
1. GHG Emissions	Scope 1 (tCO <sub>2</sub> eq)	110	162
	Scope 2 (tCO <sub>2</sub> eq)	308	392
	Scope 3 (tCO <sub>2</sub> eq)	12,043	13,919
	Total Emissions Scope 1+2 (tCO <sub>2</sub> eq)	418	554
	Total Emissions Scope 1+2+3 (tCO <sub>2</sub> eq)	12,461	14,472
2. Carbon Footprint	Total Emissions Scope 1+2 (tCO <sub>2</sub> eq/EURm)	9	12
	Total Emissions Scope 1+2+3 (tCO <sub>2</sub> eq/EURm)	277	305
3. GHG Intensity of Investee Companies	Scope 1+2 (tCO <sub>2</sub> eq/EURm)	43	45
	Scope 1+2+3 (tCO <sub>2</sub> eq/EURm)	1,007	920
4. Exposure to companies active in the fossil fuel sector	(% involvement)	2%	1%
5. Share of Non-Renewable Energy Consumption and Production	Non-Renewable Energy Consumption (%)	71%	74%
	Non-Renewable Energy Production (%)	0%	1%
6. Energy consumption intensity per high impact sector	Agriculture, Forestry & Fishing (GWh/EURm)	no data	no data
	Construction (GWh/EURm)	no data	no data
	Electricity, Gas, Steam & Air Conditioning Supply (GWh/EURm)	no data	no data
	Manufacturing (GWh/EURm)	0.13	0.18
	Mining & Quarrying (GWh/EURm)	no data	no data
	Real Estate Activities (GWh/EURm)	no data	no data
	Transportation & Storage (GWh/EURm)	no data	no data
	Water Supply, Sewerage, Waste Remediation (GWh/EURm)	no data	no data
	Trade & Repair of Automobiles (GWh/EURm)	insufficient data	insufficient data
7. Activities Negatively Affecting Biodiversity Areas	(% involvement)	0%	0%
8. Emissions to Water	(t/EURm)	insufficient data	no data
9. Hazardous waste ratio	(t/EURm)	4	8
	Watch (% involvement)	0%	2%

10. Violations of UNGC and OECD Guidelines for Multinational Enterprises	Breach (% involvement)	5%	5%
11. Lack of Processes & Compliance Mechanisms to Monitor Compliance with UNGC and OECD guidelines	(% involvement)	71%	52%
12. Unadjusted Gender Pay Gap	% of Male Gross Hourly Rate	insufficient data	no data
13. Board Gender Diversity	% of Female Board Members	20%	23%
14. Exposure to Controversial Weapons	(% involvement)	0%	0%

Voluntary indicators	Metrics	2022	2023
Water Usage and Recycling	% Water Withdrawal	n/a	59%
	Recycling & Reuse (cubic metres)	n/a	29,758,440
Number of Identified Cases of Severe Human Rights Issues & Incidents	Weighted number of incidents	n/a	0.1

The fossil fuel exposure % shown in the table above is for investee company **WEG**. WEG manufactures and sells efficient electrical motors, which help customers across a variety of industrial sectors reduce their energy requirements. The SFDR PAI methodology for fossil fuel sector exposure considers Oil & Gas Production, Thermal Coal Extraction and Thermal Coal Supporting Products/Services. The third-party data provider estimates WEG as having c.2.5% of their total revenue derived from products supporting thermal coal.

Notes: PAI data is sourced from third-party ESG data providers. 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. Data for certain metrics may be based on limited data across the portfolio companies.



## What were the top investments of this financial product?

Largest investments	Sector	% assets	Country
Mahindra & Mahindra	Consumer Discretionary	5.3	India
Taiwan Semiconductor	Information Technology	5.1	Taiwan
Tata Consultancy Services	Information Technology	5.0	India
Unicharm	Consumer Staples	4.9	Japan
Hoya	Health Care	3.6	Japan
Jerónimo Martins	Consumer Staples	3.6	Portugal
Infosys	Information Technology	3.4	India
HDFC Bank*	Financials	3.3	India
Kotak Mahindra Bank	Financials	3.0	India
EPAM Systems	Information Technology	2.8	United States
Godrej Consumer Products	Consumer Staples	2.7	India
Marico	Consumer Staples	2.7	India

The list includes the investments constituting the **greatest proportion of investments** of the financial product during the reference period which is: 1 January 2023 to 31 December 2023.

Globant	Information Technology	2.5	Argentina
RaiaDrogasil	Consumer Staples	2.5	Brazil
Delta Electronics	Information Technology	2.5	Taiwan

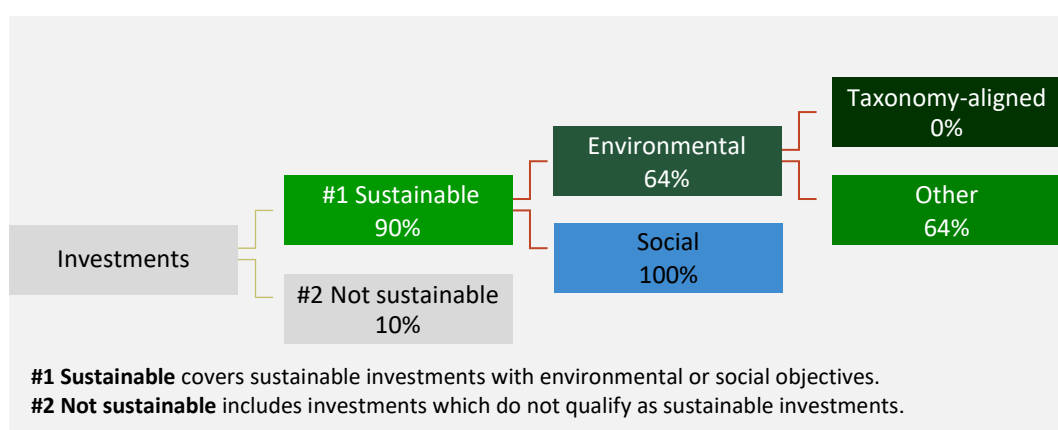
\*HDFC Limited merged with HDFC Bank. The % assets figure is the average of both holdings.



## What was the proportion of sustainability-related investments?

### ● What was the asset allocation?

The Fund invested 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 Investment Manager's own philosophy explained in the Investment Policy of the Prospectus.



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.

### ● In which economic sectors were the investments made?

The average holdings (excluding cash) over the reporting period in Global Industry Classification Standard (GICs) sectors:

Sector	% assets
Communication Services	-
Consumer Discretionary	9.8
Consumer Staples	25.6
Energy	-
Financials	15.1
Health Care	7.5
Industrials	6.3
Information Technology	34.5
Materials	-
Real Estate	-
Utilities	-
Cash and cash equivalents	1.3

To comply, with the EU Taxonomy, the criteria for **fossil gas** include limitations on emissions and switching to fully renewable power or lower-carbon fuels by the end of 2035. For **nuclear energy**, the criteria include comprehensive safety and waste management rules.

**Enabling activities** directly enable other activities to make a substantial contribution to an environmental objective

**Transitional activities are economic activities** for which low-carbon alternatives are not yet available and that have greenhouse gas emission levels corresponding to the best performance.

Taxonomy-aligned activities are expressed as a share of:

- **turnover** reflecting the share of revenue from green activities of investee companies
- **capital expenditure** (CapEx) showing the green investments made by investee companies, e.g. for a transition to a green economy.
- **operational expenditure** (OpEx) reflecting green operational activities of investee companies.

The Fund has no direct holdings in companies materially involved in the exploration, production or generation of fossil fuel energy.

The Investment Manager checks investee companies (via a third-party research platform and on a quarterly basis) for any revenues derived from exploration, mining, extraction, production, processing, storage, refining or distribution, including transportation, storage and trade, of fossil fuels. They disclose any companies above their material threshold (5% of revenues) on their website.

During the period the Fund held **WEG** which derives from oil and gas supporting products and services, and thermal coal supporting products and services estimated as 2.5% per activity (5% in total). The company manufactures and sells renewable energy solutions used in solar and wind power generation, hydroelectric power plants and biomass helping society to shift away from fossil fuel energy production.

Additional transparency is provided by the Investment Manager in their annual report (**Annual Stewardship Review 2022** pg.16), where they disclose companies that are providing services to the fossil fuel industry directly or via their underlying subsidiaries.



**To what extent were sustainable investments with an environmental objective aligned with the EU Taxonomy<sup>1</sup>?**

***Did the financial product investment in fossil gas and/or nuclear energy related activities***

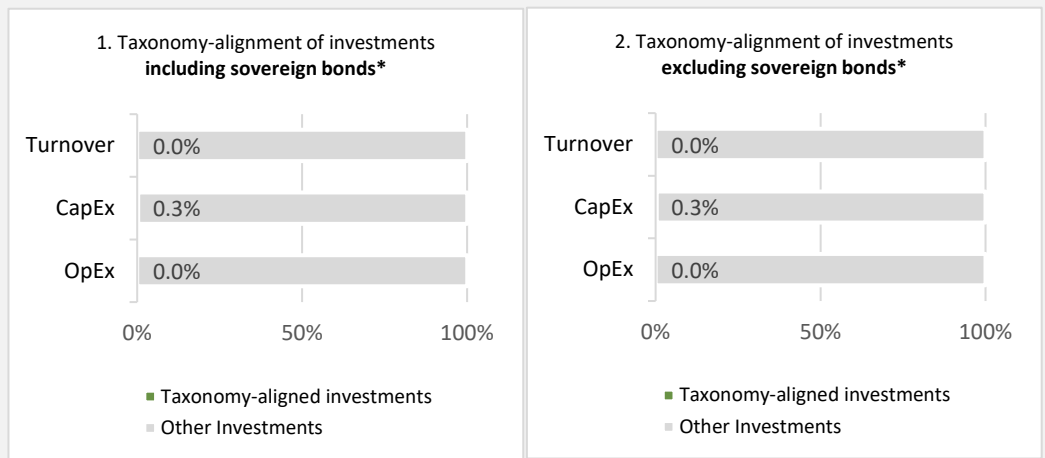
- Yes
  - In fossil gas
  - In nuclear energy
- No

<sup>1</sup> Fossil gas and/or nuclear related activities will only comply with the EU Taxonomy where they contribute to limiting climate change (“climate change mitigation”) and do not significantly harm any EU Taxonomy objective – see explanatory notes in the left hand margin. The full criteria for fossil gas and nuclear energy economic activities that comply with the EU Taxonomy are laid down in Commission Delegated Regulation (EU) 2022/1214.



are sustainable investments with an environmental objective that **do not take into account the criteria** for environmentally sustainable economic activities under the EU Taxonomy.

The graphs below show in green the percentage of investments that were aligned with the EU Taxonomy. As there is no appropriate methodology to determine the taxonomy-alignment of sovereign bonds\*, the first graph shows the Taxonomy alignment in relation to all the investments of the financial product including sovereign bonds, while the second graph shows the Taxonomy alignment only in relation to the investments of the financial product other than sovereign bonds.



% figures represent taxonomy-aligned investments

\*For the purpose of these graphs, 'sovereign bonds' consist of all sovereign exposures

● **What was the share of investments made in transitional and enabling activities?**

The reported share of investments made in transitional and enabling activities for the Fund is **0%**.

● **How did the percentage of investments aligned with the EU Taxonomy compare with previous reference periods?**

The percentage of investments aligned with the EU Taxonomy for the previous reference period was **0%**.



**What was the share of sustainable investments with an environmental objective that were not aligned with the EU Taxonomy?**

The Fund does not actively target EU Taxonomy-aligned assets.

As at 31 December 2023, the Fund held **47** companies. Based on reported turnover data, there was no alignment with the EU taxonomy from any of these companies.



**What was the share of socially sustainable investments?**

**All companies** in the Fund were aligned to socially sustainable investments as defined by the Investment Manager's human development pillars.



**What investments were included under "not sustainable", what was their purpose and were there any minimum environmental or social safeguards?**

The "#2 Not sustainable" assets are cash and near-cash assets held pending investment, to meet liquidity requirements, or assets held in order to allow efficient operational exit of positions. Cash is held by the depositary.

The Fund's service providers for these assets are reviewed and assessed for compliance with FSI's modern slavery policy.



### What actions have been taken to attain the sustainable investment objective during the reference period?

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. Engagement is fully integrated into the responsibilities of the investment team and contributes invaluable insights into their understanding of each company.

More information is available on the Investment Manager's website (links below):

[Stewardship and corporate engagement policy](#)

[Engagement booklet](#)

[Proxy voting](#)

[Annual stewardship review](#)

During the reporting period, the Investment Manager met with **71%** of Fund companies.

All engagement starts with bottom-up analysis, with responsibility shared across the investment team. Over the period and across their funds, the Investment Manager engaged on issues such as:

- **Pollution, natural resource degradation, biodiversity and climate change** – packaging, plastic pellets, deforestation, sustainability of supply chains (soy, palm oil and coffee), fossil fuel versus renewables, water, waste and energy efficiency
- **Aligned remuneration and incentives** – living wage, gender pay gap and complexity of incentives
- **Animal testing/welfare** – animal testing exposure
- **Human rights and modern slavery** – conflict minerals in the supply chains of semiconductors, trafficking, forced labour and child labour in the Asia Pacific region and public health
- **Diversity, equity and inclusion** – diversity, particularly gender, in senior management and on boards
- **Addictive products** – indirect exposure to tobacco, chemicals, gaming, adult entertainment, and sugar content in food
- **Governance** – corporate strategy and legal structure

During the period the Investment Manager engaged with **62%** of Fund companies.

- Environmental issues 32%
- Social issues 23%
- Governance issues 45%

*Engagements may relate to one or multiple environmental, social or governance issues.*

Proxy voting is an extension of the Investment Manager's engagement activities. It is not outsourced to an external provider or separate proxy voting/engagement team. The Investment Manager considers each proxy vote individually and on its own merits in the context of their knowledge about that particular company. A breakdown of voting activity for the Fund is detailed below.



**Voting activity:** 1 January 2023 to 31 December 2023

Total proposals to vote on	536
Number of meetings to vote at	69
Number of companies that held voting meetings	44
Number of votes against management proposals	22
Number of votes abstained from voting	5
Number of shareholder proposals to vote on	0
Number of shareholder proposals voted against	0
Number of shareholder proposals abstained from voting	0

**Voting rationales:** 1 January 2023 to 31 December 2023

Company	Proposal	No. of proposals	Voting decision
EPAM Systems Foshan Haitian Flavouring Glodon Infineon Technologies Vitasoy Yifeng Pharmacy Chain	Appointment of auditor	6	Against management recommendation
	<p><b>Rationale</b></p> <p>The Investment Manager voted against the appointment of the auditor as they have been in place for over 10 years and the companies have given no information on intended rotation. Rotating an auditor on a relatively frequent basis (e.g. every 5-10 years) helps to ensure a fresh pair of eyes are examining the accounts and follows best practice.</p>		
Amoy Diagnostics	Amendments to articles	1	Against management recommendation
	<p><b>Rationale</b></p> <p>The Investment Manager voted against the company's request to increase share capital and share count as they did not have sufficient information at the time of voting for the justification of these amendments to articles.</p>		
Banco Bradesco	Remuneration policy	2	Against management recommendation
	Approve recasting of votes for amended Supervisory Council slate		
	<p><b>Rationale</b></p> <p>The Investment Manager voted against the company's remuneration policy as they believe it lacks long-term alignment with company performance and market best practice. They also voted against the company's request to recast votes for an amended slate of directors as they do not believe this is in shareholders' interest.</p>		
Dino Polska	Management report	4	Against management recommendation
	Financial statements		
	Remuneration report	<p><b>Rationale</b></p> <p>The Investment Manager voted against the company's accounts and reports because the auditor has been in place for over 10 years and the company has given no information on intended rotation. They also voted against their remuneration report as they believe the scheme is too short term.</p>	

Foshan Haitian Flavouring	Connected transactions	2	Against management recommendation
	<p><b>Rationale</b> The Investment Manager voted against the company's request to approve connected transactions entered into between the company and related entities and their respective annual caps. They do not believe these requests are in shareholders' interests.</p>		
Hangzhou Robam	Election of the Chair of the Nomination Committee	1	Against management recommendation
	<p><b>Rationale</b> The Investment Manager voted against the election of the Chair of the Nomination Committee at the company in support of encouraging better gender diversity. At present the company has no female directors and believe the Chair of the Nomination Committee has an important role in facilitating a more gender diverse Board of Directors.</p>		
Kingmed Diagnostics	Related party transaction	1	Against management recommendation
	<p><b>Rationale</b> The Investment Manager voted against a related party transaction which would transfer 73% ownership of a subsidiary pharmaceutical company to the Deputy General Manager of the listco. The Investment Manager could not find any reasons behind the sale nor the valuation at which the transaction would happen.</p>		
Midea	Renewed liability insurance	1	Abstained from voting
	<p><b>Rationale</b> The Investment Manager voted to abstain on the approval of a renewed liability insurance for Directors, Supervisors, and Senior Management as they did not have sufficient information on the details of the insurance policy at the time of voting.</p>		
RaiaDrogasil	Voting processes	4	Against management recommendation
	Board elections	2	Abstained from voting
	<p><b>Rationale</b> The Investment Manager voted against the company's request to adopt cumulative voting and to recast votes for the amended Board and supervisory council slate, as well as for permission to re-consider voting instructions should the meeting be held on second call. They do not believe these requests are in shareholders' interests. The Investment Manager also abstained from voting on the request to hold a separate election for Board members and for a minority candidate as they prefer to support the Board.</p>		
Techtronic Industries	Amendment to the share award scheme	2	Against management recommendation
	Amendment to the share option scheme		
	<p><b>Rationale</b> The Investment Manager voted against the company's share award and options scheme as the company had not disclosed how options are awarded other than at the absolute discretion of the Board, who</p>		

	also award options to themselves, family members and non-executives.		
TOTVS	Remuneration policy long-term incentive plan Establishment of supervisory council	3	Against management recommendation
	Establishment of supervisory council	1	Abstained from voting
	<b>Rationale</b> The Investment Manager voted against the company's remuneration policy and long-term incentive plan as they believe it is excessively diluted and would prefer for the Founder/Chair not to receive a performance based remuneration like the management team. The Investment Manager also voted against and abstained from voting on proposals relating to the company's request to establish a supervisory council as they did not have sufficient information to know who they would be voting for.		
WEG	Amended Supervisory Council slate	1	Against management recommendation
	Election of Supervisory Council	1	Abstained from voting
	<b>Rationale</b> The Investment Manager voted against the company's request to recast votes for the amended Supervisory Council slate, as they preferred to vote in favour of the female candidate nominated by minority shareholders and who has been on the fiscal council for two years. The Investment Manager also voted to abstain from voting on the election of the supervisory council as they preferred to support the minority candidate.		



### How did this financial product perform compared to the reference sustainable benchmark?

A sustainable benchmark has not been designated to compare the performance for this Fund.

- **How did the reference benchmark differ from a broad market index?**  
Not applicable.
- **How did this financial product perform with regard to the sustainability indicators to determine the alignment of the reference benchmark with the sustainable investment objective?**  
Not applicable.
- **How did this financial product perform compared with the reference benchmark?**  
Not applicable.
- **How did this financial product perform compared with the broad market index?**  
Not applicable.

**Reference benchmarks** are indexes to measure whether the financial product attains the sustainable objective.

Template periodic disclosure for the financial products referred to in Article 9, paragraphs 1 to 4a, of Regulation (EU) 2019/2088 and Article 5, first paragraph, of Regulation (EU) 2020/852

**Product name:**  
Stewart Investors Global Emerging Markets Sustainability Fund

**Legal entity identifier:**  
549300V44ENSGLMQBN36

**Sustainable investment** means an investment in an economic activity that contributes to an environmental or social objective, provided that the investment does not significantly harm any environmental or social objective and that the investee companies follow good governance practices.

The **EU Taxonomy** is a classification system laid down in Regulation (EU) 2020/852 establishing a list of **environmentally sustainable economic activities**. That Regulation does not lay down a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

## Sustainable investment objective

### Did this financial product have a sustainable investment objective?

●● <input checked="" type="checkbox"/> Yes	●○ <input type="checkbox"/> No
<p><input checked="" type="checkbox"/> It made <b>sustainable investments with an environmental objective: 63%</b></p> <ul style="list-style-type: none"> <li><input type="checkbox"/> in economic activities that qualify as environmentally sustainable under the EU Taxonomy</li> <li><input checked="" type="checkbox"/> in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy</li> </ul> <p><input checked="" type="checkbox"/> It made <b>sustainable investments with a social objective: 100%</b></p>	<p><input type="checkbox"/> It <b>promoted Environmental/Social (E/S) characteristics</b> and while it did not have as its objective a sustainable investment, it had a proportion of ___% of sustainable investments</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy</li> <li><input type="checkbox"/> with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy</li> <li><input type="checkbox"/> with a social objective</li> </ul> <p><input type="checkbox"/> It promoted E/S characteristics, but <b>did not make any sustainable investments</b></p>

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.



### To what extent was the sustainable investment objective of this financial product met?

The Fund has 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. The contribution to sustainable development is assessed under two frameworks, social and environmental.

#### 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

As at 31 December 2023, the Fund held **57** companies. **All companies (100%)** were contributing to at least one **human development pillar** and, in total, were making **167 contributions** to the pillars.

Further information about how the Investment Manager uses the human development pillars is available on the Investment Manager’s website – [stewartinvestors.com/all/how-we-invest/our-approach/human-development-pillars](https://stewartinvestors.com/all/how-we-invest/our-approach/human-development-pillars)

### **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

As at 31 December 2023, the Fund held **57** companies. **36 companies (63%)** were contributing to **climate change solutions**. These companies were contributing to **33** different solutions and, in total, were making **111 contributions** to the solutions.

**Sustainability indicators** measure how the sustainable objectives of this financial product are attained.

Further information about how the Investment Manager uses the Project Drawdown climate solutions is available on the Investment Manager’s website – [stewartinvestors.com/all/how-we-invest/our-approach/climate-solutions](https://stewartinvestors.com/all/how-we-invest/our-approach/climate-solutions)

**Assessment**

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

1. there is either a direct or enabling link between the activities of the company and the achievement of a positive social or environmental outcome;
2. 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
3. the company recognises potential negative social or environmental outcomes associated with its 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.

Notes:  
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.  
  
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).  
  
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).

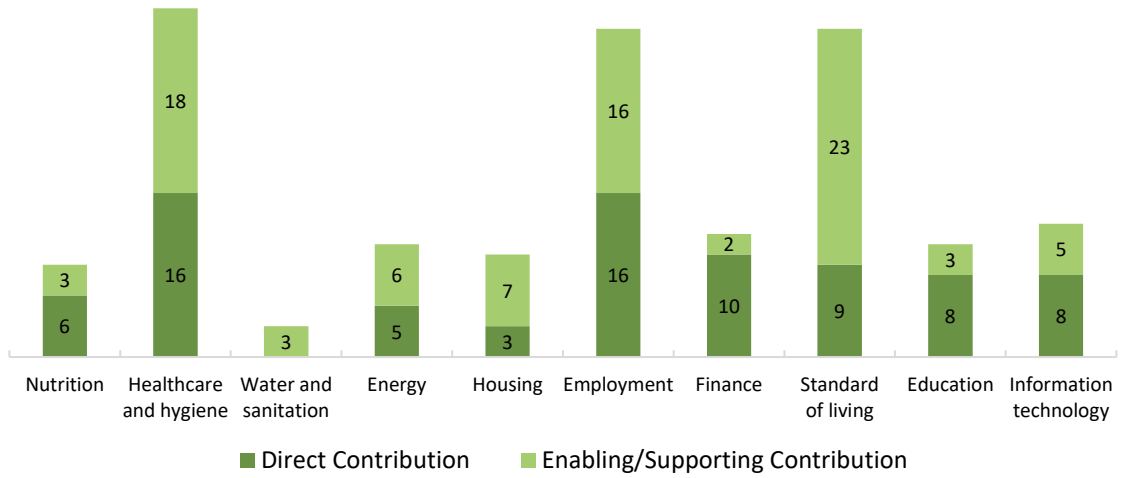
● **How did the sustainability indicators perform?**

The Investment Manager’s Portfolio Explorer tool provides the contribution that each company makes to climate solutions, human development and the Sustainable Development Goals, as well as the investment rationale, key risks and areas for improvement. Click on the link below to access the tool.

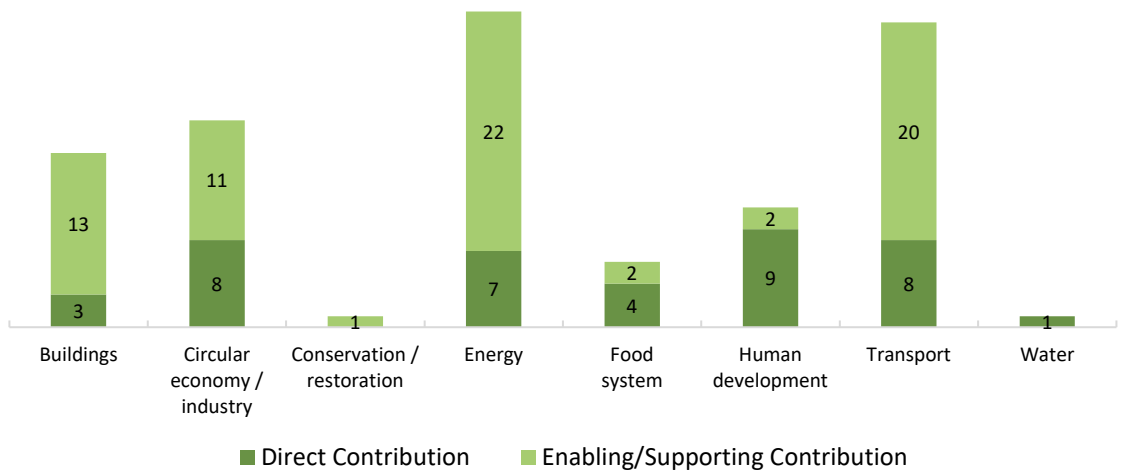
[stewartinvestors.com/all/how-we-invest/our-approach/portfolio-explorer](https://stewartinvestors.com/all/how-we-invest/our-approach/portfolio-explorer)

The social and environmental outcomes for the Fund as at 31 December 2023 are provided in the charts below.

**Human development pillars**  
(number of companies contributing to each pillar)



**Climate change solutions**  
(number of companies contributing to each solution)



Notes: Direct Contribution - directly attributable to products, services or practices provided by that company. Enabling/Supporting Contribution - supported or made possible by products or technologies provided by that company.

● **...and compared to previous periods?**

Changes in the sustainability outcomes for the Fund year-on-year are related to bottom-up changes in the portfolio and/or changes in the sustainability profile of individual investee companies.

The social and environmental outcomes for the Fund over previous periods are provided in the tables below.

## Positive social outcomes

Human development pillars	Contribution	31-Dec-2022	31-Dec-2021
No. of companies (%)	-	53 (100%)	52 (100%)
Total number of contributions	-	143	142
Nutrition	Direct	7	4
	Enabling/Supporting	1	1
Healthcare and hygiene	Direct	16	17
	Enabling/Supporting	10	9
Water and sanitation	Direct	-	-
	Enabling/Supporting	1	1
Energy	Direct	4	4
	Enabling/Supporting	5	4
Housing	Direct	3	3
	Enabling/Supporting	7	6
Employment	Direct	18	20
	Enabling/Supporting	12	10
Finance	Direct	8	6
	Enabling/Supporting	4	5
Standard of living	Direct	6	6
	Enabling/Supporting	21	24
Education	Direct	5	5
	Enabling/Supporting	3	3
Information technology	Direct	8	9
	Enabling/Supporting	4	5

## Positive environmental outcomes

Climate solutions	Contribution	31-Dec-2022	31-Dec-2021
No. of companies (%)	-	31 (58%)	30 (58%)
Number of different solutions	-	29	29
Total number of solutions	-	85	75
Buildings	Direct	2	2
	Enabling/Supporting	9	10
	Indirect	n/a	1
Circular economy/industry	Direct	7	2
	Enabling/Supporting	8	-
	Indirect	n/a	1
Conservation/restoration	Direct	1	1
	Enabling/Supporting	2	-
	Indirect	n/a	1
Energy	Direct	7	6
	Enabling/Supporting	15	9
	Indirect	n/a	3
Food system	Direct	3	2
	Enabling/Supporting	2	1
	Indirect	n/a	1
Human development	Direct	8	8
	Enabling/Supporting	-	-
	Indirect	n/a	-
Transport	Direct	6	6
	Enabling/Supporting	14	14
	Indirect	n/a	6
Water	Direct	1	1
	Enabling/Supporting	-	-
	Indirect	n/a	-



During 2022 and following feedback from clients, the Investment Manager removed the Indirect Contribution from their climate solutions measures.

Indirect Contribution – providing generic products or services to companies making direct or enabling contributions or making operational decisions which have a material contribution.

In 2022, Project Drawdown added 11 new climate solutions to their framework. The Investment Manager considered these new solutions for their 2022 reporting measures. More detail on these changes are available on the Investment Manager’s website: [stewartinvestors.com/all/insights/climate-solutions-update](https://stewartinvestors.com/all/insights/climate-solutions-update)

● ***How did the sustainable investments not cause significant harm to any sustainable investment objective?***

The Fund only invests 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.

The 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:

[stewartinvestors.com/all/insights/our-position-on-harmful-and-controversial-products-and-services](https://stewartinvestors.com/all/insights/our-position-on-harmful-and-controversial-products-and-services)

**Principal adverse impacts** are the most significant negative impacts of investment decisions on sustainability factors relating to environmental, social and employee matters, respect for human rights, anti-corruption and anti-bribery matters.

— *How were the indicators for adverse impacts on sustainability factors taken into account?*

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 a company's quality or sustainability positioning through either meetings, ongoing monitoring and reviewing their annual reports, the Investment Manager will re-evaluate the investment case.

In addition, the Fund portfolio is 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 Principal Adverse Impacts (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 investor does no significant harm but still have 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, Stewart Investors will not invest or will exit the Funds' position in the company in a timely manner.

The Investment Manager includes product level data on Principal Adverse Impact (PAI) indicators in the question below.

*Were sustainable investments aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights? Details:*

The Fund's sustainable investments are aligned with these Guidelines and Principles.

The Investment Manager continually monitors the companies owned to understand any changes to the strategies. The Fund's 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.

During the reporting period the Fund held the following companies which flagged against the Investment Manager's policy.

#### **Tata Consultancy Services (TCS)**

**Activity exposure:** UN Global Compact Principle 2: Businesses should make sure that they are not complicit in human rights abuses.

**Reason for exception/holding:** TCS has no direct involvement in nuclear weapons or energy, however the external research provider considers the company to be involved because its parent company, Tata Sons, owns greater than 50% of TCS.

Tata Sons involvement is due to the company owning Tata Advanced Systems which acquired Tata Power's Strategic Engineering Division. The Strategic Engineering Division provides control systems for the Indian Navy's nuclear missile submarines.

As India has not signed the Treaty on the Non-Proliferation of Nuclear Weapons, the external data provider considers Tata Sons and by extension TCS to be in support of the nuclear weapons programme of India. The Investment Manager disagrees with this assessment and does not see anything in the activities or conduct of the company to question its sustainability positioning or the investment case.

## WEG

**Activity exposure >5% revenue:** Supporting Oil & Gas and Supporting Thermal Coal

**Reason for exception/holding:** The company manufactures and sells renewable energy solutions used in solar and wind power generation, hydroelectric power plants and biomass helping society to shift away from fossil fuel energy production. WEG also manufacture and sell energy efficient electric motors, which help their customers reduce their energy requirements and greenhouse gas emissions.

Revenues derived from oil and gas supporting products and services, and thermal coal supporting products and services accounted for an estimated 2.5% per activity (5% in total) of the company's overall revenue in FY2022, according to the external research provider.

Thermal coal exposure for supporting products and services was added by the external research provider in early 2023 and the Investment Manager contacted the company directly to check the 2.5% revenue estimates provided. Given that coal is not a strategic market segment for their products or customers, the company estimate that <1% revenues to be a more accurate reflection of their exposure.



### How did this financial product consider principal adverse impacts on sustainability factors?

In addition to the detail described above, the Investment Manager has set a materiality threshold of 5% of revenue for direct involvement in companies materially involved in the exploration, production or generation of fossil fuel energy and a threshold of 0% for controversial weapons. Portfolio companies are checked against the thresholds each quarter by an external third-party research platform.

The below table sets out the PAI indicators for the Fund.

Mandatory indicators	Metrics	2022	2023
1. GHG Emissions	Exposure (EUR m)	315	451
	Scope 1 (tCO <sub>2</sub> eq)	1,625	2,631
	Scope 2 (tCO <sub>2</sub> eq)	4,085	6,006
	Scope 3 (tCO <sub>2</sub> eq)	249,681	192,034
	Total Emissions Scope 1+2 (tCO <sub>2</sub> eq)	5,710	8,637
	Total Emissions Scope 1+2+3 (tCO <sub>2</sub> eq)	255,390	200,671
	2. Carbon Footprint	Total Emissions Scope 1+2 (tCO <sub>2</sub> eq/EURm)	18
Total Emissions Scope 1+2+3 (tCO <sub>2</sub> eq/EURm)		795	425
3. GHG Intensity of Investee Companies	Scope 1+2 (tCO <sub>2</sub> eq/EURm)	61	59
	Scope 1+2+3 (tCO <sub>2</sub> eq/EURm)	1,470	1,327
4. Exposure to companies active in the fossil fuel sector	(% involvement)	2%	1%
	Non-Renewable Energy Consumption (%)	69%	72%

5. Share of Non-Renewable Energy Consumption and Production	Non-Renewable Energy Production (%)	16%	14%
	Agriculture, Forestry & Fishing (GWh/EURm)	no data	no data
	Construction (GWh/EURm)	no data	no data
	Electricity, Gas, Steam & Air Conditioning Supply (GWh/EURm)	no data	no data
	Manufacturing (GWh/EURm)	0.12	0.15
6. Energy consumption intensity per high impact sector	Mining & Quarrying (GWh/EURm)	no data	no data
	Real Estate Activities (GWh/EURm)	no data	no data
	Transportation & Storage (GWh/EURm)	no data	no data
	Water Supply, Sewerage, Waste Remediation (GWh/EURm)	no data	no data
	Trade & Repair of Automobiles (GWh/EURm)	insufficient data	insufficient data
7. Activities Negatively Affecting Biodiversity Areas	(% involvement)	0%	0%
8. Emissions to Water	(t/EURm)	insufficient data	no data
9. Hazardous waste ratio	(t/EURm)	16	38
10. Violations of UNGC and OECD Guidelines for Multinational Enterprises	Watch (% involvement)	0%	0%
	Breach (% involvement)	5%	4%
11. Lack of Processes & Compliance Mechanisms to Monitor Compliance with UNGC and OECD guidelines	(% involvement)	70%	55%
12. Unadjusted Gender Pay Gap	% of Male Gross Hourly Rate	insufficient data	no data
13. Board Gender Diversity	% of Female Board Members	19%	22%
14. Exposure to Controversial Weapons	(% involvement)	0%	0%
<b>Voluntary indicators</b>	<b>Metrics</b>	<b>2022</b>	<b>2023</b>
Water Usage and Recycling	% Water Withdrawal	n/a	61%
	Recycling & Reuse (cubic metres)	n/a	27,475,678
Number of Identified Cases of Severe Human Rights Issues & Incidents	Weighted number of incidents	n/a	0.1

The fossil fuel exposure % shown in the table above is for investee company **WEG**. WEG manufactures and sells efficient electrical motors, which help customers across a variety of industrial sectors reduce their energy requirements. The SFDR PAI methodology for fossil fuel sector exposure considers Oil & Gas Production, Thermal Coal Extraction and Thermal Coal Supporting Products/Services. The third-party data provider estimates WEG as having c.2.5% of their total revenue derived from products supporting thermal coal.

Notes: PAI data is sourced from third-party ESG data providers. 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. Data for certain metrics may be based on limited data across the portfolio companies.



## What were the top investments of this financial product?

The list includes the investments constituting the **greatest proportion of investments** of the financial product during the reference period which is: 1 January 2023 to 31 December 2023.

Largest investments	Sector	% assets	Country
Mahindra & Mahindra	Consumer Discretionary	5.3	India
Tube Investments	Consumer Discretionary	4.2	India
Tata Consultancy Services	Information Technology	4.2	India
Taiwan Semiconductor	Information Technology	3.9	Taiwan
Unicharm	Consumer Staples	3.7	Japan
Hoya	Health Care	3.5	Japan
Kotak Mahindra Bank	Financials	3.1	India
Marico	Consumer Staples	2.9	India
HDFC Bank*	Financials	2.7	India
Jerónimo Martins	Consumer Staples	2.7	Portugal
EPAM Systems	Information Technology	2.5	United States
Voltronic Power	Industrials	2.5	Taiwan
Tech Mahindra	Information Technology	2.4	India
Godrej Consumer Products	Consumer Staples	2.4	India
RaiaDrogasil	Consumer Staples	2.3	Brazil

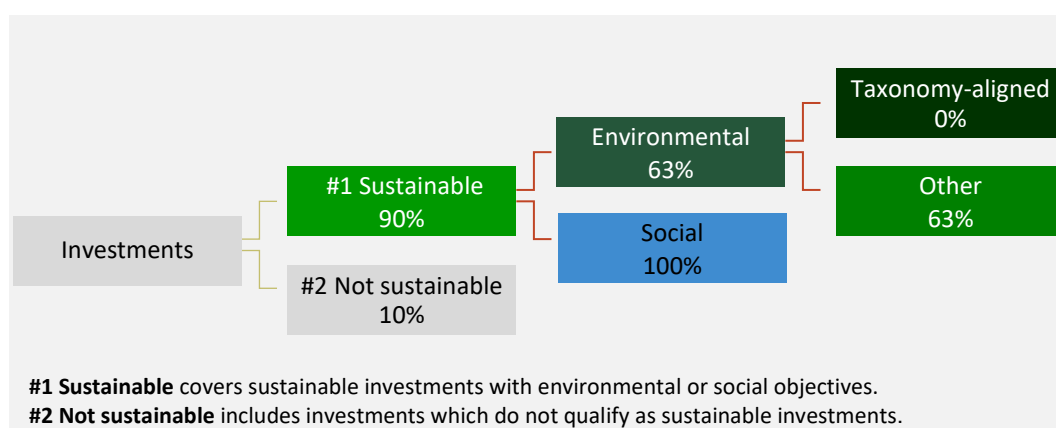
\*HDFC Limited merged with HDFC Bank. The % assets figure is the average of both holdings.



## What was the proportion of sustainability-related investments?

### ● What was the asset allocation?

The Fund invested 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 Investment Manager's own philosophy explained in the Investment Policy of the Prospectus.



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.

● ***In which economic sectors were the investments made?***

The average holdings (excluding cash) over the reporting period in Global Industry Classification Standard (GICs) sectors:

Sector	% assets
Communication Services	-
Consumer Discretionary	13.4
Consumer Staples	23.1
Energy	-
Financials	16.4
Health Care	8.0
Industrials	10.0
Information Technology	24.2
Materials	-
Real Estate	-
Utilities	-
Cash and cash equivalents	4.9

The Fund has no direct holdings in companies materially involved in the exploration, production or generation of fossil fuel energy.

The Investment Manager checks investee companies (via a third-party research platform and on a quarterly basis) for any revenues derived from exploration, mining, extraction, production, processing, storage, refining or distribution, including transportation, storage and trade, of fossil fuels. They disclose any companies above their material threshold (5% of revenues) on their website.

During the period the Fund held **WEG** which derives from oil and gas supporting products and services, and thermal coal supporting products and services estimated as 2.5% per activity (5% in total). The company manufactures and sells renewable energy solutions used in solar and wind power generation, hydroelectric power plants and biomass helping society to shift away from fossil fuel energy production.

Additional transparency is provided by the Investment Manager in their annual report (**Annual Stewardship Review 2022** pg.16), where they disclose companies that are providing services to the fossil fuel industry directly or via their underlying subsidiaries.

To comply, with the EU Taxonomy, the criteria for **fossil gas** include limitations on emissions and switching to fully renewable power or lower-carbon fuels by the end of 2035. For **nuclear energy**, the criteria include comprehensive safety and waste management rules.

**Enabling activities** directly enable other activities to make a substantial contribution to an environmental objective

**Transitional activities are economic activities** for which low-carbon alternatives are not yet available and that have greenhouse gas emission levels corresponding to the best performance.



## To what extent were sustainable investments with an environmental objective aligned with the EU Taxonomy<sup>1</sup>?

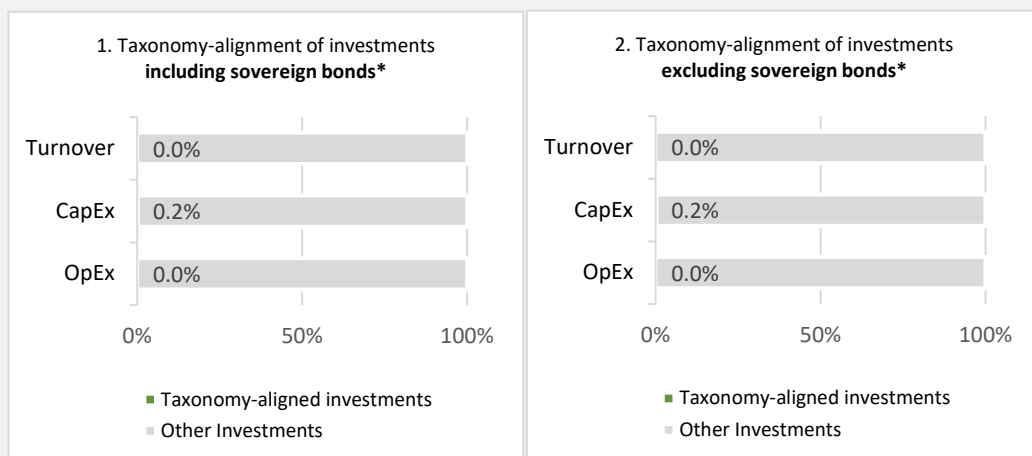
### ● **Did the financial product invest in fossil gas and/or nuclear energy related activities?**

Yes

In fossil gas    In nuclear energy

No

*The graphs below show in green the percentage of investments that were aligned with the EU Taxonomy. As there is no appropriate methodology to determine the taxonomy-alignment of sovereign bonds\*, the first graph shows the Taxonomy alignment in relation to all the investments of the financial product including sovereign bonds, while the second graph shows the Taxonomy alignment only in relation to the investments of the financial product other than sovereign bonds.*



% figures represent taxonomy-aligned investments

\*For the purpose of these graphs, 'sovereign bonds' consist of all sovereign exposures

### ● **What was the share of investments made in transitional and enabling activities?**

The reported share of investments made in transitional and enabling activities for the Fund is **0%**.

### ● **How did the percentage of investments aligned with the EU Taxonomy compare with previous reference periods?**

The percentage of investments aligned with the EU Taxonomy for the previous reference period was **0%**.

<sup>1</sup> Fossil gas and/or nuclear related activities will only comply with the EU Taxonomy where they contribute to limiting climate change ("climate change mitigation") and do not significantly harm any EU Taxonomy objective – see explanatory notes in the left hand margin. The full criteria for fossil gas and nuclear energy economic activities that comply with the EU Taxonomy are laid down in Commission Delegated Regulation (EU) 2022/1214.





### What was the share of sustainable investments with an environmental objective that were not aligned with the EU Taxonomy?

The Fund does not actively target EU Taxonomy-aligned assets.

As at 31 December 2023, the Fund held **57** companies. Based on reported turnover data, there was no alignment with the EU taxonomy from any of these companies.



### What was the share of socially sustainable investments?

**All companies** in the Fund were aligned to socially sustainable investments as defined by the Investment Manager’s human development pillars.



### What investments were included under “not sustainable”, what was their purpose and were there any minimum environmental or social safeguards?

The “#2 Not sustainable” assets are cash and near-cash assets held pending investment, to meet liquidity requirements, or assets held in order to allow efficient operational exit of positions. Cash is held by the depositary.

The Fund’s service providers for these assets are reviewed and assessed for compliance with FSI’s modern slavery policy.



### What actions have been taken to attain the sustainable investment objective during the reference period?

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. Engagement is fully integrated into the responsibilities of the investment team and contributes invaluable insights into their understanding of each company.

More information is available on the Investment Manager’s website (links below):

[Stewardship and corporate engagement policy](#)

[Engagement booklet](#)

[Proxy voting](#)

[Annual stewardship review](#)

During the reporting period, the Investment Manager met with **71%** of Fund companies.

All engagement starts with bottom-up analysis, with responsibility shared across the investment team. Over the period and across their funds, the Investment Manager engaged on issues such as:

- **Pollution, natural resource degradation, biodiversity and climate change** – packaging, plastic pellets, deforestation, sustainability of supply chains (soy, palm oil and coffee), fossil fuel versus renewables, water, waste and energy efficiency
- **Aligned remuneration and incentives** – living wage, gender pay gap and complexity of incentives
- **Animal testing/welfare** – animal testing exposure

- **Human rights and modern slavery** – conflict minerals in the supply chains of semiconductors, trafficking, forced labour and child labour in the Asia Pacific region and public health
- **Diversity, equity and inclusion** – diversity, particularly gender, in senior management and on boards
- **Addictive products** – indirect exposure to tobacco, chemicals, gaming, adult entertainment, and sugar content in food
- **Governance** – corporate strategy and legal structure

During the period the Investment Manager engaged with **62%** of Fund companies.

- Environmental issues 36%
- Social issues 19%
- Governance issues 45%

*Engagements may relate to one or multiple environmental, social or governance issues.*

Proxy voting is an extension of the Investment Manager’s engagement activities. It is not outsourced to an external provider or separate proxy voting/engagement team. The Investment Manager considers each proxy vote individually and on its own merits in the context of their knowledge about that particular company. A breakdown of voting activity for the Fund is detailed below.

**Voting activity: 1 January 2023 to 31 December 2023**

Total proposals to vote on	660
Number of meetings to vote at	89
Number of companies that held voting meetings	56
Number of votes against management proposals	33
Number of votes abstained from voting	4
Number of shareholder proposals to vote on	0
Number of shareholder proposals voted against	0
Number of shareholder proposals abstained from voting	0

**Voting rationales: 1 January 2023 to 31 December 2023**

Company	Proposal	No. of proposals	Voting decision
EPAM Systems Foshan Haitian Flavouring Glodon Vitasoy Yifeng Pharmacy Chain	Appointment of auditor	5	Against management recommendation
	<b>Rationale</b> The Investment Manager voted against the appointment of the auditor as they have been in place for over 10 years and the companies have given no information on intended rotation. Rotating an auditor on a relatively frequent basis (e.g. every 5-10 years) helps to ensure a fresh pair of eyes are examining the accounts and follows best practice.		
Aavas Financiers	Repricing of options granted under equity stock option plan for employees 2020-2022	3	Against management recommendation

	<p><b>Rationale</b> The Investment Manager voted against the company's request to reprice options granted under various equity stock option plans for employees due to a share price fall. They do not believe this request is in shareholders' interest.</p>		
Amoy Diagnostics	Amendments to articles	1	Against management recommendation
	<p><b>Rationale</b> The Investment Manager voted against the company's request to increase share capital and share count as they did not have sufficient information at the time of voting for the justification of these amendments to articles.</p>		
Banco Bradesco	Remuneration policy	2	Against management recommendation
	Approve recasting of votes for amended Supervisory Council slate		
	<p><b>Rationale</b> The Investment Manager voted against the company's remuneration policy as they believe it lacks long-term alignment with company performance and market best practice. They also voted against the company's request to recast votes for an amended slate of directors as they do not believe this is in shareholders' interest.</p>		
BRAC Bank	Increase in authorised capital	1	Against management recommendation
	<p><b>Rationale</b> The Investment Manager voted against the company's request to increase authorised share capital by more than 100%, as the company had not given any justification for why they are doing this at the time of voting.</p>		
Dino Polska	Management report Financial statements	4	Against management recommendation
	Remuneration report		
	<p><b>Rationale</b> The Investment Manager voted against the company's accounts and reports because the auditor has been in place for over 10 years and the company has given no information on intended rotation. They also voted against their remuneration report as they believe the scheme is too short term.</p>		
Foshan Haitian Flavouring	Connected transactions	2	Against management recommendation
	<p><b>Rationale</b> The Investment Manager voted against the company's request to approve connected transactions entered into between the company and related entities and their respective annual caps. They do not believe these requests are in shareholders' interests.</p>		
Hangzhou Robam	Election of the Chair of the Nomination Committee	1	Against management recommendation
	<p><b>Rationale</b> The Investment Manager voted against the election of the Chair of the Nomination Committee at the company in support of</p>		

	encouraging better gender diversity. At present the company has no female directors, and believe the Chair of the Nomination Committee has an important role in facilitating a more gender diverse Board of Directors.		
Kingmed Diagnostics	Related party transaction	1	Against management recommendation
	<p><b>Rationale</b></p> <p>The Investment Manager voted against a related party transaction which would transfer 73% ownership of a subsidiary pharmaceutical company to the Deputy General Manager of the listco. The Investment Manager could not find any reasons behind the sale nor the valuation at which the transaction would happen.</p>		
Philippine Seven	Approve all other business matters	1	Against management recommendations
	<p><b>Rationale</b></p> <p>The Investment Manager voted against the company's request for management to approve all other business matters before the annual general meeting (AGM) of shareholders. As active shareholders the Investment Manager prefers to vote on such matters at the AGM.</p>		
RaiaDrogasil	Voting processes	4	Against management recommendation
	Board elections	2	Abstained from voting
	<p><b>Rationale</b></p> <p>The Investment Manager voted against the company's request to adopt cumulative voting and to recast votes for the amended Board and supervisory council slate, as well as for permission to reconsider voting instructions should the meeting be held on second call. They do not believe these requests are in shareholders' interests. The Investment Manager also abstained from voting on the request to hold a separate election for Board members and for a minority candidate as they prefer to support the Board.</p>		
Techtronic Industries	Amendment to the share award scheme	2	Against management recommendation
	Amendment to the share option scheme		
<p><b>Rationale</b></p> <p>The Investment Manager voted against the company's share award and options scheme as the company had not disclosed how options are awarded other than at the absolute discretion of the Board, who also award options to themselves, family members and non-executives.</p>			
TOTVS	Remuneration policy long-term incentive plan Establishment of supervisory council	3	Against management recommendation
	Establishment of supervisory council	1	Abstained from voting
	<p><b>Rationale</b></p> <p>The Investment Manager voted against the company's remuneration policy and long-term incentive plan as they believe it is excessively diluted, and would prefer for the Founder/Chair not</p>		

	to receive a performance based remuneration like the management team. The Investment Manager also voted against and abstained from voting on proposals relating to the company's request to establish a supervisory council as they did not have sufficient information to know who they would be voting for.		
Vinda International	Authority to issue shares without pre-emptive rights	2	Against management recommendation
	Authority to issue repurchased shares		
	<b>Rationale</b> The Investment Manager voted against the company's request to issue shares without pre-emptive rights and issue repurchased shares, as the share discount rate had not been disclosed.		
WEG	Amended Supervisory Council slate	1	Against management recommendation
	Election of Supervisory Council	1	Abstained from voting
	<b>Rationale</b> The Investment Manager voted against the company's request to recast votes for the amended Supervisory Council slate, as they preferred to vote in favour of the female candidate nominated by minority shareholders and who has been on the fiscal council for two years. The Investment Manager also voted to abstain from voting on the election of the supervisory council as they preferred to support the minority candidate.		



### How did this financial product perform compared to the reference sustainable benchmark?

A sustainable benchmark has not been designated to compare the performance for this Fund.

- **How did the reference benchmark differ from a broad market index?**  
Not applicable.
- **How did this financial product perform with regard to the sustainability indicators to determine the alignment of the reference benchmark with the sustainable investment objective?**  
Not applicable.
- **How did this financial product perform compared with the reference benchmark?**  
Not applicable.
- **How did this financial product perform compared with the broad market index?**  
Not applicable.

**Reference benchmarks** are indexes to measure whether the financial product attains the sustainable objective.

Template periodic disclosure for the financial products referred to in Article 9, paragraphs 1 to 4a, of Regulation (EU) 2019/2088 and Article 5, first paragraph, of Regulation (EU) 2020/852

**Product name:**  
Stewart Investors Indian Subcontinent Sustainability Fund

**Legal entity identifier:**  
549300KV9RVYY1I3UF70

*The Fund launched during the period.*

## Sustainable investment objective

### Did this financial product have a sustainable investment objective?

**Yes**

It made **sustainable investments with an environmental objective: 59%**

in economic activities that qualify as environmentally sustainable under the EU Taxonomy

in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy

It made **sustainable investments with a social objective: 100%**

**No**

It **promoted Environmental/Social (E/S) characteristics** and while it did not have as its objective a sustainable investment, it had a proportion of \_\_\_% of sustainable investments

with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy

with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy

with a social objective

It promoted E/S characteristics, but **did not make any sustainable investments**

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.

**Sustainable investment** means an investment in an economic activity that contributes to an environmental or social objective, provided that the investment does not significantly harm any environmental or social objective and that the investee companies follow good governance practices.

The **EU Taxonomy** is a classification system laid down in Regulation (EU) 2020/852 establishing a list of **environmentally sustainable economic activities**. That Regulation does not lay down a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.



### To what extent was the sustainable investment objective of this financial product met?

The Fund has 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. The contribution to sustainable development is assessed under two frameworks, social and environmental.

#### 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

As at 31 December 2023, the Fund held **37** companies. **All companies (100%)** were contributing to at least one **human development pillar** and, in total, were making **107 contributions** to the pillars.

Further information about how the Investment Manager uses the human development pillars is available on the Investment Manager’s website – [stewartinvestors.com/all/how-we-invest/our-approach/human-development-pillars](https://stewartinvestors.com/all/how-we-invest/our-approach/human-development-pillars)

### 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

As at 31 December 2023, the Fund held **37** companies. **22 companies (59%)** were contributing to **climate change solutions**. These companies were contributing to **38** different solutions and, in total, were making **78 contributions** to the solutions.

Further information about how the Investment Manager uses the Project Drawdown climate solutions is available on the Investment Manager’s website – [stewartinvestors.com/all/how-we-invest/our-approach/climate-solutions](https://stewartinvestors.com/all/how-we-invest/our-approach/climate-solutions)

### Assessment

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

1. there is either a direct or enabling link between the activities of the company and the achievement of a positive social or environmental outcome;
2. 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
3. the company recognises potential negative social or environmental outcomes associated with its 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.

#### Notes:

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.

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).

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).

#### ● **How did the sustainability indicators perform?**

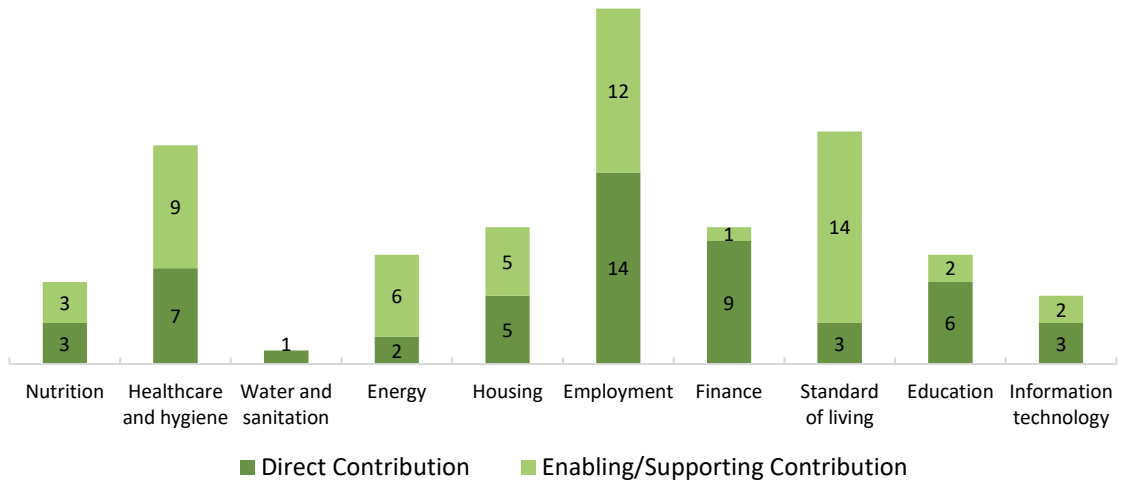
The Investment Manager’s Portfolio Explorer tool provides the contribution that each company makes to climate solutions, human development and the Sustainable Development Goals, as well as the investment rationale, key risks and areas for improvement. Click on the link below to access the tool.

[stewartinvestors.com/all/how-we-invest/our-approach/portfolio-explorer](https://stewartinvestors.com/all/how-we-invest/our-approach/portfolio-explorer)

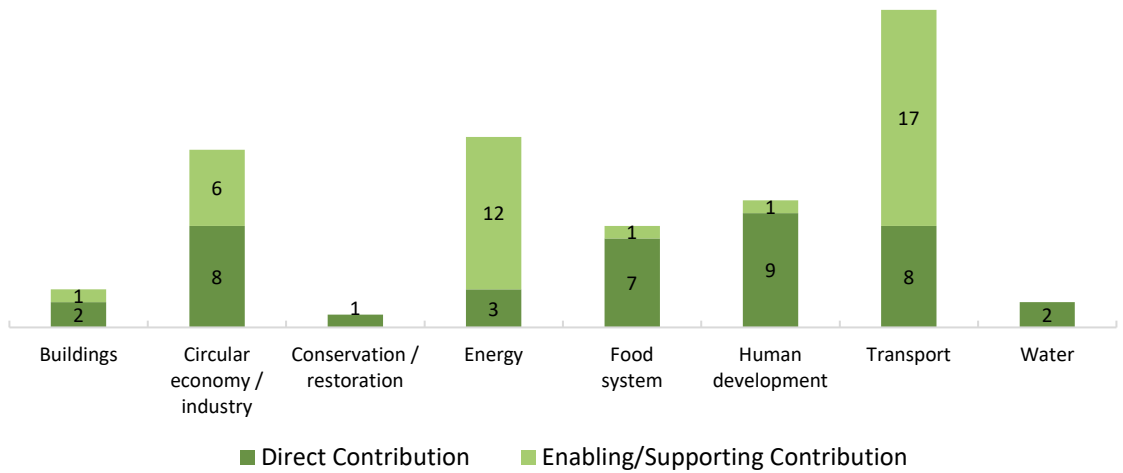
The social and environmental outcomes for the Fund as at 31 December 2023 are provided in the charts below.



**Human development pillars**  
(number of companies contributing to each pillar)



**Climate change solutions**  
(number of companies contributing to each solution)



Notes: Direct Contribution - directly attributable to products, services or practices provided by that company. Enabling/Supporting Contribution - supported or made possible by products or technologies provided by that company.

● **...and compared to previous periods?**

Not applicable, the Fund launched during the period.

● **How did the sustainable investments not cause significant harm to any sustainable investment objective?**

The Fund only invests 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.

**Principal adverse impacts** are the most significant negative impacts of investment decisions on sustainability factors relating to environmental, social and employee matters, respect for human rights, anti-corruption and anti-bribery matters.

The 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:

[stewartinvestors.com/all/insights/our-position-on-harmful-and-controversial-products-and-services](https://stewartinvestors.com/all/insights/our-position-on-harmful-and-controversial-products-and-services)

– *How were the indicators for adverse impacts on sustainability factors taken into account?*

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 a company's quality or sustainability positioning through either meetings, ongoing monitoring and reviewing their annual reports, the Investment Manager will re-evaluate the investment case.

In addition, the Fund portfolio is 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 Principal Adverse Impacts (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 investor does no significant harm but still have 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, Stewart Investors will not invest or will exit the Funds' position in the company in a timely manner.

The Investment Manager includes product level data on Principal Adverse Impact (PAI) indicators in question below.

*Were sustainable investments aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights? Details:*

The Fund's sustainable investments are aligned with these Guidelines and Principles.

The Investment Manager continually monitors the companies owned to understand any changes to the strategies. The Fund's 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.

During the reporting period the Fund held the following company which flagged against the Investment Manager’s policy.

**Tata Consultancy Services (TCS)**

**Activity exposure:** UN Global Compact Principle 2: Businesses should make sure that they are not complicit in human rights abuses.

**Reason for exception/holding:** TCS has no direct involvement in nuclear weapons or energy, however the external research provider considers the company to be involved because its parent company, Tata Sons, owns greater than 50% of TCS.

Tata Sons involvement is due to the company owning Tata Advanced Systems which acquired Tata Power’s Strategic Engineering Division. The Strategic Engineering Division provides control systems for the Indian Navy’s nuclear missile submarines.

As India has not signed the Treaty on the Non-Proliferation of Nuclear Weapons, the external data provider considers Tata Sons and by extension TCS to be in support of the nuclear weapons programme of India. The Investment Manager disagrees with this assessment and does not see anything in the activities or conduct of the company to question its sustainability positioning or the investment case.



**How did this financial product consider principal adverse impacts on sustainability factors?**

In addition to the detail described above, the Investment Manager has set a materiality threshold of 5% of revenue for direct involvement in companies materially involved in the exploration, production or generation of fossil fuel energy and a threshold of 0% for controversial weapons. Portfolio companies are checked against the thresholds each quarter by an external third-party research platform.

The below table sets out the PAI indicators for the Fund.

Mandatory indicators	Metrics	2023
Exposure	(EUR m)	5
	Scope 1 (tCO2eq)	133
	Scope 2 (tCO2eq)	26
	Scope 3 (tCO2eq)	1,989
1. GHG Emissions	Total Emissions Scope 1+2 (tCO2eq)	158
	Total Emissions Scope 1+2+3 (tCO2eq)	2,147
2. Carbon Footprint	Total Emissions Scope 1+2 (tCO2eq/EURm)	31
	Total Emissions Scope 1+2+3 (tCO2eq/EURm)	425
3. GHG Intensity of Investee Companies	Scope 1+2 (tCO2eq/EURm)	119
	Scope 1+2+3 (tCO2eq/EURm)	1,892
4. Exposure to companies active in the fossil fuel sector	(% involvement)	0%

5. Share of Non-Renewable Energy Consumption and Production	Non-Renewable Energy Consumption (%)	80%
	Non-Renewable Energy Production (%)	33%
6. Energy consumption intensity per high impact sector	Agriculture, Forestry & Fishing (GWh/EURm)	no data
	Construction (GWh/EURm)	no data
	Electricity, Gas, Steam & Air Conditioning Supply (GWh/EURm)	no data
	Manufacturing (GWh/EURm)	0.51
	Mining & Quarrying (GWh/EURm)	no data
	Real Estate Activities (GWh/EURm)	no data
	Transportation & Storage (GWh/EURm)	no data
	Water Supply, Sewerage, Waste Remediation (GWh/EURm)	no data
	Trade & Repair of Automobiles (GWh/EURm)	no data
	7. Activities Negatively Affecting Biodiversity Areas	(% involvement)
8. Emissions to Water	(t/EURm)	no data
9. Hazardous waste ratio	(t/EURm)	1
10. Violations of UNGC and OECD Guidelines for Multinational Enterprises	Watch (% involvement)	0%
	Breach (% involvement)	2%
11. Lack of Processes & Compliance Mechanisms to Monitor Compliance with UNGC and OECD guidelines	(% involvement)	72%
12. Unadjusted Gender Pay Gap	% of Male Gross Hourly Rate	no data
13. Board Gender Diversity	% of Female Board Members	22%
14. Exposure to Controversial Weapons	(% involvement)	0%
<b>Voluntary indicators</b>	<b>Metrics</b>	<b>2023</b>
Water Usage and Recycling	% Water Withdrawal	44%
	Recycling & Reuse (cubic metres)	6,294,344
Number of Identified Cases of Severe Human Rights Issues & Incidents	Weighted number of incidents	0.1

Notes: PAI data is sourced from third-party ESG data providers. 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. Data for certain metrics may be based on limited data across the portfolio companies.



## What were the top investments of this financial product?

Largest investments	Sector	% assets	Country
Mahindra & Mahindra	Consumer Discretionary	7.8	India
Tube Investments	Consumer Discretionary	6.0	India
CG Power	Industrials	5.9	India
Kotak Mahindra Bank	Financials	4.3	India
Aavas Financiers	Financials	4.0	India
Dr. Lal PathLabs	Health Care	3.4	India
Godrej Consumer Products	Consumer Staples	3.4	India
Tata Consumer Products	Consumer Staples	3.4	India
HDFC Bank*	Financials	3.2	India
Tech Mahindra	Information Technology	3.2	India
Marico	Consumer Staples	3.2	India
Blue Dart Express	Industrials	3.1	India
Syngene	Health Care	2.8	India
Dr. Reddy's Laboratories	Health Care	2.8	India
Triveni Turbines	Industrials	2.7	India

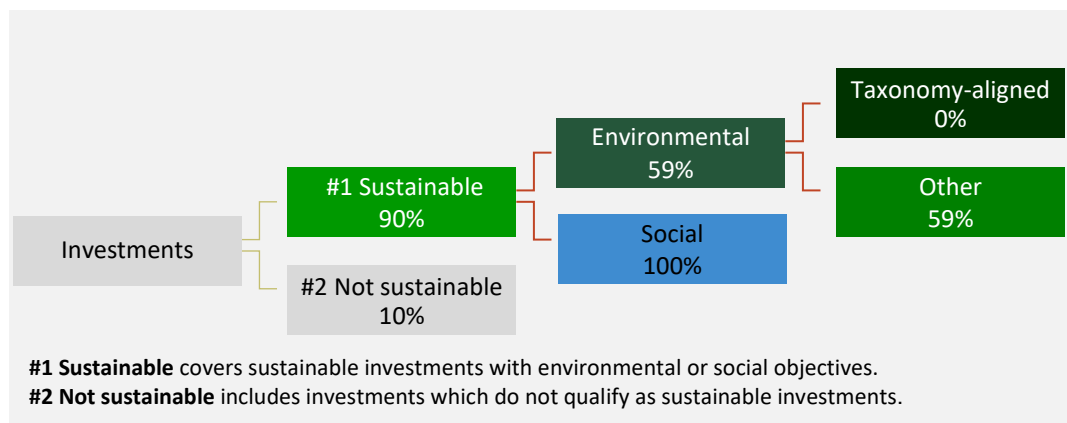
\*HDFC Limited merged with HDFC Bank. The % assets figure is the average of both holdings.



## What was the proportion of sustainability-related investments?

### ● What was the asset allocation?

The Fund invested 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 Investment Manager's own philosophy explained in the Investment Policy of the Prospectus.



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.

● **In which economic sectors were the investments made?**

The average holdings (excluding cash) over the reporting period in Global Industry Classification Standard (GICs) sectors:

Sector	% assets
Communication Services	3.5
Consumer Discretionary	17.4
Consumer Staples	11.1
Energy	-
Financials	19.7
Health Care	10.7
Industrials	18.9
Information Technology	8.9
Materials	4.0
Real Estate	-
Utilities	-
Cash and cash equivalents	5.8

The Fund has no direct holdings in companies materially involved in the exploration, production or generation of fossil fuel energy.

The Investment Manager checks investee companies (via a third-party research platform and on a quarterly basis) for any revenues derived from exploration, mining, extraction, production, processing, storage, refining or distribution, including transportation, storage and trade, of fossil fuels. They disclose any companies above their material threshold (5% of revenues) on their website.

Additional transparency is provided by the Investment Manager in their annual report ([Annual Stewardship Review 2022](#) pg.16), where they disclose companies that are providing services to the fossil fuel industry directly or via their underlying subsidiaries.



**To what extent were sustainable investments with an environmental objective aligned with the EU Taxonomy<sup>1</sup>?**

● **Did the financial product investment in fossil gas and/or nuclear energy related activities**

- Yes
- In fossil gas     In nuclear energy
- No

<sup>1</sup> Fossil gas and/or nuclear related activities will only comply with the EU Taxonomy where they contribute to limiting climate change (“climate change mitigation”) and do not significantly harm any EU Taxonomy objective – see explanatory notes in the left hand margin. The full criteria for fossil gas and nuclear energy economic activities that comply with the EU Taxonomy are laid down in Commission Delegated Regulation (EU) 2022/1214.

To comply, with the EU Taxonomy, the criteria for **fossil gas** include limitations on emissions and switching to fully renewable power or lower-carbon fuels by the end of 2035. For **nuclear energy**, the criteria include comprehensive safety and waste management rules.

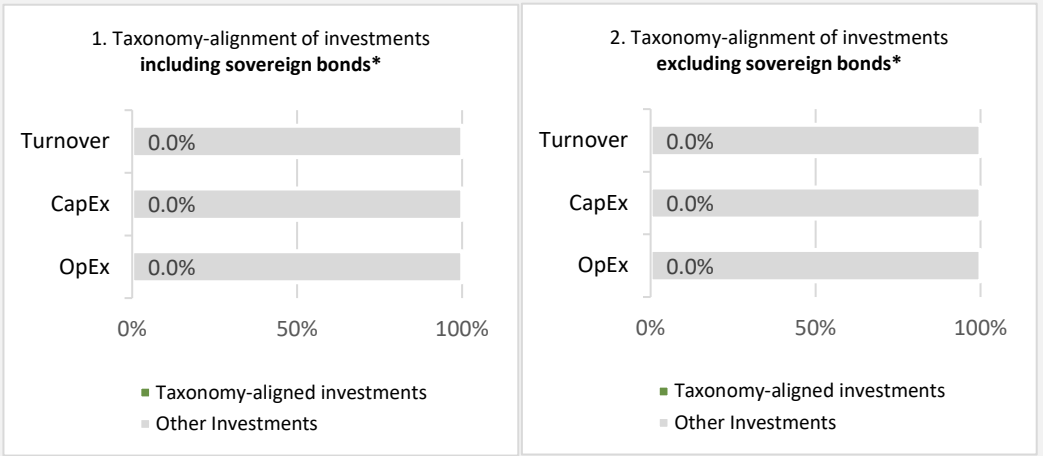
**Enabling activities** directly enable other activities to make a substantial contribution to an environmental objective

**Transitional activities are economic activities** for which low-carbon alternatives are not yet available and that have greenhouse gas emission levels corresponding to the best performance.

Taxonomy-aligned activities are expressed as a share of:

- **turnover** reflecting the share of revenue from green activities of investee companies
- **capital expenditure (CapEx)** showing the green investments made by investee companies, e.g. for a transition to a green economy.
- **operational expenditure (OpEx)** reflecting green operational activities of investee companies.

The graphs below show in green the percentage of investments that were aligned with the EU Taxonomy. As there is no appropriate methodology to determine the taxonomy-alignment of sovereign bonds\*, the first graph shows the Taxonomy alignment in relation to all the investments of the financial product including sovereign bonds, while the second graph shows the Taxonomy alignment only in relation to the investments of the financial product other than sovereign bonds.



% figures represent taxonomy-aligned investments  
 \*For the purpose of these graphs, 'sovereign bonds' consist of all sovereign exposures

● **What was the share of investments made in transitional and enabling activities?**

The reported share of investments made in transitional and enabling activities for the Fund is **0%**.

● **How did the percentage of investments aligned with the EU Taxonomy compare with previous reference periods?**

Not applicable, the Fund launched during the period.



are sustainable investments with an environmental objective that **do not take into account the criteria** for environmentally sustainable economic activities under the EU Taxonomy.



**What was the share of sustainable investments with an environmental objective that were not aligned with the EU Taxonomy?**

The Fund does not actively target EU Taxonomy-aligned assets.

As at 31 December 2023, the Fund held **37** companies. Based on reported turnover data, there was no alignment with the EU taxonomy from any of these companies.



**What was the share of socially sustainable investments?**

**All companies** in the Fund were aligned to socially sustainable investments as defined by the Investment Manager’s human development pillars.



**What investments were included under “not sustainable”, what was their purpose and were there any minimum environmental or social safeguards?**

The “#2 Not sustainable” assets are cash and near-cash assets held pending investment, to meet liquidity requirements, or assets held in order to allow efficient operational exit of positions. Cash is held by the depositary.



The Fund's service providers for these assets are reviewed and assessed for compliance with FSI's modern slavery policy.



### What actions have been taken to attain the sustainable investment objective during the reference period?

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. Engagement is fully integrated into the responsibilities of the investment team and contributes invaluable insights into their understanding of each company.

More information is available on the Investment Manager's website (links below):

[Stewardship and corporate engagement policy](#)

[Engagement booklet](#)

[Proxy voting](#)

[Annual stewardship review](#)

During the reporting period, the Investment Manager met with **80%** of Fund companies.

All engagement starts with bottom-up analysis, with responsibility shared across the investment team. Over the period the Investment Manager engaged on issues such as:

- **Pollution, natural resource degradation, biodiversity and climate change** – packaging, plastic pellets, deforestation, sustainability of supply chains (soy, palm oil and coffee), fossil fuel versus renewables, water, waste and energy efficiency
- **Aligned remuneration and incentives** – living wage, gender pay gap and complexity of incentives
- **Animal testing/welfare** – animal testing exposure
- **Human rights and modern slavery** – conflict minerals in the supply chains of semiconductors, trafficking, forced labour and child labour in the Asia Pacific region and public health
- **Diversity, equity and inclusion** – diversity, particularly gender, in senior management and on boards
- **Addictive products** – indirect exposure to tobacco, chemicals, gaming, adult entertainment, and sugar content in food
- **Governance** – corporate strategy and legal structure

During the period the Investment Manager engaged with **90%** of Fund companies.

- Environmental issues 77%
- Social issues 9%
- Governance issues 15%

*Engagements may relate to one or multiple environmental, social or governance issues.*

Proxy voting is an extension of the Investment Manager's engagement activities. It is not outsourced to an external provider or separate proxy voting/engagement team. The Investment Manager considers each proxy vote individually and on its own merits in the context of their knowledge about that particular company. A breakdown of voting activity for the Fund is detailed below.

### Voting activity: 17 January to 31 December 2023

Total proposals to vote on	320
Number of meetings to vote at	57
Number of companies that held voting meetings	38
Number of votes against management proposals	3
Number of votes abstained from voting	0
Number of shareholder proposals to vote on	0
Number of shareholder proposals voted against	0
Number of shareholder proposals abstained from voting	0

### Voting rationales: 17 January to 31 December 2023

Company	Proposal	No. of proposals	Voting decision
Aavas Financiers	Repricing of options granted under equity stock option plan for employees 2020-2022	3	Against management recommendation
	<b>Rationale</b> The Investment Manager voted against the company's request to reprice options granted under various equity stock option plans for employees due to a share price fall. They do not believe this request is in shareholders' interest.		



### How did this financial product perform compared to the reference sustainable benchmark?

A sustainable benchmark has not been designated to compare the performance for this Fund.

- **How did the reference benchmark differ from a broad market index?**  
Not applicable.
- **How did this financial product perform with regard to the sustainability indicators to determine the alignment of the reference benchmark with the sustainable investment objective?**  
Not applicable.
- **How did this financial product perform compared with the reference benchmark?**  
Not applicable.
- **How did this financial product perform compared with the broad market index?**  
Not applicable.

**Reference benchmarks** are indexes to measure whether the financial product attains the sustainable objective.

Template periodic disclosure for the financial products referred to in Article 9, paragraphs 1 to 4a, of Regulation (EU) 2019/2088 and Article 5, first paragraph, of Regulation (EU) 2020/852

**Product name:**  
Stewart Investors Worldwide Leaders  
Sustainability Fund

**Legal entity identifier:**  
5493003C0PDCQZH4VL30

**Sustainable investment** means an investment in an economic activity that contributes to an environmental or social objective, provided that the investment does not significantly harm any environmental or social objective and that the investee companies follow good governance practices.

The **EU Taxonomy** is a classification system laid down in Regulation (EU) 2020/852 establishing a list of **environmentally sustainable economic activities**. That Regulation does not lay down a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

## Sustainable investment objective

Did this financial product have a sustainable investment objective?	
<input checked="" type="radio"/> <input checked="" type="radio"/> <input checked="" type="checkbox"/> <b>Yes</b>	<input type="radio"/> <input type="radio"/> <input type="checkbox"/> <b>No</b>
<p><input checked="" type="checkbox"/> It made <b>sustainable investments with an environmental objective: 79%</b></p> <ul style="list-style-type: none"> <li><input type="checkbox"/> in economic activities that qualify as environmentally sustainable under the EU Taxonomy</li> <li><input checked="" type="checkbox"/> in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy</li> </ul> <p><input checked="" type="checkbox"/> It made <b>sustainable investments with a social objective: 100%</b></p>	<p><input type="checkbox"/> It <b>promoted Environmental/Social (E/S) characteristics</b> and while it did not have as its objective a sustainable investment, it had a proportion of ___% of sustainable investments</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy</li> <li><input type="checkbox"/> with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy</li> <li><input type="checkbox"/> with a social objective</li> </ul> <p><input type="checkbox"/> It promoted E/S characteristics, but <b>did not make any sustainable investments</b></p>

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.



### To what extent was the sustainable investment objective of this financial product met?

The Fund has 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. The contribution to sustainable development is assessed under two frameworks, social and environmental.

#### 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

As at 31 December 2023, the Fund held **38** companies. **All companies (100%)** were contributing to at least one **human development pillar** and, in total, were making **98 contributions** to the pillars.

Further information about how the Investment Manager uses the human development pillars is available on the Investment Manager’s website – [stewartinvestors.com/all/how-we-invest/our-approach/human-development-pillars](https://stewartinvestors.com/all/how-we-invest/our-approach/human-development-pillars)

### 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

As at 31 December 2023, the Fund held **38** companies. **30 companies (79%)** were contributing to **climate change solutions**. These companies were contributing to **36** different solutions and, in total, were making **94 contributions** to the solutions.

Further information about how the Investment Manager uses the Project Drawdown climate solutions is available on the Investment Manager’s website – [stewartinvestors.com/all/how-we-invest/our-approach/climate-solutions](https://stewartinvestors.com/all/how-we-invest/our-approach/climate-solutions)

### Assessment

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

1. there is either a direct or enabling link between the activities of the company and the achievement of a positive social or environmental outcome;
2. 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
3. the company recognises potential negative social or environmental outcomes associated with its 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.

#### Notes:

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.

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).

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).

#### ● **How did the sustainability indicators perform?**

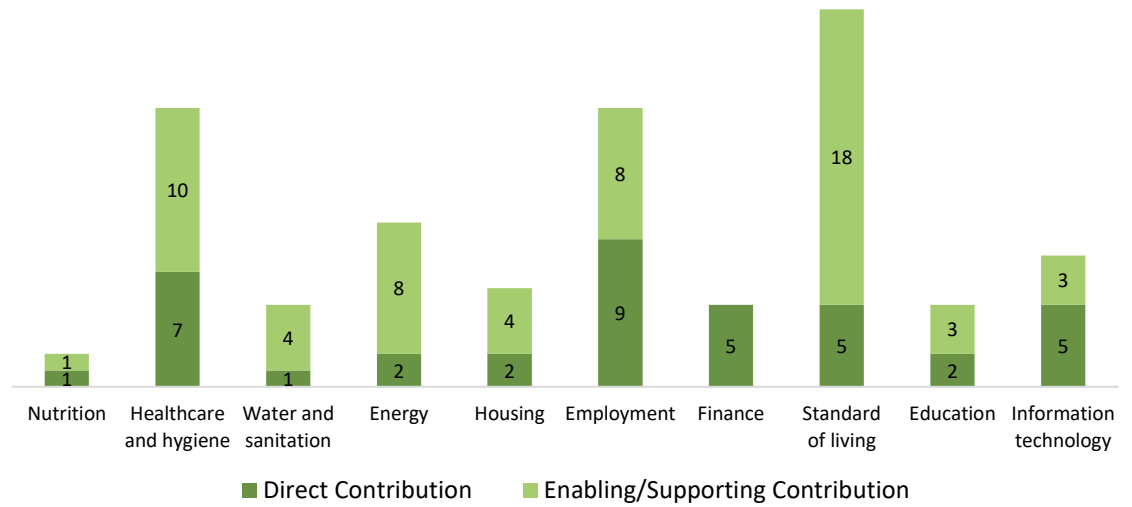
The Investment Manager’s Portfolio Explorer tool provides the contribution that each company makes to climate solutions, human development and the Sustainable Development Goals, as well as the investment rationale, key risks and areas for improvement. Click on the link below to access the tool.

[stewartinvestors.com/all/how-we-invest/our-approach/portfolio-explorer](https://stewartinvestors.com/all/how-we-invest/our-approach/portfolio-explorer)

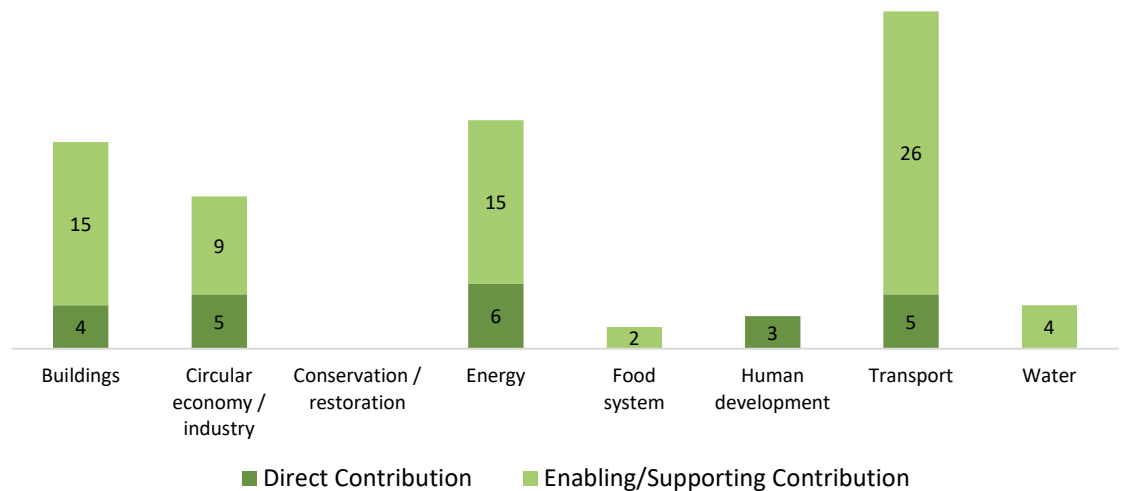
The social and environmental outcomes for the Fund as at 31 December 2023 are provided in the charts below.

**Sustainability indicators** measure how the sustainable objectives of this financial product are attained.

**Human development pillars**  
(number of companies contributing to each pillar)



**Climate change solutions**  
(number of companies contributing to each solution)



Notes: Direct Contribution - directly attributable to products, services or practices provided by that company. Enabling/Supporting Contribution - supported or made possible by products or technologies provided by that company.

● **...and compared to previous periods?**

Changes in the sustainability outcomes for the Fund year-on-year are related to bottom-up changes in the portfolio and/or changes in the sustainability profile of individual investee companies.

The social and environmental outcomes for the Fund over previous periods are provided in the tables below.

## Positive social outcomes

Human development pillars	Contribution	31-Dec-2022	31-Dec-2021
No. of companies (%)	-	42 (100%)	40 (100%)
Total number of contributions	-	106	102
Nutrition	Direct	2	1
	Enabling/Supporting	3	4
Healthcare and hygiene	Direct	10	9
	Enabling/Supporting	11	8
Water and sanitation	Direct	1	1
	Enabling/Supporting	3	3
Energy	Direct	2	1
	Enabling/Supporting	5	6
Housing	Direct	2	2
	Enabling/Supporting	3	3
Employment	Direct	9	8
	Enabling/Supporting	4	5
Finance	Direct	3	2
	Enabling/Supporting	2	2
Standard of living	Direct	6	6
	Enabling/Supporting	22	20
Education	Direct	2	2
	Enabling/Supporting	7	8
Information technology	Direct	6	7
	Enabling/Supporting	3	4

## Positive environmental outcomes

Climate solutions	Contribution	31-Dec-2022	31-Dec-2021
No. of companies (%)	-	32 (76%)	27 (68%)
Number of different solutions	-	35	27
Total number of solutions	-	94	71
Buildings	Direct	1	3
	Enabling/Supporting	13	10
	Indirect	n/a	3
Circular economy/industry	Direct	8	3
	Enabling/Supporting	8	1
	Indirect	n/a	1
Conservation/restoration	Direct	1	1
	Enabling/Supporting	1	-
	Indirect	n/a	-
Energy	Direct	7	3
	Enabling/Supporting	11	7
	Indirect	n/a	3
Food system	Direct	-	-
	Enabling/Supporting	5	3
	Indirect	n/a	-
Human development	Direct	3	4
	Enabling/Supporting	1	-
	Indirect	n/a	-
Transport	Direct	5	4
	Enabling/Supporting	27	19
	Indirect	n/a	5
Water	Direct	-	-
	Enabling/Supporting	3	1
	Indirect	n/a	-

During 2022 and following feedback from clients, the Investment Manager removed the Indirect Contribution from their climate solutions measures.

Indirect Contribution – providing generic products or services to companies making direct or enabling contributions or making operational decisions which have a material contribution.

In 2022, Project Drawdown added 11 new climate solutions to their framework. The Investment Manager considered these new solutions for their 2022 reporting measures. More detail on these changes are available on the Investment Manager’s website: [stewartinvestors.com/all/insights/climate-solutions-update](https://stewartinvestors.com/all/insights/climate-solutions-update)

● ***How did the sustainable investments not cause significant harm to any sustainable investment objective?***

The Fund only invests 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.

The 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:

[stewartinvestors.com/all/insights/our-position-on-harmful-and-controversial-products-and-services](https://stewartinvestors.com/all/insights/our-position-on-harmful-and-controversial-products-and-services)

**Principal adverse impacts** are the most significant negative impacts of investment decisions on sustainability factors relating to environmental, social and employee matters, respect for human rights, anti-corruption and anti-bribery matters.

— *How were the indicators for adverse impacts on sustainability factors taken into account?*

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 a company's quality or sustainability positioning through either meetings, ongoing monitoring and reviewing their annual reports, the Investment Manager will re-evaluate the investment case.

In addition, the Fund portfolio is 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 Principal Adverse Impacts (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 investor does no significant harm but still have 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, Stewart Investors will not invest or will exit the Funds' position in the company in a timely manner.

The Investment Manager includes product level data on Principal Adverse Impact (PAI) indicators in the question below.

Were sustainable investments aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights? Details:

The Fund's sustainable investments are aligned with these Guidelines and Principles.

The Investment Manager continually monitors the companies owned to understand any changes to the strategies. The Fund's 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.

During the reporting period the Fund held the following companies which flagged against the Investment Manager's policy.

#### **Tata Consultancy Services (TCS)**

**Activity exposure:** UN Global Compact Principle 2: Businesses should make sure that they are not complicit in human rights abuses.

**Reason for exception/holding:** TCS has no direct involvement in nuclear weapons or energy, however the external research provider considers the company to be involved because its parent company, Tata Sons, owns greater than 50% of TCS.

Tata Sons involvement is due to the company owning Tata Advanced Systems which acquired Tata Power's Strategic Engineering Division. The Strategic Engineering Division provides control systems for the Indian Navy's nuclear missile submarines.

As India has not signed the Treaty on the Non-Proliferation of Nuclear Weapons, the external data provider considers Tata Sons and by extension TCS to be in support of the nuclear weapons programme of India. The Investment Manager disagrees with this assessment and does not see anything in the activities or conduct of the company to question its sustainability positioning or the investment case.

### Philips

**Activity exposure:** UN Global Compact Principle 1: Businesses should support and respect the protection of internationally proclaimed human rights.

**Reason for exception/holding:** The company is facing lawsuits and investigations over alleged health risks associated with their sleep apnoea and respiratory care devices. The affected portion of the business represented 6.5% of group sales in FY2020, the year before the recall.

The company has recalled impacted devices, and has not yet been found liable for these claims. The external research provider has put the company on a watchlist and the Investment Manager continued to monitor the situation and engage with the management team. In Q4 2023, the Investment Manager lost conviction that company management could sufficiently improve the quality of the culture and franchise and exited the position.

### WEG

**Activity exposure >5% revenue:** Supporting Oil & Gas and Supporting Thermal Coal

**Reason for exception/holding:** The company manufactures and sells renewable energy solutions used in solar and wind power generation, hydroelectric power plants and biomass helping society to shift away from fossil fuel energy production. WEG also manufacture and sell energy efficient electric motors, which help their customers reduce their energy requirements and greenhouse gas emissions.

Revenues derived from oil and gas supporting products and services, and thermal coal supporting products and services accounted for an estimated 2.5% per activity (5% in total) of the company's overall revenue in FY2022, according to the external research provider.

Thermal coal exposure for supporting products and services was added by the external research provider in early 2023 and the Investment Manager contacted the company directly to check the 2.5% revenue estimates provided. Given that coal is not a strategic market segment for their products or customers, the company estimate that <1% revenues to be a more accurate reflection of their exposure.



## How did this financial product consider principal adverse impacts on sustainability factors?

In addition to the detail described above, the Investment Manager has set a materiality threshold of 5% of revenue for direct involvement in companies materially involved in the exploration, production or generation of fossil fuel energy and a threshold of 0% for controversial weapons. Portfolio companies are checked against the thresholds each quarter by an external third-party research platform.

The below table sets out the PAI indicators for the Fund.

<b>Mandatory indicators</b>	<b>Metrics</b>	<b>2022</b>	<b>2023</b>
Exposure	(EUR m)	49	66
1. GHG Emissions	Scope 1 (tCO <sub>2</sub> eq)	331	578
	Scope 2 (tCO <sub>2</sub> eq)	177	292
	Scope 3 (tCO <sub>2</sub> eq)	13,983	19,624
	Total Emissions Scope 1+2 (tCO <sub>2</sub> eq)	508	871
	Total Emissions Scope 1+2+3 (tCO <sub>2</sub> eq)	14,491	20,494
2. Carbon Footprint	Total Emissions Scope 1+2 (tCO <sub>2</sub> eq/EURm)	10	13
	Total Emissions Scope 1+2+3 (tCO <sub>2</sub> eq/EURm)	294	312
3. GHG Intensity of Investee Companies	Scope 1+2 (tCO <sub>2</sub> eq/EURm)	33	41
	Scope 1+2+3 (tCO <sub>2</sub> eq/EURm)	967	1,359
4. Exposure to companies active in the fossil fuel sector	(% involvement)	1%	2%
5. Share of Non-Renewable Energy Consumption and Production	Non-Renewable Energy Consumption (%)	78%	85%
	Non-Renewable Energy Production (%)	insufficient data	0%
6. Energy consumption intensity per high impact sector	Agriculture, Forestry & Fishing (GWh/EURm)	no data	no data
	Construction (GWh/EURm)	no data	no data
	Electricity, Gas, Steam & Air Conditioning Supply (GWh/EURm)	no data	no data
	Manufacturing (GWh/EURm)	0.07	0.10
	Mining & Quarrying (GWh/EURm)	no data	no data
	Real Estate Activities (GWh/EURm)	no data	no data
	Transportation & Storage (GWh/EURm)	insufficient data	insufficient data
	Water Supply, Sewerage, Waste Remediation (GWh/EURm)	no data	no data
7. Activities Negatively Affecting Biodiversity Areas	Trade & Repair of Automobiles (GWh/EURm)	insufficient data	no data
	(% involvement)	1%	0%
8. Emissions to Water	(t/EURm)	insufficient data	no data
9. Hazardous waste ratio	(t/EURm)	2	5
10. Violations of UNGC and OECD Guidelines for Multinational Enterprises	Watch (% involvement)	1%	1%
	Breach (% involvement)	4%	2%
11. Lack of Processes & Compliance Mechanisms to Monitor Compliance with UNGC and OECD guidelines	(% involvement)	77%	60%
12. Unadjusted Gender Pay Gap	% of Male Gross Hourly Rate	insufficient data	no data
13. Board Gender Diversity	% of Female Board Members	30%	29%
14. Exposure to Controversial Weapons	(% involvement)	0%	0%

Voluntary indicators	Metrics	2022	2023
Water Usage and Recycling	% Water Withdrawal	n/a	32%
	Recycling & Reuse (cubic metres)	n/a	4,747,704
Number of Identified Cases of Severe Human Rights Issues & Incidents	Weighted number of incidents	n/a	0.4

The fossil fuel exposure % shown in the table above is for investee company **WEG**. WEG manufactures and sells efficient electrical motors, which help customers across a variety of industrial sectors reduce their energy requirements. The SFDR PAI methodology for fossil fuel sector exposure considers Oil & Gas Production, Thermal Coal Extraction and Thermal Coal Supporting Products/Services. The third-party data provider estimates WEG as having c.2.5% of their total revenue derived from products supporting thermal coal.

Notes: PAI data is sourced from third-party ESG data providers. 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. Data for certain metrics may be based on limited data across the portfolio companies.



## What were the top investments of this financial product?

Largest investments	Sector	% assets	Country
Mahindra & Mahindra	Consumer Discretionary	7.2	India
Watsco	Industrials	6.3	United States
bioMérieux	Health Care	6.0	France
DHL Group	Industrials	5.3	Germany
Fortinet	Information Technology	4.5	United States
Costco	Consumer Staples	4.4	United States
Infineon Technologies	Information Technology	4.0	Germany
Unicharm	Consumer Staples	3.0	Japan
Copart	Industrials	2.7	United States
CSL	Health Care	2.7	Australia
Arista Networks	Information Technology	2.6	United States
HDFC Bank*	Financials	2.6	India
Kotak Mahindra Bank	Financials	2.5	India
Beiersdorf	Consumer Staples	2.4	Germany
Halma	Information Technology	2.3	United Kingdom

\*HDFC Limited merged with HDFC Bank. The % assets figure is the average of both holdings.

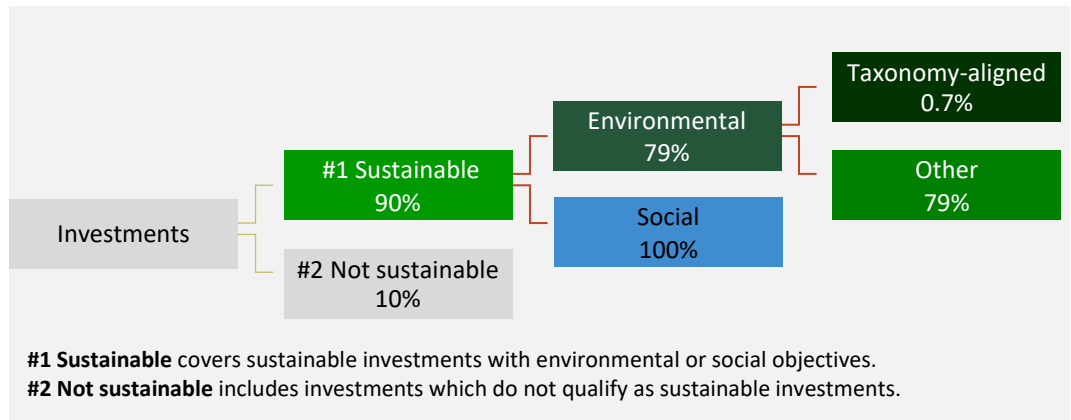
The list includes the investments constituting the **greatest proportion of investments** of the financial product during the reference period which is: 1 January 2023 to 31 December 2023.



## What was the proportion of sustainability-related investments?

### ● *What was the asset allocation?*

The Fund invested 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 Investment Manager's own philosophy explained in the Investment Policy of the Prospectus.



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. The 0.7% Taxonomy-aligned figure is weighted contribution based on reported turnover reflecting the share of revenue from green activities of investee companies. Separately, the 79% 'Other' figure is based on those companies contributing towards the Investment Manager's climate solutions assessment detailed above.

### ● *In which economic sectors were the investments made?*

The average holdings (excluding cash) over the reporting period in Global Industry Classification Standard (GICs) sectors:

Sector	% assets
Communication Services	-
Consumer Discretionary	7.7
Consumer Staples	11.3
Energy	-
Financials	12.0
Health Care	13.8
Industrials	28.2
Information Technology	24.4
Materials	0.4
Real Estate	-
Utilities	-
Cash and cash equivalents	2.1

The Fund has no direct holdings in companies materially involved in the exploration, production or generation of fossil fuel energy.

**Asset allocation** describes the share of investments in specific assets.

To comply, with the EU Taxonomy, the criteria for **fossil gas** include limitations on emissions and switching to fully renewable power or lower-carbon fuels by the end of 2035. For **nuclear energy**, the criteria include comprehensive safety and waste management rules.

**Enabling activities** directly enable other activities to make a substantial contribution to an environmental objective

**Transitional activities are economic activities** for which low-carbon alternatives are not yet available and that have greenhouse gas emission levels corresponding to the best performance.

The Investment Manager checks investee companies (via a third-party research platform and on a quarterly basis) for any revenues derived from exploration, mining, extraction, production, processing, storage, refining or distribution, including transportation, storage and trade, of fossil fuels. They disclose any companies above their material threshold (5% of revenues) on their website.

During the period the Fund held **WEG** which derives from oil and gas supporting products and services, and thermal coal supporting products and services estimated as 2.5% per activity (5% in total). The company manufactures and sells renewable energy solutions used in solar and wind power generation, hydroelectric power plants and biomass helping society to shift away from fossil fuel energy production.

Additional transparency is provided by the Investment Manager in their annual report (**Annual Stewardship Review 2022** pg.16), where they disclose companies that are providing services to the fossil fuel industry directly or via their underlying subsidiaries.



### To what extent were sustainable investments with an environmental objective aligned with the EU Taxonomy<sup>1</sup>?

**Did the financial product investment in fossil gas and/or nuclear energy related activities**

Yes

In fossil gas     In nuclear energy

No

Taxonomy-aligned activities are expressed as a share of:

- **turnover** reflecting the share of revenue from green activities of investee companies
- **capital expenditure** (CapEx) showing the green investments made by investee companies, e.g. for a transition to a green economy.
- **operational expenditure** (OpEx) reflecting green operational activities of investee companies.

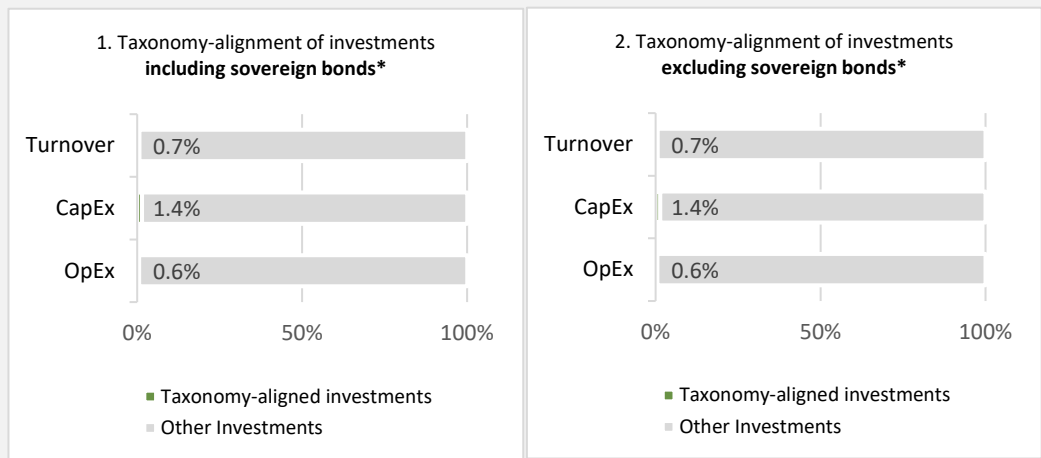
<sup>1</sup> Fossil gas and/or nuclear related activities will only comply with the EU Taxonomy where they contribute to limiting climate change (“climate change mitigation”) and do not significantly harm any EU Taxonomy objective – see explanatory notes in the left hand margin. The full criteria for fossil gas and nuclear energy economic activities that comply with the EU Taxonomy are laid down in Commission Delegated Regulation (EU) 2022/1214.



are

sustainable investments with an environmental objective that **do not take into account the criteria** for environmentally sustainable economic activities under the EU Taxonomy.

The graphs below show in green the percentage of investments that were aligned with the EU Taxonomy. As there is no appropriate methodology to determine the taxonomy-alignment of sovereign bonds\*, the first graph shows the Taxonomy alignment in relation to all the investments of the financial product including sovereign bonds, while the second graph shows the Taxonomy alignment only in relation to the investments of the financial product other than sovereign bonds.



% figures represent taxonomy-aligned investments

\*For the purpose of these graphs, 'sovereign bonds' consist of all sovereign exposures

● **What was the share of investments made in transitional and enabling activities?**

The reported share of investments made in transitional and enabling activities for the Fund is **0%**.

● **How did the percentage of investments aligned with the EU Taxonomy compare with previous reference periods?**

The percentage of investments aligned with the EU Taxonomy for the previous reference period was **0%**.



**What was the share of sustainable investments with an environmental objective that were not aligned with the EU Taxonomy?**

The Fund does not actively target EU Taxonomy-aligned assets.

As at 31 December 2023, the Fund held **38** companies. Based on reported turnover data, **36** of the **38** companies had **no alignment** with the EU Taxonomy.



**What was the share of socially sustainable investments?**

**All companies** in the Fund were aligned to socially sustainable investments as defined by the Investment Manager's human development pillars.



**What investments were included under "not sustainable", what was their purpose and were there any minimum environmental or social safeguards?**

The "#2 Not sustainable" assets are cash and near-cash assets held pending investment, to meet liquidity requirements, or assets held in order to allow efficient operational exit of positions. Cash is held by the depositary.



The Fund's service providers for these assets are reviewed and assessed for compliance with FSI's modern slavery policy.



### What actions have been taken to attain the sustainable investment objective during the reference period?

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. Engagement is fully integrated into the responsibilities of the investment team and contributes invaluable insights into their understanding of each company.

More information is available on the Investment Manager's website (links below):

[Stewardship and corporate engagement policy](#)

[Engagement booklet](#)

[Proxy voting](#)

[Annual stewardship review](#)

During the reporting period, the Investment Manager met with **77%** of Fund companies.

All engagement starts with bottom-up analysis, with responsibility shared across the investment team. Over the period and across their funds, the Investment Manager engaged on issues such as:

- **Pollution, natural resource degradation, biodiversity and climate change** – packaging, plastic pellets, deforestation, sustainability of supply chains (soy, palm oil and coffee), fossil fuel versus renewables, water, waste and energy efficiency
- **Aligned remuneration and incentives** – living wage, gender pay gap and complexity of incentives
- **Animal testing/welfare** – animal testing exposure
- **Human rights and modern slavery** – conflict minerals in the supply chains of semiconductors, trafficking, forced labour and child labour in the Asia Pacific region and public health
- **Diversity, equity and inclusion** – diversity, particularly gender, in senior management and on boards
- **Addictive products** – indirect exposure to tobacco, chemicals, gaming, adult entertainment, and sugar content in food
- **Governance** – corporate strategy and legal structure

During the period the Investment Manager engaged with **71%** of Fund companies.

- Environmental issues 21%
- Social issues 18%
- Governance issues 62%

*Engagements may relate to one or multiple environmental, social or governance issues.*

Proxy voting is an extension of the Investment Manager's engagement activities. It is not outsourced to an external provider or separate proxy voting/engagement team. The Investment Manager considers each proxy vote individually and on its own merits in the context of their knowledge about that particular company. A breakdown of voting activity for the Fund is detailed below.

**Voting activity: 1 January 2023 to 31 December 2023**

Total proposals to vote on	533
Number of meetings to vote at	45
Number of companies that held voting meetings	39
Number of votes against management proposals	32
Number of votes abstained from voting	1
Number of shareholder proposals to vote on	8
Number of shareholder proposals voted against	4
Number of shareholder proposals abstained from voting	0

**Voting rationales: 1 January 2023 to 31 December 2023**

Company	Proposal	No. of proposals	Voting decision
Arista Networks Beiersdorf bioMérieux Cognex Constellation Software Copart Costco Edwards Lifesciences Expeditors Fastenal Fortinet Graco Infineon Technologies Markel Old Dominion Freight Line Roper Technologies Synopsis Texas Instruments Watsco	Appointment of auditor	19	Against management recommendation
	<b>Rationale</b> The Investment Manager voted against the appointment of the auditor as they have been in place for over 10 years and the companies have given no information on intended rotation. Rotating an auditor on a relatively frequent basis (e.g. every 5-10 years) helps to ensure a fresh pair of eyes are examining the accounts and follows best practice.		
Costco	Healthcare policy	1	Supported shareholder proposal
	<b>Rationale</b> The Investment Manager supported a shareholder proposal which requested the company provide a report on the risks caused by state policies restricting reproductive health care beyond litigation and legal compliance. Following a meeting with the company to discuss this proposal, it is understood that the company has already done the work on this for their employees, so it is not a big ask for them to publish it, and believe it would be useful for shareholders to have more information and clarity on the technicalities of the company's healthcare policy.		

Edwards Lifesciences	Personal liability	1	Against management recommendation
	Shareholder proposal: management roles	1	Supported shareholder proposal
	<p><b>Rationale</b></p> <p>The Investment Manager voted against the company's request to remove personal liability from certain senior officers as they believe such an amendment is unnecessary and do not think the company's reasoning holds merit. They supported a shareholder proposal which requested that the company separate the roles of the Chair and CEO.</p>		
Expeditors	Shareholder proposal: severance approval policy	2	Against shareholder proposal
	Shareholder proposal: diversity and inclusion report		
	<p><b>Rationale</b></p> <p>The Investment Manager voted against two shareholder proposals. The first proposal requested the company seek shareholder approval for severance payments valued at 2.99 times the sum of salary and short-term bonus. The company has a very different remuneration culture to its peers. Managers are not paid bonuses if the company generates operating losses until all the losses are recouped. The Board has also provided sufficient explanation that under no circumstances will executives be paid severance of that magnitude. The second proposal requested the company conduct further quantitative analysis and publish a report assessing its diversity, equity and inclusion (DEI) efforts. The company's approach to diversity is reasonable and the Board has provided enough evidence of a responsible and progressive attitude to DEI matters.</p>		
Fortinet	Personal liability	1	Against management recommendation
	<p><b>Rationale</b></p> <p>The Investment Manager voted the company's request to remove personal liability from certain senior officers. We believe such an amendment is unnecessary and do not think the company's reasoning holds merit.</p>		
Philips	Allocation of dividends	6	Against management recommendation
	Remuneration report		
	Director elections		
	Authority to suppress pre-emptive rights		
	Authority to repurchase shares		
	<p><b>Rationale</b></p> <p>The Investment Manager voted against the allocation of dividends as they believe the company needs to pay back debts before paying out dividends. They voted against the company's remuneration report as they believe the remuneration structure needs a complete overhaul which is not being addressed in the proposal despite there</p>		

	being an opportunity to do so. They voted against the election of the CFO and Chair of the Audit Committee given the precarious position of the company's finances and in their view that little has been done to improve the quality of the financials. They also voted against the request to suppress pre-emptive rights of shareholders as they believe the use of readjusted metrics to overlook accountability for acquisitions and other restructuring decisions is not something management and the Board have earned. Finally, they voted against the request to repurchase shares as they believe the company should use cash flows to reduce leverage.		
Nestlé	Shareholder proposal: voting processes	1	Against shareholder proposal
	<b>Rationale</b> The Investment Manager voted against a shareholder proposal which would have enabled an independent proxy to vote on additional or amended proposals from shareholders at the company's annual general meeting. As active shareholders they believe voting is an important responsibility in their investment management duties.		
Roper Technologies	Personal liability	1	Against management recommendation
	<b>Rationale</b> The Investment Manager voted against the company's request to remove personal liability from certain senior officers. As they believe such an amendment is unnecessary and do not think the company's reasoning holds merit.		
Synopsis	Executive compensation	2	Against management recommendation
	Shareholder proposal: share ownership	1	Against shareholder proposal
	<b>Rationale</b> The Investment Manager voted against the company's executive remuneration and amendments to their Employee Equity Incentive plan as they believe it is subject to adjustments to facilitate payments to management. They also voted against a shareholder proposal relating to the company which would enable shareholders with a combined 10% share ownership the right to call a special shareholder meeting.		
Texas Instruments	Executive compensation	1	Against management recommendation
	Shareholder proposal: customer due diligence	2	Supported shareholder proposal
	<b>Rationale</b> The Investment Manager voted against the company's executive remuneration, as they believe the absolute pay-outs for the CEO are high compared to other executive directors and the median employee. They also disagree with the vast majority of remuneration being discretionary and believe it is in shareholder interests for management to be measured against a few key metrics that hold them to account over the long term.		

	The Investment Manager supported shareholder proposals relating requested the company report on its process for customer due diligence, by outlining sanctions and export control compliance, risks associated with Russia’s invasion of Ukraine, more information on the know-your-customer due diligence process, and an assessment of legal, regulatory and reputational risks to the company. They also supported a request for the company to adopt a 10% threshold for calling special meetings, as currently the Board’s threshold is a shareholding of 25% which appears high.		
WEG	Amended Supervisory Council slate	1	Against management recommendation
	Election of Supervisory Council	1	Abstained from voting
	<b>Rationale</b> The Investment Manager voted against the company’s request to recast votes for the amended Supervisory Council slate, as they preferred to vote in favour of the female candidate nominated by minority shareholders and who has been on the fiscal council for two years. The Investment Manager also voted to abstain from voting on the election of the supervisory council as they preferred to support the minority candidate.		



### How did this financial product perform compared to the reference sustainable benchmark?

A sustainable benchmark has not been designated to compare the performance for this Fund.

- **How did the reference benchmark differ from a broad market index?**  
Not applicable.
- **How did this financial product perform with regard to the sustainability indicators to determine the alignment of the reference benchmark with the sustainable investment objective?**  
Not applicable.
- **How did this financial product perform compared with the reference benchmark?**  
Not applicable.
- **How did this financial product perform compared with the broad market index?**  
Not applicable.

**Reference benchmarks** are indexes to measure whether the financial product attains the sustainable objective.

Template periodic disclosure for the financial products referred to in Article 9, paragraphs 1 to 4a, of Regulation (EU) 2019/2088 and Article 5, first paragraph, of Regulation (EU) 2020/852

Product name:

Stewart Investors Worldwide Sustainability Fund

Legal entity identifier:

549300CUQ1MDVG6JSB91

## Sustainable investment objective

### Did this financial product have a sustainable investment objective?

Yes

It made **sustainable investments with an environmental objective: 72%**

in economic activities that qualify as environmentally sustainable under the EU Taxonomy

in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy

It made **sustainable investments with a social objective: 100%**

No

It **promoted Environmental/Social (E/S) characteristics** and while it did not have as its objective a sustainable investment, it had a proportion of \_\_\_% of sustainable investments

with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy

with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy

with a social objective

It promoted E/S characteristics, but **did not make any sustainable investments**

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.

**Sustainable investment** means an investment in an economic activity that contributes to an environmental or social objective, provided that the investment does not significantly harm any environmental or social objective and that the investee companies follow good governance practices.

The **EU Taxonomy** is a classification system laid down in Regulation (EU) 2020/852 establishing a list of **environmentally sustainable economic activities**. That Regulation does not lay down a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.



### To what extent was the sustainable investment objective of this financial product met?

The Fund has 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. The contribution to sustainable development is assessed under two frameworks, social and environmental.

#### 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

As at 31 December 2023, the Fund held **50** companies. **All companies (100%)** were contributing to at least one **human development pillar** and, in total, were making **119 contributions** to the pillars.

Further information about how the Investment Manager uses the human development pillars is available on the Investment Manager’s website – [stewartinvestors.com/all/how-we-invest/our-approach/human-development-pillars](https://stewartinvestors.com/all/how-we-invest/our-approach/human-development-pillars)

### 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

As at 31 December 2023, the Fund held **50** companies. **36 companies (72%)** were contributing to **climate change solutions**. These companies were contributing to **41** different solutions and, in total, were making **114 contributions** to the solutions.

Further information about how the Investment Manager uses the Project Drawdown climate solutions is available on the Investment Manager’s website – [stewartinvestors.com/all/how-we-invest/our-approach/climate-solutions](https://stewartinvestors.com/all/how-we-invest/our-approach/climate-solutions)

### Assessment

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

1. there is either a direct or enabling link between the activities of the company and the achievement of a positive social or environmental outcome;
2. 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
3. the company recognises potential negative social or environmental outcomes associated with its 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.

#### Notes:

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.

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).

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).

### ● **How did the sustainability indicators perform?**

The Investment Manager’s Portfolio Explorer tool provides the contribution that each company makes to climate solutions, human development and the Sustainable Development Goals, as well as the investment rationale, key risks and areas for improvement. Click on the link below to access the tool.

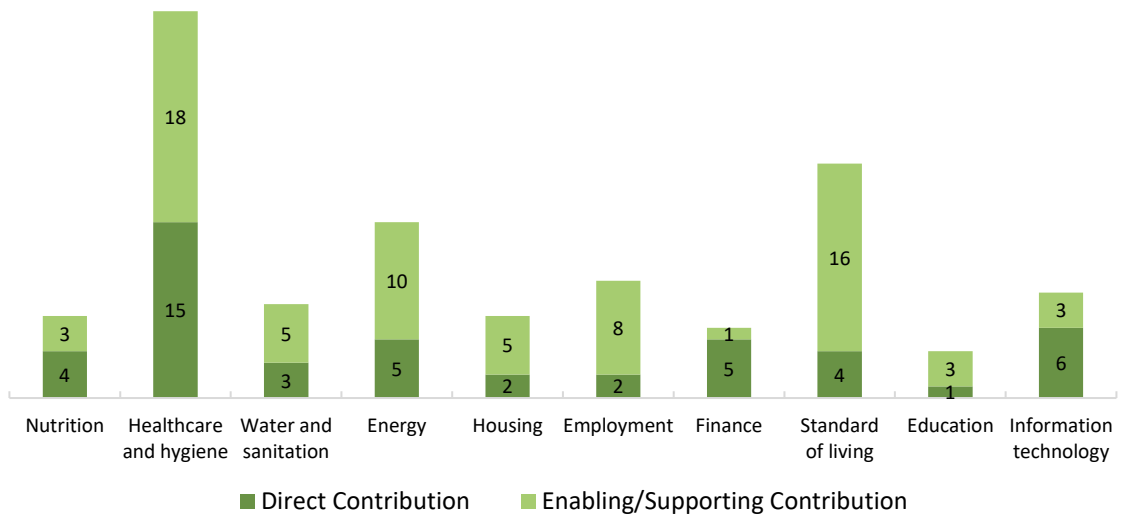
[stewartinvestors.com/all/how-we-invest/our-approach/portfolio-explorer](https://stewartinvestors.com/all/how-we-invest/our-approach/portfolio-explorer)

The social and environmental outcomes for the Fund as at 31 December 2023 are provided in the charts below.

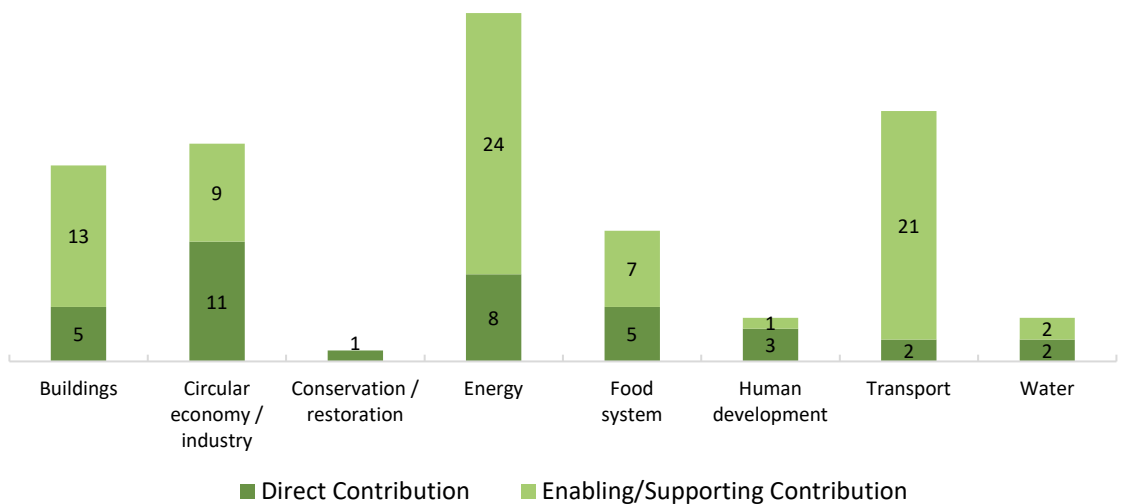
**Sustainability indicators** measure how the sustainable objectives of this financial product are attained.



**Human development pillars**  
(number of companies contributing to each pillar)



**Climate change solutions**  
(number of companies contributing to each solution)



Notes: Direct Contribution - directly attributable to products, services or practices provided by that company. Enabling/Supporting Contribution - supported or made possible by products or technologies provided by that company.

● **...and compared to previous periods?**

Changes in the sustainability outcomes for the Fund year-on-year are related to bottom-up changes in the portfolio and/or changes in the sustainability profile of individual investee companies.

The social and environmental outcomes for the Fund over previous periods are provided in the tables below.

## Positive social outcomes

Human development pillars	Contribution	31-Dec-2022	31-Dec-2021
No. of companies (%)	-	49 (100%)	48 (100%)
Total number of contributions	-	111	114
Nutrition	Direct	4	3
	Enabling/Supporting	7	10
Healthcare and hygiene	Direct	15	18
	Enabling/Supporting	14	11
Water and sanitation	Direct	2	2
	Enabling/Supporting	6	7
Energy	Direct	3	3
	Enabling/Supporting	6	6
Housing	Direct	2	2
	Enabling/Supporting	2	1
Employment	Direct	3	2
	Enabling/Supporting	4	5
Finance	Direct	2	2
	Enabling/Supporting	2	2
Standard of living	Direct	5	4
	Enabling/Supporting	18	19
Education	Direct	2	1
	Enabling/Supporting	5	6
Information technology	Direct	4	5
	Enabling/Supporting	5	5

## Positive environmental outcomes

Climate solutions	Contribution	31-Dec-2022	31-Dec-2021
No. of companies (%)	-	35 (71%)	31 (65%)
Number of different solutions	-	34	31
Total number of solutions	-	99	90
Buildings	Direct	2	1
	Enabling/Supporting	13	14
	Indirect	n/a	2
Circular economy/industry	Direct	9	3
	Enabling/Supporting	9	-
	Indirect	n/a	-
Conservation/restoration	Direct	1	1
	Enabling/Supporting	-	-
	Indirect	n/a	-
Energy	Direct	7	8
	Enabling/Supporting	16	13
	Indirect	n/a	4
Food system	Direct	5	4
	Enabling/Supporting	8	7
	Indirect	n/a	-
Human development	Direct	2	2
	Enabling/Supporting	1	1
	Indirect	n/a	-
Transport	Direct	2	2
	Enabling/Supporting	20	17
	Indirect	n/a	7
Water	Direct	3	3
	Enabling/Supporting	1	1
	Indirect	n/a	-

During 2022 and following feedback from clients, the Investment Manager removed the Indirect Contribution from their climate solutions measures.

Indirect Contribution – providing generic products or services to companies making direct or enabling contributions or making operational decisions which have a material contribution.

In 2022, Project Drawdown added 11 new climate solutions to their framework. The Investment Manager considered these new solutions for their 2022 reporting measures. More detail on these changes are available on the Investment Manager’s website: [stewartinvestors.com/all/insights/climate-solutions-update](https://stewartinvestors.com/all/insights/climate-solutions-update)

● ***How did the sustainable investments not cause significant harm to any sustainable investment objective?***

The Fund only invests 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.

The 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:

[stewartinvestors.com/all/insights/our-position-on-harmful-and-controversial-products-and-services](https://stewartinvestors.com/all/insights/our-position-on-harmful-and-controversial-products-and-services)

**Principal adverse impacts** are the most significant negative impacts of investment decisions on sustainability factors relating to environmental, social and employee matters, respect for human rights, anti-corruption and anti-bribery matters.

*How were the indicators for adverse impacts on sustainability factors taken into account?*

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 a company's quality or sustainability positioning through either meetings, ongoing monitoring and reviewing their annual reports, the Investment Manager will re-evaluate the investment case.

In addition, the Fund portfolio is 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 Principal Adverse Impacts (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 investor does no significant harm but still have 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, Stewart Investors will not invest or will exit the Funds' position in the company in a timely manner.

The Investment Manager includes product level data on Principal Adverse Impact (PAI) indicators in the question below.

Were sustainable investments aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights? Details:

The Fund's sustainable investments are aligned with these Guidelines and Principles.

The Investment Manager continually monitors the companies owned to understand any changes to the strategies. The Fund's 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.

During the reporting period the Fund held the following companies which flagged against the Investment Manager's policy.

#### **Spirax-Sarco Engineering**

**Activity exposure >5% revenue:** Supporting Oil & Gas.

**Reason for exception/holding:** The company provides precision heat and control equipment and systems that improve energy efficiency for customers operating in the oil industry.

Revenues derived from oil and gas supporting products and services accounted for 5% of the company's overall revenue in FY2022.

#### **WEG**

**Activity exposure >5% revenue:** Supporting Oil & Gas and Supporting Thermal Coal

**Reason for exception/holding:** The company manufactures and sells renewable energy solutions used in solar and wind power generation, hydroelectric power plants and biomass helping society to shift away from fossil fuel energy production. WEG also manufacture and sell energy efficient electric motors, which help their customers reduce their energy requirements and greenhouse gas emissions.

Revenues derived from oil and gas supporting products and services, and thermal coal supporting products and services accounted for an estimated 2.5% per activity (5% in total) of the company's overall revenue in FY2022, according to the external research provider.

Thermal coal exposure for supporting products and services was added by the external research provider in early 2023 and the Investment Manager contacted the company directly to check the 2.5% revenue estimates provided. Given that coal is not a strategic market segment for their products or customers, the company estimate that <1% revenues to be a more accurate reflection of their exposure.



## How did this financial product consider principal adverse impacts on sustainability factors?

In addition to the detail described above, the Investment Manager has set a materiality threshold of 5% of revenue for direct involvement in companies materially involved in the exploration, production or generation of fossil fuel energy and a threshold of 0% for controversial weapons. Portfolio companies are checked against the thresholds each quarter by an external third-party research platform.

The below table sets out the PAI indicators for the Fund.

Mandatory indicators	Metrics	2022	2023
Exposure	(EUR m)	247	211
	Scope 1 (tCO <sub>2</sub> eq)	424	452
	Scope 2 (tCO <sub>2</sub> eq)	980	927
	Scope 3 (tCO <sub>2</sub> eq)	36,984	47,221
1. GHG Emissions	Total Emissions Scope 1+2 (tCO <sub>2</sub> eq)	1,404	1,379
	Total Emissions Scope 1+2+3 (tCO <sub>2</sub> eq)	38,388	48,600
2. Carbon Footprint	Total Emissions Scope 1+2 (tCO <sub>2</sub> eq/EURm)	6	7
	Total Emissions Scope 1+2+3 (tCO <sub>2</sub> eq/EURm)	156	231
3. GHG Intensity of Investee Companies	Scope 1+2 (tCO <sub>2</sub> eq/EURm)	27	23
	Scope 1+2+3 (tCO <sub>2</sub> eq/EURm)	855	1,060
4. Exposure to companies active in the fossil fuel sector	(% involvement)	2%	1%
5. Share of Non-Renewable Energy Consumption and Production	Non-Renewable Energy Consumption (%)	69%	73%
	Non-Renewable Energy Production (%)	0%	0%
	Agriculture, Forestry & Fishing (GWh/EURm)	no data	no data
	Construction (GWh/EURm)	no data	no data
	Electricity, Gas, Steam & Air Conditioning Supply (GWh/EURm)	no data	no data
	Manufacturing (GWh/EURm)	0.09	0.09
6. Energy consumption intensity per high impact sector	Mining & Quarrying (GWh/EURm)	no data	no data
	Real Estate Activities (GWh/EURm)	no data	no data
	Transportation & Storage (GWh/EURm)	no data	no data
	Water Supply, Sewerage, Waste Remediation (GWh/EURm)	no data	no data
	Trade & Repair of Automobiles (GWh/EURm)	insufficient data	insufficient data
7. Activities Negatively Affecting Biodiversity Areas	(% involvement)	1%	4%
8. Emissions to Water	(t/EURm)	0	no data
9. Hazardous waste ratio	(t/EURm)	9	11
10. Violations of UNGC and OECD Guidelines for Multinational Enterprises	Watch (% involvement)	0%	0%
	Breach (% involvement)	0%	0%

11. Lack of Processes & Compliance Mechanisms to Monitor Compliance with UNGC and OECD guidelines	(% involvement)	86%	67%
12. Unadjusted Gender Pay Gap	% of Male Gross Hourly Rate	insufficient data	insufficient data
13. Board Gender Diversity	% of Female Board Members	32%	33%
14. Exposure to Controversial Weapons	(% involvement)	0%	0%

Voluntary indicators	Metrics	2022	2023
Water Usage and Recycling	% Water Withdrawal	n/a	insufficient data
	Recycling & Reuse (cubic metres)	n/a	insufficient data
Number of Identified Cases of Severe Human Rights Issues & Incidents	Weighted number of incidents	n/a	0.1

The fossil fuel exposure % shown in the table above is for investee company **WEG**. WEG manufactures and sells efficient electrical motors, which help customers across a variety of industrial sectors reduce their energy requirements. The SFDR PAI methodology for fossil fuel sector exposure considers Oil & Gas Production, Thermal Coal Extraction and Thermal Coal Supporting Products/Services. The third-party data provider estimates WEG as having c.2.5% of their total revenue derived from products supporting thermal coal.

Notes: PAI data is sourced from third-party ESG data providers. 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. Data for certain metrics may be based on limited data across the portfolio companies.



## What were the top investments of this financial product?

Largest investments	Sector	% assets	Country
Fortinet	Information Technology	5.1	United States
Halma	Information Technology	3.9	United Kingdom
Infineon Technologies	Information Technology	3.8	Germany
Roche	Health Care	3.8	Switzerland
Beiersdorf	Consumer Staples	3.6	Germany
DiaSorin	Health Care	3.7	Italy
Watsco	Industrials	3.4	United States
Spectris	Information Technology	3.2	United Kingdom
bioMérieux	Health Care	3.1	France
Kotak Mahindra Bank	Financials	3.0	India
Adyen	Financials	2.5	Netherlands
Unicharm	Consumer Staples	2.5	Japan
Coloplast	Health Care	2.4	Denmark
Jerónimo Martins	Consumer Staples	2.4	Portugal
Zebra Technologies	Information Technology	2.2	United States

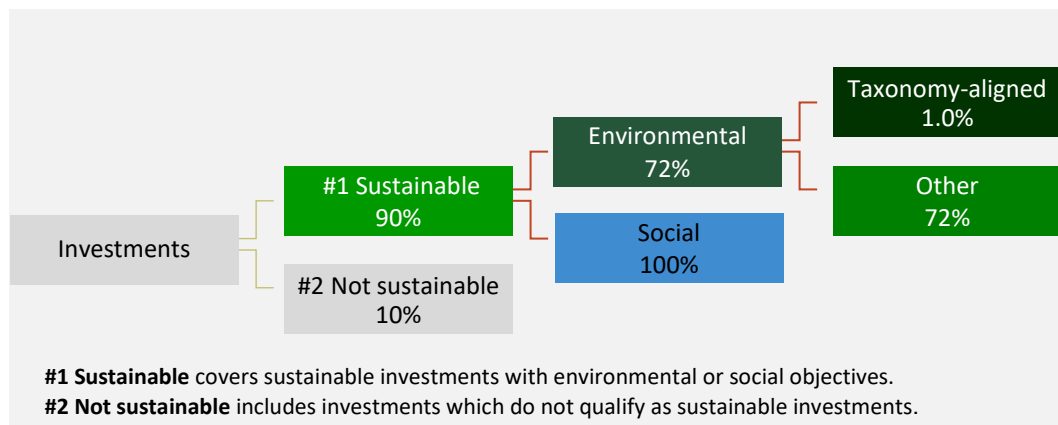
The list includes the investments constituting the **greatest proportion of investments** of the financial product during the reference period which is: 1 January 2023 to 31 December 2023.

## What was the proportion of sustainability-related investments?



### ● **What was the asset allocation?**

The Fund invested 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 Investment Manager's own philosophy explained in the Investment Policy of the Prospectus.



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. The 1.0% Taxonomy-aligned figure is weighted contribution based on reported turnover reflecting the share of revenue from green activities of investee companies. Separately, the 72% 'Other' figure is based on those companies contributing towards the Investment Manager's climate solutions assessment detailed above.

### ● **In which economic sectors were the investments made?**

The average holdings (excluding cash) over the reporting period in Global Industry Classification Standard (GICs) sectors:

Sector	% assets
Communication Services	1.8
Consumer Discretionary	0.5
Consumer Staples	13.0
Energy	-
Financials	13.1
Health Care	24.0
Industrials	17.4
Information Technology	26.1
Materials	1.9
Real Estate	-
Utilities	-
Cash and cash equivalents	2.2

The Fund has no direct holdings in companies materially involved in the exploration, production or generation of fossil fuel energy.

**Asset allocation** describes the share of investments in specific assets.

To comply, with the EU Taxonomy, the criteria for **fossil gas** include limitations on emissions and switching to fully renewable power or lower-carbon fuels by the end of 2035. For **nuclear energy**, the criteria include comprehensive safety and waste management rules.

**Enabling activities** directly enable other activities to make a substantial contribution to an environmental objective

**Transitional activities are economic activities** for which low-carbon alternatives are not yet available and that have greenhouse gas emission levels corresponding to the best performance.



Taxonomy-aligned activities are expressed as a share of:

- **turnover** reflecting the share of revenue from green activities of investee companies
- **capital expenditure** (CapEx) showing the green investments made by investee companies, e.g. for a transition to a green economy.
- **operational expenditure** (OpEx) reflecting green operational activities of investee companies.

The Investment Manager checks investee companies (via a third-party research platform and on a quarterly basis) for any revenues derived from exploration, mining, extraction, production, processing, storage, refining or distribution, including transportation, storage and trade, of fossil fuels. They disclose any companies above their material threshold (5% of revenues) on their website.

During the period the Fund held **Spirax-Sarco Engineering** which derives 5% of revenues from products and services supporting the oil & gas industry. The company provides precision heat and control equipment and systems that improve energy efficiency for customers operating in the oil industry. The Fund also held **WEG** which derives from oil and gas supporting products and services, and thermal coal supporting products and services estimated as 2.5% per activity (5% in total). The company manufactures and sells renewable energy solutions used in solar and wind power generation, hydroelectric power plants and biomass helping society to shift away from fossil fuel energy production.

Additional transparency is provided by the Investment Manager in their annual report (**Annual Stewardship Review 2022** pg.16), where they disclose companies that are providing services to the fossil fuel industry directly or via their underlying subsidiaries.



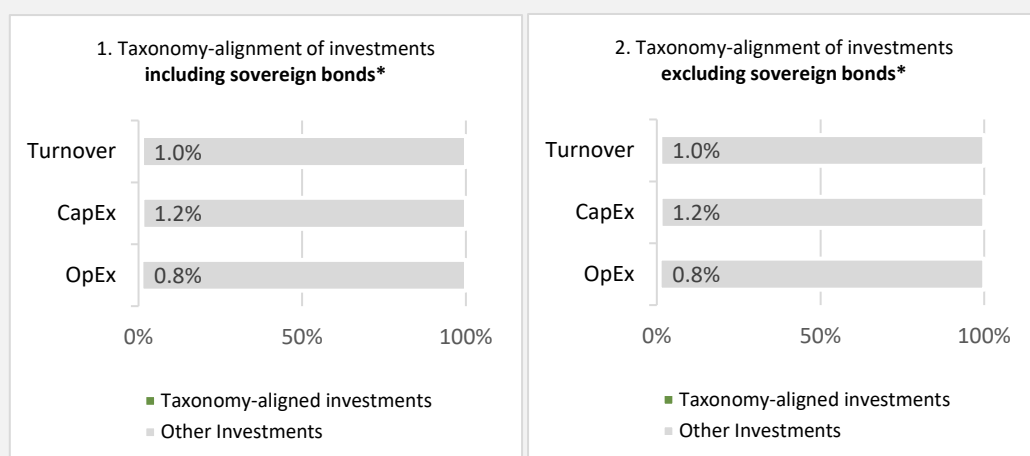
**To what extent were sustainable investments with an environmental objective aligned with the EU Taxonomy<sup>1</sup>?**

**Did the financial product investment in fossil gas and/or nuclear energy related activities**

- Yes
  - In fossil gas     In nuclear energy
- No

<sup>1</sup> Fossil gas and/or nuclear related activities will only comply with the EU Taxonomy where they contribute to limiting climate change (“climate change mitigation”) and do not significantly harm any EU Taxonomy objective – see explanatory notes in the left hand margin. The full criteria for fossil gas and nuclear energy economic activities that comply with the EU Taxonomy are laid down in Commission Delegated Regulation (EU) 2022/1214.

The graphs below show in green the percentage of investments that were aligned with the EU Taxonomy. As there is no appropriate methodology to determine the taxonomy-alignment of sovereign bonds\*, the first graph shows the Taxonomy alignment in relation to all the investments of the financial product including sovereign bonds, while the second graph shows the Taxonomy alignment only in relation to the investments of the financial product other than sovereign bonds.



% figures represent taxonomy-aligned investments

\*For the purpose of these graphs, 'sovereign bonds' consist of all sovereign exposures

● **What was the share of investments made in transitional and enabling activities?**

The reported share of investments made in transitional and enabling activities for the Fund is **0%**.

● **How did the percentage of investments aligned with the EU Taxonomy compare with previous reference periods?**

The percentage of investments aligned with the EU Taxonomy for the previous reference period was **0%**.



**What was the share of sustainable investments with an environmental objective that were not aligned with the EU Taxonomy?**

The Fund does not actively target EU Taxonomy-aligned assets.

As at 31 December 2023, the Fund held **50** companies. Based on reported turnover data, **47** of the **50** companies had **no alignment** with the EU Taxonomy.



**What was the share of socially sustainable investments?**

**All companies** in the Fund were aligned to socially sustainable investments as defined by the Investment Manager's human development pillars.



**What investments were included under "not sustainable", what was their purpose and were there any minimum environmental or social safeguards?**

The "#2 Not sustainable" assets are cash and near-cash assets held pending investment, to meet liquidity requirements, or assets held in order to allow efficient operational exit of positions. Cash is held by the depositary.

are sustainable investments with an environmental objective that **do not take into account the criteria** for environmentally sustainable economic activities under the EU Taxonomy.

The Fund's service providers for these assets are reviewed and assessed for compliance with FSI's modern slavery policy.



### What actions have been taken to attain the sustainable investment objective during the reference period?

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. Engagement is fully integrated into the responsibilities of the investment team and contributes invaluable insights into their understanding of each company.

More information is available on the Investment Manager's website (links below):

[Stewardship and corporate engagement policy](#)

[Engagement booklet](#)

[Proxy voting](#)

[Annual stewardship review](#)

During the reporting period, the Investment Manager met with **89%** of Fund companies.

All engagement starts with bottom-up analysis, with responsibility shared across the investment team. Over the period and across their funds, the Investment Manager engaged on issues such as:

- **Pollution, natural resource degradation, biodiversity and climate change** – packaging, plastic pellets, deforestation, sustainability of supply chains (soy, palm oil and coffee), fossil fuel versus renewables, water, waste and energy efficiency
- **Aligned remuneration and incentives** – living wage, gender pay gap and complexity of incentives
- **Animal testing/welfare** – animal testing exposure
- **Human rights and modern slavery** – conflict minerals in the supply chains of semiconductors, trafficking, forced labour and child labour in the Asia Pacific region and public health
- **Diversity, equity and inclusion** – diversity, particularly gender, in senior management and on boards
- **Addictive products** – indirect exposure to tobacco, chemicals, gaming, adult entertainment, and sugar content in food
- **Governance** – corporate strategy and legal structure

During the period the Investment Manager engaged with **64%** of Fund companies.

- Environmental issues 16%
- Social issues 16%
- Governance issues 64%

*Engagements may relate to one or multiple environmental, social or governance issues.*

Proxy voting is an extension of the Investment Manager's engagement activities. It is not outsourced to an external provider or separate proxy voting/engagement team. The Investment Manager considers each proxy vote individually and on its own merits in the context of their knowledge about that particular company. A breakdown of voting activity for the Fund is detailed below.

**Voting activity: 1 January 2023 to 31 December 2023**

Total proposals to vote on	629
Number of meetings to vote at	54
Number of companies that held voting meetings	48
Number of votes against management proposals	37
Number of votes abstained from voting	1
Number of shareholder proposals to vote on	6
Number of shareholder proposals voted against	3
Number of shareholder proposals abstained from voting	0

**Voting rationales: 1 January 2023 to 31 December 2023**

Company	Proposal	No. of proposals	Voting decision
A.O. Smith Advanced Drainage Systems Arista Networks Beiersdorf bioMérieux Cognex Constellation Software Edwards Lifesciences Elisa Fortinet Infineon Technologies Markel Nordson Roper Technologies Synopsys Texas Instruments Veeva Systems Vitasoy Watsco Zebra Technologies	Appointment of auditor	20	Against management recommendation
	<p><b>Rationale</b></p> <p>The Investment Manager voted against the appointment of the auditor as they have been in place for over 10 years and the companies have given no information on intended rotation. Rotating an auditor on a relatively frequent basis (e.g. every 5-10 years) helps to ensure a fresh pair of eyes are examining the accounts and follows best practice.</p>		
A.O. Smith	Shareholder proposal: report on racism	1	Against shareholder proposal
	<p><b>Rationale</b></p> <p>The Investment Manager voted against a shareholder proposal requesting the company to produce a report on racism in company culture. The Investment Manager believes the company is committed to diversity and inclusion as reflected in its Board which is 50% female and/or from underrepresented racial/ethnic groups. The company began tracking racial diversity in leadership roles in 2021, has enhanced its inclusivity training for leaders and continues to promote and discuss the topic heavily.</p>		

Edwards Lifesciences	Personal liability	1	Against management recommendation
	Shareholder proposal: management roles	1	Supported shareholder proposal
	<p><b>Rationale</b></p> <p>The Investment Manager voted against the company's request to remove personal liability from certain senior officers as they believe such an amendment is unnecessary and do not think the company's reasoning holds merit. They supported a shareholder proposal which requested that the company separate the roles of the Chair and CEO.</p>		
Fortinet	Personal liability	1	Against management recommendation
	<p><b>Rationale</b></p> <p>The Investment Manager voted the company's request to remove personal liability from certain senior officers. We believe such an amendment is unnecessary and do not think the company's reasoning holds merit.</p>		
Natura	Remuneration policy	4	Against management recommendation
	Supervisory council election		
	Director elections		
	<p><b>Rationale</b></p> <p>The Investment Manager voted against the company's remuneration policy as they do not believe it is particularly long-term and the absolute pay amounts have increased significantly, especially in the context of recent poor performance. They voted against the establishment of a supervisory council as at the time of voting the company had not disclosed the candidates that would be up for election. The Investment Manager also voted against the election of a candidate, appointed by minority shareholders, to the supervisory council in alignment with their vote against the establishment of the supervisory council and they do not believe the candidate is truly independent.</p>		
Nordson	Executive compensation	4	Against management recommendation
	Elimination of supermajority requirement		
	<p><b>Rationale</b></p> <p>The Investment Manager voted against the remuneration proposal, as they have done at the previous three annual general meetings. Their preference is for schemes that are reasonable and simple, and while they do not disagree with any of the chosen metrics in their own right, they think five separate performance metrics split across various payment methods is overly complex. They also voted against the company's request to eliminate the requirement for supermajority support for proposals, such as mergers and takeovers, as they believe the supermajority condition makes it more difficult for would-be acquirers with short-term agendas to enact a takeover.</p>		

Synopsis	Executive compensation	2	Against management recommendation
	Shareholder proposal: share ownership	1	Against shareholder proposal
	<p><b>Rationale</b></p> <p>The Investment Manager voted against the company's executive remuneration and amendments to their Employee Equity Incentive plan as they believe it is subject to adjustments to facilitate payments to management. They also voted against a shareholder proposal relating to the company which would enable shareholders with a combined 10% share ownership the right to call a special shareholder meeting.</p>		
Texas Instruments	Executive compensation	1	Against management recommendation
	Shareholder proposal: customer due diligence	2	Supported shareholder proposal
	<p><b>Rationale</b></p> <p>The Investment Manager voted against the company's executive remuneration, as they believe the absolute pay-outs for the CEO are high compared to other executive directors and the median employee. They also disagree with the vast majority of remuneration being discretionary and believe it is in shareholder interests for management to be measured against a few key metrics that hold them to account over the long term.</p> <p>The Investment Manager supported shareholder proposals relating requested the company report on its process for customer due diligence, by outlining sanctions and export control compliance, risks associated with Russia's invasion of Ukraine, more information on the know-your-customer due diligence process, and an assessment of legal, regulatory and reputational risks to the company. They also supported a request for the company to adopt a 10% threshold for calling special meetings, as currently the Board's threshold is a shareholding of 25% which appears high.</p>		
Veeva Systems	Shareholder proposal: amendments to bylaws	1	Against shareholder proposal
	<p><b>Rationale</b></p> <p>The Investment Manager voted against a shareholder proposal which requested amendments to bylaws as they believe the company is shareholder friendly, and the proposal would breach the Company's Certification of Incorporation.</p>		
WEG	Amended Supervisory Council slate	1	Against management recommendation
	Election of Supervisory Council	1	Abstained from voting
	<p><b>Rationale</b></p> <p>The Investment Manager voted against the company's request to recast votes for the amended Supervisory Council slate, as they preferred to vote in favour of the female candidate nominated by minority shareholders and who has been on the fiscal council for two years. The Investment Manager also voted to abstain from</p>		

	voting on the election of the supervisory council as they preferred to support the minority candidate.		
Zebra Technologies	Executive compensation	1	Against management recommendation
	<b>Rationale</b> The Investment Manager voted against the company's executive compensation as they believe there is a large disparity between the CEO's pay and the other executives.		



### How did this financial product perform compared to the reference sustainable benchmark?

A sustainable benchmark has not been designated to compare the performance for this Fund.

- ***How did the reference benchmark differ from a broad market index?***  
Not applicable.
- ***How did this financial product perform with regard to the sustainability indicators to determine the alignment of the reference benchmark with the sustainable investment objective?***  
Not applicable.
- ***How did this financial product perform compared with the reference benchmark?***  
Not applicable.
- ***How did this financial product perform compared with the broad market index?***  
Not applicable.

**Reference benchmarks** are indexes to measure whether the financial product attains the sustainable objective.

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Representative and Paying Agent in Switzerland: BNP Paribas Securities Services, Paris, succursale de Zurich, Selnaustrasse 16, 8002 Zurich, Switzerland. The Prospectus, Key Information Documents (KIDs), the Instrument of Incorporation as well as the Annual and Semi-annual Reports may be obtained free of charge from the representative in Switzerland.

## About First Sentier Investors

References to 'we', 'us' or 'our' are references to First Sentier Investors, a global asset management business which is ultimately owned by Mitsubishi UFJ Financial Group, Inc (MUFG). Our investment team operates under the trading name of Stewart Investors which is part of the First Sentier Investors Group.

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