

The disclosures are aligned with the requirements of MAS Circular No. CFC 02/2022 (section 14).

## **Introduction**

This document sets-out the firm-level disclosures required to be made under Article 10 of SFDR by the First Sentier Investors group<sup>1</sup> which includes the Stewart Investors investment team.

Any amendments to this disclosure will be explained in a table at the end of this document.

## **Disclosures**

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

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

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

For each Article 8 or 9 financial product, Schedule 1 sets-out a concise summary of:

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

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<sup>1</sup> In particular, this document includes disclosures made by First Sentier Investors (Ireland) Limited and First Sentier Investors Global Umbrella Fund plc

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

June 2024

Name	LEI
Financial market participant(s)	
First Sentier Investors Global Umbrella Fund plc	n/a
Financial product(s)	
Singapore VCC - Stewart Investors Asia Pacific Sustainability Fund	549300BZRT184DKU8I49
Singapore VCC - Stewart Investors Global Emerging Markets Sustainability Fund	549300V44ENSGMLQBN36
Singapore VCC - Stewart Investors Indian Subcontinent Sustainability Fund	549300KV9RVYY1I3UF70
Singapore Unit Trust (SUT) - Stewart Investors Worldwide Leaders Sustainability Fund	n/a
Stewart Investors Asia Pacific Leaders Sustainability Fund	549300VKJEPJT5Q4V960

### Summary

The Stewart Investors (Investment Manager) Article 9 Funds and related investment strategies seek to achieve long-term capital appreciation while also generating positive social and/or environmental sustainable outcomes. The Stewart Investors investment team employ a bottom-up investment process, investing in companies which both contribute to, and benefit from, sustainable development. This document outlines the Investment Manager's approach to meeting the Funds sustainable investment objective through rigorous bottom-up research, company engagement, adherence to their position statement on harmful and controversial products and services, group-wide exclusion policies and third-party research providers. The document also provides detail on the how the Funds sustainability objectives and outcomes are monitored and assessed both internally and with the use of external frameworks, and it also details how the Investment Manager is committed to providing full transparency on investee companies, and the contribution these companies are making to sustainable development.

### No significant harm to the sustainable investment objective

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

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

<https://www.stewartinvestors.com/all/how-we-invest/our-approach/portfolio-explorer.html>

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

All harmful business activities are defined and publicly disclosed, and subject to a materiality assessment by the Investment Manager. The Investment Manager's position on harmful and controversial products and services and investment exclusions is available on the Stewart Investors website.

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

If an investment is held in a company that has material exposure to harmful products and services, this will be disclosed on the Stewart Investors website, and the reasons for the exception and for maintaining the holding explained. Exceptions may occur if a company is winding down a legacy commercial activity (in which case the company will be engaged and encouraged to cease the commercial activity concerned), or if a company is only indirectly exposed to a harmful industry or activity, for example, a company making safety products for a wide range of industries may also have customers in the fossil fuel or defence industries.

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

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

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

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

The Principle Adverse Sustainability Indicators are incorporated into the Investment Manager's company analysis, team discussion and engagement programme.

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,
- exiting 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.

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

The Investment Manager continually monitors the companies owned to understand any changes to their strategies. Each Fund portfolio is assessed by an external service provider for compliance with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and

Human Rights, UN global norms and exposure to high-risk sectors. The Investment Manager also receives regular updates from a controversy monitoring service. Where issues are raised by these services, the Investment Manager will review and consider as part of the investment analysis and depending on the detail may engage with the company in question, and if necessary will divest to ensure the portfolio continues to meet the principles which sit at the heart of the investment philosophy.

### **Sustainable investment objective of the financial product**

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

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

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

### **Investment strategy**

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

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

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

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

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

Important areas of focus are the independence and diversity of Board directors, remuneration structures, staff turnover rates, management longevity, supplier terms like accounts payable days, capital allocation policies and practices, tax policies and practices, and whether companies behave in ways that are more than adequate for them to retain their social license to operate.

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

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

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

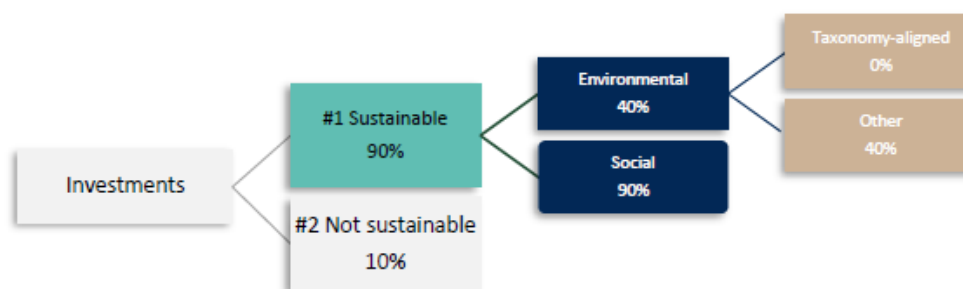
- Board assessment – there should be a transparent procedure for the appointment of new directors to a board. FSI expect that companies are able to demonstrate diversity of gender, age, ethnicity, sexuality and thought across their organisation and at board level.
- Ownership and shareholder rights - in general, FSI will not support resolutions that propose: changes to the corporate structure that curtail shareholder rights; or changes to the capital structure that could dilute shareholders' voting and/or economic rights.

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

### **Proportion of investments**

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

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



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

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

### Monitoring of sustainable investment objective

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

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

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

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

Where issues are raised by these services, the 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.

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

### Methodologies

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

### **Human development pillars**

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

- Nutrition
- Healthcare and hygiene
- Water and sanitation
- Energy
- Housing

### **Employment**

- Finance
- Standard of living
- Education
- Information

### **Climate change solutions**

Project Drawdown is a non-profit organisation, founded in 2014, which has mapped, measured and modelled over 80 different solutions to global warming, with the ultimate goal of reaching drawdown – i.e. the point in the future when emissions stop increasing and start to steadily decrease. Each Fund investment is mapped by the manager against the c.80 solutions (which are captured in eight broader solutions of Buildings, Circular economy / industry, Conservation / restoration, Energy, Food system, Human development, Transport and Water). The Investment Manager's focus is on whether the companies themselves are making a meaningful contribution and will have meaningful involvement with the delivery of any of those solutions. Where the companies in which the Funds invest do contribute to any of the solutions, they will be involved in making products and delivering services directly, by enabling/supporting those solutions, or indirectly. These frameworks, alongside the Investment Manager's own bottom-up analysis, lean on measurable and reportable outcomes as evidence for determining a company's meaningful contribution to sustainable development.

### **Meaningful company contribution:**

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

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

<https://www.stewartinvestors.com/all/how-we-invest/our-approach/portfolio-explorer.html>



The Funds report on these indicators in the annual report and also on the Stewart Investors and First Sentier Investors website:

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

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

### **Data sources and processing**

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

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

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

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

The flow of data and information about companies is continuous. Information is updated on an ongoing basis by the investment team by conducting in-depth research and writing detailed reports on companies. The team performs periodic review exercises for different portfolio and focus list companies to ensure they continue to meet the investment case. These exercises are normally performed by a different analyst to the one who completed the original company report. Timing of

gathering and updating company data and information is dependent on various factors such as the publication of company reports and results, investor presentations, meetings with companies and any external research subjects commissioned. The team meet and liaise with companies on an on-going basis and are continuously assessing their sustainability credentials and quality. Due to the wide range and timing of data sources and different level of disclosure from individual companies it is not possible to determine what proportion of the data used by the investment team is estimated. In order to validate their own in-depth analysis of companies and to monitor adherence to their position statement on harmful and controversial products and services and Group-wide exclusion policies, the Investment Manager also receives regular notifications on company controversies from RepRisk. They also analyse all the holdings in Fund portfolios on Sustainalytics on a quarterly basis.

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

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

#### **Limitations to methodologies and data**

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

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

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

#### **Due diligence**

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

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

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

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

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

While Stewart Investors retains control of the investment philosophy, process and all investment decisions including risk monitoring, additional independent oversight and support is provided by relevant teams at First Sentier Investors (FSI) which is the parent brand of Stewart Investors. This includes the FSI Investment Product Research & Assurance function who report to the FSI Global Head of Product. The team are responsible for overseeing investment risks within all portfolios. They review and interpret risk and performance reports, prepared by the FSI Performance teams, and are responsible for implementing stress testing and liquidity monitoring on portfolios, where appropriate. They also provide independent challenge to the investment team and provide reporting and commentary on performance and risk into the FSI Global Investment Committee and regional committees and boards. The Investment Team attends regular risk assurance review meetings which include representatives from risk assurance and performance reporting.

### ***Engagement policies***

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

Different forms of engagement:

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

Bottom-up:

- Driven by company analysis and monitoring
- Seeks to build positive long-term company relationships
- Negative responses can lead to divestment

Thematic:

- Cross-cutting issues identified through team discussion
- Often supported by commissioned research
- Never generic, issues relate back to company circumstances

Collaborative:

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

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

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

More information on the approach and the policy is available on the Investment Manager's website:  
<https://www.stewartinvestors.com/all/how-we-invest/sustainable-investing/engagement.html>  
<https://www.stewartinvestors.com/content/dam/stewartinvestors/pdf/global/si-corporate-engagement-policy.pdf>