



Sustainable Finance Disclosures Regulation (“SFDR”)

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

(Regulation (EU) 2019/2088)

Introduction

This document sets-out the firm-level disclosures required to be made under Article 10 of SFDR by the First Sentier Investors group¹. The group includes investment teams trading as:

- FSSA Investment Managers (www.fssaim.com);
- The Sustainable Funds Group, a part of Stewart Investors (www.stewartinvestors.com/all/sustainable-funds-group.html and sfg.stewartinvestors.com); and
- St Andrews Partners, a part of Stewart Investors (www.stewartinvestors.com/all/st-andrews-partners.html).

The required disclosures will be subject to regulatory technical standards which are not yet adopted at the date of this document. The disclosures will be updated as required.

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

Disclosures

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

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

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

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

- the environmental or social characteristics or the sustainable investment objectives of the product;
- the methodologies used to assess, measure and monitor the environmental or social characteristics or the impact of the sustainable investments selected for the financial

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

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.

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

30 April 2022

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

1. FSSA Investment Managers financial products

Name	LEI
Financial market participant(s)	
First Sentier Investors Global Umbrella Fund plc	n/a
First Sentier Investors International IM Limited ²	549300CCC4Z8M05T6N95
Financial product(s)	
FSSA Asian Equity Plus Fund	549300ZMXZQSOPU0T420
FSSA Asian Growth Fund	549300XJFRTRHUTLLR97
FSSA Asia Focus Fund	549300LAC4P0KXGYJG33
FSSA Asia Opportunities Fund	549300SM7XIROBMZU550
FSSA Asia Pacific All Cap Fund	549300SM7XIROBMZU550
FSSA China A Shares Fund	5493003H85K45YEMYA03
FSSA China Focus Fund	549300SVCX8IKHXVNY34
FSSA China Growth Fund	5493004Q3YHN6B7BLH98
FSSA Global Emerging Markets Focus Fund	549300SL3RBSIYHE9F49
FSSA Greater China Growth Fund	54930071KVAFFNC5LG34
FSSA Hong Kong Growth Fund	549300YMO8UBPRDX6227
FSSA Indian Subcontinent Fund	549300JYCOP3BMVTQE19
FSSA Japan Equity Fund	549300BVF6Q2HF8PQC35
FSSA ASEAN All Cap Fund	5493009FP6QE07BQYA98
FSSA Asia Pacific Leaders investment strategy	n/a
FSSA China All Cap investment strategy	n/a
FSSA Asia Equity Leaders investment strategy	n/a

No sustainable investment objective

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

Environmental or social characteristics

Environmental and social characteristics (combined with sustainability risks) are integrated into the investment analysis and assessment criteria for selecting companies in the product's portfolio.

This product promotes the following characteristics:

Environmental characteristics:

- reductions in greenhouse gas emissions,
- reduction in fossil fuel exposure and deforestation, and
- improvements to biodiversity.

Social characteristics:

- human health, and
- exclusions of certain activities with adverse social impacts and human rights.

² Not subject to SFDR; disclosing for transparency purposes

The product plans to invest all of its assets in investments which contribute to the attainment of the environmental or social characteristics promoted by the product. Uninvested assets will be held in cash or near cash equivalents.

Indicators

This product uses the following indicators:

Environmental Indicators	
Greenhouse gas emissions	<ul style="list-style-type: none"> • Scope 1 and 2 GHG emissions
Fossil fuel exposure	<ul style="list-style-type: none"> • Coal revenues
Environmental Protection	<ul style="list-style-type: none"> • Adherence to Roundtable Sustainable Palm Oil (RSPO) standards • No Deforestation, No Peat, No Exploitation (NDPE) policies (deforestation and biodiversity protection)
Social Indicators	
Human health	<ul style="list-style-type: none"> • Number of companies with tobacco revenues
Adverse social impacts	<ul style="list-style-type: none"> • Number of companies which primarily operate in the gambling industry • Number of companies involved in the production of pornography
Human rights	<ul style="list-style-type: none"> • Number of companies that are involved in the production or development of cluster munitions, anti-personnel mines, small arms, biological weapons, chemical weapons or uranium munitions

Methodologies

Assessment, measurement and monitoring of investments (including screening criteria): The manager reviews and analyses each company’s environmental and social characteristics. These cover aspects including how each company contributes towards climate change and how they support and uphold the fundamental principles of human rights. The manager’s view is that companies with strong environmental and social characteristics merit a higher valuation multiple and are expected to outperform their peers. The manager reviews each investee company for their management of environmental and social characteristics, corporate governance, and activities considered detrimental to society.

Data sources: Direct engagement with investee companies is an important source of data, supplemented by Sustainalytics, RepRisk, MSCI Governance Research, MSCI Climate Value at Risk tool and Glass Lewis.

2. Property Securities financial products

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

No sustainable investment objective

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

Environmental or social characteristics

Environmental and social characteristics (combined with sustainability risks) are integrated into the investment analysis and assessment criteria for selecting companies in the product's portfolio.

This product promotes the following characteristics:

Environmental characteristics:

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

Social characteristics:

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

The product plans to invest all of its assets in investments which contribute to the attainment of the environmental or social characteristics promoted by the product. Uninvested assets will be held in cash or near cash equivalents.

Indicators

This product uses the following indicators:

Environmental Indicators	
Green-house gas emission reduction	<ul style="list-style-type: none"> • Defined Scope 1 and 2 green-house gas emission reduction plan
Waste reduction	<ul style="list-style-type: none"> • Defined waste management reduction plan
Social Indicators	
Employee gender diversity and equal opportunity	<ul style="list-style-type: none"> • Employee diversity plan in place
Community initiative	<ul style="list-style-type: none"> • Charity or foundation plan in place
Social responsibility	<ul style="list-style-type: none"> • Systemic breaches of UN Global Compact Principles

Methodologies

Assessment, measurement and monitoring of investments (including screening criteria): A two-pronged approach is used to assess investments. First, sustainability considerations are a material variable in the initial screen of companies used to determine the investible universe. Low environmental or social scores, in combination with low scores on other factors, can lead to a company being excluded from the investment universe. Secondly, each company is rated on specific environmental and social characteristics. A higher environmental or social characteristic assessment leads to a higher target valuation and positive selection of that asset. The manager seeks to understand and capture sustainability risks and opportunities using a proprietary quality-ranking model. The model employed includes a range of environmental and social characteristics, which are expected to influence investment returns, both in general and within infrastructure securities.

Data sources: Direct engagement with investee companies is an important source of data, supplemented by Sustainalytics, RepRisk, MSCI Governance Research, MSCI Climate Value at Risk tool and Glass Lewis.

3. Listed Infrastructure financial products

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

No sustainable investment objective

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

Environmental or social characteristics

Environmental and social characteristics (combined with sustainability risks) are integrated into the investment analysis and assessment criteria for selecting companies in the product's portfolio.

This product promotes the following characteristics:

Environmental characteristics: climate change mitigation, namely a reduction in carbon intensity (measured as carbon emissions per MWh) and the adoption of renewable and cleaner energy technologies

Social characteristics: the protection of labour rights, and the provision of safe and secure working environments for all workers

The product plans to invest all of its assets in investments which contribute to the attainment of the environmental or social characteristics promoted by the product. Uninvested assets will be held in cash or near cash equivalents.

Indicators

This product uses the following indicators:

Environmental: For utility companies, demonstrating declining carbon intensity (as measured by tons of carbon emitted per MWh of electricity generated) over rolling five year periods; or carbon intensity at least 25% below the industry average, and

Social: Alignment with the Ten Principles of the UN Global Compact and the OECD Guidelines for Multinational Enterprises.

Methodologies

Assessment, measurement and monitoring of investments (including screening criteria): The product is managed using a process that ranks companies by relative quality and value, and that incorporates the consideration of six sustainability criteria. The manager seeks to understand and capture sustainability risks and opportunities using a proprietary quality-ranking model. The model employed includes a range of environmental and social characteristics, which are expected to influence investment returns, both in general and within infrastructure securities.

Data sources: Direct engagement with investee companies is an important source of data, supplemented with external services such as Sustainalytics, RepRisk, MSCI Governance Research, MSCI Climate Value at Risk tool and Glass Lewis.

4. European Diversified Infrastructure financial products

Name	LEI
Financial market participant(s)	
First Sentier Investors (Ireland) Limited	254900UC15SMIDJKJ902
Financial product(s)	
European Diversified Infrastructure Fund FCP-SIF	222100D6IJOL25B4TS19
European Diversified Infrastructure German Feeder Fund SCA, SICAV-SIF	254900PA54CLA6K7QB70
European Diversified Infrastructure Feeder Fund II SCA, SICAV-SIF	254900VFPT1X8C7COI90
European Diversified Infrastructure Fund II SCSp	222100783YRIP8Y6JD67
EDIF II Feeder Fund S.C.A. RAIF	254900CS64VGI4N25I11
EDIF II FF II S.C.A. RAIF	25490035L65VW68YAD27
European Diversified Infrastructure Fund III SCSp	25490060JRKFY51QYQ65
EDIF III Feeder Fund SCA SICAV-RAIF	254900HZ1LMIKMRAHF77

No sustainable investment objective

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

Environmental or social characteristics

The product promotes environmental and social characteristics and incorporates these into the

investment and asset management process. This includes four minimum standards which apply to all assets in the portfolio:

1. Improving health and safety through defining and implementing standardised metrics, setting zero accident targets, and including health and safety performance and culture as part of senior management team incentives where appropriate;
2. Reducing CO2 emissions and improving other relevant environmental standards;
3. Increasing equality and representation; and
4. Encouraging apprenticeship and continuous development.

Good governance constitutes an additional minimum standard for ESG performance which applies to all assets in the portfolio. FSI takes active steps to work with investee companies to improve corporate governance standards through independent board representation, implementing risk management systems and risk registers, adhering to relevant standards or certifications, and carrying out regular employee engagement surveys and customer satisfaction surveys.

(together the “Five Minimum Standards” for ESG performance)

Methodologies

Assessment, measurement and monitoring of investments (including screening criteria): Progress against implementation of the Five Minimum Standards is tracked in every portfolio company and a resulting scorecard is reported internally and to investors on a quarterly basis. This quarterly scorecard typically involves a Yes/No/In progress indication of compliance with each of the Minimum Standards, based on discussions with the Board and management team.

In addition, the manager tracks Key Performance Indicators (KPIs) at every asset on an annual basis, covering diversity; Scope 1 and 2 greenhouse gas emissions; and health and safety performance. Additional, asset-specific KPIs may be set for particular companies, depending on the key environmental or social issues facing the business.

Targets and actions to be taken to address sustainability risks are included in 100-day plans and longer-term business plans. Quarterly asset management reviews for each business provide a further opportunity to monitor sustainability risks, with ESG issues covered as a standing agenda item. The manager also takes steps to ensure our portfolio companies comply with all applicable laws and have all required policies and certifications in place.

Data sources: Direct engagement with investee companies via board representation and/or workshops with management.

Sustainability indicators: Investment teams gather data on the following indicators from all portfolio companies on an annual basis:

- The Accident Frequency Rate (“AFR”) per 100,000 hours worked
- Scope 1 and 2 greenhouse gas emissions
- Total employees + % female
- New hires + % female

- % women in senior management
- % women on Board.

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

1. Responsible Listed Infrastructure financial products

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

Sustainable investment objective

The product seeks to make investments that contribute to positive social and environmental sustainability outcomes (in accordance with its investment objective and policy) as its sustainable investment objective.

Methodologies

Assessment, measurement and monitoring of investments (including screening criteria): The binding methodology uses an active investment process which ranks companies by valuation and quality criteria, including a ranking of sustainability factors. The research and analysis includes examining how companies' management of sustainability issues positively aligns with the UN Sustainable Development Goals. The manager seeks to understand and capture sustainability risks and opportunities using a proprietary quality-ranking model. The model includes a range of sustainability factors, which are expected to influence investment returns, both in general and within infrastructure securities.

Data sources: The manager believes the most important source of investment research is generated internally through investment team's experience and regular meetings with senior management of investee companies, other stakeholders including suppliers, competitors, regulators and industry bodies. To supplement the product's internal research, the manager considers the research of sell side ESG analysts on sustainability issues, along with other external services such as Sustainalytics, RepRisk, MSCI Governance Research, MSCI Climate Value at Risk tool and Glass Lewis.

Sustainability indicators: The product uses indicators to assess factors including greenhouse gas emissions, energy performance, social and employee data, and human rights and bribery and corruption criteria.

2. Stewart Investors - Sustainable Funds Group - financial products

Name	LEI
Financial market participant(s)	
First Sentier Investors Global Umbrella Fund plc	n/a
First Sentier Investors International IM Limited ³	549300CCC4Z8M05T6N95
Financial product(s)	
Stewart Investors Asia Pacific and Japan Sustainability Fund	549300G4DULVSULOBZ21

³ Not subject to SFDR; disclosing for transparency purposes

Stewart Investors Asia Pacific Leaders Sustainability Fund	549300VKJEPJT5Q4V960
Stewart Investors Asia Pacific Sustainability Fund	549300BZRT184DKU8I49
Stewart Investors European Sustainability Fund	254900AC9R2R60MRRP06
Stewart Investors Global Emerging Markets Leaders Sustainability Fund	254900RVHSO4VFH1ZI59
Stewart Investors Global Emerging Markets Sustainability Fund	549300V44ENSGLMQBN36
Stewart Investors Indian Subcontinent Sustainability Fund	549300KV9RVYY1I3UF70
Stewart Investors Worldwide Leaders Sustainability Fund	5493003C0PDCQZH4VL30
Stewart Investors Worldwide Sustainability Fund	549300CUQ1MDVG6JSB91
Stewart Investors Worldwide Sustainability investment strategy	n/a
Stewart Investors Asia Pacific Sustainability investment strategy	n/a

Sustainable investment objectives

The products seek 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.

Methodologies

Assessment, measurement and monitoring of investments (including screening criteria): The binding elements 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.

Data sources: The manager has a commitment to engage with each company's management team to address sustainability concerns, issues and risks. 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. Analysis performed by third party data providers, such as Sustainalytics, RepRisk and Glass Lewis, 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. The manager reviews each and every investment. The reviews include assessments, where relevant, to environmental indicators, social indicators, and other topics such as leverage, safety, employee engagement, harmful or controversial products and services, and unethical conduct.

Sustainability indicators: The products only invest in companies that are sustainable investments which contribute to a social and/or environmental objective. The contribution of each product's investments to the social and environmental objectives are assessed by reference to two

framework indicators – the manager’s human development pillars and Project Drawdown climate change solutions.

(a) Human development pillars

The 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

(b) 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 product 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 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 product 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 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.

Table of amendments (Article 12 SFDR)

Date of amendment	Explanation
30 April 2022	<ul style="list-style-type: none"> • Change to name of FSSA ASEAN All Cap Fund • FSSA Investment Managers financial products: update to characteristics and inclusion of indicators • Property Securities financial products: update to characteristics and inclusion of indicators • Listed Infrastructure financial products: update to characteristics and inclusion of indicators • European Diversified Infrastructure financial products: refinement of characteristics to make clear that good governance is not an E or S characteristic; and amendments to indicators to replace recordable and lost time injuries with a single accident frequency rate and to remove energy, water and other air emission KPIs • Stewart Investors – Sustainable Funds Group – financial products: update to characteristics and inclusion of indicators • Inclusion of ISINs for Stewart Investors European Sustainability Fund and Stewart Investors Global Emerging Markets Leaders Sustainability Fund.