

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.

Product name:
FSSA Hong Kong Growth Fund

Legal entity identifier:
549300YMO8UBPRDX6227

Environmental and/or social characteristics

Does this financial product have a sustainable investment objective?

Yes

No

It will make a minimum of **sustainable investments with an environmental objective: %**

It **promotes Environmental/Social (E/S) characteristics** and while it does not have as its objective a sustainable investment, it will have a minimum proportion of % of sustainable investments

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

with an environmental objective 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.

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

With a social objective

It will make a minimum of **sustainable investments with a social objective: %**

It promotes E/S characteristics, but **will not make any sustainable investments**



Sustainability indicators measure how the environmental or social characteristics promoted by the financial product are attained.

What environmental and/or social characteristics are promoted by this financial product?

The environmental characteristics promoted by the Fund are:

- reductions in greenhouse gas emissions,
- reduction in fossil fuel exposure and deforestation, and
- non-exploitation of biodiversity.

The social characteristics promoted by the Fund are:

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

- **What sustainability indicators are used to measure the attainment of each of the environmental or social characteristics promoted by this financial product?**

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 and safety	<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

- **What are the objectives of the sustainable investments that the financial product partially intends to make and how does the sustainable investment contribute to such objectives?**

Not applicable.

- **How do the sustainable investments that the financial product partially intends to make, not cause significant harm to any environmental or social sustainable investment objective?**

Not applicable.

How have the indicators for adverse impacts on sustainability factors been taken into account?

Not applicable.

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

Not applicable.

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 EU Taxonomy sets out a “do no significant harm” principle by which Taxonomy-aligned investments should not significantly harm EU Taxonomy objectives and is accompanied by specific EU criteria.

The “do no significant harm” principle applies only to those investments underlying the financial product that take into account the EU criteria for environmentally sustainable economic activities. The investments underlying the main portion of this financial product do not take into account the EU criteria for environmentally sustainable economic activities.

Any other sustainable investments must also not significantly harm any environmental or social objectives.



Does this financial product consider principal adverse impacts on sustainability factors?



Yes,

In order to ensure that the Fund achieves sustainable investment success, it is important that the Investment Manager identifies whether an investment decision will have a negative impact on the environmental, social or governance factors integrated into the investment process. The Investment Manager commits that for every active equity investment the corresponding issuer should be assessed for relevant adverse impacts and the results of this assessment documented. Where adverse sustainability impacts are identified, the Investment Manager engages with the company in accordance with the commitments made under the Responsible Investment and Stewardship Policy and Principles. Where engagement is unsuccessful, the Investment Manager considers escalating the issue by:

- wider engagement with other investors;
- writing to or meeting with the chairperson or lead independent director;
- voting against directors they feel are not providing appropriate oversight; or

If an appropriate response is not received from the company, or inadequate progress is demonstrated, the Investment Manager will consider divestment.



No,



What investment strategy does this financial product follow?

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

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

- ***What are the binding elements of the investment strategy used to select the investments to attain each of the environmental or social characteristics promoted by this financial product?***

The Fund supports and monitors the global transition to net zero emissions in line with the goals of the Paris Climate Agreement. The Investment Manager expect investee companies to be prepared for the transition to a low carbon economy and to be transparent about their strategies and processes to achieve this outcome. As such, the Investment Manager will engage with

The investment strategy guides investment decisions based on factors such as investment objectives and risk tolerance.

companies where the Investment Manager is of a view that the investee company is not making sufficient progress on climate related issues.

The following are binding elements of the investment strategy for the Fund:

Greenhouse gas emissions – the Fund will not invest in companies that do not take their environmental impact seriously as determined through our engagement with management and the monitoring of commitments on an ongoing basis. Companies that do not make progress in reducing their absolute greenhouse gas emissions and/or intensity per their commitment will be excluded.

Coal Exposure – the Fund does not invest in companies with a materially large exposure to coal mining and processing where it is a key part of the business. We impose a 10% maximum revenue threshold when measured on a rolling average over 3 year average.

Environmental Protection – deforestation and biodiversity – the Fund expects companies to adhere to the policies of the Roundtable on Sustainable Palm Oil (RSPO) and commit to No Deforestation, No Peat, No Exploitation (NDPE) policies. The Fund strongly encourages consumer companies to adhere to these policies and will divest in companies that do not prioritise or wilfully neglect the preservation of forests and biodiversity.

Human health – tobacco – the Fund does not invest in companies that are involved in the production of tobacco products. The Investment Manager continues to engage with banking exposure to encourage them to cease doing business with the tobacco industry.

Adverse social impacts – gambling – the Fund does not invest in companies whose primary business is gambling. The Fund imposes a 10% maximum revenue threshold on a rolling 3-year average for each company.

Adverse social impacts – pornography – the Fund does not invest in companies involved in the production of pornography or adult entertainment.

Human rights – controversial weapons – the Fund does not invest in companies that are involved in the production or development of cluster munitions, anti-personnel mines, small arms, biological weapons, chemical weapons or uranium munitions.

Companies held by the Fund are subject to ongoing monitoring using the Investment Manager's exclusion policy, threshold limit checks, and bottom-up research performed by the Investment Manager/analysts, augmented with information from external data providers.

● ***What is the committed minimum rate to reduce the scope of the investments considered prior to the application of that investment strategy?***

The Fund has no committed minimum rate by which the scope of investments are reduced prior to applying the Fund's investment strategy.

● ***What is the policy to assess good governance practices of the investee companies?***

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

Board assessment – there should be a transparent procedure for the appointment of new directors to a board. The Investment Manager expects that companies are able to demonstrate diversity of gender, age, ethnicity, thought, among other factors, and across their organisation and at board level.

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

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

Good governance practices include sound management structures, employee relations, remuneration of staff and tax compliance.

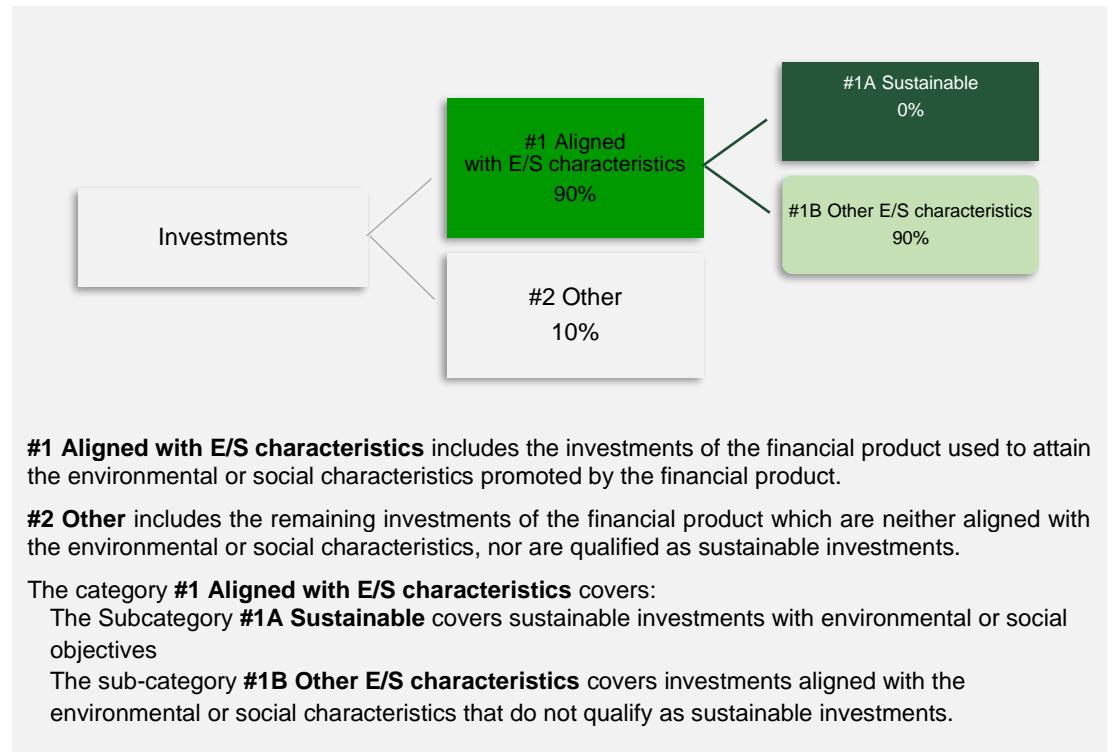


What is the asset allocation planned for this financial product?

The Fund invests primarily (at least 70% of its Net Asset Value) in equity securities or equity-related securities listed on the Stock Exchange of Hong Kong Limited or securities issued by such companies which in the Investment Manager's opinion have significant assets, business, production activities, trading or other business interests in Hong Kong and traded on Regulated Markets.

Asset allocation describes the share of investments in specific assets.

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.



● **How does the use of derivatives attain the environmental or social characteristics promoted by the financial product?**

The Fund may only use derivatives for purposes of hedging and efficient portfolio management. It is not intended that the Fund will use derivatives for investment purposes.

● **Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy1?**

Yes

In fossil gas

In nuclear energy

No

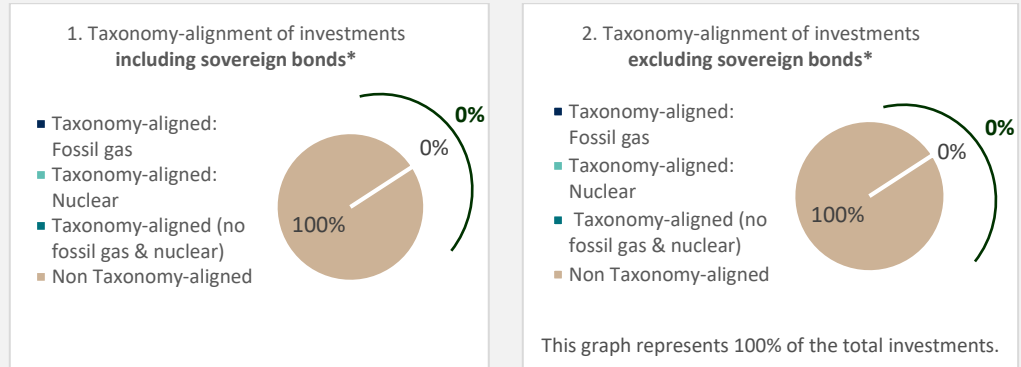
Enabling activities directly enable other activities to make a substantial contribution to an environmental objective.

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



To what minimum extent are sustainable investments with an environmental objective aligned with the EU Taxonomy?

The two graphs below show in navy the minimum percentage of investments that are 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.



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

● **What is the minimum share of investments in transitional and enabling activities?**

The Fund promotes E/S characteristics, but will not seek to make any sustainable investments. Accordingly, there is no minimum share of investments in transitional and enabling activities.

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 is the minimum share of sustainable investments with an environmental objective that are not aligned with the EU Taxonomy?

The Fund promotes E/S characteristics, but will not seek to make any sustainable investments. Accordingly, there is no minimum share of sustainable investments that are not aligned with the EU Taxonomy.



What is the minimum share of socially sustainable investments?

The Fund promotes E/S characteristics, but will not seek to make any sustainable investments. Accordingly, there is no minimum share of socially sustainable investments.



What investments are included under “#2 Other”, what is their purpose and are there any minimum environmental or social safeguards?

The “#2 Other” assets are cash and near-cash assets held pending investment or to meet liquidity requirements.

Service providers are reviewed and assessed for compliance with First Sentier Investors' modern slavery policy.



Is a specific index designated as a reference benchmark to determine whether this financial product is aligned with the environmental and/or social characteristics that it promotes?

No specific index is designated as a reference benchmark to determine whether the Fund is aligned with the environmental and/or social characteristics promoted.

Reference benchmarks are indexes to measure whether the financial product attains the environmental or social characteristics that they promote.

- ***How is the reference benchmark continuously aligned with each of the environmental or social characteristics promoted by the financial product?***
Not applicable.
- ***How is the alignment of the investment strategy with the methodology of the index ensured on a continuous basis?***
Not applicable.
- ***How does the designated index differ from a relevant broad market index?***
Not applicable.
- ***Where can the methodology used for the calculation of the designated index be found?***
Not applicable



Where can I find more product specific information online?

More product-specific information can be found on the website:

<https://www.firstsentierinvestors.com/uk/en/institutional/responsible-investment/Regulatory-Disclosures.html>