

SFDR PRODUCT DISCLOSURE

AMOVA AM JAPAN VALUE FUND

August 2023



## (a) Summary

The Investment Manager's ESG integrated investment process ensures the following screens are complied with:

- No investments in companies that violate the UN Global Compact principles and the OECD Guidelines for Multinational Enterprises
- No investment in companies involved in the manufacture of tobacco or companies deriving more than 10% of their revenues from the sale of tobacco
- No investment in companies exposed to controversial weapons
- No investment in companies deriving more than 5% of their revenue from the gambling industry
- No investment in companies with no independent board member

The Investment Manager will also ensure that where investee companies have a GHG intensity that exceeds the Sub-Fund's benchmark, GHG intensity carbon emission reduction initiatives have been put in place or investee companies are working towards transition (based on third party data provider or engagement).

The Sub-Fund will seek to achieve its investment objective through capital appreciation and dividends by primarily investing in Japanese companies listed on the Tokyo Stock Exchange. The Sub-Fund in normal market conditions will follow a value strategy, investing in companies identified as mispriced based on fundamental research.

The evaluation of sustainability risk is performed through an internal assessment framework through which investee companies are scored in order to identify and then engage with investee companies that are exposed to material ESG risks.

Good governance criteria are assessed as part of initial company research and on an ongoing basis, with holdings falling outside of the pre-determined parameters covering sound management structures, employee relations, remuneration of staff and tax compliance will be reviewed. The Investment Manager will engage to try to resolve the issue but divestment may ultimately be considered.

The Sub-Fund will therefore always be fully invested in line with its negative screens and with the process is applies to achieve its GHG intensity and carbon emissions reduction initiative targets.

ESG data is obtained from specialized third-party vendors, by engaging with companies directly or proxied. The data is reviewed by an independent ESG data team.

The lack or delay of corporate disclosures, particularly in the Asian region, constitutes a primary methodology and data limitation which may lag investment decisions and cause emissions data to be over or underestimated and negative screens violations to be immediately detected with a delay.

Engagement with companies will be performed in the context of the absence of carbon emission reduction initiatives for companies that have a GHG intensity which exceeds the Sub-Fund's benchmark GHG intensity and as part of the investment manager good governance policy.

The Sub-Fund promotes environmental or social characteristics but does not have as its objective sustainable investment and does not use a benchmark that is aligned with the environmental or social characteristics it promotes.

**(b) No sustainable investment objective**

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

## (c) Environmental or social characteristics of the financial product

The Investment Manager's ESG integrated investment process ensures the following screens are complied with:

- No investments in companies that violate the UN Global Compact principles and the OECD Guidelines for Multinational Enterprises
- No investment in companies involved in the manufacture of tobacco or companies deriving more than 10% of their revenues from the sale of tobacco
- No investment in companies exposed to controversial weapons
- No investment in companies deriving more than 5% of their revenue from the gambling industry
- No investment in companies with no independent board member

In terms of GHG emissions, the Investment Manager identifies companies that have GHG intensity emissions that are higher than the Sub-Fund's benchmark, reviews whether they have implemented GHG reduction initiatives and engages with them if they have not.

The Sub-Fund is included within the assets under management captured by Amova AM's group net zero target of achieving a 50% reduction in its carbon footprint by 2030 (with the base year of 2019).

## (d) Investment strategy

### Environmental or social characteristics

The Sub-Fund will seek to achieve its investment objective through capital appreciation and dividends by primarily investing in Japanese companies listed on the Tokyo Stock Exchange. The Sub-Fund in normal market conditions will follow a value strategy, investing in companies identified as mispriced based on fundamental research.

Many of the Sub-Fund's investments will offer potential (technology, products or services) to address environmental and societal issues while remaining undervalued. ESG integration will be further strengthened through thematic engagement on carbon reduction, board independence and diversity, corporate governance and other issues. As part of the investment process, the Investment Manager will aim to manage a portfolio that consists of companies with a GHG intensity lower than the benchmark or with commitments to reduce carbon emissions, in addition to having no major controversies on issues related to environment and human rights.

The Sub-Fund's characteristics, how they are assessed, measured and then reported are as follows:

*A portfolio composed of companies that either have a GHG intensity lower than the Sub-Fund's benchmark GHG intensity or have GHG reduction initiatives in place.*

The Investment Manager will ensure that where investee companies have a GHG intensity that exceeds the Sub-Fund's benchmark, GHG intensity carbon emission reduction initiatives have been put in place or investee companies are working towards transition (based on third party data provider or engagement).

## Article 8 Product Website disclosure

The review process will therefore follow the below steps:

- If the GHG intensity of an investee company exceeds the benchmark, it is eligible for review.
- Third party data will be reviewed to validate that the company is considered to be taking steps toward transition.
- If no third party data is available, companies will be evaluated and engaged on an individual basis by the Investment Manager to confirm that they are taking steps towards transition.

*No investments in companies in violation of the UN Global Compact or the OECD Guidelines for Multinational Enterprises:*

The Investment Manager will not invest in companies violating principles of the UN Global Compact or the OECD Guidelines for Multinational Enterprises as defined by a third party data provider.

*No investments in companies materially exposed to the tobacco industry:*

The Investment Manager will not invest in companies involved in the manufacture of tobacco or companies deriving more than 10% of their revenues from the sale of tobacco. Restrictions are based on revenue information from a third party data provider.

*No investments in companies involved in controversial weapons:*

The Investment Manager will not invest in companies with any identifiable revenues related to controversial weapons or that are involved in their production based on information from a 3rd party data provider.

*No investments in companies materially exposed to the gambling industry:*

The Investment Manager will not invest in companies that derive more than 5% of their revenues from the gambling industry. Restrictions are based on revenue information from a 3rd party data provider.

*No investments in companies with no independent director:*

The Investment Manager will not invest in companies that have no independent director.

### **Good governance**

A company's ability to sustain long-term shareholder value is a key consideration of the Investment Manager when identifying investment opportunities. The Investment Manager finds that this potential is demonstrated by companies and management teams with strong governance.

The SFDR requires products classified as Article 8 to not invest in companies which do not follow good governance practices. Good governance practices include sound management structures, employee relations, remuneration of staff and tax compliance. As such, the Investment Manager has outlined the Sub-Fund's Good Governance criteria:

- 1) Companies should adhere to the UN Global Compact principles and the OECD Guidelines for Multinational Enterprises. There should be no very severe controversies relating to tax compliance.
- 2) There should be no very severe controversies relating to governance practices, bribery, corruption and business ethics.

- 3) There should be no very severe controversies related to investee companies' impact on the environment.
- 4) There should be no very severe controversies relating to labour rights and the supply chain.
- 5) There should be no very severe controversies related to anticompetitive practices, marketing and advertising, product quality and safety, and customer relations.
- 6) There should be no very severe controversies related to freedom of expression and censorship, and other human rights abuses and adverse impact on a community.
- 7) Boards should have at least 1 independent board member (which shall have no ties to the company or its shareholders).
- 8) The company should provide investors with accurate financial statements and reports that have been subjected to external audit.
- 9) The company should have clear and comprehensive compensation disclosures. The company should also maintain an appropriate pay structure with an emphasis on long-term shareholder value.
- 10) The company should adhere to internal assessment principles relating to governance risk, including accounting irregularities, fair disclosures, internal data falsifications and other governance related controversies.

Good governance criteria are assessed as part of initial company research and on an ongoing basis, with holdings falling outside of the pre-determined parameters being reviewed internally. No investment can be made in a security that does not meet all criteria outlined above. If there is a change in the status of an existing security which results in it not meeting the above criteria, the Investment Manager will engage to try to resolve the issue but divestment may ultimately be considered.

## (e) Proportion of investments

The Sub-Fund product promotes environmental or social characteristics but without having sustainable investment objective and does not commit to make sustainable investments.

The Sub-Fund will therefore always be fully invested in line with its negative screens and with the process it applies to achieve its GHG intensity and carbon emissions reduction initiative targets.

Other investments will only be made in Money Market Instruments, bank deposits and other eligible liquid assets as defined in the Sub-Fund's investment policy for investment and treasury purposes without being part of the core investment policy.

## (f) Monitoring of environmental or social characteristics

The monitoring of the Sub-Fund environmental and social characteristics will be performed as follows:

## **Engagement**

Prior to investing and monthly thereafter, the GHG intensity of companies will be reviewed to identify companies that have higher GHG emissions than the Sub-Funds benchmark.

Those companies will then be reviewed to assess whether they have implemented carbon emission reduction initiatives (through third party data service or own research).

The companies that have not implemented such initiatives will be subject to engagement by the investment manager. This engagement may be performed prior to or after the investment.

This process will be performed by the investment manager and independently monitored.

## **Negative screens**

The control of negative screens will be performed prior to investment and on a monthly basis thereafter. This process will be performed by the investment manager and independently monitored.

## **(g) Methodologies for environmental or social characteristics**

The attainment of the Sub-Fund environmental and social characteristics will be met through:

### **Engagement**

Systematic engagement with investee companies which do not have carbon emission reduction initiative in place and have a GHG intensity that is higher than the Sub-Funds benchmark.

## Negative screens

The implementation of the following screening criteria's:

- No investments in companies that violate the UN Global Compact principles and the OECD Guidelines for Multinational Enterprises.
- No investment in companies involved in the manufacture of tobacco or companies that derive more than 10% of their revenue from the sale of tobacco.
- No investment in companies exposed to controversial weapons.
- No investment in issuers deriving more than 5% of their revenue from the gambling industry.

## (h) Data sources and processing

### Carbon intensity

GHG emissions at company level are obtained from specialized third-party vendors. The data is reviewed by an independent ESG data team who performs data quality controls including the review of abnormal results, large variations and sample comparisons with other available data sources. The ESG data team also ensures that data points used to perform portfolio and benchmark level calculations are aligned.

The Sub-Fund's portfolio and benchmark carbon intensity will be calculated as follows:

$$\Sigma [(Company\ scope\ 1\ \&\ 2\ carbon\ emissions / USD\ company\ sales) * company\ portfolio\ weight\ or\ benchmark\ weight]$$

The ESG data team then processes the data by performing portfolio level GHG emissions calculation based on a documented and transparent calculation methodology and provides the portfolio management and the control teams with tools and reports that allow the monitor and manage the portfolio GHG emissions.

When data isn't available based on third party disclosures, company level proxies provided by specialized third-party vendors are used. Where data isn't available from third party vendor, missing data will be either be sourced by engaging with the company or by using sector based proxies.

The proportion of proxied data and the methodologies applied are monitored to ensure that the calculated portfolio and benchmark level GHG emissions constitute a fair and reliable estimation.

### Negative screens

The data used to monitor negative screens is acquired from specialized third-party vendors and through the portfolio management team screening process.

Third-party vendor data is reviewed by an independent ESG data team who performs data quality controls including the review of missing data points or abnormal results.

The ESG data team then processes the data by ensuring it flows to the relevant portfolio management system and provides the portfolio management and the control teams with tools and reports that allow them to monitor and manage the Sub-Fund's adherence to its environmental and social guidelines.

### (i) Limitations to methodologies and data

The lack or delay of corporate disclosures, constitutes the primary methodology and data limitation. GHG emissions at company level are based on company disclosures or estimations. ESG data service providers may also collect available data and update their systems with some delay. Despite the review process implemented, the GHG emissions data may only be updated when new disclosures are available (and therefore delayed compared to the investment decision) and could be impacted by potential proxy biases when data could not be sourced from corporate disclosures.

Negative screens are based on third party reports and the investment manager analysis its coverage may therefore vary and controversies or violations may not be immediately detected if data is not readily available.

### (j) Due diligence

The Investment Manager incorporates the analysis of environmental, social and governance ("ESG") factors as part of its investment process and fundamental research.

The Sub-Fund promotes environmental and/or social characteristics through a set of ESG indicators, binding limits, voting and during its engagement process.

The evaluation of sustainability risk is performed through an internal assessment framework through which investee companies are scored in order to identify and then engage with investee companies that are exposed to material ESG risks.

Principal adverse impacts on sustainability factors ("PAIs") as referred to in Annex I of the SFDR Delegated Act, are also taken into account through a set of binding limits, voting and targeted engagement that is performed towards poor performing companies in terms of their GHG intensity relative to the Sub-Fund's benchmark.

### (k) Engagement Policies

The Sub-Fund's strategy involves the investment manager engaging with issuers as part of the investment process, both before and during the period of investment. This engagement will in particular be performed:

- in the context of the absence of carbon emission reduction initiatives for companies that have a GHG intensity which exceeds the Sub-Fund's benchmark GHG intensity.
- as part of the investment manager good governance policy

## (I) Designated reference benchmark

This Sub-Fund has not designated a reference benchmark that is aligned with the environmental or social characteristics it promotes.