



**Pacific Capital UCITS Funds plc**  
**Article 10 SFDR Website Disclosure in respect of**

<b>Name of Fund</b>	<b>Legal Entity Identifier</b>
Lockhart Asset Management Multi Asset Stewardship Fund	213800L8ZDSQ6HEZQH80

**(the “Fund”)**

**February 2025**

Regulation (EU) 2019/2088 on sustainability-related disclosures in the financial services sector, as amended (“**SFDR**”) requires certain EU-regulated entities (including Pacific Capital UCITS Funds plc, the “**Company**”) to disclose information on a public website regarding the promotion of environmental and/or social characteristics for certain financial products.

This document (hereinafter referred to as the “**Article 10 Statement**”) constitutes the transparency disclosure with respect to the Fund for the purposes of Article 10 of SFDR and is available at the following website: <https://www.lockhartassetmanagement.com/our-range/>

This Article 10 Statement should be read in conjunction with the latest prospectus of the Company (the “**Prospectus**”) and the supplement in respect of the Fund (the “**Supplement**”) which set out in detail the investment policy of the Fund and its approach to sustainable investment. The Supplement also incorporates the Annex setting out certain prescribed pre-contractual disclosures required under SFDR (the “**Sustainability Annex**”).

Any capitalised terms appearing in this Article 10 Statement and not expressly defined herein shall have the meaning given to them in the Prospectus and / or the Supplement.



## Summary

This summary section has been completed in furtherance of SFDR and, in particular, Article 25 of Commission Delegated Regulation (EU) 2021/1288 ("**SFDR Level 2**") and summarises the key information referred to in the remaining sections of this Article 10 Statement.

Classification	The Fund has been classified as a fund which promotes environmental and/or social characteristics under Article 8 of SFDR.
No Sustainable Investment Objective	The Fund promotes environmental or social characteristics in accordance with Article 8 of SFDR, but does not have a sustainable investment objective as contemplated by Article 9 of SFDR.
Environmental or social characteristics of the financial product	<p>The Fund promotes both environmental and social characteristics.</p> <p>The environmental characteristics promoted by the Fund include climate change mitigation; renewable energy; clean technologies; battery solutions; clean water; recycling &amp; water treatment; and biodiversity.</p> <p>The social characteristics promoted by the Fund include improving board diversity; reducing gender pay gap; improving senior female management representation; extending human lifespan; access to healthcare; social housing; education; and drug discovery.</p>
Investment Strategy	<p>The Fund invests in Underlying Funds which invest in strategies which are intended to generate returns using global equity securities (e.g. common stock and preferred stock) and debt securities (e.g. government and corporate bonds of fixed and floating rate) and currencies. The Fund may also gain direct exposure to fixed income instruments, equities, money market instruments and closed-ended funds which are listed or traded on Recognised Markets worldwide.</p> <p>The Fund will apply the Sustainable Criteria outlined by the Global Sustainable Investment Alliance to investments in Underlying Funds, to the relevant Underlying Fund's status as an Article 8 or Article 9 Fund under SFDR and will also have regard to the sustainability indicators, proprietary scoring, binding elements, SASB scoring and other factors described in further detail in this Article 10 Statement and the Sustainability Annex. The investment strategy shall also promote the environmental characteristics through active engagement with the management of underlying issuers.</p>
Proportion of investments	The Investment Manager intends to invest a minimum of 80% of the Fund's NAV in investments which attain the environmental and social characteristics promoted by the Fund. The remainder of the portfolio shall be in investments such as cash and other liquid ancillary assets or investments for hedging or efficient portfolio management purposes.



Monitoring of environmental or social characteristics	<p>The Investment Manager's portfolio management team will implement the various criteria set out in this Article 10 Statement in making investment decisions. The Investment Manager's compliance function will monitor the integration of ESG requirements through a combination of automated, manual and periodic reviews.</p>
Methodologies	<p>The methodologies to measure how the environmental or social characteristics promoted by the Fund are met include a review of Underlying Funds against the Sustainable Criteria Investment Styles laid out by the Global Sustainable Investment Alliance, the Investment Manager's sustainable investment internal scoring criteria for direct investments, principal adverse indicators (specifically in respect of greenhouse gas ("GHG") emissions (Scope 1, 2 &amp; 3), GHG intensity, carbon footprint and board diversity) and an evaluation of SASB scores issued by TruValue Labs.</p> <p>The Fund will seek to invest in Underlying Funds that either (a) qualify as Article 8 (funds which promote environmental or social characteristics) or Article 9 (funds with a sustainable investment objective) under the SFDR or funds or (b) which meet one or more of the Sustainable Criteria investment styles laid out in the Global Sustainable Investment Alliance detailed further below.</p>
Data sources and processing	<p>Data sources used to attain environmental or social characteristics promoted may include both proprietary information and third party data providers including TruValue Labs as described in further detail below.</p>
Limitations to methodologies and data	<p>Whilst it is recognised that data availability may impact the extent to which environmental or social characteristics promoted can be measured, this is managed through the use of both proprietary data and data sourced from third party data providers generally with broad capabilities and coverage.</p>
Due diligence	<p>A full look-through of Underlying Funds is carried out to test the Underlying Funds' environmental or social exposures and revenue exposures to industries with positive/negative environmental or social contributions. This provides the Investment Manager with an in-depth assessment of each Underlying Fund's investment exposures. This analysis enables the Investment Manager to ensure relevant stakeholder engagement with the relevant Underlying Fund manager if it deems a particular investment within an Underlying Fund to have significant negative impact on the environment or on social objectives.</p> <p>The Investment Manager and analysts carry out analysis of potential investments and ongoing monitoring through quantitative and qualitative analysis which may focus on the investee company/underlying fund's strategy, performance, risks faced, vehicle cost and its commitment to corporate governance and quality and experience of management. A quantitative systematic process is periodically conducted to assess holdings within Underlying Funds, including their environmental and/or social characteristics, principal adverse impacts and negative externalities.</p>



Engagement policies	Engagement with investee companies and Underlying Fund managers is through direct dialogue with the investor relations team, management teams or through exercising voting rights at general meetings. If the Investment Manager thinks a company or Underlying Fund is not being managed in the interests of its clients or in a manner consistent with the promotion of environmental or social characteristics as set out herein, it will decide how best to engage with the company or Underlying Fund to address this.
Designated reference benchmark	The Fund does not have a 'Designated reference benchmark' to attain the environmental or social characteristics promoted.



## **Introduction**

This Article 10 disclosure document sets out information in relation to the sustainable investment approach of the Fund in accordance with the requirements of Articles 23 to 36 of SFDR Level 2. The headings below are in the order mandated by SFDR Level 2 and the information included beneath each heading address the prescribed information to be provided to investors pursuant to the above Articles.

As further described below, the Fund, a sub-fund of the Company, promotes, among other characteristics, certain environmental or social characteristics, provided that the companies and underlying funds (“**Underlying Funds**”) in which investments are made follow good governance practices, in particular regarding sound management structures, employee relations, remuneration of staff and tax compliance. Each Underlying Fund pursues a similar approach to the promotion of environmental or social characteristics, with the only differences between the Underlying Funds relating to the extent to which they take exposure to equity markets.

### **1. No Sustainable Investment Objective**

This Fund promotes environmental or social characteristics as set out below but does not have sustainable investment as its objective.

The Fund does not commit to making sustainable investments within the meaning of Article 2(17) of SFDR.

### **2. Environmental or Social Characteristics of the Fund**

- The Fund will promote both environmental and social characteristics.
- The following list are environmental characteristics which will be promoted by the Fund:
  - climate change mitigation;
  - renewable energy;
  - clean technologies;
  - battery solutions;
  - clean water;
  - recycling & water treatment; and
  - biodiversity.
- The following list are social characteristics which will be promoted by the Fund:
  - improving board diversity;
  - reducing gender pay gap;
  - improving senior female management representation;
  - extending human lifespan;
  - access to healthcare;
  - social housing;
  - education; and
  - drug discovery



### 3. Investment Strategy

While the Fund will invest primarily in Underlying Funds, it may also invest in fixed income securities (government and sovereign bonds and sustainable bonds) and equities. The criteria to be considered by the Investment Team when making investment decisions on behalf of the Fund are set out below in respect of each category of investment. The Investment Team will also ensure that any target issuer will also follow good governance practices in terms of its management structures, employee relations, remuneration of staff and tax compliance (as relevant).

#### *Investment in Underlying Funds*

The Fund will seek to invest in Underlying Funds that either (a) qualify as Article 8 (funds which promote environmental or social characteristics) or Article 9 (funds with a sustainable investment objective) under the SFDR or (b) which meet one or more of the Sustainable Criteria investment styles laid out in the Global Sustainable Investment Alliance.

While an Underlying Fund shall be eligible for investment where it meets only one of the Sustainable Criteria investment styles outlined below, the Investment Manager shall also have regard to circumstances where a given Underlying Fund promotes more than one Sustainable Criteria investment style or where the Investment Manager believe that the particular steps taken by an Underlying Fund in furtherance of one of the Sustainable Criteria investment styles shall have a particularly positive impact. In such circumstances, the Investment Manager shall favour the Underlying Fund which it determines to have the greater positive impact from a Sustainable Criteria perspective when choosing between two or more Underlying Funds which are otherwise equally attractive in terms of expected returns and the other factors outlined above.

The Sustainable Criteria investment styles as defined by the GSIA are set out in the table below.

<b>Style Name</b>	<b>Description</b>
Negative / Exclusionary Screening	The exclusion from an Underlying Fund of certain sectors, companies or practices based on specific criteria related to environmental, social or governance (“ESG”) factors such as entities with exposure to tobacco, armaments, thermal coal, animal testing or other factors which are detrimental to ESG goals.
Positive / Best in Class Screening	Investment in sectors, companies or projects selected for positive ESG performance relative to industry peers.
Norms Based Screening	Screening of investments against minimum standards of business practice based on international norms, such as those issued by the Organisation for Economic Co-



Style Name	Description
	operation and Development; International Labor Organization, the United Nations and UNICEF.
ESG Integration	The systematic and explicit inclusion by investment managers of ESG factors into financial analysis.
Sustainability Themed Investing	Investment in themes or assets specifically related to sustainability (such as clean energy, green technology or sustainable agriculture).
Impact / Community Investing	Targeted investments aimed at solving social or environmental problems where capital is specifically directed to underserved individuals or communities, as well as financing that is provided to businesses with a clear social or environmental purpose.
Stewardship and Voting	The use of shareholder power to influence corporate behaviour, including through direct corporate engagement (i.e., communicating with senior management and/or boards of companies), filing or co-filing shareholder proposals, and proxy voting that is guided by comprehensive ESG guidelines.

Although the Fund does not have a sustainable investment objective and does not commit to invest a minimum percentage in "sustainable investments" within the meaning of Article 2(17) of SFDR, certain principal adverse impact indicators ("**PAIs**") are used as a proxy to measure and test the environmental and social characteristics of the investments within Underlying Funds. Specifically, greenhouse gas ("**GHG**") emissions (Scope 1, 2 & 3), GHG intensity, carbon footprint & board diversity PAIs are used to calculate fund and company scores to measure and test how they are performing regarding environmental and social characteristics. These PAIs help the Fund in analysing the potential negative impact of underlying investments on the environment and society and the Fund will expand the list of PAIs considered as reporting by individual issuers and third party data analysts improves over time.

A full look-through of Underlying Funds is carried out to test the relevant Underlying Fund's environmental or social exposures and revenue exposures to industries with positive/negative environmental or social contributions. This provides the Investment Manager with an in-depth assessment of the Underlying Fund's investment exposures. This analysis enables the Investment Manager to ensure relevant stakeholder engagement with the relevant Underlying Fund manager if it deems a particular investment within an Underlying Fund to have significant negative impact on the environment or on social objectives.



### *Direct Fixed Income Investments*

The Fund may invest directly in government and sovereign bonds and sustainable bond asset classes which meet internal scoring criteria related to sustainable metrics.

The Investment Manager's sustainable investment internal scoring criteria for direct investment in government and sovereign bonds assesses the issuing government or sovereign entity pursuant to a number of binding factors, including carbon emissions and air pollution policies, the implementation of a free and fair electoral process, freedom of the press, protection of the right to vote and democratic institutions.

In assessing the investment universe of sustainable bonds, the internal scoring criteria will be focused on the extent to which all funding raised pursuant to the debt issuance is allocated towards investment into projects with environmental benefits such as renewable energy, sustainable resource use, conservation of natural resources, clean transportation and adaptation to climate change.

### *Direct Equity Investments*

Where it is proposed that the Fund make an equity investment, the Investment Manager shall assess the target issuer in terms of its commitment towards positive climate and environmental change (which may be evidenced by the issuer being engaged in the manufacture of goods or provision of services which promote climate change or by steps taken by the issuer to minimise its own environmental impact through climate emissions / carbon neutrality targets or similar initiatives) or its commitment to positive social change (as evidenced by its engagement with its employees and community and by its positive contribution to society through its business activities).

The Investment Manager's internal scoring system seeks to ensure that any direct investment meets the minimum criteria set out above. Once a given investment is deemed eligible for inclusion in the investment universe of the Fund, the Investment Manager shall have regard to other factors including the anticipated return and the role of the investment and its role in providing a diversified portfolio. References to Sustainable Criteria in the Supplement shall, where the context admits, include references to the Investment Manager's internal scoring criteria as set out in this section.

### *Cash and Cash Equivalents*

The Fund may also retain amounts in cash or cash equivalents (including but not limited to deposits, money market instruments, short-term debt obligations and treasury bills listed or traded on Recognised Markets) pending reinvestment or for ancillary liquidity purposes or margin requirements in connection with the Fund's investments in financial derivative instruments described below. Investments made for such ancillary liquidity purposes are not subject to the Sustainable Criteria set out above.

### *Additional ESG criteria (Direct and Indirect investments)*



Additionally, the Investment Manager considers Sustainable Accounting Standards Board ("**SASB**") scores provided by TruValue Labs, a third party data service provider which analyses various publicly available sources to assess ESG risks and opportunities against 26 ESG categories as defined by the SASB, along with an overall score and a volume score. This SASB data feed covers 19,000+ companies with more than 12 years of history and assists in providing coverage for the Fund's look-through to investments within Underlying Funds. Where data is lacking, the Investment Manager will use supplemental data or industry averages to get a greater understanding of an investment's environmental or social characteristics.

For sovereign and supranational bonds (whether direct or indirectly invested in), environmental and social characteristics are measured using a ESGP (Environmental, Social, Governance & Political) score ("**ESGP score**") calculated by collecting data from the World Bank and Freedom House. The ESGP score is an average of the E, S, G & P score (shown below). The E score is calculated by averaging normalised E1, E2 and E3 scores, the S score is calculated by averaging normalised S1, S2 and S3 scores & the G Score is calculated by averaging normalised G1, G2 and G3 scores (raw data is collected from the World Bank). The Global Freedom Score is calculated by Freedom House which rates countries across 13 factors, looking at factors such as the rule of law, political freedoms and freedom of expression. A country's carbon intensity (tons of Co2 utilised to produce \$1,000 of GDP) are used to measure how individual countries rank from an environmental perspective compared to their global peers.

Metrics used to calculate Sovereign bond ESGP Score	
E	E1 CO2 emissions (metric tons per capita)
	E2 PM2.5 air pollution, mean annual exposure (micrograms per cubic meter)
	E3 Terrestrial and marine protected areas (% of total territorial area)
S	S1 Individuals using the Internet (% of population)
	S2 Mortality rate, under-5 (per 1,000 live births)
	S3 Proportion of seats held by women in national parliaments (%)
G	G1 Control of Corruption: Estimate
	G2 Strength of legal rights index (0=weak to 12=strong)
	G3 Rule of Law: Estimate
P	P Global Freedom

The corporate issuers of equities in which the Fund invests directly are assessed to ensure that they follow good governance practices in terms of its management structures, employee relations, remuneration of staff and tax compliance. The Fund will seek to encourage good governance of companies within Underlying Fund portfolios by engaging with underlying fund managers.

*Policy to assess good governance practices*

- A detailed annual due diligence is carried out on Underlying Funds to ensure the fund management team are applying good governance practices in their investment process and in relation to the management of the relevant Fund having regard, where relevant to factors such as sound management structures, employee relations, remuneration of staff and tax compliance.. Additionally, the governance of underlying investments are assessed on a quarterly basis using a full look-through analysis where governance scores are measured.
- Any direct investments made by the Fund must follow good governance practices regarding sound management structures, employee relations, remuneration of staff and tax compliance.
- As part of its overall stewardship of investments, the Fund will seek to encourage good governance of companies within Underlying Fund portfolios by engaging with underlying fund managers to encourage them to invest in companies with good governance practices and also engage directly with companies to ensure good governance is being achieved and improved.

**4. Proportion of Investments**

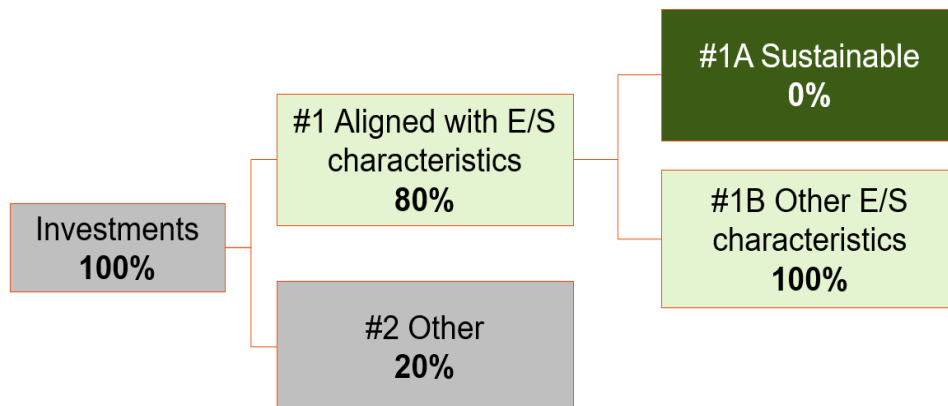
The following allocations apply to the Fund:

**#1 Aligned with E/S characteristics:** The Investment Manager intends to invest a minimum of **80%** of the Fund's NAV in investments which attain the environmental characteristics promoted by the Fund.

**#1A Sustainable:** The Investment Manager does not commit to invest a minimum percentage of the Fund's NAV in sustainable investments.

**#2 Other:** The remaining **20%** of the Fund's NAV will be in investments which seek to achieve the broader objectives of the Fund, including those which may not match the Portfolio's ESG criteria in its entirety.

The table below illustrates the intended allocation.



There may be times when the Fund is not in a position to maintain a minimum commitment due to extenuating circumstances or reasons beyond the control of the Investment Manager. In such circumstances, the Investment Manager will take all reasonable steps as soon as reasonably possible to rectify any deviation taking into account the best interests of Shareholders.

## **5. Monitoring of environmental or social characteristics**

The Investment Manager reviews compliance with the environmental, social and sustainability indicators on a quarterly basis to review exposure (both direct and through Underlying Funds) to themes, sectors, SASB categories, ESG criteria and PAI criteria (each as set out in the Supplement and this Article 10 Statement). Once the Investment Manager's portfolio management team has completed its SASB, ESG and PAI evaluation for each underlying investment against the relevant criteria set out herein, they are then aggregated, initially at Underlying Fund level to reach Underlying Fund scores and subsequently on an aggregated basis across all investments to reach a Fund score.

The output of the above evaluation process is processed and visualised using several different techniques to provide further insights into Fund exposures and characteristics. The relevant Fund scores arising from this process are compared to benchmarks to assess how each Fund is performing by reference to the sustainability indicators set out herein. The process has been systematised and can be run on an ad-hoc basis when required.

The Investment Manager will implement the various criteria set out in this Article 10 Statement in making investment decisions. The Investment Manager's compliance function will monitor the integration of ESG requirements through a combination of automated and manual reviews.

## **6. Methodologies for environmental or social characteristics**

A number of metrics are utilised to measure the manner in which the Environmental and Social characteristics promoted by the Fund are met.

- (a) In the case of investments through Underlying Funds, the Investment Manager applies the GSIA categorisation process to each Underlying Fund. The stewardship and engagement policies of Underlying Fund managers are also monitored, to ensure they are active participants in stock ownership and are driving company management to improve their Sustainable processes.
- (b) The Investment Manager's sustainable investment internal scoring criteria for direct investment in government and sovereign bonds assesses the issuing government or sovereign entity pursuant to a number of binding factors, including carbon emission thresholds and air pollution policies, the implementation of a free and fair electoral process, freedom of the press, protection of the right to vote and democratic institutions
- (c) Where it is proposed that the Fund make an equity investment, the Investment Manager shall assess the target issuer in terms of its commitment towards positive climate and



environmental change (which may be evidenced by the issuer being engaged in the manufacture of goods or provision of services which promote climate change or by steps taken by the issuer to minimise its own environmental impact through climate emissions / carbon neutrality targets or similar initiatives) or its commitment to positive social change (as evidenced by its engagement with its employees and community and by its positive contribution to society through its business activities). The Investment Manager will apply a proprietary scoring system to assess the target investments against the above metrics and issuers which fall below a relevant threshold will be excluded from the investment process.

- (d) The Fund applies the PAIs described in further detail above in respect of "sustainability indicators", including GHG, carbon footprint and board diversity PAIs and will exclude both direct and indirect exposure to issuers who fail to meet the thresholds set by the Investment Manager as part of its internal scoring system.
- (e) The Fund assesses the SASB Scores provided by TruValue Labs and described in further detail above and will exclude direct and indirect exposure to issuers who fail to meet internal scoring thresholds set by the Investment Manager.
- (f) The relevant issuer of sustainable bonds or equities should also follow good governance practices in terms of its management structures, employee relations, remuneration of staff and tax compliance.

## **7. Data sources and processing**

Information and data are sourced from in-house analysis, from direct engagement and interaction with Underlying Funds, companies, governments and other issuers and from third parties.

The Investment Manager may use, in the course of evaluating sustainable performance, data obtained from a variety of sources. These can include quantitative data from Bloomberg, or from our third party data sources such as TruValue Labs, the World Bank and Freedom House. Furthermore, the Investment Manager may at times blend this data to form its own view on Sustainability and create internal metrics.

The indicators applied by the Investment Manager are assessed in reliance on one or a number of third party ESG vendors. Data quality and coverage are regularly assessed. Data errors are removed where appropriate and the third party data provider is approached for an explanation and to correct the error.

The Investment Manager when utilising data to evaluate holdings also undertakes a qualitative assessment of the values and approach of an Underlying Fund manager for example, to ensure that as well as any data the Investment Manager may have collected during its investment process is backed up with qualitative evidence of how the investment helps promote environmental or social characteristics. Some of the Underlying Funds release their holdings data 1-3 months after the relevant reference period and a few Underlying Funds do not provide holdings data to third party data providers; this can make precise and timely full look-through analysis challenging.

The Investment Manager has access to multiple sources, which ensures diversity of inputs and assists with the abovementioned issues. The Investment Manager, in its sole discretion, retains the right to disapply data and/or ratings provided by third party vendors where it deems the data and/or ratings to be inaccurate or inappropriate. Furthermore, as the regulatory landscape and expectations around company disclosure become formalized, it is expected that the quality and accuracy of data will improve. The Investment Manager routinely engages with data providers to evaluate the quality of data points and has switched vendors as a result of ongoing reviews.

## **8. Limitations to methodologies and data**

The methodology applied by ESG data providers is often inconsistent, with different providers and data sources choosing to emphasize certain factors over others, with the result that different data providers or data sources may have widely diverging views as to the environmental or social characteristics of a given issuer. Data evaluation or compliance with sustainability criteria is difficult, and not all stocks or bonds are covered with an equal quality of data.

To assess company involvement in different activities, the Investment Manager, Underlying Fund managers and third-party data providers strive to obtain information directly from companies. Sources of data include annual reports, regulatory filings, sustainability reports, press releases, investor presentations, company websites, and other company disclosures. Industry databases are cross-referenced to complement company disclosures. However, the quality of available data can vary greatly, depending on the issuer, the jurisdiction in which they operate, their regulatory status and other factors.

Measurements that involve snap shots, such as the principal adverse impact indicators, can have different reference timeframes. Due to point in time assessments of, for example, previous fiscal year revenues on an individual issuer, or statements made from such an issuer that has been subject to further qualitative analysis from a third-party provider, the calculation of principal adverse impact indicators can result in a non-quantifiable margin of error. Lack of granularity in the data sources used in combination with using historical data published in, for example, annual reports means that there is both a significant time lag in snapshot metrics as well as challenges to data quality.

Historically, company disclosure in respect of carbon data has been voluntary and data providers have developed proprietary methodologies to capture outliers and in cases of non-disclosed data to use estimates. Estimates facilitate portfolio level assessments, but limits accuracy of company level assessments. Carbon emissions data quality is essential to the calculation of carbon metrics and the use of estimates may affect aggregated portfolio level data.

Limitations to norm-based research and controversial weapons research are related to the differences in methodologies rather than lack of or quality of data as they use publicly known alleged or verified incidents or controversies, such as violation of labour rights reported in the media. Different research providers have different methodologies for collecting this type of information and for how that information is assessed. Where a company is reported as breaching a global norms



principle, the Investment Manager's methodology may include reaching out to companies to get their view on the issue, any action plans, or other plans in relation to the controversy or any other relevant information.

Other limitations include a lack of ESG disclosure by issuers, a lack of data available from third-party providers on specific topics (such as biodiversity reporting), and a lag in the frequency with third-party providers publish updated ESG data points.

## **9. Due diligence**

The Investment Manager and its team of analysts carries out analysis of potential investments and ongoing monitoring through quantitative and qualitative analysis which will include a focus on the investee company / Underlying Fund's strategy, performance, risk profile and prevailing risks faced, and vehicle cost. The Investment Manager will also consider each target Fund's commitment to corporate governance and quality and experience of management. A quantitative systematic process as outlined above is periodically conducted to assess the entire portfolio of underlying holdings and to evaluate them against the SASB categories, ESG criteria and PAI criteria (each as set out in the Supplement and this Article 10 Statement).

The investment teams monitor on an ongoing basis the public statements of investee companies through financial information platforms such as Bloomberg, financial statements, regulatory announcements, financial reports and accounts, results meetings and investor days and capital markets updates.

Performance monitoring is done on at least a monthly basis in a formal setting, with ad hoc performance analysis being conducted in real time by the portfolio managers. Further to this, at these monthly meetings any changes to strategy or changes to underlying teams within Underlying Funds is discussed.

## **10. Engagement policies**

Engagement by the Investment Manager with investee companies and Underlying Fund managers will generally be through direct dialogue with the investor relations team and/or management teams or through exercising voting rights at general meetings. If the Investment Manager thinks an underlying portfolio company or Underlying Fund is not being managed in the interests of its clients or in a manner consistent with the environmental or social characteristics promoted by the Fund, it will decide how best to engage with the company or Underlying Fund to address this.

Where the Investment Manager has concerns about the performance or strategy of an investee company or Underlying Fund, or where it has reason to believe that a Fund's rights as a shareholder is being compromised in any way, the Investment Manager will, in appropriate circumstances, escalate its involvement with investee companies or the relevant Underlying Fund manager. If a satisfactory response is not possible the Investment Manager may escalate this further by one or more of the actions below:



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ASSET MANAGEMENT

- holding additional meetings with management specifically to discuss concerns;
- intervening jointly with other institutions on particular issues;
- submitting resolutions for consideration at general meetings; and/or
- disinvesting from the relevant position.

**11. Designated reference benchmark**

The Fund does not have a 'Designated reference benchmark' to attain the environmental or social characteristics promoted.