

# SFDR PRODUCT DISCLOSURE

## NIKKO AM GLOBAL EQUITY FUND

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## (a) Resumen

Las características medioambientales y sociales de Nikko AM Global Equity Fund implican gestionar unos objetivos y límites frente a varias de las principales incidencias adversas sobre los factores de sostenibilidad, y garantizar que:

- La intensidad de carbono del Subfondo se mantenga por lo menos un 20% por debajo de la del MSCI ACWI Total Net Return Index.
- No se efectúen inversiones en empresas expuestas a armas controvertidas, o que infrinjan los principios del Pacto Mundial de las Naciones Unidas o las Líneas Directrices de la Organización de Cooperación y Desarrollo Económicos para Empresas Multinacionales

Asimismo, el Subfondo no invertirá en valores que pertenezcan al sector de tabaco según la clasificación GICS.

El Gestor de inversiones también garantizará que las empresas en las que se invierte observen buenas prácticas de gobernanza mediante sus actividades de análisis, implicación y voto por delegación. Algunos de los criterios supervisados en este contexto serán, por ejemplo: que los consejos de las empresas en las que se invierte sean suficientemente independientes para llevar a cabo su supervisión por cuenta de los inversores; actuar con integridad sin soborno ni corrupción; que las empresas cumplan los principios del Pacto Mundial de las Naciones Unidas; que hayan presentado unos estados financieros e informes correctos que hayan sido auditados externamente; que las empresas no hayan estado expuestas a controversias muy graves en materia de derechos laborales; que las empresas divulguen información clara y completa sobre la remuneración; que mantengan una estructura salarial apropiada orientada al valor de los accionistas a largo plazo; y que cumplan la legislación tributaria pertinente.

El Gestor de inversiones también garantizará que el Subfondo esté invertido en todo momento en consonancia con los límites vinculantes arriba indicados y adoptará medidas en caso de que se detecten desviaciones en sus revisiones periódicas.

El seguimiento de los compromisos medioambientales, sociales y de gobernanza («**ESG**») arriba indicados tiene, no obstante, unas limitaciones debido a retrasos en la divulgación de información y la ausencia de datos para determinadas empresas. Para gestionar estos problemas, hay un proceso de revisión de la calidad de los datos ESG utilizados y podrán utilizarse datos indicativos.

La estrategia del Subfondo se centra en seleccionar inversiones de Futuro de Calidad. El Gestor de inversiones identifica las empresas de Futuro de Calidad mediante su análisis ascendente (*bottom-up*) con su enfoque de Cuatro Pilares, que analiza la calidad de la franquicia, la gestión y el balance de una empresa, y calcula una valoración.

Por consiguiente, el proceso de diligencia debida del Gestor de inversiones comporta los compromisos siguientes: centrarse en empresas de Futuro de Calidad orientadas a un propósito; la implicación; respetar unas características ESG previamente establecidas; e integrar los aspectos ESG en el proceso de inversión

El Subfondo promueve características medioambientales o sociales, pero no tiene como objetivo una inversión sostenible y no usa un índice de referencia que se ajuste a las características medioambientales o sociales que promueve.

## (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'**

As part of its Future Quality investment approach, the Investment Manager analyses ESG factors at every stage of the investment. The Investment Manager more specifically considers sustainability indicators both within a set of binding limits and during its engagement process.

Sustainability indicators, including PAI factors as referred to in Annex I of the SFDR Delegated Act, are considered pre-investment by Investment Manager. The pre-investment process notably requires ensuring that below screening criteria are complied with:

- No investment is made in companies contravening the UN Global Compact principles (**PAI**).
- No investment is made in companies exposed to controversial weapons (**PAI**).
- No investment is made in companies contravening to the Organisation for Economic Co-operation and Development Guidelines for Multinational Enterprises (**PAI** thereafter named "OECD guidelines") by ensuring in particular that targeted companies do not face controversies relating to the environment, customers, labour rights, human rights or governance that are assessed to be "very severe" by the Investment Manager.
- No investment in securities that belong to the tobacco GICs sector.

As part of its pre-investment due diligence, the Investment Manager also commits to review the Scope level 1 and 2 carbon emissions (**PAI**) of companies that are considered for investment and ensure that the Sub-Fund carbon intensity remains at least 20% lower than the MSCI ACWI Total Return Net Index carbon intensity.

Post-investment the Investment Manager will monitor the above ESG characteristics to ensure that they remain complied with and take action if deviations are detected.

### **(d) Investment strategy**

#### **Environmental or social characteristics**

The Investment Manager aims to manage a portfolio which has a low carbon intensity and has no major controversies on issues related to environmental and human rights. These commitments can be measured and the Investment Manager believes they are consistent with 'Future Quality' companies – i.e. companies that in the Investment Manager's view, will attain and sustain high returns on invested capital over the long-term.

The characteristics, how they are assessed, measured and then reported are as follows:

#### ***A portfolio with substantially lower carbon intensity relative to its benchmark:***

The portfolio's carbon footprint is reported in the Investment Manager's quarterly ESG report, which can be downloaded on <https://emea.nikkoam.com/ucits/nguf>. The data is also monitored by the Investment Manager's Risk & Performance team on a monthly basis.

***No exposure to companies violating the UN Global Compact principles or which face very severe controversies relating to the environment, customers, labour rights, human rights or governance:***

The Investment Manager seeks to avoid companies that are violating the UN Global Compact principles or have very severe controversies related to OECD Guidelines for Multinational Enterprises. This is measured at the stock level and is part of pre-trade compliance checks. The Investment Manager accepts that not all companies are perfect and on occasions some will face issues that may significantly impact value. On these few occasions, the Investment Manager will engage with management to understand the controversy and make sure the management team is following a path to recovery. The data is also monitored by independent control teams on a monthly basis.

***We do not invest in companies involved in the manufacture or sale of either tobacco or controversial weapons:***

The Investment Manager will not invest in “tobacco” securities as defined by Global Industry Classification Standards or in companies exposed to controversial weapons. This is measured and assessed at the stock level and is part of pre-trade compliance checks and is monitored on a monthly basis.

**Good governance**

The Investment Manager has outlined the Sub-Fund’s Good Governance criteria:

- A company’s board is responsible for overseeing management on behalf of investors. The Investment Manager believes that a board should have at least 1 independent board member and that member should have no ties to the company or its shareholders.
- Good governance breeds good business ethics. A company should act with integrity and without bribery and corruption. There should be no very severe controversies relating to governance. Companies should adhere to the UN Global Compact principles.
- Good governance should result in a company providing investors with accurate financial statements and reports that have been subjected to external audit.
- Sound employee relations are integral to the success of a company. The Investment Manager believes that good governance results in sound employee relations and in turn Future Quality. Good governance will ensure no very severe controversies relating to labour rights. Companies should adhere to the UN Global Compact principles.
- The Investment Manager believes that a company should have clear and comprehensive compensation disclosures. A company should also maintain an appropriate pay structure with an emphasis on long-term shareholder value.
- Companies that significantly breach tax regulation do not demonstrate good governance. The Investment Manager believes adherence to the appropriate tax laws is essential for Future Quality companies.

***How does the Investment Manager apply good governance?***

*Research*

All investment ideas are subject to the same detailed, fundamental, bottom-up research using the Four-Pillar framework prior to being presented to the investment team.

The Management Quality Pillar identifies strong management teams with proven track records and clear business strategies. The Investment Manager expects the management teams of its investment companies to be able to attract and retain the best talent and foster positive company cultures. Potential investments are also attractive to the Investment Manager if they

can provide value for all stakeholders, set stretching ESG-related targets, and embrace robust governance standards.

#### Engagement

The Sub-Fund portfolio managers and analysts engage with issuers as part of the investment process, both before and during the period of investment. This engagement would cover investee companies alignment with the Investment Manager's Future Quality, good governance criteria and environmental and social characteristics.

#### Proxy Voting

The Investment Manager believes proxy voting is a key component in the ongoing dialogue with companies in which it invests and as such, is an important aspect of Future Quality investing and good governance. The Sub-Fund's strategy is to exercise proxy voting rights independently; the Investment Manager takes an active role in voting and does not use standing instructions.

The Investment Manager's voting behaviour is as much as possible aligned with its engagement approach. When required, the Investment Manager uses its voting rights to re-enforce its good governance and Future Quality criteria.

### **(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 negative filters (environmental, customer, labour rights and human rights very severe controversies, UN Global Compact principles and OECD Guidelines for Multinational Enterprises, sectoral exclusions including controversial weapons and tobacco) that are applied to the Sub-Fund's investment universe will be monitored on an ongoing basis.

By selecting companies from this adjusted investment universe, the Sub-Fund will aim to deliver its financial investment objective by ensuring that the Sub-Fund average carbon intensity remains at least 20% lower than its benchmark, being the MSCI ACWI Total Return Index.

The Sub-Fund will therefore always be fully invested in line with its negative filters and relative carbon emissions binding limit.

### **(f) Monitoring of environmental or social characteristics**

#### **Carbon intensity**

The Sub-Fund's relative carbon intensity is calculated based on companies scope 1 & 2 emissions. Prior to investment in a new position the portfolio management team ensures that the addition of a new position won't cause the previously calculated relative carbon intensity to increase above its limit.

In addition, the portfolio management and independent control teams will review the Sub-Fund's relative carbon intensity at least on a monthly basis.

Should the Sub-Fund's relative carbon intensity increase above the Sub-Fund's binding limit as a result of market movements or updated GHG emissions data, the investment manager would ensure that new trades don't contribute to increase the relative carbon intensity further and that it decreases below the specified limit during the course of the next quarter.

### **Negative screens**

The portfolio management team will screen new company purchases against all applicable negative screens (no exposure to companies involved in UN GC & OECD principles violations, the manufacture or selling of controversial weapons, tobacco & very severe controversies).

In addition, the portfolio management and independent control teams will review existing positions against those negative screens at least on a monthly basis. Should a position be deemed no longer compliant with the negative screen the investment manager shall place an immediate block on any buy transactions. The investment manager will then enter a period of engagement with the company to seek resolution. If no resolution is forthcoming a sale would be made at the appropriate time.

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

#### **Carbon intensity**

The investment manager will ensure that the Sub-Fund's scope 1 & scope 2 GHG emissions are at least 20% lower than the MSCI ACWI Total Return Net Index Scope 1 & Scope 2 GHG emissions based on the data provided by an independent ESG data team.

#### **Negative screens**

The investment manager will ensure that investee companies comply with the negative screens based on very severe controversies, UN Global Compact principles, OECD Guidelines for Multinational Enterprises, the manufacture or selling of controversial weapons and the exposure to the tobacco sector by reviewing data and controversies reported by the independent ESG data team.

The portfolio management team together with ESG specialists will review controversies on at least a monthly basis in order to classify them and identify very severe controversies.

### **(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:

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

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.

As of the 30<sup>th</sup> September 2022, the proportion of data that had to be estimated amounted to 28% at Sub-Fund level and 14.7% at benchmark level.

### **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 portfolio 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. Despite the review process implemented the GHG emissions data will therefore only be updated when new disclosures are available (and therefore delayed compared to the investment decision) and could be impacted by potential proxy biases.

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 focus of the Sub-Fund's strategy is picking Future Quality investments. The Investment Manager identifies Future Quality companies through bottom-up research using its Four-Pillar approach, which analyses the quality of a company's Franchise, Management and Balance Sheet, as well as calculating a Valuation.

The ability to sustain returns over the long term is a key ingredient of strong Future Quality investment opportunities. Increasingly, the Investment Manager finds that this potential is demonstrated most robustly either by companies with high-quality environmental, social and corporate governance ("ESG") credentials and management teams that provide value to all stakeholders, or those businesses that aspire towards a high-quality ESG and stakeholder focus.

The Investment Manager believes that there is a strong connection between ESG considerations and Future Quality investments. Not least because, in its experience, companies that the Investment Manager rates highly from an ESG standpoint often make effective Future



Quality investments. When the Investment Manager analyses Future Quality potential through its Four-Pillar framework, there is a significant element of ESG-related research.

The Investment Manager due-diligence process therefore revolves around the following commitments:

### **Purpose led Future Quality Companies**

- Focus on companies creating stakeholder value
- High and sustainable cash-flow returns delivered by trustworthy management teams
- Believing that companies that target solutions for today's problems are likely to be among the long-term winners

### **Engagement**

- ESG ratings and scores are imperfect and engagement helps to understand why
- ESG issues management is aligned with long term investment horizon
- We can help companies address their apparent weaknesses

### **ESG characteristics**

- Substantially lower carbon intensity relative to the Sub-Fund benchmark
- No violations of UN Global Compact principles
- No very severe controversies related to OECD Guidelines for Multinational Enterprises, environment, human rights, customers, labour rights or governance.
- No exposure to controversial weapons
- No tobacco

### **ESG integration**

- ESG helps to find Future Quality companies
- ESG research is performed by the portfolio management team directly aided by a team of dedicated ESG specialists
- ESG decisions are not delegated to other teams
- ESG factors are analysed at every stage of the investment

### **(k) Engagement Policies**

The Sub-Fund's strategy involves portfolio managers and analysts engaging with issuers as part of the investment process, both before and during the period of investment. Should a company, at any point, not fulfil the Investment Manager's Future Quality criteria, the Investment Manager would engage with management. The Investment Manager will seek commitments from companies to address any concerns raised by the portfolio managers. Subsequently, the Investment Manager monitors these issues and company progress. All engagements are recorded within the Investment Manager's research platform.



**(l) Designated reference benchmark**

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