

## SUSTAINABILITY-RELATED DISCLOSURE

### C WorldWide International Equities ADR (the “Strategy”),

Legal entity identifier: 967600QIGO353E50TF04

This sustainability-related disclosure has been prepared in accordance with article 10 of Regulation (EU) 2019/2088 of the European Parliament and the Council of 27 November 2019 on sustainability-related disclosures in the financial sector (the “Disclosure Regulation”).

The information in this sustainability-related disclosure is a supplement to the pre-contractual disclosure.

### 1. Summary

The Strategy promotes **environmental or social characteristics** but does not have as its objective sustainable investment.

The Strategy promotes environmental and social characteristics by:

- Considering selected principal adverse impacts (PAI) on sustainability factors (**principal adverse impacts**).
- Avoiding investments in investee companies involved in controversial weapons (**controversial weapons**).
- Avoiding investments in companies exceeding a certain level of involvement in small arms (**sector exclusions**).

The **investment strategy** of the Strategy includes the following elements:

- Principal adverse impacts,
- Controversial weapons,
- Sector exclusions,
- UN Global Compact,
- Active ownership, and
- Norm-based screening.

The **binding elements of the investment strategy** used to select the investments to attain each of the environmental or social characteristics promoted by the Strategy are principal adverse impacts, controversial weapons and sector exclusions.

The attainment of the environmental or social characteristics promoted by the Strategy are measured by the following **sustainability indicators**:

- **Principal adverse impacts:** The selected PAI Indicators specified in the PAI Overview of the Investment Manager.
- **Controversial weapons:** The number of investee companies of the Strategy involved in the core weapon system of controversial weapons, or components or services of the core weapon system that are considered tailor-made and essential for the lethal use of the weapon.

- **Sector exclusions:** The number of investee companies of the Strategy exceeding a certain level of involvement in small arms.

The Strategy plans to **allocate a minimum of 90% of the assets** of the Strategy to investments in equities. All equities are used to meet the environmental or social characteristics promoted by the Strategy, in accordance with the binding elements of the investment strategy.

The investee companies are systematically **screened and monitored** prior to the initial investment and continuously during the holding period to ensure that the investments are made in accordance with the binding elements of the investment strategy and that the investee companies follow good governance practices. Furthermore, the investee companies are systematically screened for violations of international conventions, norms and standards relating to sustainability issues such as human rights, labour rights, the environment and business ethics.

The environmental or social characteristics of the Strategy will primarily be attained using **data** supplied by Morningstar Sustainalytics. The quality of the research provided is evaluated on an ongoing basis to ensure a high data quality. Morningstar Sustainalytics generally update their company specific data annually based on annual reporting by the companies. Company specific data will therefore not always be fully updated.

Furthermore, the environmental or social characteristics of the Strategy will be attained using a proprietary analysis tool to identify and assess principal adverse impacts on sustainability factors. Principal adverse impacts are identified and assessed prior to the initial investment in an investee company and regularly during the holding period. All the PAI Indicators are sourced via Bloomberg to the extent investee companies report and disclose. For some PAI indicators data from several data providers are applied.

**Engagement** with the management of an investee company is conducted through meetings or collectively with other investors. The decision to engage in an investee company and the method of engagement is made based on a proportionality consideration. All general meetings of investee companies are monitored and voting rights are exercised.

## **2. No sustainable investment objective**

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

## **3. Environmental or social characteristics of the financial product**

### **Principal adverse impacts**

The Strategy promotes environmental and social characteristics by considering selected principal adverse impacts on sustainability factors.

### **Controversial weapons**

The Strategy promotes social characteristics by avoiding investments in investee companies involved in controversial weapons.

**Sector exclusions**

The Strategy promotes social characteristics by avoiding investments in companies exceeding a certain level of involvement in small arms.

## **4. Investment strategy**

The investment strategy of the Strategy includes the following elements:

**Principal adverse impacts**

Principal adverse impacts are identified, prioritized, and assessed from a materiality perspective relevant to the specific investment strategy of the Strategy. A proprietary analysis tool based on PAI indicators is applied. In addition, the Strategy will consider principal adverse impacts through active ownership. Principal adverse impacts are considered as part of the investment process and regularly during the holding period of an investee company.

**Controversial weapons**

Before an investment is made in an investee company and regularly during the holding period the Strategy conducts screening of the activities of each investee company to avoid investments in companies involved in controversial weapons.

**Sector exclusions**

Before an investment is made in an investee company and regularly during the holding period the Strategy conducts screening of the activities of the investee company to avoid investments in companies exceeding a certain level of involvement in specific activities. If the activities of an investee company exceed the level of involvement the shares in the investee company will be sold within a reasonable time-period and in accordance with the general obligation to execute all orders on terms most favourable to the client.

**UN Global Compact**

Before the initial investment in an investee company is made and regularly during the holding period it will be evaluated whether an investee company is compliant with the 10 principles of the UN Global Compact.

**Active ownership**

Engagement is an integral part of the investment process. It is anchored directly with the portfolio management team responsible for the Strategy. Through engagement sustainable business conduct is encouraged. All general meetings of investee companies are monitored and voting rights are exercised. It is not possible to exercise voting rights in investee companies for all depositary receipts. For depositary receipts where it is possible to exercise voting rights reasonable efforts will be made to exercise such rights.

**Norm-based screening**

The investee companies are systematically screened and monitored prior to the initial investment and continuously during the holding period for violations of international conventions, norms and standards relating to sustainability issues such as human rights, labour rights, the environment and business ethics.

**The binding elements of the investment strategy**

The binding elements of the investment strategy used to select the investments to attain each of the environmental or social characteristics promoted by the Strategy are principal adverse impacts, controversial weapons and sector exclusions.

**The policy to assess good governance practices of the investee companies**

The policy to assess good governance practices of investee companies is described in the Responsible Investment Policy of the C WorldWide Group. Screenings are performed prior to the initial investment and continuously during the holding period in order to ensure that the investee companies in which the Strategy invest follow good governance practices, including practices relating to sound management structures, shareholder rights, employee relations, remuneration of staff and tax compliance. Furthermore, the Strategy will attempt to strengthen good governance practices through active ownership.

**5. Proportion of investments**

The investments of the Strategy mainly consist of equities, including depositary receipts. All equities are used to meet the environmental or social characteristics promoted by the Strategy, in accordance with the binding elements of the investment strategy. The Strategy plans to allocate a minimum of 90% of the assets of the Strategy to investments in equities.

The remaining investments of the Strategy consist of cash held as ancillary liquidity.

All investments in investee companies constitute direct exposure to such investee companies. The Strategy does not use derivatives.

**6. Monitoring of environmental or social characteristics**

The environmental or social characteristics of the Strategy and the sustainability indicators used to measure the attainment of each of those environmental or social characteristics promoted by the financial product are continuously monitored.

The investee companies are systematically screened and monitored prior to the initial investment and continuously during the holding period to ensure that the investments are made in accordance with the binding elements of the investment strategy and that the investee companies follow good governance practices.

Monitoring of the investee companies can be described in two parts:

*Initial investments*

Before an initial investment is made the investee company is screened via Morningstar Sustainalytics and, in the case of PAIs, via a proprietary analysis tool, and the investment will only be effectuated if the screening proves satisfactory that the investment will not cause a breach of the binding elements of the investment strategy and that the investee company follows good governance practices.

*Holding period*

During the holding period, all investee companies are screened quarterly via Morningstar Sustainalytics. If a screening reveals a breach of the sector exclusions or that the investee company is involved in controversial weapons or does not follow good governance practices, the shares in the investee company will be sold within a reasonable time-period and in accordance with the general obligation to execute all orders on terms most favourable to the client.

As for the PAIs all investee companies are screened regularly – and as a minimum once a year - during the holding period via a proprietary analysis tool. Where material adverse impacts have been identified in relation to an investee company, such impacts may form the basis for an engagement with the investee company.

## 7. Methodologies

The attainment of the environmental or social characteristics promoted by the Strategy are measured by the following sustainability indicators:

### Principal adverse impacts

The Strategy considers principal adverse impacts on sustainability factors as part of its investment decision process as specified in the PAI Overview of the Investment Manager. The PAI Overview is available at [PAI overview - C WorldWide Asset Management](#)

Principal adverse impacts are defined as the most significant negative impacts of investment decisions on sustainability factors relating to environmental, social or employee matters, respect for human rights, anti-corruption and anti-bribery matters.

The PAI-indicators are considered to assess the principal adverse impacts on sustainability factors.

### Controversial weapons

Controversial weapons are defined as weapons that have a disproportionate and indiscriminate impact on civilian populations, sometimes even years after a conflict has ended. Some controversial weapons are illegal, as their production and use are prohibited by international legal instruments such as conventions or bans. Others are legal.

Controversial weapons include but are not restricted to anti-personnel mines, biological and chemical weapons, cluster weapons, depleted uranium munitions, white phosphorus munition and nuclear weapons.

Exclusion of controversial weapons is measured by the number of investee companies of the Strategy involved in the core weapon system of controversial weapons, or components or services of the core weapon system that are considered tailor-made and essential for the lethal use of the weapon.

Involvement is identified as an investee company's own operations, through a subsidiary where the investee company owns more than 10% of the voting rights or where a directly involved company holds 10% or more of the investee company's voting rights. Links below 10% do not give rise to involvement, so the Strategy may invest in a company holding such a stake in a company involved in controversial weapons.

### Sector exclusions

The number of investee companies of the Strategy exceeding a certain level of involvement in the activities specified below:

| Activities | Description of Activities                                                                                                                                  | Level of involvement |
|------------|------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------|
| Small arms | Companies involved in the manufacturing and sale of assault weapons or key components, accessories or ammunition of assault weapons to civilian customers. | 5%                   |

|  |                                                                                            |    |
|--|--------------------------------------------------------------------------------------------|----|
|  | Companies involved in the retail or distribution of assault weapons to civilian customers. | 5% |
|--|--------------------------------------------------------------------------------------------|----|

Generally, the level of involvement is measured as the percentage of an investee company's revenue derived from the relevant activity either directly or indirectly through corporate ownership. The estimation of revenue is either based on data provided by the investee companies or data provided by Morningstar Sustainalytics.

If an investee company holds a majority stake (i.e., 50% and above) in another company that is considered directly involved in a relevant activity, the investee company is considered involved in the same category of involvement as the subsidiary. In these cases, the subsidiary's revenues are attributed to the investee company. In the case of a minority stake (i.e. 10-50%), in another company that is considered directly involved in a relevant activity, the revenues of the subsidiary are not attributed to the investee company. Where the investee company holds a minority stake in another company, the Strategy does not screen that other company for involvement in a relevant activity. As a result, the Strategy may invest in an investee company that holds a minority stake in another company that is involved in an excluded activity.

## 8. Data sources and processing

The environmental or social characteristics of the Strategy will primarily be attained using data supplied by the global sustainability research provider Morningstar Sustainalytics. The quality of the research provided by Morningstar Sustainalytics is evaluated on an ongoing basis to ensure a high data quality.

The data supplied by Morningstar Sustainalytics is received in a form where it can be used without further processing for determining whether an investee company is engaged in activities that exceed the limits of the sector exclusions.

The data supplied by Morningstar Sustainalytics will to a limited extent be estimated where no underlying data is available from the investee companies.

Furthermore, the environmental or social characteristics of the Strategy will be attained using a proprietary analysis tool to identify and assess principal adverse impacts on sustainability factors. Our PAI analysis tool applies data from external sustainability data providers, company disclosure and internal research. The external data used in the assessment of the principal adverse impacts vary. All the PAI Indicators are sourced via Bloomberg to the extent companies report and disclose. For some PAI indicators data from several data providers are applied.

## 9. Limitations to methodologies and data

Morningstar Sustainalytics generally update their company specific data annually based on annual reporting by the companies. Company specific data will therefore not always be fully updated.

In relation to IPO's and in other rare occasions an investee company will not be covered or fully covered by research from Morningstar Sustainalytics or the quality of the data supplied by Morningstar Sustainalytics will be of an insufficient quality. For these investee companies alternative internal and/or external research and data will be applied.

The quality of our methodology for identifying and assessing principal adverse impacts is dependent on quality data from the investee companies. Where quality data from the investee companies is not available, we rely on data from third-party service providers. Such data might not be completely accurate.

Limitations to the methodology and data are not expected to affect the attainment of the environmental or social characteristics promoted by the Strategy in any material way.

## **10. Due diligence**

The investee companies are systematically screened and monitored prior to the initial investment and continuously during the holding period for violations of international conventions, norms and standards relating to sustainability issues such as human rights, labour rights, the environment and business ethics. The due diligence is based on internal analysis, external research as well as screenings via Morningstar Sustainalytics.

Furthermore, the Investment Manager has developed a proprietary analysis tool to identify and assess principal adverse impacts across the PAI indicators considered by the Strategy. Principal adverse impacts are identified and assessed prior to the primary investment in an investee company and regularly during the holding period.

## **11. Engagement policies**

Engagement is an integral part of the investment process. It is anchored directly with the portfolio management team responsible for the Strategy. Through engagement sustainable business conduct is encouraged.

The management of an investee company is engaged directly through meetings or collectively with other investors. This approach provides access to highly qualified specialists with a strong knowledge and a network that can be leveraged in the ongoing engagement with the investee companies on key issues, including sustainability issues such as human rights, labour rights, and environmental issues.

The decision to engage an investee company in relation to a specific matter and the method of engagement is made based on a proportionality consideration of several factors, including the size of the shareholding in the investee company, the materiality of the matter, the reliability of the data, the possibility of effecting the behaviour of the investee company and the resources required to conduct the engagement.

All general meetings of investee companies are monitored and voting rights are exercised. It is not possible to exercise voting rights in investee companies for all depositary receipts. For depositary receipts where it is possible to exercise voting rights reasonable efforts will be made to exercise such rights.

## **12. Revision history**

To see the revision history, please follow this link: [Sustainability - C WorldWide Asset Management](#)