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# SFDR Annual Report:

Principal Adverse Sustainability  
Impacts (PASI) Statement

2022

# SFDR Report: Principal Adverse Sustainability Impacts (PASI) Statement

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## Financial market participant

Veritas Asset Management LLP (“Veritas” or “VAM LLP”)

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## Summary

Veritas Asset Management LLP (549300RL3U27X2Y98H34), the Investment Manager is not obliged to consider principal adverse impacts on sustainability factors (“PAIs”) under SFDR as it is not subject to the entity level reporting requirements under Article 4 of SFDR. However, the Investment Manager has determined to have regard to a specific set of PAIs set out in Annex I of the regulatory technical standards (“RTS”) published by the EU Commission in furtherance of SFDR (Commission Delegated Regulation (EU) 2022/1288), as a mechanism to allow it to consider any negative external effect of its investments on environmental and social characteristics. For this reason, the investment manager has opted to publish reporting on PAIs where feasible.

The PAIs that have been deemed relevant to assets managed include: 1. GHG emissions, 2. Carbon footprint, 3. GHG intensity of investee companies, 4. Exposure to companies active in the fossil fuel sector, 10. Violations of UN Global Compact principles and Organisation for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises and 14. Exposure to controversial weapons (anti-personnel mines, cluster munitions, chemical weapons, and biological weapons).

To ensure transparency of the highest level, the report covers all PAIs set out in Annex I of the regulatory technical standards (“RTS”) published by the EU Commission in furtherance of SFDR (Commission Delegated Regulation (EU) 2022/1288), irrespective of materiality. The metrics reported are dependent on data availability and asset coverage. The reported impact may not include all assets if data could not be obtained or estimated. VAM LLP utilise the third party, MSCI ESG Research LLC, for external reporting. The underlying data and methodologies applied may be subject to revisions as industry standards evolve.

This principal adverse impacts statement covers the reference period from 1 January 2022 to 31 December 2022. As this is the first reference period, the report makes no comparison on impact compared to the previous year.

The present statement is the consolidated principal adverse sustainability impacts statement of Veritas Asset Management LLP, this includes 100% of Assets Under Management (AUM).

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# SFDR Report: Principal Adverse Sustainability Impacts (PASI) Statement

## Principal adverse sustainability impacts statement

### INDICATORS APPLICABLE TO INVESTMENTS IN INVESTEE COMPANIES

#### CLIMATE AND OTHER ENVIRONMENT-RELATED INDICATORS

Adverse Sustainability Indicator	Metric	Impact	Asset Coverage	Explanation	Actions taken
<b>Greenhouse Gas Emissions</b>					
1. GHG Emissions	Scope 1 GHG emissions	154,408.44	99.92%	Sum of portfolio companies' Carbon Emissions - Scope 1 (tCO2e) weighted by the portfolio's value of investment in a company and by the company's most recently available enterprise value including cash.	Engagement and voting, as required.
	Scope 2 GHG emissions	113,373.29	99.92%	Sum of portfolio companies' Carbon Emissions - Scope 2 (tCO2e) weighted by the portfolio's value of investment in a company and by the company's most recently available enterprise value including cash.	Engagement and voting, as required.
	Scope 3 GHG emissions	6,098,318.89	99.89%	Sum of portfolio companies' Scope 3 - Total Emission Estimated (tCO2e) weighted by the portfolio's value of investment in a company and by the company's most recently available enterprise value including cash.	Engagement and voting, as required.
	Total GHG emissions	6,366,135.00	99.89%	The total annual Scope 1, Scope 2, and estimated Scope 3 GHG emissions associated with the market value of the portfolio. Companies' carbon emissions are apportioned across all outstanding shares and bonds (based on the most recently available enterprise value including cash).	Engagement and voting, as required.

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### INDICATORS APPLICABLE TO INVESTMENTS IN INVESTEE COMPANIES

#### CLIMATE AND OTHER ENVIRONMENT-RELATED INDICATORS

Adverse Sustainability Indicator	Metric	Impact	Asset Coverage	Explanation	Actions taken
<b>Greenhouse Gas Emissions</b>					
<b>2. Carbon Footprint</b>	Carbon Footprint	268.60	99.89%	The total annual Scope 1, Scope 2, and estimated Scope 3 GHG emissions associated with 1 million EUR invested in the portfolio. Companies' carbon emissions are apportioned across all outstanding shares and bonds (based on the most recently available enterprise value including cash).	Engagement and voting, as required.
<b>3. GHG intensity of investee company</b>	GHG Intensity of investee companies	659.91	99.89%	The portfolio's weighted average of its holding issuers' GHG Intensity (Scope 1, Scope 2 and estimated Scope 3 GHG emissions/EUR million revenue).	Engagement and voting, as required.
<b>4. Exposure to companies active in the fossil fuel sector</b>	Share of investments in companies active in the fossil fuel sector	5.96%	99.62%	The percentage of the portfolio's market value exposed to issuers with fossil fuels related activities, including extraction, processing, storage and transportation of petroleum products, natural gas, and thermal and metallurgical coal.	Business involvement monitoring

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### INDICATORS APPLICABLE TO INVESTMENTS IN INVESTEE COMPANIES

#### CLIMATE AND OTHER ENVIRONMENT-RELATED INDICATORS

Adverse Sustainability Indicator	Metric	Impact	Asset Coverage	Explanation	Actions taken
<b>Greenhouse Gas Emissions</b>					
<b>5. Share of non-renewable energy consumption and production</b>	Share of non-renewable energy consumption and production	72.85%	81.13%	The portfolio's weighted average of issuers' energy consumption and/or production from non-renewable sources as a percentage of total energy used and/or generated.	Not required
<b>6. Energy consumption intensity per high impact climate sector</b>	NACE Code A (Agriculture, Forestry and Fishing)	N/A	86.49%	The portfolio's weighted average of Energy Consumption Intensity (GwH/million EUR revenue) for issuers classified within NACE Code A (Agriculture, Forestry and Fishing)	Not required
	NACE Code B (Mining and Quarrying)	N/A	86.49%	The portfolio's weighted average of Energy Consumption Intensity (GwH/million EUR revenue) for issuers classified within NACE Code B (Mining and Quarrying)	Not required
	NACE Code C (Manufacturing)	0.22	86.49%	The portfolio's weighted average of Energy Consumption Intensity (GwH/million EUR revenue) for issuers classified within NACE Code C (Manufacturing)	Not required

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#### CLIMATE AND OTHER ENVIRONMENT-RELATED INDICATORS

Adverse Sustainability Indicator	Metric	Impact	Asset Coverage	Explanation	Actions taken
<b>Greenhouse Gas Emissions</b>					
	NACE Code D (Electricity, Gas, Steam and Air Conditioning Supply)	N/A	86.49%	The portfolio's weighted average of Energy Consumption Intensity (GwH/million EUR revenue) for issuers classified within NACE Code D (Electricity, Gas, Steam and Air Conditioning Supply)	Not required
	NACE Code E (Water Supply; Sewerage, Waste Management and Remediation Activities)	N/A	86.49%	The portfolio's weighted average of Energy Consumption Intensity (GwH/million EUR revenue) for issuers classified within NACE Code E (Water Supply; Sewerage, Waste Management and Remediation Activities)	Not required
	NACE Code F (Construction)	0.18	86.49%	The portfolio's weighted average of Energy Consumption Intensity (GwH/million EUR revenue) for issuers classified within NACE Code F (Construction)	Not required
	NACE Code G (Wholesale and Retail Trade; Repair of Motor Vehicles and Motorcycles)	0.04	86.49%	The fund's weighted average of Energy Consumption Intensity (GwH/million EUR revenue) for issuers classified within NACE Code G (Wholesale and Retail Trade; Repair of Motor Vehicles and Motorcycles)	Not required

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#### CLIMATE AND OTHER ENVIRONMENT-RELATED INDICATORS

Adverse Sustainability Indicator	Metric	Impact	Asset Coverage	Explanation	Actions taken
<b>Greenhouse Gas Emissions</b>					
	NACE Code H (Transportation and Storage)	1.50	86.49%	The portfolio's weighted average of Energy Consumption Intensity (GwH/million EUR revenue) for issuers classified within NACE Code H (Transportation and Storage)	Not required
	NACE Code L (Real Estate Activities)	0.04	86.49%	The portfolio's weighted average of Energy Consumption Intensity (GwH/million EUR revenue) for issuers classified within NACE Code L (Real Estate Activities)	Not required
<b>Biodiversity</b>					
<b>7. Activities negatively affecting biodiversity-sensitive areas</b>	Share of investments in investee companies with sites/operations located in or near to biodiversity sensitive areas where activities of those investee companies negatively affect those areas	0.00%	99.65%	The percentage of the portfolio's market value exposed to issuers' that reported having operations in or near biodiversity sensitive areas and have been implicated in controversies with severe or very severe impacts on the environment.	Not required

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### Water

<b>8. Emissions to water</b>	Tonnes of emissions to water generated by investee companies per million EUR invested, expressed as a weighted average	0.00	1.97%	The total annual wastewater discharged (metric tons reported) into surface waters as a result of industrial or manufacturing activities associated with 1 million EUR invested in the portfolio . Companies' water emissions are apportioned across all outstanding shares and bonds (based on the most recently available enterprise value including cash).	Not required
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### Waste

<b>9. Hazardous waste ratio</b>	Tonnes of hazardous waste generated by investee companies per million EUR invested, expressed as a weighted average	0.30	33.08%	The total annual hazardous waste (metric tons reported) associated with 1 million EUR invested in the portfolio. Companies' hazardous waste is apportioned across all outstanding shares and bonds (based on the most recently available enterprise value including cash).	Not required
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### INDICATORS APPLICABLE TO INVESTMENTS IN INVESTEE COMPANIES

#### SOCIAL AND EMPLOYEE, RESPECT FOR HUMAN RIGHTS, ANTI-CORRUPTION AND ANTI-BRIBERY MATTERS

Adverse Sustainability Indicator	Metric	Impact	Asset Coverage	Explanation	Actions taken
<b>10. Violations of UN Global Compact principles and Organisation for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises</b>	Share of investments in investee companies that have been involved in violations of the UNGC principles or OECD Guidelines for Multinational Enterprises	0.00%	99.65%	The percentage of the portfolio's market value exposed to issuers with very severe controversies related to the company's operations and/or products.	Controversy's monitoring and engagement, as required.



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### INDICATORS APPLICABLE TO INVESTMENTS IN INVESTEE COMPANIES

#### SOCIAL AND EMPLOYEE, RESPECT FOR HUMAN RIGHTS, ANTI-CORRUPTION AND ANTI-BRIBERY MATTERS

Adverse Sustainability Indicator	Metric	Impact	Asset Coverage	Explanation	Actions taken
<b>Social and employee matters</b>					
<b>11. Lack of processes and compliance mechanisms to monitor compliance with UN Global Compact principles and OECD Guidelines for Multinational Enterprises</b>	Share of investments in investee companies without policies to monitor compliance with the UNGC principles or OECD Guidelines for Multinational Enterprises or grievance /complaints handling mechanisms to address violations of the UNGC principles or OECD Guidelines for Multinational Enterprises	61.76%	99.62%	The percentage of the portfolio's market value exposed to issuers that are not signatories in the UN Global Compact.	Not required
<b>12. Unadjusted gender pay gap</b>	Average unadjusted gender pay gap of investee companies	6.32%	22.63%	The portfolio holdings' weighted average of the difference between the average gross hourly earnings of male and female employees, as a percentage of male gross earnings.	Not required
<b>13. Board gender diversity</b>	Average ratio of female to male board members in investee companies	32.92%	99.65%	The portfolio holdings' weighted average of the ratio of female to male board members.	Not required

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### INDICATORS APPLICABLE TO INVESTMENTS IN INVESTEE COMPANIES

#### SOCIAL AND EMPLOYEE, RESPECT FOR HUMAN RIGHTS, ANTI-CORRUPTION AND ANTI-BRIBERY MATTERS

Adverse Sustainability Indicator	Metric	Impact	Asset Coverage	Explanation	Actions taken
<b>Social and employee matters</b>					
<b>14. Exposure to controversial weapons (anti-personnel mines, cluster munitions, chemical weapons and biological weapons)</b>	Share of investments in investee companies involved in the manufacture or selling of controversial weapons	0.00%	99.62%	The percentage of the portfolio's market value exposed to issuers with an industry tie to landmines, cluster munitions, chemical weapons or biological weapons. Note: Industry ties includes ownership, manufacturing and investments. Ties to landmines do not include related safety products.	Investment restriction, where a company derives a significant proportion of revenue from these business activities.

### INDICATORS APPLICABLE TO INVESTMENTS IN INVESTEE COMPANIES

#### INDICATORS APPLICABLE TO INVESTMENTS IN SOVEREIGNS AND SUPRANATIONALS

Adverse Sustainability Indicator	Metric	Impact	Asset Coverage	Explanation	Actions taken
<b>Environmental</b>					
<b>15. GHG Intensity</b>	GHG intensity of investee countries	N/A	0.00%	The portfolio's weighted average of sovereign issuers' GHG Emissions Intensity (Scope 1, 2 and 3 emissions/EUR M GDP)	Not required

# SFDR Report: Principal Adverse Sustainability Impacts (PASI) Statement

## Principal adverse sustainability impacts statement

### Social

<b>16. Investee countries subject to social violations</b>	Number of investee countries subject to social violations (absolute number), as referred to in international treaties and conventions, United Nations principles and, where applicable, national law	N/A	0.00%	The portfolio's number of unique sovereign issuers with European External Action Service (EEAS) restrictive measures (sanctions) on imports and exports	Not required
	Number of investee countries subject to social violations (relative number divided by all investee countries), as referred to in international treaties and conventions, United Nations principles and, where applicable, national law	N/A	0.00%	The portfolio's percentage of unique sovereign issuers with European External Action Service (EEAS) restrictive measures (sanctions) on imports and exports	Not required

### INDICATORS APPLICABLE TO INVESTMENTS IN INVESTEE COMPANIES

### INDICATORS APPLICABLE TO INVESTMENTS IN REAL ESTATE ASSETS

Adverse Sustainability Indicator	Metric	Impact	Asset Coverage	Explanation	Actions taken
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### Fossil Fuels

<b>17. Exposure to fossil fuels through real estate assets</b>	Share of investments in real estate assets involved in the extraction, storage, transport or manufacture of fossil fuels	N/A	N/A	Not currently available	Not required
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# SFDR Report: Principal Adverse Sustainability Impacts (PASI) Statement

## Principal adverse sustainability impacts statement

### Energy efficiency

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<b>18. Exposure to energy-inefficient real estate assets</b>	Share of investments in energy-inefficient real estate assets	N/A	N/A	Not currently available	Not required
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# SFDR Report: Principal Adverse Sustainability Impacts (PASI) Statement

## Additional climate and other environment-related indicators

### INDICATORS APPLICABLE TO INVESTMENTS IN INVESTEE COMPANIES

Adverse Sustainability Indicator	Metric	Impact	Asset Coverage	Explanation	Actions taken
<b>Emissions</b>					
<b>1. Emissions of inorganic pollutants</b>	Tonnes of inorganic pollutants equivalent per million EUR invested, expressed as a weighted average	0.17%	17.05%	The total annual inorganic pollutants (metric tons reported) discharged as a result of companies' operations associated with 1 million EUR invested in the portfolio. Companies' emissions of inorganic pollutants are apportioned across all outstanding shares and bonds (based on the most recently available enterprise value including cash).	Not required
<b>2. Emissions of air pollutants</b>	Tonnes of air pollutants equivalent per million EUR invested, expressed as a weighted average	0.18%	15.52%	The total annual air pollutants (metric tons reported) released as a result of companies' operations associated with 1 million EUR invested in the portfolio. Companies' emissions of air pollutants are apportioned across all outstanding shares and bonds (based on the most recently available enterprise value including cash).	Not required
<b>3. Emissions of ozone depletion substances</b>	Tonnes of ozone depletion substances equivalent per million EUR invested, expressed as a weighted average	0.00%	4.90%	The total annual ozone depletion substances (metric tons reported) discharged as a result of companies' operations associated with 1 million EUR invested in the portfolio. Companies' emissions of ozone depletion substances are apportioned across all outstanding shares and bonds (based on the most recently available enterprise value including cash).	Not required

# SFDR Report: Principal Adverse Sustainability Impacts (PASI) Statement

## Additional climate and other environment-related indicators

### INDICATORS APPLICABLE TO INVESTMENTS IN INVESTEE COMPANIES

Adverse Sustainability Indicator	Metric	Impact	Asset Coverage	Explanation	Actions taken
<b>Emissions</b>					
<b>4. Investments in companies without carbon emission reduction initiatives</b>	Share of investments in investee companies without carbon emission reduction initiatives aimed at aligning with the Paris Agreement	27.23%	99.89%	The percentage of the portfolio's market value exposed to issuers without a carbon emissions reduction target aligned with the Paris Agreement.	Not required
<b>Energy performance</b>					
<b>5. Breakdown of energy consumption by type of non-renewable sources of energy</b>	Breakdown of energy consumption by type of non-renewable sources of energy (Coal)	0.37%	58.57%	The energy consumption from coal (GWh), as a percentage of total energy consumption. An issuers' energy consumption is apportioned across all outstanding shares and bonds (based on the most recently available enterprise value including cash). Exposure to energy consumption is based on the portfolio's market value in the issuer to the issuer's EVIC, which is then multiplied by the issuer's total energy consumption by source.	Not required
	Breakdown of energy consumption by type of non-renewable sources of energy (Lignite)	0.00%	58.57%	The energy consumption from lignite (GWh), as a percentage of total energy consumption. An issuers' energy consumption is apportioned across all outstanding shares and bonds (based on the most recently available enterprise value including cash). Exposure to energy consumption is based on the portfolio's market value in the issuer to the issuer's EVIC, which is then multiplied by the issuer's total energy consumption by source.	Not required

# SFDR Report: Principal Adverse Sustainability Impacts (PASI) Statement

## Additional climate and other environment-related indicators

### Energy performance

Breakdown of energy consumption by type of non-renewable sources of energy (Natural Gas)	3.15%	58.57%	The energy consumption from natural gas (GWh), as a percentage of total energy consumption. An issuers' energy consumption is apportioned across all outstanding shares and bonds (based on the most recently available enterprise value including cash). Exposure to energy consumption is based on the portfolio's market value in the issuer to the issuer's EVIC, which is then multiplied by the issuer's total energy consumption by source.	Not required
Breakdown of energy consumption by type of non-renewable sources of energy (Oil & Gas)	0.00%	58.57%	The energy consumption from oil & gas (GWh), as a percentage of total energy consumption. An issuers' energy consumption is apportioned across all outstanding shares and bonds (based on the most recently available enterprise value including cash). Exposure to energy consumption is based on the portfolio's market value in the issuer to the issuer's EVIC, which is then multiplied by the issuer's total energy consumption by source.	Not required
Breakdown of energy consumption by type of non-renewable sources of energy (Nuclear)	0.00%	58.57%	The energy consumption from nuclear (GWh), as a percentage of total energy consumption. An issuers' energy consumption is apportioned across all outstanding shares and bonds (based on the most recently available enterprise value including cash). Exposure to energy consumption is based on the portfolio's market value in the issuer to the issuer's EVIC, which is then multiplied by the issuer's total energy consumption by source.	Not required
Breakdown of energy consumption by type of non-renewable sources of energy (Fossil Fuel)	0.10%	58.57%	The energy consumption from fossil fuel (GWh), as a percentage of total energy consumption. An issuers' energy consumption is apportioned across all outstanding shares and bonds (based on the most recently available enterprise value including cash). Exposure to energy consumption is based on the portfolio's market value in the issuer to the issuer's EVIC, which is then multiplied by the issuer's total energy consumption by source.	Not required

# SFDR Report: Principal Adverse Sustainability Impacts (PASI) Statement

## Additional climate and other environment-related indicators

### Energy performance

Breakdown of energy consumption by type of non-renewable sources of energy (Other Non-Renewable)	87.26%	58.57%	The energy consumption from other non-renewables (GWh), as a percentage of total energy consumption. An issuers' energy consumption is apportioned across all outstanding shares and bonds (based on the most recently available enterprise value including cash). Exposure to energy consumption is based on the portfolio's market value in the issuer to the issuer's EVIC, which is then multiplied by the issuer's total energy consumption by source.	Not required
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### Water, waste, and material emissions

<b>6. Water usage and recycling</b>	1. Average amount of water consumed and reclaimed by the investee companies (in cubic meters) per million EUR of revenue of investee companies	N/A	0.00%	Sum of portfolio companies' Reclaimed Water Intensity (m3/EUR million sales) weighted by the portfolio's value of investment in a company and by the company's most recently available enterprise value including cash (EVIC).	Not required
	2. Weighted average percentage of water recycled and reused by investee Companies	N/A	0.00%	Sum of portfolio companies' Percentage of Reclaimed Water Relative to Total Water Consumed (measured in cubic meters) weighted by the portfolio's value of investment in a company and by the company's most recently available enterprise value including cash (EVIC).	Not required



# SFDR Report: Principal Adverse Sustainability Impacts (PASI) Statement

## Additional climate and other environment-related indicators

### Water, waste, and material emissions

<b>7. Investments in companies without water management policies</b>	Share of investments in investee companies without water management policies	45.58%	99.59%	The percentage of the portfolio's market value exposed to issuers without evidence of setting water reduction targets, measuring water footprint, implementing water conservation measures, or other initiatives focused on water management.	Not required
<b>8. Exposure to areas of high water stress</b>	Share of investments in investee companies with sites located in areas of high-water stress without a water management policy	5.56%	99.59%	The percentage of the portfolio's market value exposed to issuers that reported having operations in areas of high-water stress but showed no evidence of a water management policy.	Not required
<b>9. Investments in companies producing chemicals</b>	Share of investments in investee companies the activities of which fall under Division 20.2 of Annex I to Regulation (EC) No 1893/2006	0.00%	100.00%	The percentage of the portfolio's market value exposed to issuers classified as manufacturers of pesticides and other agrochemical products by NACE Group (NACE Group Code 20.2).	Not required

# SFDR Report: Principal Adverse Sustainability Impacts (PASI) Statement

## Additional climate and other environment-related indicators

### Water, waste, and material emissions

<b>10. Land degradation, desertification, soil sealing</b>	Share of investments in investee companies the activities of which cause land degradation, desertification or soil sealing	3.73%	99.62%	The percentage of the portfolio's market value exposed to issuers that report involvement in activities, which cause land degradation, desertification, or soil sealing.	Not required
<b>11. Investments in companies without sustainable land/agriculture practices</b>	Share of investments in investee companies without sustainable land/agriculture practices or policies	27.46%	99.59%	The percentage of the portfolio's market value exposed to issuers without evidence of disclosure related to its policies or practices towards sustainable agriculture or management of land.	Not required
<b>12. Investments in companies without sustainable oceans/seas practices</b>	Share of investments in investee companies without sustainable oceans/seas practices or policies	77.98%	99.62%	The percentage of the portfolio's market value exposed to issuers without evidence of disclosure related to its policies or practices towards sustainable management of ocean resources.	Not required

# SFDR Report: Principal Adverse Sustainability Impacts (PASI) Statement

## Additional climate and other environment-related indicators

### Water, waste, and material emissions

<b>13. Non-recycled waste ratio</b>	Tonnes of non-recycled waste generated by investee companies per million EUR invested, expressed as a weighted average	0.37	18.07%	The total annual non-recycled waste (metric tons reported) associated with 1 million EUR invested in the portfolio. Companies' non-recycled waste is apportioned across all outstanding shares and bonds (based on the most recently available enterprise value including cash).	Not required
<b>14. Natural species and protected areas</b>	1.Share of investments in investee companies whose operations affect threatened species	0.22%	99.62%	The percentage of the portfolio's market value exposed to issuers with operations that affect IUCN Red List species and/or national conservation list species.	Not required
	2.Share of investments in investee companies without a biodiversity protection policy covering operational sites owned, leased, managed in, or adjacent to, a protected area or an area of high biodiversity value outside protected areas	1.42%	99.62%	The percentage of the portfolio's market value exposed to issuers that operate near protected areas or an area of high biodiversity value outside protected areas without a biodiversity protection policy covering operational sites owned, leased, managed.	Not required

# SFDR Report: Principal Adverse Sustainability Impacts (PASI) Statement

## Additional climate and other environment-related indicators

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### Water, waste, and material emissions

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<b>15. Deforestation</b>	Share of investments in companies without a policy to address deforestation	91.61%	99.62%	The percentage of the portfolio's market value exposed to issuers without a deforestation policy.	Not required
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### Green securities

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<b>16. Share of securities not certified as green under a future EU legal act setting up an EU Green Bond Standard</b>	Share of securities in investments not certified as green	N/A	N/A	Not currently available	Not required
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# SFDR Report: Principal Adverse Sustainability Impacts (PASI) Statement

## Additional climate and other environment-related indicators

### INDICATORS APPLICABLE TO INVESTMENTS IN SOVEREIGNS AND SUPRANATIONALS

Adverse Sustainability Indicator	Metric	Impact	Asset Coverage	Explanation	Actions taken
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#### Green securities

<b>17. Share of bonds not certified as green under a future EU act setting up an EU Green Bond standard</b>	Share of bonds not certified as green	N/A	N/A	Not currently available	Not required
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### INDICATORS APPLICABLE TO INVESTMENTS IN REAL ESTATE ASSETS

Adverse Sustainability Indicator	Metric	Impact	Asset Coverage	Explanation	Actions taken
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#### Greenhouse Gas Emissions

<b>18. GHG emissions</b>	Scope 1 GHG emissions generated by real estate assets	N/A	N/A	Not currently available	Not required
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# SFDR Report: Principal Adverse Sustainability Impacts (PASI) Statement

## Additional climate and other environment-related indicators

### INDICATORS APPLICABLE TO INVESTMENTS IN REAL ESTATE ASSETS

Adverse Sustainability Indicator	Metric	Impact	Asset Coverage	Explanation	Actions taken
<b>Greenhouse Gas Emissions</b>					
	Scope 2 GHG emissions generated by real estate assets	N/A	N/A	Not currently available	Not required
	Scope 3 GHG emissions generated by real estate assets	N/A	N/A	Not currently available	Not required
	Total GHG emissions generated by real estate assets	N/A	N/A	Not currently available	Not required

# SFDR Report: Principal Adverse Sustainability Impacts (PASI) Statement

## Additional climate and other environment-related indicators

### Energy consumption

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<b>19. Energy consumption intensity</b>	Energy consumption in GWh of owned real estate assets per square meter	N/A	N/A	Not currently available	Not required
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### Waste

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<b>20. Waste production in operations</b>	Share of real estate assets not equipped with facilities for waste sorting and not covered by a waste recovery or recycling contract	N/A	N/A	Not currently available	Not required
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### Resource consumption

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<b>21. Raw materials consumption for new construction and major renovations</b>	Share of raw building materials (excluding recovered, recycled and biosourced) compared to the total weight of building materials used in new construction and major renovations	N/A	N/A	Not currently available	Not required
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# SFDR Report: Principal Adverse Sustainability Impacts (PASI) Statement

## Additional climate and other environment-related indicators

### Biodiversity

<b>22. Land artificialisation</b>	Share of non-vegetated surface area (surfaces that have not been vegetated in ground, as well as on roofs, terraces and walls) compared to the total surface area of the plots of all assets	N/A	N/A	Not currently available	Not required
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## Additional indicators for social and employee, respect for human rights, anti-corruption and anti-bribery matters

### INDICATORS APPLICABLE TO INVESTMENTS IN INVESTEE COMPANIES

Adverse Sustainability Indicator	Metric	Impact	Asset Coverage	Explanation	Actions taken
<b>Social and employee matters</b>					
<b>1. Investments in companies without workplace accident prevention policies</b>	Share of investments in investee companies without a workplace accident prevention policy	24.80%	99.62%	The percentage of the portfolio's market value exposed to issuers without a workplace accident prevention policy.	Not required



# SFDR Report: Principal Adverse Sustainability Impacts (PASI) Statement

## Additional indicators for social and employee, respect for human rights, anti-corruption and anti-bribery matters

### INDICATORS APPLICABLE TO INVESTMENTS IN INVESTEE COMPANIES

Adverse Sustainability Indicator	Metric	Impact	Asset Coverage	Explanation	Actions taken
<b>Social and employee matters</b>					
<b>2. Rate of accidents</b>	Rate of accidents in investee companies expressed as a weighted average	2.42	27.77%	Sum of portfolio companies' recordable incident rate (fatalities, lost time injuries, restricted work injuries and medical treatment injuries) weighted by the portfolio's value of investment in a company and by the company's most recently available enterprise value including cash (EVIC).	Not required
<b>3. Number of days lost to injuries, accidents, fatalities or illness</b>	Number of workdays lost to injuries, accidents, fatalities or illness of investee companies expressed as a weighted average	0.64%	4.54%	The total Workdays Lost Due to Workplace Accidents or Illness associated with EUR 1 million invested in the portfolio. It is calculated as the weighted average of Workdays Lost Due to Workplace Accidents or Illness per company divided by the company's most recently available enterprise value including cash (EVIC).	Not required
<b>4. Lack of a supplier code of conduct</b>	Share of investments in investee companies without any supplier code of conduct (against unsafe working conditions, precarious work, child labour and forced labour)	64.24%	99.62%	The percentage of the portfolio's market value exposed to issuers' where their supplier code of conduct does not include commitments to eradicate unsafe working conditions, precarious work, child labor and forced labor.	Not required

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## Additional indicators for social and employee, respect for human rights, anti-corruption and anti-bribery matters

### INDICATORS APPLICABLE TO INVESTMENTS IN INVESTEE COMPANIES

Adverse Sustainability Indicator	Metric	Impact	Asset Coverage	Explanation	Actions taken
<b>Social and employee matters</b>					
<b>5. Lack of grievance/complaints handling mechanism related to employee matters</b>	Share of investments in investee companies without any grievance/complaints handling mechanism related to employee matters	41.33%	99.62%	The percentage of the portfolio's market value exposed to issuers without evidence of disclosure indicating availability of grievance and complaint-handling procedures.	Not required
<b>6. Insufficient whistleblower protection</b>	Share of investments in entities without policies on the protection of whistleblowers	16.48%	99.62%	The percentage of the portfolio's market value exposed to issuers without a whistleblower protection policy.	Not required
<b>7. Incidents of discrimination</b>	1. Number of incidents of discrimination reported in investee companies expressed as a weighted average	0.00	99.65%	The total number of severe and very severe discrimination and diversity controversies associated with EUR 1 million invested in the portfolio. It is calculated as the weighted average of Number of Severe and Very Severe Discrimination and Diversity Controversies per company divided by the company's most recently available enterprise value including cash (EVIC).	Not required

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## Additional indicators for social and employee, respect for human rights, anti-corruption and anti-bribery matters

### INDICATORS APPLICABLE TO INVESTMENTS IN INVESTEE COMPANIES

Adverse Sustainability Indicator	Metric	Impact	Asset Coverage	Explanation	Actions taken
<b>Social and employee matters</b>					
	2. Number of incidents of discrimination leading to sanctions in investee companies expressed as a weighted average	N/A	N/A	Please note that we are currently unable to provide any data for "Number of incidents of discrimination leading to sanctions in investee companies expressed as a weighted average" due to the ambiguity of the definition. While we can report on the number of incidents of discrimination or provide a list of companies on the EU sanctions list, there is no evidence to suggest the causality of the incidents and the imposition of sanctions and trade restrictions.	Not required
<b>8. Excessive CEO pay ratio</b>	Average ratio within investee companies of the annual total compensation for the highest compensated individual to the median annual total compensation for all employees (excluding the highest-compensated individual)	241.72	57.94%	The portfolio's weighted average of issuers' ratio of CEO pay to average employee pay.	Not required
<b>Human rights</b>					
<b>9. Lack of a human rights policy</b>	Share of investments in entities without a human rights policy	15.85%	99.62%	The percentage of the portfolio's market value exposed to issuers without a formal human rights policy.	Not required

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## Additional indicators for social and employee, respect for human rights, anti-corruption and anti-bribery matters

### Human rights

10. Lack of due diligence	Share of investments in entities without a due diligence process to identify, prevent, mitigate and address adverse human rights impacts	51.47%	99.62%	The percentage of the portfolio's market value exposed to issuers without defined processes, set targets or reported achievements for monitoring the effectiveness of its human rights policy.	Not required
11. Lack of processes and measures for preventing trafficking in human beings	Share of investments in investee companies without policies against trafficking in human beings	40.34%	99.62%	The percentage of the portfolio's market value exposed to issuers without a policy against trafficking in human beings.	Not required
12. Operations and suppliers at significant risk of incidents of child labour	Share of investments in investee companies exposed to operations and suppliers at significant risk of incidents of child labour exposed to hazardous work in terms of geographic areas or type of operation	0.85%	99.62%	The percentage of the portfolio's market value exposed to issuers with disclosed operations and suppliers at significant risk of child labor incidents involving hazardous work based on geographic location or type of operation.	Not required
13. Operations and suppliers at significant risk of incidents of forced or compulsory labour	Share of the investments in investee companies exposed to operations and suppliers at significant risk of incidents of forced or compulsory labour in terms in terms of geographic areas and/or the type of operation	1.09%	99.62%	The percentage of the portfolio's market value exposed to issuers that have reported having operations and suppliers at significant risk of forced or compulsory labor incidents based on geographic location or type of operation.	Not required

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## Additional indicators for social and employee, respect for human rights, anti-corruption and anti-bribery matters

### Human rights

<b>14. Number of identified cases of severe human rights issues and incidents</b>	Number of cases of severe human rights issues and incidents connected to investee companies on a weighted average basis	0.00	99.65%	The total number of severe and very severe human rights concerns controversies associated with EUR 1 million invested in the portfolio. It is calculated as the weighted average of Number of Severe and Very Severe Human Rights Concerns Controversies per company divided by the company's most recently available enterprise value including cash (EVIC).	Not required
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### Anti-corruption and anti-bribery

<b>15. Lack of anti-corruption and anti-bribery policies</b>	Share of investments in entities without policies on anti-corruption and antibribery consistent with the United Nations Convention against Corruption	11.65%	99.62%	The percentage of the portfolio's market value exposed to issuers without an anti-corruption and anti-bribery policy consistent with the United Nations Convention against Corruption.	Not required
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<b>16. Cases of insufficient action taken to address breaches of standards of anti-corruption and anti-bribery</b>	Share of investments in investee companies with identified insufficiencies in actions taken to address breaches in procedures and standards of anti-corruption and anti-bribery	1.56%	99.62%	The percentage of the portfolio's market value exposed to issuers that have not disclosed sufficient actions taken to address anti-corruption and/or anti-bribery policy or procedure violations.	Not required
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## Additional indicators for social and employee, respect for human rights, anti-corruption and anti-bribery matters

### Anti-corruption and anti-bribery

<b>17. Number of convictions and amount of fines for violation of anti-corruption and anti-bribery laws</b>	Number of convictions for violations of anti-corruption and anti-bribery laws by investee companies	3.25	99.65%	The sum of number of convictions against the portfolio's holdings for violation of anti-corruption and anti-bribery laws.	Not required
	Amount of fines for violations of anti-corruption and anti-bribery laws by investee companies	36,000,386.44	99.65%	The sum of fines for convictions against the portfolio's holdings related to a violation of anti-corruption and anti-bribery laws.	Not required

### INDICATORS APPLICABLE TO INVESTMENTS IN SOVEREIGNS AND SUPRANATIONALS

Adverse Sustainability Indicator	Metric	Impact	Coverage	Explanation	Actions taken
<b>18. Average income inequality score</b>	The distribution of income and economic inequality among the participants in a particular economy including a quantitative indicator explained in the explanation column	N/A	0.00%	The weighted average of the portfolio's issuers' GINI Index score (measures the equality of income distribution within a population. Ranges from 0 (perfect equality) to 100 (perfect inequality)). (Source: CIA, WDI)).	Not required

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### INDICATORS APPLICABLE TO INVESTMENTS IN SOVEREIGNS AND SUPRANATIONALS

Adverse Sustainability Indicator	Metric	Impact	Asset Coverage	Explanation	Actions taken
<b>Social</b>					
<b>19. Average freedom of expression score</b>	Measuring the extent to which political and civil society organisations can operate freely including a quantitative indicator explained in the explanation column	N/A	0.00%	The weighted average of the portfolio's issuers' Press Freedom score (Countries with lower scores demonstrate higher press freedom. Data source: Freedom house).	Not required
<b>Human rights</b>					
<b>20. Average human rights performance</b>	Measure of the average human right performance of investee countries using a quantitative indicator explained in the explanation column	N/A	0.00%	The portfolio's weighted average of issuers' WJP Rule of Law Index, Fundamental Rights Sub-score (measures a country's performance on human rights issues, as per Factor 4 of the WJP Rule of Law Index. Scores can range from 0-1.0, and higher values denote stronger national performance across a broad range of human rights issues. Values are updated annually via the World Justice Project with no analytical inputs from MSCI ESG Research. Data source: World Justice Project (WJP) Rule of Law Index®.	Not required
<b>Governance</b>					
<b>21. Average corruption score</b>	Measure of the perceived level of public sector corruption using a quantitative indicator explained in the explanation column	N/A	0.00%	The weighted average of portfolio's issuers' Corruption Perception Index score (measures the degree to which public sector corruption is perceived to exist in different countries around the world. Data source: Transparency International. Countries with lower score are perceived to be more corrupt).	Not required

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### Governance

22. Non-cooperative tax jurisdictions	Investments in jurisdictions on the EU list of non-cooperative jurisdictions for tax Purposes	N/A	0.00%	The percentage of the portfolio's market value exposed to issuers' domiciled in jurisdictions on the EU list of non-cooperative jurisdictions for tax purposes.	Not required
23. Average political stability score	Measure of the likelihood that the current regime will be overthrown by the use of force using a quantitative indicator explained in the explanation column	N/A	0.00%	The weighted average of the portfolio's issuers' Stability & Peace score (Assesses the level of stability and peace in a region. This sub-factor is assessed using two data points: (1) political stability and absence of violence/ terrorism, which captures the perceptions of the likelihood that the government will be destabilized or overthrown by unconstitutional or violent means, including politically motivated violence and terrorism; and 2) global peace index, which measures the relative position of nations' and regions' peacefulness by gauging ongoing domestic and international conflict, safety and security in society, and militarization in different regions. Regions with high political instability and violence and conflict score poorly. (Score: 0-10)).	Not required
24. Average rule of law score	Measure of the level of corruption, lack of fundamental rights, and the deficiencies in civil and criminal justice using a quantitative indicator explained in the explanation column	N/A	0.00%	The weighted average of the portfolio's issuers' Rule of Law score (Capturing perceptions of the extent to which agents have confidence in and abide by the rules of society, and in particular the quality of contract enforcement, property rights, the police, and the courts, as well as the likelihood of crime and violence. Data source: Worldwide Governance Indicators (WGI). Countries with higher score demonstrate better rule of law.).	Not required



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