

Annex – SFDR Pre-Contractual Disclosures

ANNEX II

Template pre-contractual disclosure for the financial products referred to in Article 8, paragraphs 1, 2 and 2a, of Regulation (EU) 2019/2088 and Article 6, first paragraph, of Regulation (EU) 2020/852

Sustainable investment means an investment in an economic activity that contributes to an environmental or social objective, provided that the investment does not significantly harm any environmental or social objective and that the investee companies follow good governance practices.

The **EU Taxonomy** is a classification system laid down in Regulation (EU) 2020/852, establishing a list of **environmentally sustainable economic activities**. That Regulation does not lay down a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

Product name: Ownership Capital Global Equity Strategy

Environmental and/or social characteristics

Does this financial product have a sustainable investment objective? *[tick and fill in as relevant, the percentage figure represents the minimum commitment to sustainable investments]*

Yes

 No

- It will make a minimum of **sustainable investments with an environmental objective: ___%**
 - in economic activities that qualify as environmentally sustainable under the EU Taxonomy
 - in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy
- It will make a minimum of **sustainable investments with a social objective: ___%**

- It **promotes Environmental/Social (E/S) characteristics** and while it does not have as its objective a sustainable investment, it will have a minimum proportion of **5%** of sustainable investments
 - with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy
 - with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy
 - with a social objective
- It promotes E/S characteristics, but **will not make any sustainable investments**

What environmental and/or social characteristics are promoted by this financial product? *[indicate the environmental and/or social characteristics promoted by the financial product and whether a reference benchmark has been designated for the purpose of attaining the environmental or social characteristics promoted by the financial product]*



The Strategy seeks to promote decarbonization, which the Investment Manager considers to be the stabilization of GHG concentration, reduction of GHG emissions, or the increase of GHG removals (the “**Environmental Characteristics**”). The Strategy

promotes the Environmental Characteristics through investing in companies with low levels of carbon intensity, which contribute to decarbonisation through their operations and/or products and services and/or have the ability and willingness to reduce their level of carbon intensity over time.

● ***What sustainability indicators are used to measure the attainment of each of the environmental or social characteristics promoted by this financial product?***

The Investment Manager assesses each company for their contribution to decarbonisation using the metric of carbon intensity. Carbon intensity is calculated as Scope 1 + Scope 2 emissions per million USD sales. Scope 1 emissions are direct emissions from owned or controlled sources, while Scope 2 emissions include indirect emissions from the generation of purchased energy.

As carbon intensity is expected to vary depending on the market or industry sector, the Investment Manager determines the company's contribution to decarbonisation on a case-by-case basis by taking into account the carbon intensity of the individual company and its market or industry sector and any relevant qualitative data. While the primary metric used to measure the attainment of contribution to decarbonisation is carbon intensity, examples of the additional criteria used to inform the assessment include adoption of formal environmental policies, effective processes for managing carbon intensity, public reporting of GHG emissions and GHG intensity reduction targets.

A reference benchmark has not been designated for the purpose of attaining the Environmental Characteristics. Within this document, the "Benchmark" refers to the weighted average carbon intensity (Scope 1 + 2 emissions / \$m sales) of the MSCI World Index (M1WO) used as a metric to assist with determining whether an asset is considered to be low carbon intensity and promoting Environmental Characteristics.

The Strategy considers investments with a carbon intensity below the Benchmark to be low carbon intensity and promoting Environmental Characteristics.

The Strategy considers investments with carbon intensity above the Benchmark to also be promoting Environmental Characteristics if they publicly disclose carbon emissions and have a publicly disclosed decarbonisation target, as they are contributing to overall decarbonisation through an active and transparent process to reduce their emissions.

Companies with high carbon intensity above the Benchmark that do not publicly disclose carbon emissions and have a publicly disclosed decarbonisation target are not considered to be promoting Environmental Characteristics.

The Strategy expects a minimum of 5% of investments will promote Environmental Characteristics, which may or may not be sustainable investments. The Strategy expects a minimum of 5% of investments that will be sustainable investments.

● ***What are the objectives of the sustainable investments that the financial product partially intends to make and how does the sustainable investment contribute to such objectives?***

[include, for financial products that make sustainable investments, a description of the objectives and how the sustainable investments contribute to the sustainable investment objective. For the financial products referred to in Article 6, first paragraph, of Regulation (EU) 2020/852, list the environmental objectives set out in Article 9 of that Regulation to which the sustainable investment underlying the financial product contributes]

The objective of the sustainable investments that the financial product partially intends to make is to promote the stabilization of GHG concentration, reduction of GHG emissions, or the increase of GHG removals. The sustainable investment contributes to this objective through investing in companies which promote decarbonisation through their operations and/or products and services. This can include companies with low operating emissions and companies producing sustainable products which support the low-carbon transition.

Sustainability indicators
measure how the environmental or social characteristics promoted by the financial product are attained.

Principal adverse impacts are the most significant negative impacts of investment decisions on sustainability factors relating to environmental, social and employee matters, respect for human

How do the sustainable investments that the financial product partially intends to make, not cause significant harm to any environmental or social sustainable investment objective? *[include a description for the financial product that partially intends to make sustainable investments]*

Sustainable investments are evaluated using the Investment Manager’s proprietary ESG Questionnaire prior to investment to ensure they do not significantly harm other environmental or social sustainable investment objectives. Examples of factors considered include:

- Environmental: formal environmental policy, pollution, waste management, energy and water usage
- Social: Health and Safety Certifications and Human Capital management

How have the indicators for adverse impacts on sustainability factors been taken into account? *[include an explanation of how the indicators for adverse impacts in Table 1 of Annex I and any relevant indicators in Tables 2 and 3 of Annex I, are taken into account]*

The Investment Manager assesses material impacts of investee company operations and products/services on Sustainability Factors through analysis conducted during the investment due diligence process, and regular monitoring throughout the holding period. The Investment Manager assesses the company through its own environmental, social and governance (“ESG”) analysis tool, which is an extensive questionnaire based on different ESG factors. ESG factors are defined as measures used to evaluate the company across management, environmental, social and governance categories. For sustainable investments, the indicators for adverse impacts on sustainability factors (the “PAI indicators”) are either directly or indirectly included in the investment due diligence process and have been taken into account by ensuring that the investments do no significant harm to any environmental or social objective. The Disclosure of Principal Adverse Impacts Policies (the “PAI Statement”) is available on our website here: (<https://www.ownershipcapital.com/sfdr>).

How are the sustainable investments aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights? *Details: [include an explanation on the alignment with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights, including the principles and rights set out in the eight Strategycamental conventions identified in the Declaration of the International Labour Organisation on Strategycamental Principles and Rights at Work and the International Bill of Human Rights]*

Sustainable investments are evaluated using the Investment Manager’s ESG Questionnaire prior to investment for alignment to the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights (the “OECD and UN Guidelines”). The Investment Manager uses third-party screening services from MSCI ESG Research LLC to screen companies for known violations as well as their own assessment. Any companies which the Investment Manager determines to be frequent violators of the OECD and UN Guidelines will not be considered sustainable investments.



Does this financial product consider principal adverse impacts on sustainability factors?

X

Yes, _____ *[if the financial product considers principal adverse impacts on sustainability factors, include a clear and reasoned explanation of how it considers principal adverse impacts on sustainability factors. Indicate where, in the information to be disclosed pursuant to Article 11(2) of Regulation (EU) 2019/2088, the information on principal adverse impacts on sustainability factors is available]*

No.

[Include statement for financial products referred to in Article 6, first paragraph, of Regulation (EU) 2020/852]

The EU Taxonomy sets out a “do not significant harm” principle by which Taxonomy-aligned investments should not significantly harm EU Taxonomy objectives and is accompanied by specific EU criteria.

The “do no significant harm” principle applies only to those investments underlying the financial product that take into account the EU criteria for environmentally sustainable economic activities. The investments underlying the remaining portion of this financial product do not take into account the EU criteria for environmentally sustainable economic activities.

Any other sustainable investments must also not significantly harm any environmental or social objectives.

The Investment Manager assesses material impacts of investee company operations and products/services on Sustainability Factors through analysis conducted during the investment due diligence process, and regular monitoring throughout the holding period. The Investment Manager assesses the company through its own environmental, social and governance (“**ESG**”) analysis tool, which is an extensive questionnaire based on different ESG factors. ESG factors are defined as measures used to evaluate the company across management, environmental, social and governance categories. For sustainable investments, the indicators for adverse impacts on sustainability factors (the “PAI indicators”) are either directly or indirectly included in the investment due diligence process and have been taken into account by ensuring that the investments do no significant harm to any environmental or social objective. The Disclosure of Principal Adverse Impacts Policies (the “**PAI Statement**”) is available on our website here: (<https://www.ownershipcapital.com/sfdr>).



What investment strategy does this financial product follow? *[provide a description of the investment strategy and indicate how the strategy is implemented in the investment process on a continuous basis]*

The investment portfolio is actively managed through an engaged ownership approach whereby financial and extra-financial factors (including ESG issues) are analysed and integrated into the investment-decision making process to reduce portfolio risk and create long-term value.

The Investment Manager conducts a full management profile and ESG analysis for each investee company. This analysis is performed in parallel with the in-depth financial analysis. The Investment Manager scores the company using the Investment Manager’s own ESG analysis tool, which is an extensive questionnaire based on different ESG factors (the ESG Questionnaire). The ESG Questionnaire is completed for all holdings in the portfolio prior to investment in the relevant target company. The ESG Questionnaire is completed based on quantitative and qualitative data available through the Investment Manager’s internal research, information made available by the issuer through company reporting and publicly available data sources, as well as direct interactions with the company. ESG factors are defined as measures used to evaluate the company across management, environmental, social and governance categories.

The investment strategy guides investment decisions based on factors such as investment objectives and risk

Carbon-related metrics including carbon intensity and decarbonisation targets are assessed through the ESG Questionnaire as part of the Investment Manager's environmental assessment.

● ***What are the binding elements of the investment strategy used to select the investments to attain each of the environmental or social characteristics promoted by this financial product?***

The Strategy has the following binding elements:

1. The Investment Manager will assess all holdings for ESG Risks annually.
2. The Investment Manager will engage with all equity holdings on an annual basis.
3. The Investment Manager will only invest in companies where it has access to the management team to undertake engagement activities on carbon emissions.
4. The Investment Manager will measure the carbon intensity of each portfolio holding annually. As carbon intensity is expected to vary depending on the market or industry sector, the Investment Manager determines the company's contribution to decarbonisation on a case-by-case basis by taking into account the carbon intensity of the individual company and its market or industry sector and any relevant qualitative data.
5. The Strategy will maintain a minimum of 5% of investments that will be used to meet the Environmental Characteristics. The Strategy considers investments with a carbon intensity below the Benchmark to be low carbon intensity and promoting Environmental Characteristics. The Strategy considers investments with carbon intensity above the Benchmark to also be promoting Environmental Characteristics if they publicly disclose carbon emissions and have a publicly disclosed decarbonisation target, as they are contributing to overall decarbonisation through an active and transparent process to reduce their emissions. Companies with high carbon intensity above the Benchmark that do not publicly disclose carbon emissions and have a publicly disclosed decarbonisation target are not considered to be promoting Environmental Characteristics.
6. The Strategy will maintain a minimum of 5% of investments that will be sustainable investments. The Strategy considers companies with operations that have low carbon intensity to be sustainable investments, provided that such investments do not significantly harm any to an environmental objective and that the investee companies follow good governance practices.

● ***What is the committed minimum rate to reduce the scope of the investments considered prior to the application of that investment strategy? [include an indication of the rate, where there is a commitment to reduce the scope of investments by a minimum rate]***

There is no committed minimum rate to reduce the scope of the investments considered prior to the application of that investment strategy.

● ***What is the policy to assess good governance practices of the investee companies? [include a short description of the policy to assess good governance practices of the investee companies]***

ESG factors are defined as measures used to evaluate the company across Management, Environmental, Social and Governance categories, examples of the governance criteria considered include board independence, ethics and compliance. All portfolio companies are assessed across multiple governance metrics including compliance with the UN Global Compact, incidents of bribery or corruption, discrimination or diversity incidents, business ethics incidents, controlling shareholder concerns, multiple equity classes with differing voting rights and government ownership for each company. Companies with repeated violations of the UN Global Compact or other incidents of poor governance will not be considered for investment.

Good governance practices include sound management structures, employee relations, remuneration of staff and tax compliance.



What is the asset allocation planned for this financial product? *[include a narrative explanation of the investments of the financial product, including the minimum proportion of the investments of the financial product used to meet the environmental or social characteristics promoted by the financial product in accordance with the binding elements of the investment strategy, including the minimum proportion of sustainable investments of the financial product where that financial products commits to making sustainable investments, and the purpose of the remaining proportion of the investments, including a description of any minimum environmental or social safeguards]*

Asset allocation describes the share of investments in

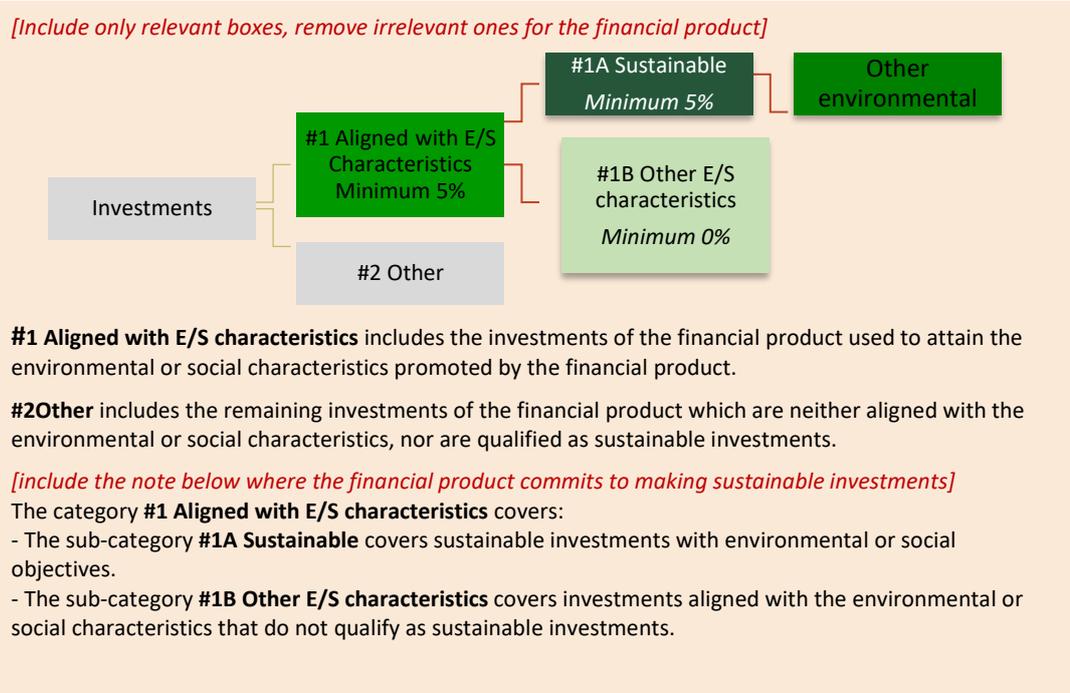
[include note only for financial products referred to in Article 6 of Regulation (EU) 2020/852]

Taxonomy-aligned activities are expressed as a share of:

- **turnover** reflecting the share of revenue from green activities of investee companies
- **capital expenditure** (CapEx) showing the green investments made by investee companies, e.g. for a transition to a green economy.
- **operational expenditure** (OpEx) reflecting

The Strategy aims to achieve its investment objective through a strategy of long-term investing in publicly listed equities. The Strategy may invest in companies located anywhere in the world provided the equities are listed on exchanges in global developed markets. The Strategy does not have a limit on maximum exposure to any one market or industry sector.

The Strategy expects a minimum of 5% of investments will be used to meet the Environmental Characteristics promoted by the product, which may or may not be sustainable investments. The Strategy expects to maintain a minimum of 5% of investments that will be sustainable investments. Regarding the remaining proportion of investments that do not meet the environmental characteristics of the Strategy, the Investment Manager typically will not invest in companies which score poorly on ESG factors, which are considered material to the target company, as determined by the ESG Questionnaire. In certain cases where the company scores poorly on relevant ESG factors, the Investment Manager may still choose to invest and engage with the company to improve their performance on the ESG factor. The Investment Manager will not invest in companies which score poorly on relevant ESG factors that cannot be improved through engagement.



- **How does the use of derivatives attain the environmental or social characteristics promoted by the financial product?** *[for financial products that use derivatives as defined in Article 2(1), point (29), of Regulation (EU) No 600/2014 to attain the environmental or social characteristics they promote, describe how the use of those derivatives meets those characteristics]*

The product does not use derivatives.



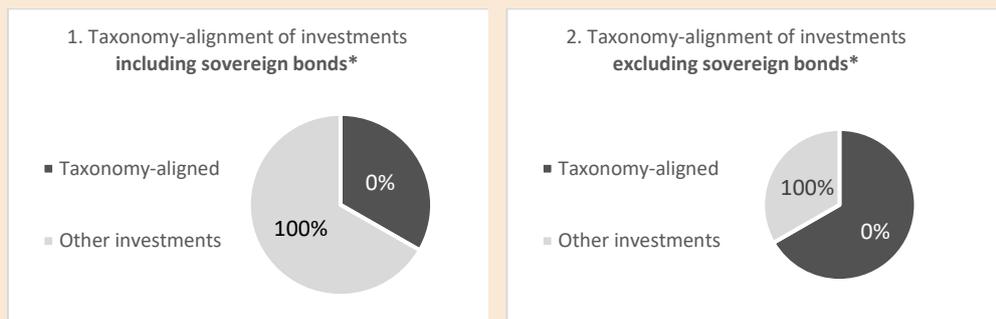
To what minimum extent are sustainable investments with an environmental objective aligned with the EU Taxonomy? *[include a section for the financial products referred to in Article 6, first paragraph, of Regulation (EU) 2020/852 and include the graphical representation referred to in Article 15(1), point (a), of this Regulation, the description referred to in Article 15(1), point (b), of this Regulation, a clear explanation as referred to in Article 15(1), point (c), of this Regulation, a narrative explanation as referred to in Article 15(1), point (d), of this Regulation and the information referred to in Article 15(3) of this Regulation]*

[include note only for the financial products referred to in Article 6, first paragraph, of Regulation (EU) 2020/852]

Enabling activities directly enable other activities to make a substantial contribution to an environmental objective. **Transitional activities** are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels

0%. The sustainable investments with an environmental objective may be aligned to the EU taxonomy. However, the Financial product does not intend to make a minimum amount of sustainable investments aligned with the EU taxonomy.

The two graphs below show in green the minimum percentage of investments that are aligned with the EU Taxonomy. As there is no appropriate methodology to determine the Taxonomy-alignment of sovereign bonds, the first graph shows the Taxonomy alignment in relation to all the investments of the financial product including sovereign bonds, while the second graph shows the Taxonomy alignment only in relation to the investments of the financial product other than sovereign bonds.*



* For the purpose of these graphs, 'sovereign bonds' consist of all sovereign exposures

- **What is the minimum share of investments in transitional and enabling activities?** *[include section for the financial products referred to in Article 6, first paragraph, of Regulation (EU) 2020/852]*
0%. The Financial product does not intend to invest a minimum amount in transitional and enabling activities.



What is the minimum share of sustainable investments with an environmental objective that are not aligned with the EU Taxonomy? *[include section only for the financial products referred to in Article 6, first paragraph, of Regulation (EU) 2020/852 where the financial product invests in economic activities that are not environmentally sustainable economic activities and explain why the financial product invests in sustainable investments with an environmental objective in economic activities that are not Taxonomy-aligned]*

The minimum share of sustainable investments with an environmental objective that are not aligned with the EU taxonomy is 5%.



What is the minimum share of socially sustainable investments? *[include section only where the financial product includes sustainable investments with a social objective]*

0%. The Financial product does not intend to make socially sustainable investments aligned to the EU taxonomy.



What investments are included under “#2 Other”, what is their purpose and are there any minimum environmental or social safeguards?

[include note for financial products referred to in Article 6, first paragraph, of Regulation (EU) 2020/852 that invest in environmental economic activities that are not environmentally sustainable economic activities]

The Investment Manager conducts a full management profile and ESG analysis for each investee company. This analysis is performed in parallel with the in-depth financial analysis. The Investment Manager scores the company using the Investment Manager’s own ESG analysis tool, which is an extensive questionnaire based on different ESG factors (the ESG Questionnaire). The ESG Questionnaire is completed for all holdings in the portfolio prior to investment in the relevant target company. The ESG Questionnaire is completed based on quantitative and qualitative data available through the Investment Manager’s internal research, information made available by the issuer through company reporting and publicly available data sources, as well as direct interactions with the company. ESG factors are defined as measures used to evaluate the company across management, environmental, social and governance categories.

Given the focus of the Strategy on investing in companies with good environmental and social indicators, the Investment Manager typically will not invest in companies which score poorly on ESG factors, which are considered material to the target company, as determined by the ESG Questionnaire. In certain cases where the company scores poorly on relevant ESG factors, the Investment Manager may still choose to invest and engage with the company to improve their performance on the ESG factor. The Investment Manager will not invest in companies which score poorly on relevant ESG factors that cannot be improved through engagement.



Is a specific index designated as a reference benchmark to determine whether this financial product is aligned with the environmental and/or social characteristics that it promotes? *[include section where an index has been designated as a reference benchmark for the purpose of attaining the environmental or social characteristics promoted by the financial product and indicate where the methodology used for the calculation of the designated index can be found]*

[include section where an index has been designated as a reference benchmark for the purpose of attaining the environmental or social characteristics promoted by the financial product and indicate where the methodology used for the calculation of the designated index can be found]

No. The Strategy uses the MSCI World Net Total Return USD Index (Bloomberg ticker: M1WO) (the “Index”) as a ‘comparator benchmark’ to compare performance of the Strategy against. The investment strategy is not influenced nor constrained by the benchmark. The MSCI World Net Total Return USD Index is also used for determining the Performance Fee of the Strategy. The Investment Manager uses the weighted average carbon intensity (Scope 1 + 2 emissions / \$m sales) of the MSCI World Index (M1WO) as a metric to assist with determining whether an asset is considered to be low carbon intensity and promoting Environmental Characteristics.

The Index is not consistent with the E/S characteristics promoted by the Strategy.

are sustainable investments with an environmental objective that do not take into account the criteria for environmentally sustainable economic

[include note for financial products where an index has been designated as a reference benchmark for the purpose of attaining the environmental or social characteristics promoted by the financial product]

Reference benchmarks are indexes to measure whether the financial product attains the environmental or social characteristics that they promote.

● **How is the reference benchmark continuously aligned with each of the environmental or social characteristics promoted by the financial product?**

N/A

● **How is the alignment of the investment strategy with the methodology of the index ensured on a continuous basis?**

N/A

● **How does the designated index differ from a relevant broad market index?**

N/A

● **Where can the methodology used for the calculation of the designated index be found?**

N/A



Where can I find more product specific information online?

More product-specific information can be found on the website: *[include a hyperlink to the website referred to in Article 23 of this Regulation]*

Please find more information and available documents on our website (<https://www.ownershipcapital.com/>).