

# Sustainability-related disclosure

SSTL FP BRUNEL LOW VOL GLBEQ



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## A Summary

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

The fund invests predominantly in assets that have been selected from a sustainable point of view. Sustainability is understood to mean ecological (Environment - E) and social (Social - S) criteria as well as good corporate and government management (Governance - G). Corresponding criteria include CO2 emissions, protection of natural resources, biodiversity and water (Environment), anti-corruption measures, tax transparency (Governance) and health and safety at work (Social). When considering environmental and social characteristics, investments are made in assets of issuers that apply good corporate governance practices.

### **Investment strategy**

The fund's investment strategy pursues an ESG approach, in which the sustainable orientation of the fund is to be ensured by taking into account various sustainability indicators. Screening criteria are set for the acquisition of certain assets of the fund.

The sustainability indicators may include environmental, social, governance, sustainable business and controversy dimensions depending on the type of issuer and assesses the ESG profile of the issuer. Securities of issuers that are rated sustainable according to the sustainability metrics will be designated as sustainable in accordance with the Fund's investment strategy.

The benchmark used to guide the fund's investment strategy does not focus on the fund's environmental and social characteristics.

The assets of the fund are divided into different categories. These are firstly those that focus on ecological or social characteristics. These are " Environmental and/or Social Characteristics and "Other Investments", in which no ecological and/or social characteristics are taken into account.

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

The fulfilment of the ecological and social characteristics of the fund is measured via so-called sustainability indicators (consisting of sustainability metrics and exclusion criteria). For example, portfolio management analyses the individual assets with regard to compliance with the exclusion criteria defined as part of the investment strategy.

The sustainability indicators of this fund are:

- Exclusion criteria
- Sustainability indicators

Data used to analyse issuers and/or assets with regard to sustainability indicators are obtained from external service providers. Various service providers are used in order to benefit from the highest possible data quality.

## **Due diligence and engagement**

Quoniam (the Company) is committed to the fiduciary principle and acts exclusively in the interests of the investors. This principle is integrated into the Company's business processes. Within the framework of the fund's sustainable investment strategy, the Company strives to enter into a constructive dialogue as a responsible and active asset manager, either alone or in association with the invested companies. This approach is referred to as engagement (participation policy). The primary objective is to actively influence companies in terms of opportunities and risks related to ESG factors.

By exercising its shareholder and creditor rights, the Company can promote good governance at the companies' general meeting. The basis for voting behaviour is the current Proxy Voting Policy (Union Investment voting policy). While the Proxy Voting Policy provides a framework for voting behaviour, the Engagement Policy forms a guideline for direct corporate dialogue as part of engagement activities, from which deviations are only made in justified individual cases.

## B Sustainable investment objectives of the investments that are partially made with the financial product

This financial product does not pursue sustainable investments.

## C Environmental or social characteristics of the financial product

The fund invests predominantly in assets that have been selected from a sustainable point of view. Sustainability is understood to mean ecological (Environment - E) and social (Social - S) criteria as well as good corporate and government management (Governance - G). Corresponding criteria include CO2 emissions, protection of natural resources, biodiversity and water (Environment), anti-corruption measures, tax transparency (Governance) as well as health and safety at work (Social). When considering environmental and social characteristics, investments are made in assets of issuers that apply good corporate governance practices.

## D Investment strategy

### **Investment strategy to fulfil the environmental and/or social characteristics of the financial product**

The fund's investment strategy follows an ESG approach, in which the sustainable orientation of the fund is to be ensured by taking into account various sustainability indicators.

Exclusion criteria are set for the acquisition of certain assets of the fund. These criteria are described in the section "Methods".

First, ESG screening excludes companies from the investment universe based on their controversial business practices or activities. These exclusion criteria are based on internationally recognised standards such as the Oslo Convention on the Prohibition of Cluster Munitions or the UN Global Compact Principles and are regularly reviewed by the portfolio manager.

ESG integration involves the use of different sustainability indicators in portfolio construction. For example, we reduce the ESG risk of the fund by targeting companies with a better ESG profile or lower carbon footprint. We can optimise these sustainability metrics considering all material indicators simultaneously in our investment process.

**Policy for assessing the good governance practices of the companies in which investments are made**

For the acquisition of securities within the framework of the sustainable investment strategy of the fund, it is required that the issuers of these securities apply good corporate governance practices. To this end, exclusion criteria are defined that are based on the ten principles of the United Nations Global Compact.

The ten principles of the Global Compact include guidelines for dealing with responsibilities in the areas of human rights, labour, environment and anti-corruption. Companies should respect the protection of international human rights and ensure that they are not complicit in human rights abuses. They should work for the abolition of child labour and the elimination of all forms of forced labour, as well as the elimination of discrimination in respect of employment and occupation. They shall accelerate the development and proliferation of environmentally friendly technologies, promote environmental awareness and follow the precautionary principle in dealing with environmental problems. They shall work against corruption in all its forms, including extortion and bribery.

# E Proportion of investments

The assets of the fund are divided into different categories in the chart below. The respective share of the fund's assets is shown as a percentage.

“Investments” means all assets that can be acquired by the fund excluding borrowings and other liabilities.

The category “#1 Aligned with E/S characteristics” includes the investments of the financial product used to attain the environmental or social characteristics promoted by the financial product.

The category “#2 Other investments” includes the remaining investments of the financial product which are neither aligned with the environmental or social characteristics, nor are qualified as sustainable, for example, derivatives, bank deposits or financial instruments for which there is not enough data to be able to evaluate them for the sustainable investment strategy of the fund.



## F Monitoring of environmental or social characteristics

The fulfilment of the fund's environmental and social characteristics is measured via the so-called sustainability indicators (consisting of sustainability ratios and exclusion criteria). The sustainability indicators are described in the "Methods" section.

Within the framework of the investment process, these sustainability indicators are continuously determined and aggregated at portfolio level. Compliance with the exclusion criteria as defined in the investment strategy is implemented through corresponding systematic analyses as part of the portfolio construction. In order to monitor and control the individual investments, the sustainability indicators relevant to the investment strategy are also reported at fund level.

Technical control mechanisms are also implemented in our trading systems to monitor and ensure investment restrictions defined in the investment strategy to fulfil the fund's environmental and social characteristics (e.g. the application of exclusion criteria and minimum requirements for sustainability ratios).

## G Methodologies

The achievement of the fund's environmental and/or social characteristics is measured by sustainability indicators. The sustainability indicators of this fund are:

### Screening

Exclusion criteria are set by the Company for the acquisition of certain assets. For example, securities of companies involved in the production and transfer of landmines, cluster bombs and nuclear weapons are excluded. Furthermore, securities of countries that are deemed not free by the Freedom House Index.

### Sustainability indicators

Depending on the type of issuer, the sustainability metrics can cover the dimensions of environment, social, governance, sustainable business and controversy and assess the sustainability profile ("ESG profile") of the issuer. In the environmental area, the ESG profile is measured by issues such as greenhouse gas emissions reduction, biodiversity conservation, water intensity or waste reduction. In the social area, the ESG profile is measured on the basis of topics relating, for example, to the treatment of employees, the guarantee of health and safety standards, labour standards in the supply chain or the safety and quality of products and services.

In the area of good corporate and governance, the Company analyses compliance with good governance standards based on data from various providers and research from proxy advisors. In this context, the ESG profile is measured, for example, on topics such as corruption, compliance, transparency and risk and reputation management. The Company also takes into account sustainability ratings and ESG indicators from external providers in order to obtain a comprehensive picture of the ESG profile of issuers.

## H Data sources and processing

Data used to analyse issuers and/or assets with regard to sustainability indicators are obtained from external service providers. Various service providers (e.g. MSCI ESG Research LLC) are used in order to benefit from the highest possible data quality.

Providers of sustainability data are checked during the selection process with regard to the quality of the data they are to supply. Controls are carried out as part of the delivery of data. In particular, this involves checking the regular receipt of data and whether data has been delivered in the manner defined by the company. In addition, it is checked whether the data supplied has been correctly imported into the Company's internal systems.

Raw data flows into portfolio management software, which processes the corresponding data automatically. On the basis of these results, it can be checked for the fund, for example, whether the specified target values are being met at portfolio level.

Only a very small proportion of this data is estimated due to a lack of reporting at company level. Estimates would be based on average values of industries or sectors.

## I Limitations to methodologies and data

Currently, only certain companies are required to publish sustainability information in their annual reports. Where a complete assessment of the companies and/or assets with regard to the fulfilment of the environmental and social characteristics is not possible due to a lack of data availability, own research can be used with regard to significant violations of the exclusion criteria.

Furthermore, content that is more difficult to measure or quantify due to a lack of reporting is addressed in the context of company dialogues. The analyses of the issuers and/or assets of the fund as well as the engagement take place on a regular basis, i.e. at least annually and on an occasion-related basis. Further information on engagement can be found in the section "Engagement Policy".

Despite the partially limited data situation, it can therefore be achieved through the measures described that the ecological and/or social characteristics advertised with the financial product are fulfilled.

## J Due diligence

The Company is committed to the fiduciary principle and acts exclusively in the interests of the investors. This principle is integrated into the Company's business processes. For this purpose, an internal guideline and process system has been established, which must be adhered to by all units and is monitored by the responsible compliance department in a risk-oriented manner.

In addition to complying with the relevant applicable laws and regulatory requirements, the Fund's sustainable investment process is guided by leading national and international standards that serve as a benchmark for action.

The Company relies in particular on the following sets of rules:

- the United Nations Principles for Responsible Investment (PRI)
- the UN Global Compact
- the Oslo Convention on the Prohibition of Cluster Munitions
- the Ottawa Convention on the Prohibition of Anti-Personnel Mines
- the BVI Code of Conduct

During the acquisition and ongoing analysis of the Fund's assets, sustainability risks are taken into account as part of the Company's general due diligence obligations and in the risk analysis.

## K Engagement policies

As part of the fund's investment strategy, the Company aims to engage in constructive dialogue with the invested companies, either alone or in association, as a responsible and active asset manager. This approach is referred to as engagement. The primary objective is to actively influence companies on opportunities and risks related to ESG factors. On the one hand, these dialogues examine whether and to what extent sustainability is part of the business strategy. On the other hand, it is demanded to consistently pursue sustainability, as far as it is advantageous for the investor.

Responsible corporate governance is expected, which not only takes into account purely economic targets, but also social, ethical and environmental aspects. These targets are particularly supported by society if they promote the long-term interests of shareholders and creditors and thus the long-term value of the company. Companies are required to comply with good corporate governance standards with regard to shareholder and creditor rights, composition and remuneration of the executive board and supervisory board, capital measures, auditors and transparency, among other things.

By exercising its shareholder and creditor rights, the Company can advocate for good governance at the companies' general meeting. The analysis required for this is supported by data from various providers and research from proxy voting advisors. The basis for voting behaviour is the current Union Investment Proxy Voting Policy.

While the Proxy Voting Policy provides a framework for voting behaviour, the Engagement Policy forms a guideline for direct corporate dialogue as part of engagement activities, from which deviations are only made in justified individual cases. Both policies are updated annually and can be found at this [link](#).

In this way, a positive contribution is to be made to sustainably increasing the value of the company as well as to responsible corporate governance.

In the event of serious violations of, for example, the principles of the UN Global Compact or the labour standards of the International Labour Organization (ILO), and if no positive result has been achieved through engagement dialogues with issuers, it may in extreme cases lead to the exclusion of issuers from the investment universe.

### List of amendments:

**10.03.2021:** Initial publication

**01.01.2022:** As of 01.01.2022, an adjustment of the investment process has taken place, which is listed in the section "Assessment and measurement of environmental and social characteristics".

**01.07.2022:** Integration of the description on the consideration of adverse impacts on sustainability risks as well as the description on the fact that sustainable investments will be pursued.

**01.01.2023:** Adaptation of the document due to the Level 2 Disclosure Regulation.