



Stewart Investors

## Stewart Investors Asia Pacific All Cap Fund

Sustainability Product Report for the year ended 31 December 2025

**This Fund is authorised in the UK and regulated by the Financial Conduct Authority. First Sentier Investors (UK) Funds Limited, the manager, is authorised in the UK and regulated by the Financial Conduct Authority**

## Purpose of this document

This sustainability product report is published by First Sentier Investors (UK) Funds Limited in compliance with the requirements set out in chapter 2, 4 and 5 of the Environmental, Social and Governance sourcebook ("ESG Sourcebook") of the FCA Handbook.

In line with the FCA's guidance permitting the combination of sustainability and climate-related disclosures, this report consolidates the following:

### 1. Annual Sustainability Product Reporting

This section fulfils the obligations under the Sustainability Disclosure Requirements (SDR), providing detailed information on the product's sustainability characteristics, objectives, and performance against regulatory standards.

### 2. Climate-Related Product Disclosures

The second section addresses the public disclosures required by the Taskforce on Climate-related Financial Disclosures (TCFD) framework, outlining climate-related risks, opportunities, governance, and strategy relevant to the product.

By integrating these disclosures into a single report, we aim to deliver a streamlined, transparent, and comprehensive view of the product's sustainability and climate-related considerations, ensuring clarity and accessibility for stakeholders.

## Section 1 – Annual Sustainability Product Reporting

**Product LEI:** 549300S13AWLBOYIOL33

**This product does not have a UK sustainable investment label.**

**Sustainable investment labels help investors find products that have a specific sustainability goal. This product does not have a UK sustainable investment label as it does not have a non-financial sustainability objective. Its objective is to achieve capital growth over the long-term by following its investment policy and strategy.**

### Investment Policy

The Fund invests in a diversified portfolio of equity or equity-related securities of companies that are incorporated or listed, or where a majority of their economic activities take place, in the Asia Pacific region (excluding Japan) and which are listed, traded or dealt in on Regulated Markets worldwide.

### Investment Strategy

The Manager's investment strategy is founded on the principle of stewardship. Stewardship relates to the ability and desire of the owners and leaders of companies to make good long-term decisions on behalf of the businesses they run while effectively balancing the interest of all stakeholders.

The Manager takes a bottom-up<sup>1</sup> and qualitative approach to finding and investing in companies which it believes are both of (a) high quality (as determined through the Manager's Quality Assessment) and (b) contribute to, and benefit from, sustainable development.

The Manager has a strong conviction that the companies in which the Fund invests face fewer risks and are better placed to deliver positive long-term, risk-adjusted returns<sup>2</sup>. The Manager believes that this approach will help preserve client capital in volatile and falling markets allowing for the steady compounding of returns through economic cycles.

The Manager does not set quantitative thresholds for incorporating sustainability or ESG considerations, but rather evaluates a company's track record and business model against quality and sustainability frameworks and makes qualitative judgements.

<sup>1</sup> That is, analysing individual companies rather than countries or sectors.

<sup>2</sup> investment returns that take into account the associated risk taken in making them.

The hallmarks of the Manager's investment strategy are an exclusive focus on companies that contribute to, and benefit from, sustainable development; a research-driven, fundamental, bottom-up approach to the selection and ongoing analysis of investments; a focus on the quality and sustainability attributes of every company; a focus on company stewardship and sound governance; a long-term investment horizon; and a commitment to engagement in order to address sustainability concerns and issues.

### ESG Strategy

The Manager will invest primarily (at least 90% of the Net Asset Value of the Fund) in companies it believes contribute to, and benefit from, sustainable development. The Manager considers that a company will contribute to, and benefit from, sustainable development if its activities lead to positive social outcomes or positive environmental outcomes (as defined below).

In assessing whether a company "contributes to and benefits from" sustainable development, the Manager will consider whether:

1. there is either a direct<sup>3</sup> or enabling link<sup>4</sup> between the activities of the company and the achievement of a positive social or environmental outcome;
2. any contribution to positive social or environmental outcomes has resulted from revenue or growth drivers inherent in the company's business model, strategic initiatives that are backed by research and development or capital expenditure, or from the company's strong culture and sense of stewardship e.g. for equity and diversity; and
3. the company recognises potential negative social or environmental outcomes associated with its product or services and works towards minimising such outcomes, e.g. a company that sells affordable nutritious food products in plastic packaging, but is investigating alternative packaging options.

### Positive social outcomes

The Manager assesses positive social outcomes by reference to the below human development pillars. The investment manager has developed these human development pillars by reference to, amongst other things, the UN Human Development Index.

### Positive environmental outcomes

The Investment Manager assesses positive environmental outcomes by reference to the climate solutions developed by Project Drawdown<sup>5</sup>, a non-profit organisation that has mapped, measured and modelled over 90 different solutions that it believes will contribute to reaching drawdown – i.e., the point in the future when emissions stop increasing and start to steadily decline.

**For further information, please refer to the [First Sentier Investors ICVC prospectus](#)**

### ESG Metrics

To validate that social and environmental outcomes remain compatible with the investment strategy of the Fund, the Manager uses its annual reassessment of each company as evidence as to whether or not it continues to meet the required qualities to contribute to, and benefit from, sustainable development achieving positive social and environmental outcomes in accordance with the Manager's frameworks described above. Much of the ongoing review incorporates company meetings, team discussions, annual report reviews and investment trips. Where issues are more complex the manager may commission research from experts in the field to better understand an emerging issue.

This rigorous bottom-up analysis is supplemented by third party frameworks, external research and controversy monitoring.

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<sup>3</sup> A direct link would arise where the goods an entity produces or the services it provides are the primary means through which the positive social or environmental outcome can be achieved (e.g. solar panel manufacturers or installers).

<sup>4</sup> An enabling link would arise if the goods a company produces or services it provides enable other companies to contribute towards the achievement of the positive social or environmental outcome (e.g. manufacturers of critical components that are used as inputs in the manufacture of solar panels).

<sup>5</sup> Any reference to Project Drawdown is to describe the publicly available materials utilised by the investment manager in formulating its sustainability analysis framework. It is not intended to be, and should not be, read as constituting or implying that Project Drawdown has reviewed or otherwise endorsed the the investment manager sustainability

Companies which the Manager determines, through its ongoing assessment and engagement efforts, no longer meet the Managers standards of contributing to sustainable development will be sold and removed from the Fund in an orderly manner having regard to the best interest of investors.

### Performance of ESG metrics

The Fund reports the following metrics to assist investors in understanding the Manager’s sustainability assessment and the Fund’s exposure to harmful or controversial products, services and practices:

- a) The positive environmental and social outcomes (in accordance with the frameworks described above) that its investee companies have contributed towards during the reference period.

As of 31 December 2025, the Fund held 42 companies. All companies (100%) were contributing to at least one human development pillar and, in total, were making 99 contributions to the pillars.

25 companies (60%) were contributing to climate change solutions. These companies were contributing to 26 different solutions and, in total, were making 68 contributions to the solutions

- b) a summary of engagements with investee companies during the reference period.

Our engagement is prioritised at a company level, and we engage on issues including: pollution; natural resource degradation; biodiversity and climate change; fair wages, gender pay gaps and incentives; governance; human rights and modern slavery; diversity, equity, and inclusion; as well as addictive products.

ESG Theme	Number of engagements
Governance	16
Social	17

- c) a summary of proxy voting during the reference period

#### Voting activity: 1 January 2025 to 31 December 2025

Number of companies that held voting meetings	69
Number of meetings to vote at	97
Total proposals to vote on	702
Number of votes against management proposals	15
Number of votes abstained from voting	0
Number of shareholder proposals to vote on	0
Number of shareholder proposals voted against	0
Number of shareholder proposals abstained from voting	0

- d) Investee companies held by the Fund during the reference period that have generated over 5% of revenue from harmful or controversial products or services (as defined by the Investment Managers [position statement](#)) together with the reasons for deciding to maintain the holding.

### Jardine Matheson Holdings

**UN Global Compact Principle 1 (Watchlist):** Businesses should support and respect the protection of internationally proclaimed human rights.

**Reason for exception/holding:** Jardine Matheson operates a portfolio of businesses that support employment, infrastructure, transport, food and healthcare across Indonesia, Hong Kong, China and Southeast Asia. It invests in Astra (c.58% of 2024 group revenue) which has over 300 subsidiaries.

Concerns have been raised by our external research provider regarding one of Astra’s subsidiaries, Astra Agro Lestari (AAL). AAL is an Indonesian palm oil company which contributes c.7% to Astra’s revenue (2024). AAL has faced accusations of land grabbing and human rights abuses due to ongoing land conflicts in Indonesia. In response, AAL has provided detailed clarifications, expressing its commitment to complying with regulations and

collaborating with local communities to prevent conflicts. The company has also sought engagement with environmental groups, facilitated by independent third parties.

An independent assessment conducted by EcoNusantara over eight months involved direct engagement with affected communities. The findings, published in November 2023, found no evidence supporting many of the land grabbing and criminalisation claims against AAL.

Despite the unsubstantiated allegations, AAL has collaborated with EcoNusantara to develop a three-year action plan based on their recommendations. The plan emphasises inclusive engagement and measurable outcomes, incorporating input from key stakeholders and academic experts.

Under new management, Jardine Matheson acknowledges past shortcomings in managing community relationships. The group has taken steps to improve land use, conservation, community support, climate impact mitigation, and circularity. To support improvements in its long-term sustainability strategy, the company has applied to join the Roundtable on Sustainable Palm Oil (RSPO), a globally recognised certification standard for sustainable palm oil production. Additionally, AAL is certified under the Indonesian Sustainable Palm Oil (ISPO) scheme, a mandatory national certification system established in 2011 to enhance agricultural and sustainability standards in the Indonesian palm oil industry.

### Singapore Telecommunications (Singtel)

**UN Global Compact Principle 1 (Watchlist):** Businesses should support and respect the protection of internationally proclaimed human rights.

**Reason for exception/holding:** Singtel is a leading telecommunications provider, playing a vital role in building resilient infrastructure and fostering innovation. It invests in advanced telecommunications infrastructure, supporting economic development. Additionally, Singtel is actively involved in initiatives that promote 'smart city' solutions: enhancing urban living through technology. These initiatives encompass projects related to smart transportation, energy efficiency, and urban connectivity.

Our external research provider has placed Singtel on a 'watchlist' due to a data breach at its wholly owned subsidiary, Singtel Optus Pty Ltd ('Optus'). In 2022, Optus experienced a cybersecurity attack that exposed the personal data of millions of its current and former customers. The Australian Communications and Media Authority (ACMA) charged Optus with breaches of the Telecommunications (Interception and Access) Act for failing to protect customers' data and the company faces a class action lawsuit from former and current customers affected by the attack.

Prior to the incident, Optus had established robust data privacy and security controls, including a comprehensive data protection policy and the imposition of strict limits on access to customer information. The risk-management practices of Optus's parent company, Singtel, align with international standards (ISO 31000), indicating a structured and proactive approach to risk management.

Following the attack, Optus's technical team immediately informed regulators and the public. It communicated directly with 10 million customers, reaching out individually to those whose data had been compromised. It also engaged Deloitte to conduct a forensic review of the attack, demonstrating its commitment to understanding and addressing the breach.

In March 2023, Optus appointed a panel of global cybersecurity experts to advise on its information protection and cybersecurity strategies with the aim of enhancing its security position. Since the breach, the company has reported investments aimed at improving its cyber capabilities and providing additional protection to its customers.

Although Optus has faced significant challenges due to the data breach, its managers have taken positive steps to remedy the situation. These include improving communication, enhancing security measures, and supporting affected customers. Such actions reflect a commitment to restoring trust and preventing future incidents, positioning Singtel and Optus for a more secure future.

### Tata Consultancy Services (TCS)

**UN Global Compact Principle 2 (Breach):** Businesses should make sure that they are not complicit in human rights abuses.

**Reason for exception/holding:** TCS has no direct involvement in nuclear weapons or energy, however our external research provider considers the company to be involved because its parent company, Tata Sons, owns greater than 50% of TCS.

Tata Sons involvement is due to the company owning Tata Advanced Systems which acquired Tata Power's Strategic Engineering Division. The Strategic Engineering Division provides control systems for the Indian Navy's nuclear missile submarines.

As India has not signed the Treaty on the Non-Proliferation of Nuclear Weapons, the external data provider considers Tata Sons and by extension TCS to be in support of the nuclear weapons programme of India.

We disagree with this assessment and do not see anything in the activities or conduct of the company to question its sustainability positioning or the investment case.

## Tencent

**UN Global Compact Principle 2 (Breach):** Businesses should make sure that they are not complicit in human rights abuses.

**Reason for exception/holding:** Tencent is a leading Chinese internet and technology company best known for its super-app, WeChat. Initially designed as an instant messaging platform, WeChat now provides an essential tool allowing more than a billion users to centralise their digital lives by combining access to social media with online payments, music streaming, gaming, shopping, news, and travel booking.

Our external research provider has raised concerns regarding Tencent's involvement in censorship and surveillance, which it believes infringes the rights of its users to privacy and freedom of expression.

Tencent's privacy policies make it clear that it abides by all of the relevant privacy and security laws that apply in the various territories in which it operates. In mainland China, where the issue is most acute, it has developed a country-specific approach to privacy. This includes allowing its users to express preferences over use of their data, ensuring that data is only held for as long as necessary before being deleted and imposing tight restrictions on third-party access. Like other companies, Tencent asks for its users consent before collecting their personal data.

When Tencent does receive an official request for user data, its policies demand that it verifies the government's requirements and ensures that the request is valid before complying. In the past, these requests have typically related to gambling syndicates and prostitution rings.

It is undeniable that the limitations imposed on free speech in China differ significantly from the norms in Western democracies. For example, where posts or content are critical of the Chinese authorities, they will tend to be removed. Yet while this is different from the practices of internet companies in other parts of the world in degree, we would argue that it is not different in kind. It is impossible to operate a digital business in almost any part in the world today without receiving official requests for data. And, when those requests are made, companies have little choice but to comply with local laws, no matter if they are based in Shenzhen or in San Francisco.

We would dispute the notion that Tencent does not have adequate management systems or disclosures in place. Its website goes into some detail on these topics, partly due to the controversy that has surrounded them in the past.

## Triveni Turbines

**Activity exposure >5% revenue:** Supporting Nuclear Power.

**Reason for exception/holding:** Triveni Turbines designs and manufactures steam turbines, with a focus on renewable, efficient industrial heat and power solutions.

Revenues derived from products and services supporting nuclear power accounted for an estimated 5% of the company's overall revenue in FY2023, according to our external research provider.

Nuclear power exposure for supporting products and services was added by our external research provider in early 2024 and we contacted the company directly to check the 5% revenue estimate provided. Given the company's nuclear power exposure is related to servicing old steam turbines within the industry, the company estimates around 1% of revenue to be a more accurate reflection of its exposure.

## How the metrics should be interpreted and the methodology used in providing each metric

Companies can contribute in many different ways to a better future for people and planet. The Investment Manager has no proprietary models or 'black boxes' for assessing sustainable development, but as part of their rigorous bottom-up analysis they analyse as broad a range of quantitative and qualitative factors as possible. The Investment Manager avoids top-down scores or a focus on a handful of standardised indicators, which they believe are more often about operational efficiency than company impact. Instead, they focus on the diverse contributions each company is making.

As long-term investors, the investment team will evolve their understanding of a company and develop an investment case over multiple years in order to gather as much information and data about each company as possible. This also applies to existing holdings, where the investment team will evolve their view through ongoing research and engagement on risks and opportunities. Ongoing analysis involves desk-based research of qualitative and quantitative data, meeting management, competitors, suppliers etc. The team supplements proprietary research with third-party information. This can come from forensic accountants, macroeconomists, consultants, academics, and environmental groups, as well as more traditional analysts at investment banks. Engaging with company management on ESG issues is also an important factor and influences the level of conviction in each company.

To assess the sustainable development contribution of companies, the team utilises frameworks, such as Project Drawdown for climate change solutions and their own human development pillars for key aspects of human development (developed from the UN Human Development Index). In addition, each company is mapped against the Sustainable Development Goals.

As bottom-up investors, the Investment Manager focuses on the environmental and social outcomes of each individual company. As each company is different, it is challenging to aggregate such outcomes into a single measure or standardised score which can make reporting more challenging. However, this does not impact the attainment of the sustainable investment objective. The company contributions reported by the Investment Manager are backed by evidence and collected by the investment team using their years of experience in sustainable investing. While the Investment Manager uses third-party services to assess and validate their own in-depth analysis of companies, they do not rely on third-party researchers to tell them what is sustainable. Instead, they carry out their own analysis and rigorously test it through company meetings, team discussions and specially commissioned research. The investment team then relate each contribution back to frameworks such as Project Drawdown climate change solutions and their own human development pillars adapted from the UN Human Development Index.

### Limitations to methodologies and data

The Investment Manager avoids top-down scores or a focus on a handful of standardised indicators, which they believe are more often about operational efficiency than company impact. Instead, they focus on the diverse contributions each company is making. Unfortunately, ESG data suffers from a multitude of flaws, and in their view, does not focus on the areas that matter. They believe that one of the main challenges is that ESG scoring methodologies tend to focus on how well companies manage their internal processes, rather than the real-world impacts of their products and services.

### Data sources and processing

The flow of data and information about companies is continuous. Information is updated on an ongoing basis by the investment team by conducting in-depth research and writing detailed reports on companies. The team performs periodic review exercises on portfolio and focus list companies to ensure they continue to meet the investment case. These exercises are normally performed by a different analyst to the one who completed the original company report. Timing of gathering and updating company data and information is dependent on various factors such as the publication of company reports and results, investor presentations, meetings with companies and any external research subjects commissioned. The team meet and liaise with companies on an on-going basis and are continuously assessing their sustainability credentials and quality. Due to the wide range and timing of data sources and different level of disclosure from individual companies it is not possible to determine what proportion of the data used by the investment team is estimated.

In order to validate the investment team's own in-depth analysis of companies and to monitor adherence to their position statement on harmful and controversial products and services and Group-wide exclusion policies, the Investment Manager also receives regular notifications on company controversies from an external provider.

The Investment Manager makes best efforts to ensure the data reported is accurate and reliable. This includes comparing different sources of information and using both internal and external analysis as described above. However, a significant number of companies do not disclose environmental or social metrics and targets or their disclosures are not consistent with widely adopted reporting standards such as the Greenhouse Gas Protocol in the case of climate measures. Where information is not available, the Investment Manager may use estimates from external providers such as ISS ESG in the case for climate data. Estimates require assumptions that do not match individual companies' circumstances in the real world.

## Section 2 – Climate-related Disclosures

The investment team seeks to understand how rising to the challenge of reducing greenhouse gas emissions in line with global goals might influence a company's business, and how each company can help the world achieve their carbon-reduction targets. Some companies the investment manager invest in directly support or otherwise enable the emission reductions needed to meet global climate goals. Obvious examples include renewable energy and electric vehicles. Less obvious examples include companies supporting energy efficiency, sustainable agriculture, and waste reduction.

The investment manager's investment process recognises that companies contributing to other aspects of sustainable development, such as improved health or reduced inequality, also need to reduce carbon emissions and build resilience across their value chains. The investment team actively encourages investee companies to do more and move faster to achieve sustainable development outcomes, including transitioning to a lower-carbon world.

### Climate commitments

The investment manager established four climate change commitments in 2021:

1. Allocate capital to high-quality companies developing and implementing solutions to alleviate climate change and biodiversity loss while not investing in fossil fuel companies.
2. Provide full transparency of their investments and map these on their Portfolio Explorer tool<sup>6</sup> to frameworks such as Project Drawdown climate change solutions<sup>7</sup> to both illustrate how companies are contributing to emission reductions and to help inform and focus engagement efforts.
3. Encourage companies to take positive actions and use their influence across their value chains to drive emission reductions while also striving to ensure equitable treatment of all their stakeholders in the transition to a carbon-constrained economy.
4. Reduce emissions in their own operations and offset whatever cannot be removed. They have a target of net zero scope 1 and 2 emissions from business operations and scope 3 emissions from employee travel and commute by 2030.

## Governance of climate-related risks and opportunities

Climate change risks are overseen and monitored by multiple governance bodies within the investment manager and FSG.

The investment manager is responsible for assessing and managing climate risks and opportunities at the fund level. The investment manager manages climate change risks through bottom-up analysis and engagement with companies, guided by their [investment philosophy](#) and [Hippocratic Oath](#). The investment manager's [policies](#) and [reporting](#) on climate change and related issues are available on its website.

Monitoring and oversight of investment funds occurs on a continuous basis, with the respective portfolio manager responsible for individual investment decisions. The head of the investment team has overall responsibility for the team's work.

FSG's management team has established operational governance structures to manage, support and oversee investment and other functions across FSG's operations globally. Governance arrangements that are relevant to the investment manager and their management of climate related risks include:

- FSG's Executive Committee (ExCo) provides oversight of the investment return and risk characteristics of the

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<sup>6</sup> The Portfolio Explorer is an interactive tool which allows users to explore the companies that we invest in, and discover the contributions they are making to sustainable development.

<sup>7</sup> Founded in 2014, Project Drawdown<sup>®</sup>1 is a non-profit organisation that seeks to help the world reach 'drawdown' — the future point in time when levels of greenhouse gases in the atmosphere stop climbing and start to steadily decline. Project Drawdown's deeply researched collection of around 90 climate change solutions, which if scaled up, can deliver the Paris Agreement's temperature goal. The full set of solutions along with the research that backs them are publicly available on [www.drawdown.org](http://www.drawdown.org)

investment manager's pooled funds and mandates. This incorporates sustainability risks stemming from environmental, social and governance (ESG) sources, including climate change.

- FSG's Investment Risk Oversight (IRO) team supports the ExCo with investment assurance oversight, which includes systematic assessments of all aspects of investment and portfolio risk, including oversight of ESG-related risks.
- The IRO team collaborates with FSG's Responsible Investment team in carrying out their investment assurance activities, in particular as it relates to engagement with the investment teams on their respective approaches to responsible investment and the assessment of responsible investment characteristics of the underlying investment funds. The investment manager's team engages with the Responsible Investment team and FSG management and have representatives on FSG's ESG Impacts Committee.
- FSG's internal audit function conduct periodic audits of investment functions. These audits include assessment of whether an investment team's stated investment philosophy and process is what occurs in practice – including management of climate change and ESG issues. Further details of FSG's oversight and management of climate-related risks and opportunities across the firm can be found in FSG's entity-level Climate and Nature report on the [reports and policy section](#) of the First Sentier Investors website.

## Implications of climate change for the strategy

### Investment strategy

The investment manager's investment philosophy seeks to invest in companies well positioned to contribute to, and benefit from, sustainable development. Every investment decision the investment team makes considers the sustainability positioning of every company from the bottom-up and includes:

- Detailed company analysis, including written company reports and ongoing monitoring of investee companies
- Investment team discussion and debate
- Weekly team and strategy meetings to discuss investment opportunities, risks, and decisions
- Meetings with company management and key stakeholders, from competitors to NGOs (Non-Governmental Organisation)
- Commissioned research on various aspects of business quality, including understanding climate and related risks
- Consideration of other third-party research.

The output from many years of employing this investment philosophy has resulted in funds that have lower carbon footprints than their corresponding benchmarks, are free of fossil fuel-extracting companies, and have a minimum of 40% of companies contributing to climate change solutions. This Fund also meets those characteristics.

The investment manager believes that over time companies' climate-related risks and opportunities will manifest in different ways depending on their industry, location and position in a product or service's value chain. The investment manager employs a bottom-up assessment of each investee company, which considers these unique characteristics and the context that the company operates in. No single metric could capture the diversity or size of different companies' contribution to sustainable development or the risks they face from a changing climate.

### Investing in Quality Companies

While positive sustainability positioning is important, it is not enough to protect client assets from climate-related risks or to capture opportunities. The investment manager believes that high-quality companies are in a better position to make the long-term investments and changes needed to transition their businesses to net-zero emissions and build resilience to the physical impacts of a changing climate. The investment manager invests in companies that it believes have exceptional management teams and cultures, enduring franchises with strong market positions and reputations, and sound financials, including low or no debt, sustainable margins, and free cash flow.

## Engagement

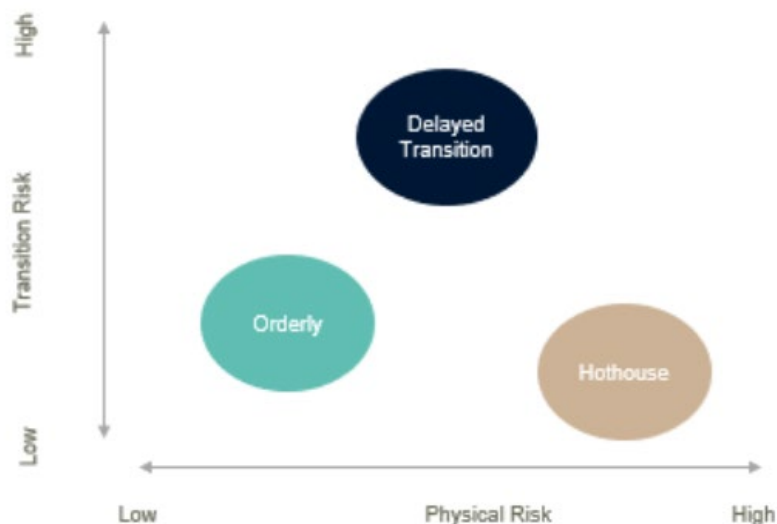
Company engagement is a critical part of the investment manager’s investment process. Engagement helps the investment team to build confidence in company management and to encourage companies to improve. The investment manager believes that constructive engagement is vital for the success of investors with a long-term investment horizon. Climate change has long been an area of engagement with companies and the investment manager sees it as a key lever in achieving their climate targets.

## Scenario analysis

The UK climate reporting legislation requires asset managers to use scenario analysis to describe the risk, opportunities and impacts of different climate change scenarios on their investments. The investment manager’s investment philosophy and process recognises that climate change is inextricably linked with other sustainable development challenges, from biodiversity loss to poverty alleviation and so cannot be looked at in isolation.

The investment manager has yet to integrate scenario analysis tools into their investment decision making, even though company resilience and their ability to transition to a net-zero carbon economy are considerations when analysing every company.

FSG’s Responsible Investment team independently conducts scenario analysis on the investment manager’s funds and provides this analysis to the investment manager and the relevant FSG governance forums. FSG’s qualitative analysis is based on the assumptions made under the three scenario narratives for the ‘Orderly’, ‘Delayed Transition’ and ‘Hothouse’ scenarios developed by the Network for Greening the Financial System, in addition to IEA Net Zero Scenario (SDS), Announced Pledges Scenario (APS) and Stated Policies Scenario (STEPS) carbon budget data. FSG’s RI team has conducted a scenario assessment of the climate-related risks and opportunities for the fund.



Source: NGFS scenario portal<sup>8</sup>

The ‘Orderly’ transition scenario assumes that climate policies are introduced smoothly and likely limit global warming to 1.5 degrees Celsius. The ‘Delayed transition’ assumes that climate policies are delayed leading to a disorderly transition requiring steeper emission reductions at a higher cost to limit temperature rise to 1.5 degrees Celsius. The late and aggressive policy shift results in higher transition risks, including economic disruptions and stranded assets. The ‘Hothouse’ scenario assumes that some climate policies are implemented in some jurisdictions, but globally efforts are insufficient to halt significant global warming. The scenario results in higher physical climate impacts and severe

<sup>8</sup> NGFS Portal: [NGFS Scenarios Portal](#)

social and economic disruption.

For transition risk exposure FSG considered stranded asset and carbon pricing risk by measuring the fund's exposure to investee company's involvement in fossil fuel related activities, whether they have set climate change related targets and the sector's contribution to fund emissions (see Key Metrics Section). For the physical risk impact exposure, FSI focused on 6 hazards (wildfires, tropical cyclones, droughts, coastal floods, river floods and temperature rise) and potential exposure to business/supply chain interruption.

The key results of the qualitative scenario analysis are that when climate policy action is high, the fund showed higher transition risk in the short and medium term compared to the less ambitious climate scenarios. However, as the portfolio has little exposure to carbon-intensive sectors and includes many companies actively contributing to climate solutions, the exposure to stranded asset and carbon pricing risks is less than for the fund's benchmark. While rapid decarbonisation will have implications for all companies, the investment manager focuses on companies with high-quality management teams, enduring franchises, and strong balance sheets should allow these companies to better adapt to a rapidly changing economy.

According to value at risk analysis, approximately 2.22% of the Fund's value may potentially be at risk under a high climate transition risk scenario. While 3.5% may potentially be at risk from future physical risk impacts under the most likely scenario RCP 4.5<sup>9</sup> (Source: ISS ESG). The Fund is associated with a potential temperature increase of 2 degrees Celsius by 2050. (Source: First Sentier Group, ISS ESG)

## Climate risk management

### Investment risks

Climate-related risks to the investments the investment manager makes on behalf of their clients is the responsibility of the investment team. As indicated in the strategy and governance sections, the investment manager believes their focus on sustainability positioning and quality are the best defence against climate-related risks.

In addition to the investment teams' internal analysis, the team commissions specialist investment research to support their knowledge building, decision-making and engagement activities. This research helps the investment team to understand how the net-zero transition and other related issues are likely to impact the companies as well as how companies are positioned to cope with the increasing impacts of a changing climate. A list of research that the investment manager have commissioned is available on their [website](#).

The investment manager [position statement on harmful and controversial](#) activities lays out their approach to managing risks by avoiding polluting companies, including fossil fuel companies, with little hope of transitioning their businesses successfully. The investment team also monitor the revenues derived from the fossil fuel industry by investee companies as these revenues are also at risk.

### Business risks

The key risk for the investment manager is the reputational and regulatory consequences if their actions do not match the statements made regarding their approach to sustainable investment (when businesses claim to be more sustainable than they are, it is known as 'greenwashing').

The investment manager manages these risks by:

- Sustainability is deeply embedded within the investment manager's investment philosophy, culture, and ethos
- FSG's compliance team review all communications and apply high standards for evidence and sourcing of

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<sup>9</sup> Representative concentration pathways (RCP) portray possible future greenhouse gas and aerosol emissions scenarios. RCP 4.5 is described by the Intergovernmental Panel on Climate Change (IPCC) as a moderate scenario in which emissions peak around 2040 and then decline.

information

- The investment manager provide full fund transparency quarterly in their [Portfolio Explorer tool](#) where it describes the investment case, sustainability positioning and contributions investee companies make, along with risks and areas for improvement
- To validate climate change contributions, the investment team refers to frameworks like [Project Drawdown](#)
- The investment manager is clear and consistent in communicating their investment philosophy and process, including their qualitative approach to assessing companies. Through improved disclosure, like this report, the investment manager believes it can continue to demonstrate an authentic, rigorous, and transparent approach to sustainable investing.

## Key metrics (as of 31 December 2025)

The following metrics are used as part of the investment manager assessment of climate-related risks and opportunities across the fund. The metrics include the Carbon Footprint, Weighted Average Carbon Intensity and Total Emissions of the fund as required by the UK Financial Conduct Authority's product-level climate disclosure rules. These rules also require the investment manager to determine if a fund has concentrated exposures or high exposures to carbon intensive sectors and if so to include quantitative scenario analysis metrics. This product did not have high exposure to carbon-intensive sectors during the reporting period; however, aside from fossil fuel companies, other high emitting sectors like cement and steel are not explicitly excluded and are eligible for investment if an individual company can meet the investment manager quality and sustainability standards.

The investment manager has set climate-related targets consistent with their commitments. These are not fund specific and relate to all their investment portfolios and business. In 2024, the investment manager reviewed its climate-related targets with the objective of:

- Simplifying and better aligning its targets with the organisation's investment philosophy.
- Using measures that better reflect real-world emissions performance.
- Focusing on those areas where the investment manager can have the greatest influence.

For 2030 its updated targets are that:

- On average, the companies the investment manager invest in will have reduced their carbon intensity<sup>10</sup> by 7% per annum over 5 years.
- 100% of companies will be disclosing Scope 1 & 2 emissions.
- 80% of companies will have emission targets.
- Our operational emissions will be net-zero (Scope 1 & 2).

These targets align with the investment manager investment philosophy, aiming to reduce emissions urgently while supporting opportunities for people globally, especially in emerging economies. However, the investment manager recognises that targets can result in unintended consequences and so will not compromise on its quality, sustainability or valuation requirements that have driven the positive outcomes the investment manager have achieved to date

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<sup>10</sup> Carbon intensity is emissions per million dollars of revenue in US dollars.

## Emissions Metrics (in GBP) - SI Asia Pacific Sustainability Fund

Total AUM: GBP £ 278.07 Million

AUM covered: GBP £ 268.29 Million<sup>11</sup>

Benchmark: Benchmark: MSCI AC Asia Pacific ex Japan

### Emissions data availability and disclosure

Percentage of covered AUM invested in holdings where reported Scope 1&2 emissions data is available from our data provider	Percentage of covered AUM invested in holdings where estimated Scope 1&2 emissions data is available from our data provider
93.42%	6.58%

Source: FSG, ISS ESG at 31 December 2025

Measures the percentage of AUM that is covered with company-reported versus modelled greenhouse gas (GHG) emissions data. Measuring GHG emissions is a critical first step as it enables companies to identify the different types of direct and indirect emissions throughout the value chain and as such enables them to design robust decarbonisation plans. The challenge remains access to robust GHG emissions data. We have experienced large differences between third-party data models as well as a difference in the company universe being covered.

### Total carbon emissions for fund

This metric measures the absolute GHG emissions associated with a fund (Scope 1, 2 and 3) expressed in tCO<sub>2</sub>e<sup>12</sup>. Scope 1, 2 and 3<sup>13</sup> emissions are allocated to investors based on an equity ownership approach (if an investor owns 10% of a company's total enterprise value, then they are allocated 10% of the company's emissions). Assets under management (AUM) is provided as, all other things being equal, higher AUM results in higher emissions.

The benchmark value is calculated by assuming the benchmark has the same total value of investments as the particular strategy. Where multiple strategies are included the benchmarks are weighted accordingly.

Use cases: To track the carbon footprint of the fund over time and compare to benchmark emissions. Not for comparison between strategies or asset managers as the data is not normalised.

Financed emissions	TCo <sub>2</sub> e 2025	TCo <sub>2</sub> e 2024	TCo <sub>2</sub> e 2023
Total Scope 1 & 2 emissions	5,910	12,252	14,257
Scope 3 emissions	89,974	237,009	275,725
Total Scope 1, 2 and 3 emissions	95,884	249,261	289,982

Source: FSG, ISS ESG at 31 December 2025

<sup>11</sup> Cash is excluded

<sup>12</sup> Not all greenhouse gases warm the atmosphere equally, some gases (such as methane) have a greater global warming potential, or warming effect, than carbon dioxide. To account for this, the term CO<sub>2</sub>e is used and means that greenhouse gases other than carbon dioxide can be converted, or normalized, to the equivalent amount of CO<sub>2</sub>, based on their relative contribution to global warming. This provides for a single, uniform means of measuring emissions reductions for multiple greenhouse gases. Source: UN-REDD (<https://www.un-redd.org/glossary/carbon-dioxide-equivalent-co2e>)

<sup>13</sup> Scope 1: An organisation's direct GHG emissions from owned or controlled sources.

Scope 2: An organisation's emissions associated with the generation of electricity, heating/ cooling, or steam purchased for own consumption.

Scope 3: All indirect emissions (not included in scope 2) that occur in the value chain of the reporting company and is divided across 15 categories for both upstream (supply chain) and downstream (lifecycle of products) activities. Scope 3 emissions are almost entirely modelled by third party providers and the investment manager believes that they are not reliable at the company level.

### Relative carbon footprint for fund

Relative Carbon Footprint: Total carbon emissions for a fund normalised by the market value of the fund, expressed in tonnes CO2/£M invested. It enables easier comparison with a benchmark, between funds, and between individual investments. On 31 December 2025, the fund's relative carbon footprint was 81.05% lower than the benchmark's relative carbon footprint.

Relative carbon footprint	Scope 1&2 emissions (tCO2e) per £M invested 2025	Scope 1&2 emissions (tCO2e) per £M invested 2024	Scope 1&2 emissions (tCO2e) per £M invested 2023
Fund	22.03	18.58	20.6
Benchmark	116.26	127.45	149.48

### Weighted average carbon intensity

This metric captures each company's greenhouse gas emissions intensity (Scope 1 & 2) by dividing emissions by £ 1 million sales. The emissions intensity is then averaged, weighted by the value of each holding in the fund. Intensity normalises company emissions by total sales, which means larger companies (with more revenues and emissions) can be compared to smaller companies. It should show which company is more efficient; however, it does not consider other variables that influence a company's revenues like currency or commodity price changes. For example, an increase in iron prices would make an iron ore producer's emission intensity fall even if they have taken no action to reduce emissions. The metric also treats all industries the same despite some being more energy or carbon-intensive and so may not distinguish the actual efforts to reduce carbon emissions between companies.

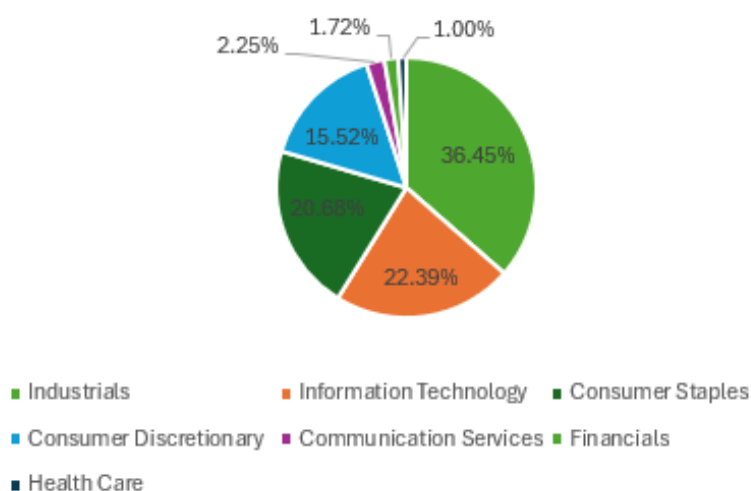
Largest contributors to carbon intensity and highest intensity companies overall uses the same method as for the carbon footprint. Use cases: To compare emissions intensity against a benchmark or other fund.

Weighted Average Carbon Intensity	Scope 1&2 emissions (tCO2e) per £M revenue 2025	Scope 1&2 emissions (tCO2e) per £M revenue 2024	Scope 1&2 emissions (tCO2e) per £M revenue 2023
Fund	67.35	70.86	59.15
Benchmark	299.47	348.77	349.15

Source: FSG, ISS ESG as at 31 December 2025

### Sector Contribution to Emissions.

#### Sector Contribution to Emissions

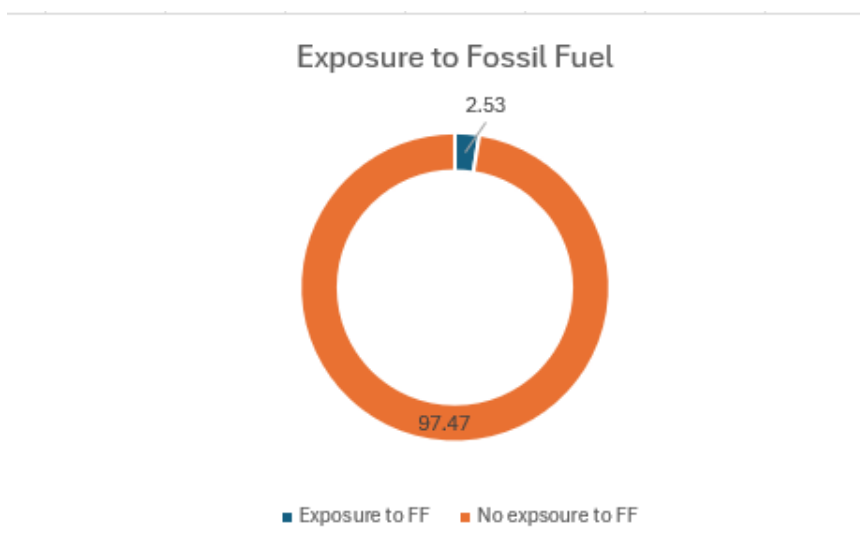


Measures the proportion of the Fund invested in sectors that are more vulnerable to transition risk within the Fund.

Metrics providing additional insights into climate-related risks and opportunities:

Exposure to Fossil Fuel (Transition Risk)

This indicator measures the portfolio's exposure to companies involved in fossil fuels as defined by Sustainalytics, this includes (i) exploration, mining, extraction, distribution or refining of hard coal and lignite; (ii) exploration, extraction, distribution (including transportation, storage and trade) or refining of liquid fossil fuels; and (iii) exploration, extraction, distribution (including transportation, storage and trade) of gaseous fossil fuels<sup>14</sup>. This measure is useful in understanding the potential stranded asset risk within the fund as the world is transitioning to a low carbon world.



Source:FSG, ISS ESG as at 31 December 2025

<sup>14</sup> The investment manager does not invest in companies that have a material exposure to the exploration, production or generation of fossil fuel energy. The investment manager defines fossil fuels as coal, unconventional oil & gas (arctic drilling, oil sands, shale energy), and conventional oil & gas. The investment manager's Funds consider exploration, extraction, power generation, transportation, distribution, refining or providing dedicated equipment or services as part of the value chain. [Our position on harmful and controversial products and services \(stewartinvestors.com\)](https://www.stewartinvestors.com)

## Legal Notices

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First Sentier Group subscribe to Institutional Investment solutions (ISS) for climate information and analysis. ISS are a world leading provider of environmental, social, and governance solutions for asset owners, asset managers, hedge funds, and asset servicing providers. ISS ESG solution provides climate data, analytics, and bespoke services to help financial market participants understand, measure, and act on climate-related risks and opportunities across all asset classes. ISS ESG platforms are capable of providing carbon foot printing and climate risk and opportunity analysis across portfolio assets. The methodologies employed for carbon foot-printing depend on the assets within the portfolio and data available. The carbon footprint assessment approach used by ISS for equity and fixed income portfolios is aligned with PCAF guidance.

ISS ESG takes an exhaustive approach for data collection, analysis and delivery to its clients. The ISS ESG methodologies provide details about the underlying models used for estimating non-disclosed data. The ISS ESG methodology documents describe the limitations and uncertainties attached to the models; and subsequently detail the ways to address these limitations using multiple metrics and via continuous improvement of these models

ISS ESG methodology: <https://www.issgovernance.com/esg/methodology-information/>

The data set out above are estimates based on data sourced by First Sentier Group. This data is current as at 31/12/2025. It is based on information and representations sourced from third parties (including portfolio companies), which may ultimately prove to be inaccurate. No assurance is given or liability accepted regarding the accuracy, validity or completeness of this data and no reliance should be placed on it by any third party