

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

Product name: Latin American Smaller Companies Fund

Legal entity identifier: 213800AZ67GL3I1NSK94

Environmental and/or social characteristics

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 include a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

Does this financial product have a sustainable investment objective?

☒ ☐ 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 ____% 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?

The Sub-Fund promotes environmental characteristics through targeting better greenhouse gas ('GHG') emission data disclosure and a commitment to credible net zero transition plans from the companies held by the Sub-Fund that are considered high intensity GHG emitters*, as well by investing in companies that are not considered high intensity GHG emitters, and excluding investments in certain sectors or business areas, as described in the investment strategy section.

No reference benchmark has been designated for the purpose of attaining the environmental or social characteristics promoted by the Sub-Fund.

* The Sub-Investment Manager considers 'high intensity GHG emitters' as companies that emit the equivalent of 1,000 CO2 tonnes per USD mm of annual revenues or more, or companies that are in one of the following industry sectors: Construction Materials, Oil & Gas, Steel, Aviation, Power Generation. This definition is going to be revised by the Sub-Investment Manager on an annual basis.

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

The Sub-Investment Manager has set expectations, as described in the investment strategy section, regarding GHG emission data disclosure and commitment to credible net zero transition plans for high intensity GHG emitters which must be met within a predetermined timeframe.

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

The Sub-Investment Manager will monitor and, on an annual basis, report the alignment of the Sub-Fund against these expectations. Sustainability indicators used by the Sub-Fund are:

- proportion of companies held in the portfolio that are considered high intensity GHG emitters and disclose GHG emissions data in line with an internationally recognised standard;
- proportion of companies held in the portfolio that are considered high intensity GHG emitters and are committed to achieve net zero before 2050;
- proportion of companies held in the portfolio that are considered high intensity GHG emitters and are committed to a net zero implementation plan that is verified by an internationally recognised third-party; and
- proportion of companies held in the portfolio that are considered high intensity GHG emitters and adhere to their credible net zero implementation plans, disclosing investments and management actions aligned with the plan and/or GHG emissions data, on at least an annual basis.

For high GHG emitting companies which do not meet each of the above criteria the Sub-Investment Manager will monitor the alignment of those companies with the expectations described in the investment strategy section.

- ***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?***

N/A

- ***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?***

N/A

- *How have the indicators for adverse impacts on sustainability factors been taken into account?*

N/A

- *How are the sustainable investments aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights?*

N/A

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.

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 rights, anti-corruption and anti-bribery matters.



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

☒ Yes, the following principal adverse impacts are considered for the Sub-Fund's investments that are classified high intensity GHG emitters:

- GHG emissions;
- Carbon footprint; and
- GHG intensity of investee companies.

Where material adverse impacts are identified, the Sub-Investment Manager will engage directly with company management where it is believed that there is a significant chance of positively affecting the behaviour of a company and /or exercise proxy voting rights in an effort to catalyse change.

An assessment of the principal adverse impacts at the aggregate Sub-Fund level will be reported on an annual basis in the annual report as required by Article 11 SFDR.

☐ No



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

What investment strategy does this financial product follow?

As part of the fundamental analysis stage of its investment process, the Sub-Investment Manager uses a consistent approach, applied on an ongoing basis, to assess the environmental and social characteristics of companies using a variety of qualitative information and available data. There will be no mechanistic reliance on external ESG ratings and scores.

Exclusions

The Sub-Fund will not invest in companies that are directly involved in the following business activities:

- the production of crude oil from oil sands;
- the manufacture and production of controversial weapons (including biological and chemical weapons, cluster munitions and landmines); and
- the manufacture and production of nuclear weapons.

The Sub-Fund will not invest in companies which derive more than 5% of their revenues from the production, distribution, or supply of tobacco related products.

In addition, the Sub-Fund will not invest in companies which derive more than 25% of their revenues from thermal coal extraction or thermal coal-based power generation.

Over time, the Investment Manager may, at its discretion and in accordance with this investment policy, elect to apply additional exclusions to be disclosed on the website as they are implemented and subsequently updated in this Prospectus at the next available opportunity.

Engagement Strategy

Furthermore, the Sub-Investment Manager will engage with company management of high intensity GHG emitters held in the Sub-Fund, seeking to ensure these companies:

- disclose GHG emissions data in line with an internationally recognised standard within 2 years, from the later of either January 2022, or when the company is incorporated into the Sub-Fund;
- commit, within 3 years, from the later of either January 2022, or when the company is incorporated into the Sub-Fund, to achieve net zero before 2050;
- commit to a net zero implementation plan that is verified by an internationally recognised organisation within 4 years, from the later of either January 2022, or when the company is incorporated into the portfolio; and
- adhere to their net zero implementation plans, disclosing investments and management actions aligned with the plan and/or GHG emissions data, on at least an annual basis.

The Sub-Fund's holdings will be monitored on an ongoing basis by the Sub-Investment Manager. A holding may be sold for a range of reasons but in particular, if it is determined that the investment case for the holding has been weakened or it no longer satisfies the investment objective and policy of the Sub-Fund. Such sales will take place over a time period to be determined by the Sub-Investment Manager, taking into account the best interests of the Shareholders of the Sub-Fund.

- ***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 Sub-Investment Manager will monitor the alignment of the Sub-Fund's investments to the promoted environmental characteristics. Deviation from these expectations will constitute a reason to sell a holding.

In the securities selection process, the Sub-Investment Manager applies in a binding manner the promoted environmental characteristics of GHG emissions data disclosure and net zero commitments, as described above, to the portfolio holdings of the Sub-Fund that are considered high intensity GHG emitters.

This criterion does not apply to the Sub-Fund's '#2 Other' investments – please find more detail in the question about 'asset allocation' planned below.

In addition, the Sub-Fund will not invest in certain sectors or investments, as described above.

- ***What is the committed minimum rate to reduce the scope of the investments considered prior to the application of that investment strategy?***

N/A

- ***What is the policy to assess good governance practices of the investee companies?***

The Sub-Investment Manager follows an internal investment framework to analyse any governance-related risk and concerns related to investee companies. This is rooted in widely accepted governance principles and guidelines.

Good governance practices are considered as part of the Sub-Investment Manager's proprietary ESG questionnaire. There is a focus on shareholder and ownership structure; board composition, independence, and diversity; related party transactions, management, disclosure and financial transparency. These focus areas may evolve over time.

For the Sub-Fund, assessing the good governance practices of companies is part of the in-depth fundamental analysis that the Sub-Investment Manager performs on investee companies. The Sub-Investment manager considers, amongst other elements, sound management structures, employee relations, remuneration of staff, and tax compliance.

Where a governance issue that is adversely prejudicial to the interests of the investee company and/or its investors is identified, the Sub-Investment Manager will engage directly with company management, exercise their voting rights or, ultimately, divest or avoid an individual company.



What is the asset allocation planned for this financial product?

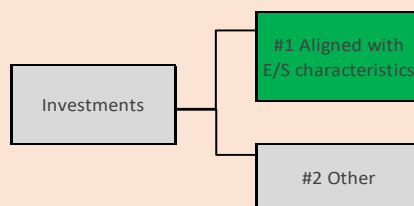
The minimum proportion of investments used to meet environmental or social characteristics promoted by the Sub-Fund (i.e. 'Aligned with E/S characteristics') is 51% of its assets.

Information on the remaining investments, their purpose and any minimum environmental or social safeguards applied is outlined in the section below on 'What investments are included under '#2 Other', what is their purpose and are there any minimum environmental or social safeguards?'

The Sub-Investment Manager applies the promoted environmental characteristics of GHG emissions disclosure and net zero commitments to the portfolio holdings of the Sub-Fund that are considered high intensity GHG emitters in accordance with binding the criteria outlined in the section 'what investment strategy does this financial product follow?' under the sub-section entitled 'Engagement Strategy'.

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

Asset allocation describes the share of investments in specific assets.



#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.

#2 Other includes the remaining investments of the financial product which are neither aligned with the environmental or social characteristics, nor are qualified as sustainable investments.

- **How does the use of derivatives attain the environmental or social characteristics promoted by the financial product?**

N/A



To what minimum extent are sustainable investments with an environmental objective aligned with the EU Taxonomy?

The Sub-Fund does not currently commit to invest in any sustainable investment within the meaning of Article 2(17) SFDR or the EU Taxonomy Regulation, accordingly the minimum share of EU Taxonomy-aligned investments is 0% of the Sub-Fund's assets.

- **Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy³⁹?**

☐ Yes:

☐ in fossil gas ☐ in nuclear energy

☒ No

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 green operational activities of investee companies.

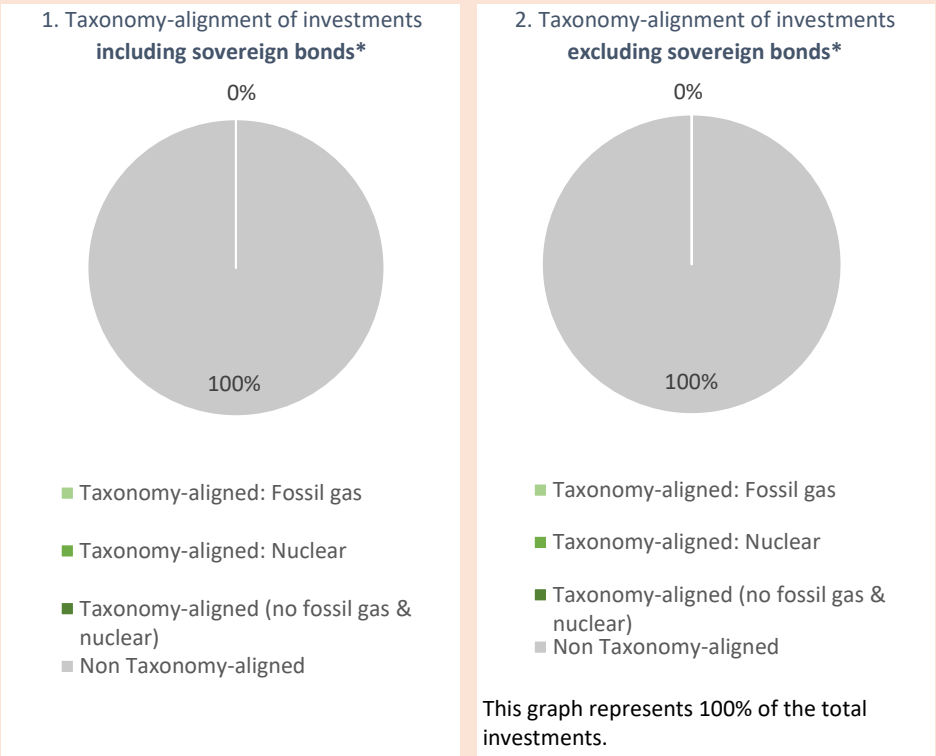
³⁹ Fossil gas and/or nuclear related activities will only comply with the EU Taxonomy where they contribute to limiting climate change ("climate change mitigation") and do not significantly harm any EU Taxonomy objective - see explanatory note in the left hand margin. The full criteria for fossil gas and nuclear energy economic activities that comply with the EU Taxonomy are laid down in Commission Delegated Regulation (EU) 2022/1214.

To comply with the EU Taxonomy, the criteria for **fossil gas** include limitations on emissions and switching to renewable power or low-carbon fuels by the end of 2035. For **nuclear energy**, the criteria include comprehensive safety and waste management rules.

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 corresponding to the best performance.

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?**

The Sub-Fund does not currently commit to invest in any sustainable investment within the meaning of Article 2(17) SFDR or the EU Taxonomy Regulation, accordingly the minimum share of investments in transitional and enabling activities is 0% of the Sub-Fund's assets.

are sustainable investments with an environmental objective that **do not take into account** the criteria for environmentally sustainable economic activities under the EU Taxonomy.

● **What is the minimum share of sustainable investments with an environmental objective that are not aligned with the EU Taxonomy?**

The Sub-Fund does not currently commit to invest in any sustainable investment within the meaning of Article 2(17) SFDR or the EU Taxonomy Regulation, accordingly the minimum share of sustainable investment with an environmental objective that is not aligned with the EU Taxonomy is 0% of the Sub-Fund's assets.

● **What is the minimum share of socially sustainable investments?**

N/A



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

‘#2 Other’ is made of:

- direct investment in high GHG emitters that are not yet aligned with E/S characteristics; and
- investments as described in the Sub-Fund's investment policy, that support the financial objective and other management activities of the Sub-Fund, such as:
 - o derivatives for hedging and/or Efficient Portfolio Management;
 - o Cash held for liquidity purposes as an ancillary asset, deposits and money market instruments;
 - o shares or units in other funds and exchange traded funds in which the Sub-Investment Manager does not have direct control of the underlying investments.

No minimum environmental or social safeguards are applied, however good governance practices are applied on all direct investments. Such investments will not usually represent a material proportion of the Sub-Fund's portfolio.



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?

N/A

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: <https://ninetyone.com/srd>