

Sustainability-Related Disclosures

Ashmore SICAV Emerging Markets Equity ex China Fund (the “**Sub-Fund**”)

Capitalised terms used herein but not defined otherwise will have the meaning given in the prospectus of the Fund (the “Prospectus”).

1 Résumé

Ce résumé est également disponible en [●] via le lien suivant :

[\[●\]](#)

Si le Compartiment promeut des caractéristiques environnementales et sociales, il n'a pas d'objectif d'investissement durable.

Le Compartiment promeut des caractéristiques environnementales et sociales 1) en excluant les émetteurs qui présentent un faible score ESG selon les critères de notation ESG propres d'Ashmore et 2) en excluant toute exposition aux entreprises qui exercent leurs activités dans certains secteurs précis.

Par ailleurs, le Gestionnaire d'investissement tient compte des pratiques de bonne gouvernance de l'ensemble des émetteurs, le cas échéant, dans le cadre de son Processus de notation ESG.

Au moins 80% des investissements du Compartiment doivent présenter les caractéristiques environnementales et/ou sociales qu'il promeut. Dans des conditions de marché normales, le Compartiment peut également investir jusqu'à 20% de sa VNI dans des liquidités et/ou des instruments de couverture (pour ceux qui sont calculés selon la méthode de l'évaluation au prix du marché). Ce plafond peut être dépassé et le Compartiment peut également investir dans des dépôts bancaires à terme dans des situations de marché défavorables ou lorsqu'il en va de l'intérêt des Actionnaires, sous réserve des dispositions du Prospectus. Tous ces actifs sont exclus des éléments contraignants de la stratégie d'investissement du Compartiment visant à promouvoir les caractéristiques environnementales et/ou sociales

Le Processus de notation ESG est réalisé au regard et sur la base de certains indicateurs environnementaux et sociaux. Le Gestionnaire d'investissement effectue les placements dans des émetteurs dont le score combiné s'élève au moins à 4 selon le Processus de notation ESG pour deux des scores « E », « S » ou « G » combinés sur trois (le « **Seuil de notation ESG** »). Les émetteurs qui ne parviennent pas à ce Seuil de notation ESG ne sont pas éligibles à l'investissement par ce Compartiment.

Le Gestionnaire d'investissement aura recours à plusieurs sources de données, y compris des sources externes, des rapports d'entreprises et des résultats d'engagement direct auprès des sociétés faisant l'objet d'un investissement et autres parties prenantes. Les données et méthodes peuvent être soumises à diverses limites susceptibles d'affecter leur fiabilité et leur qualité. Il peut notamment s'agir de différences de méthodologies, de couverture incomplète, de décalages temporels au niveau du reporting et de divergences entre les émissions estimées et publiées. Le Gestionnaire d'investissement prend toutes les mesures raisonnables pour s'assurer que ces limites ne freinent pas la capacité à atteindre les caractéristiques environnementales et sociales promues par le Compartiment.

Le processus d'investissement du Gestionnaire d'investissement se base sur les fondamentaux, tandis que l'analyse des émetteurs englobe divers facteurs, notamment les questions ESG. L'analyse des facteurs ESG est intégrée au processus d'investissement de la même manière que l'évaluation du risque macroéconomique, les performances financières et les indicateurs de crédit. Elle représente à la fois un mode de gestion du risque et une source potentielle d'alpha.

La Politique d'engagement d'Ashmore décrit l'approche de l'entreprise en matière d'engagement auprès des sociétés faisant l'objet d'un investissement, qui est intégrée au processus d'investissement et entend prendre en compte cet engagement dès le stade décisionnel initial, grâce à une surveillance des thématiques pertinentes et à un dialogue avec les émetteurs.

Le Compartiment n'a désigné aucun indice comme indice de référence au sens du Règlement SFDR.

2 No sustainable investment objective

This financial product promotes environmental and social characteristics, but does not have as its objective sustainable investment.

3 Environmental or social characteristics of the financial product

The environmental and social characteristics promoted by the Sub-Fund are:

- 1) The exclusion of issuers with low ESG scores through the application of Ashmore's ESG Scoring Process, which evaluates an issuer's ESG performance against certain ESG criteria, as described further in 7 "*Methodologies*" below; and
- 2) With respect to investments in Corporates, the reduction of exposure to certain industry sectors (such as, for this Sub-Fund, controversial weapons, pornography, coal and any company generating more than five percent of their revenues from the production of tobacco), as further set out in 4 "*Investment Strategy*" below.

4 Investment strategy

The Sub-Fund seeks to access the returns available from equities issued by Emerging Markets Corporates excluding Chinese Issuers, including voting and non-voting common stock, common stock issued to special shareholder classes and preferred stock, focussing on issuers satisfying the relevant ESG (as defined below) performance criteria. Such investments will constitute a minimum of 51% of the Sub-Fund's investments. The Sub-Fund may also seek access to returns from related synthetic products of all types and denominated in any currency, including exchange traded funds, depositary receipts, warrants, securities convertible into equity securities, other equity-related investments whose returns vary on the basis of the issuer's profitability (e.g. participation notes).

The ESG Scoring Process and industry sector exclusions are applied at the pre-investment stage, and the scores and application of the exclusions are formally reviewed at least annually.

ESG Scoring Process

The Sub-Fund adopts a responsible investment approach by applying binding ESG criteria to the portfolio (the "**ESG Scoring Process**").

The Investment Manager issues a score to each issuer, based on their historical and current performance, taking into account the environmental, social or governance aspects that an issuer may present that is drawn from a range of data sources.

Using the framework above, the Investment Manager assesses the quality of the issuer's policies and processes.

The Investment Manager's analysis is based on the disclosures in issuers' policy documents, sustainability reports and through direct engagement with the investee companies. This is

complemented by the assessment of analysis provided by third-party data providers as selected at the discretion of the Investment Manager.

Industry sector exclusions

Investments must be in compliance with the Investment Manager's industry exclusion policies, as applicable to the Sub-Fund. The list of exclusions includes certain industry sectors such as, for this Sub-Fund, controversial weapons, pornography, coal and any company generating more than five percent of their revenues from the production of tobacco, and may be amended from time to time by adding other sectors. The exclusion policy including an up to date list of industry exclusions is available on the Investment Manager's website here: <https://www.ashmoregroup.com/en-europe/esg>

The application of the exclusions of certain industry sectors by the Sub-Fund is assessed based on the proportion of the Sub-Fund's investments which breach such exclusionary screenings. Accordingly, none of the Sub-Fund's investments currently are in violation of the Investment Manager's industry sector exclusion policies.

Binding Elements of Investment Strategy

The binding elements of the investment strategy are:

1. the exclusion of issuers rated below 4 based on the application of the ESG Scoring Process; and
2. the exclusion of the sectors covered by the Investment Manager's industry exclusion policies as applicable to the Sub-Fund, as further set out in 3 "*Environmental or social characteristics of the financial product*" and 4 "*Investment Strategy*".

Assessment of Good Governance Practices

The Investment Manager considers the good governance practices of all issuers, where relevant, as part of its ESG Scoring Process and will not invest in issuers that do not meet a combined score of at least 4 for governance as described in more detail above. The Investment Manager assesses good governance of companies on the basis of the following criteria:

- Transparency and disclosure
- Governance structure
- Minority interests fair representation
- Separation of executive roles
- Management accessibility
- Long-term Incentive scheme KPIs

5 Proportion of investments

Minimum Proportion of Investments used to attain the Environmental or Social Characteristics

At least 80% of the Sub-Fund's investments exhibit the environmental and/or social characteristics promoted by the Sub-Fund in accordance with the binding elements of its investment strategy.

The Sub-Fund is also allowed to invest up to 20% of its NAV in cash and/or hedging instruments (for such hedging instruments calculated using mark to market) under normal market conditions. Such limit may be exceeded, and the Sub-Fund may also invest in bank term deposits, in case of unfavourable market conditions or where it is in the best interests of Shareholders, subject to the provisions of the Prospectus. All such assets are excluded from the binding elements of the Sub-Fund's investment strategy for promoting environmental and/or social characteristics.

The Sub-Fund does not invest in Sustainable Investments and the investments underlying the Sub-Fund do not take into account the EU criteria for environmentally sustainable economic activities within the meaning of the EU Taxonomy.

Use of Derivatives to attain the Environmental or Social Characteristics

The Sub-Fund may use financial derivative instruments and related synthetic structures. The ESG Scoring Process, ESG Scoring Threshold and industry sector exclusions will be applied to such derivative instruments except for derivatives used for hedging purposes.

Type of Exposure to Entities

Due to the nature of the asset class, the Sub-Fund will invest directly into the issuers.

6 Monitoring of environmental or social characteristics

The Investment Manager will use the sustainability indicators set out below under 7 “*Methodologies*” to monitor the attainment of the environmental and social characteristics promoted by the Sub-Fund.

The Investment Manager also considers the following issues when monitoring the environmental and social characteristics of the Sub-Fund:

- 1) The factor used to assess the attainment of the ESG score threshold (as outlined under 7 “*Methodologies*” below) is the internal issuer-specific ESG scores.
- 2) The factor used to assess the attainment of the successful sector exclusions for Corporates is ‘exposure to excluded sectors’. Compliance with this factor is maintained on a consistent basis as these exclusions are applied pre-investment and also monitored post-investment on an ongoing basis.

These factors might change as the approach is reviewed.

7 Methodologies

The ESG Scoring Process is informed by and based on the following sustainability indicators (as amended from time to time):

Environment
Impact on the global environment (including GHG emissions)
Local impact (including water and waste management)
Incidents of environmental pollution
Use of green energy
Policies and innovations to limit negative environmental impact
Social
Employee diversity and inclusion
Impact on customers
Impact on community
Labour practices (including health and safety)

Supply chain management (including risk of child labour)
Materiality of philanthropy spend
Governance
Transparency and disclosure
Governance structure
Minority interests fair representation
Separation of executive roles
Management Accessibility
Long-term Incentive scheme KPIs

The above sustainability indicators are not each individually scored. Instead, the Investment Manager uses them in their issuer assessment by asking two questions for each of the Environmental (E), Social (S) and Governance (G) aspects:

- 1) the issuer's current level of performance against considered global best ESG practice; and
- 2) the quality of their policies and initiatives designed to improve their ESG performance.

The issuer is then scored for each of the six questions on a scale of 1 – 5 (very poor to very good). Thus, the combined score for "E" is the addition of two scores, each on a scale of 1-5. Likewise for the combined scores for "S" and "G".

The Investment Manager invests in issuers that score a combined score of at least 4 according to the ESG Scoring Process on two out of three of the "E", "S" or "G" combined scores (the **"ESG Scoring Threshold"**). Issuers below this ESG Scoring Threshold are not permissible investments for this Sub-Fund. The results of the scoring are recorded in a dedicated ESG scorecard.

8 Data sources and processing

The Investment Manager will use any of the following sources to obtain data to attain the environmental and social characteristics promoted by the Sub-Fund, as relevant and applicable:

- External data sourced from third party data provider services;
- Company reports and corporate disclosures (including information on policies and processes); and
- Direct engagements with investee management, and other stakeholders.

The information gathered through the process outlined above and in Ashmore Group's ESG Policy is incorporated into investment decision-making through the Investment Managers' proprietary ESG scoring methodology as set out above.

Where there are gaps in data coverage, a certain proportion of the data used to assess the attainment of the environmental and social characteristics promoted by the Sub-Fund may be estimated due to a lack of reliable data. The Investment Manager is not currently able to confirm the exact proportion which will be estimated given the nature of investments in Emerging Markets and the fact that such proportion may change constantly. Such data will be kept under review by the Investment Manager and will be replaced with other data when available (such as from third party data providers or from directly from investees).

9 Limitations to methodologies and data

There are a number of limitations which could impact the reliability or quality of data, including differences in methodologies adopted by different data providers, coverage gaps (including across geographies), reporting timelines for data which do not align with regulatory reporting timelines under the Disclosure Regulation and discrepancies between estimated and reported emissions.

The issue of data coverage due to lack of reporting is particularly an issue in Emerging Markets where reporting frameworks and standards differ in granularity from those of Developed Markets and as a result there is often a higher reliance on proxy data. In order to address such issues with data quality the Investment Manager also relies on information gathered directly from issuers.

10 Due diligence

The Investment Manager's investment process is fundamentals driven and issuer analysis encompasses a multitude of factors, including ESG. ESG factor analysis is integrated into the investment processes in the same way as the assessment of macroeconomic risk, financial performance and credit metrics. It acts as both a form of risk management and a source of potential alpha generation.

As described under 3 "*Environmental or Social Characteristics of the Financial Product*" above, the Investment Manager applies its ESG Scoring Process to the Sub-Fund, further details of which are set out above.

11 Engagement policies

Ashmore's Engagement Policy outlines Ashmore's approach to investee engagement, which is integrated through its investment process as follows:

- Integrating investee engagement from the initial investment decision-making stage – the initial investment decision-making process will generally involve meetings with management. The outcome of the relevant Investment Committee discussions will inform the nature of ongoing dialogue and engagement with a relevant issuer. This initial process sets out the foundations of the Investment Manager's approach to stewardship and the basis of its relationship with its investees post-investment.
- Monitoring issuers on relevant matters – investment teams will correspond directly with issuers on specific material topics, including both financial and non-financial performance and risks. Discussions with issuers will focus on governance, strategy, capital structure and allocation, as well as environmental and social factors and their improvement.
- Conducting dialogue with issuers – the Investment Manager's dialogue with issuers is undertaken by investment teams and is ongoing through the life of the investment and can cover any issue that may affect an issuer's ability to deliver long term performance and to create shareholder value. Where appropriate, investment teams log and record the details of engagement activities, including final outcomes. A summary of such activities is disclosed on an annual basis in the Investment Manager's engagement report.

Furthermore, Ashmore may engage and act collectively with other investors, where appropriate and in the interests of clients, and permitted by regulations. Ashmore may also cooperate and collaborate with relevant stakeholders who bring together issuers to engage and discuss focussed issues, such as through collaborative engagement organised by industry bodies such as the Emerging Markets Trade Association, Climate Action 100+ and the United Nations Principles for Responsible Investment. For further details of the Ashmore's approach to engagement, please refer to the Engagement policy available [here](#).

12 Designated reference benchmark

The Sub-Fund does not have a designated reference benchmark within the meaning of the Disclosure Regulation.

Glossary of Additional Terms

- **“Disclosure Regulation”** means Regulation (EU) 2019/2088 of the European Parliament and of the Council of 27 November 2019 on sustainability-related disclosures in the financial services sector;
- **“EU Taxonomy”** means Regulation (EU) 2020/852 of the European Parliament and of the Council of 18 June 2020 on the establishment of a framework to facilitate sustainable investment and amending Regulation (EU) 2019/2088;
- **“ESG”** means environmental, social and governance;
- **“Investment Committee”** means the investment committee appointed by the Investment Manager with the composition, duties and functions as set out in the Sub-Fund’s prospectus;
- **“Sustainable Investment”** means a sustainable investment within the meaning of Article 2(17) of the Disclosure Regulation.