

Sustainability-Related Disclosures

Ashmore SICAV Emerging Markets Local Currency Bond 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 Yhteenveto

Tämän yhteenvedon kieliversiot ([•]) ovat saatavissa seuraavasta linkistä:

[\[•\]](#)

Tämä alarahasto edistää ympäristöön ja yhteiskuntaan liittyviä ominaisuuksia, mutta sen tavoitteena ei ole kestävien sijoitusten tekeminen.

Alarahasto edistää ympäristöön ja yhteiskuntaan liittyviä ominaisuuksia 1) sulkemalla pois matalan ESG-pistemäärän liikkeeseenlaskijoita Ashmoren omien ESG-pisteytyskriteerien avulla sekä 2) pienentämällä altistusta sellaisiin lähes valtiollisiin liikkeeseenlaskijoihin, jotka ovat tietyillä toimialasektoreilla toimivia yrityksiä, salkunhoitajan poissulkemisperiaatteiden mukaisesti.

Lisäksi salkunhoitaja arvioi tarvittaessa kaikkien liikkeeseenlaskijoiden hyvät hallintotavat osana ESG-pisteytysprosessia.

Vähintään 80 prosenttia sijoituksista on alarahaston edistämien ympäristöön ja/tai yhteiskuntaan liittyvien ominaisuuksien mukaisia. Alarahasto voi normaaleissa markkinaolosuhteissa sijoittaa myös korkeintaan 20 prosenttia nettovarallisuuseränsä sallittuihin joukkovelkakirjoihin, käteiseen ja/tai suojausinstrumentteihin (suojausinstrumentit arvostetaan markkinahintaan). Tämä raja voidaan tarjousesitteen ehtojen sallimissa rajoissa ylittää ja alarahasto voi sijoittaa myös pankkien määräaikaistalletuksiin epäedullisissa markkinaolosuhteissa tai kun tämä on osuudenomistajien etujen mukaista. Mitään tällaisia omaisuuseriä ei lasketa mukaan alarahaston sijoitusstrategian sitoviin elementteihin, joiden tulee edistää ympäristöön ja/tai yhteiskuntaan liittyviä ominaisuuksia.

ESG-pisteytysprosessi seuraa tiettyjä ympäristö- ja yhteiskunnallisia indikaattoreita ja perustuu niihin. Salkunhoitaja sijoittaa liikkeeseenlaskijoihin, joiden yhdistetty pistemäärä on vähintään 4 kahdessa (“E”, “S” tai “G”) ESG-pisteytysprosessin yhdistetyn pistemäärän ryhmässä (“**ESG-raja-arvo**”). Tämän ESG-raja-arvon alle jäävät liikkeeseenlaskijat eivät ole alarahastolle sallittuja sijoituksia. Poikkeuksena tästä ovat vihreät, yhteiskunnalliset ja kestävyysliittävät joukkovelkakirjat sekä muut salkunhoitajan määrittelemät ympäristöön, yhteiskuntaan tai hallintotapaan tai muuhun samantyyppiseen tarkoitukseen liikkeeseen lasketut joukkovelkakirjat, jotka sallitaan (“**sallitut joukkovelkakirjat**”). Selvyyden vuoksi todettakoon, että niitä ei lasketa mukaan alarahaston sijoitusstrategian sitoviin elementteihin, joiden tulee edistää ympäristöön ja/tai yhteiskuntaan liittyviä ominaisuuksia.

Salkunhoitaja hyödyntää useita tietolähteitä, mm. ulkoisia tietolähteitä, yritysraportteja sekä suoraa vuorovaikutusta sijoituskohteiden ja muiden sidosryhmien kanssa. Tietoihin ja menetelmiin saattaa liittyä useita rajoituksia, jotka voivat heikentää tietojen luotettavuutta tai laatua. Tällaisia rajoituksia ovat mm. menetelmien erot, puutteet kattavuudessa, raportointien ajallinen epäsynkronia sekä arvoitujen ja raportoitujen päästöjen ristiriitaisuudet. Salkunhoitaja toteuttaa kohtuullisia toimia varmistaakseen, että tällaiset rajoitukset eivät rajoita alarahaston edistämien ympäristöön ja yhteiskuntaan liittyvien ominaisuuksien saavuttamista.

Salkunhoitajan sijoitusprosessi on perustekijälähtöinen, ja liikkeeseenlaskija-analyyseissä otetaan huomioon laajalti eri tekijöitä, mukaan lukien ESG-tekijät. ESG-tekijäanalyysi on integroitu sijoitusprosessiin samalla tavoin kuin makrotalouden riskien, taloudellisen suorituskyvyn ja luottolaadun arvioinnit. Se toimii sekä riskinhallinnallisena toimenä että mahdollisena alfan lähteenä.

Ashmoren vaikuttamispolitiikassa on yhteenveto Ashmoren lähestymistavasta sijoitusvaikuttamiseen, joka on integroitu osaksi sijoitusprosessia. Siihen sisältyy vaikuttamista sijoituskohteisiin alustavasta sijoituspäätöksentekovaiheesta alkaen, liikkeeseenlaskijoiden seuranta olennaisissa asioissa sekä vuoropuhelun käymistä liikkeeseenlaskijoiden kanssa.

Alarahastolla ei ole nimettyä vertailuarvoa SFDR-asetuksen tarkoittamassa mielessä.

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 Quasi-Sovereign issuers which are 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 mainly seeks to access the returns available from Sovereign Transferable Securities which are debt in nature and other instruments issued by Sovereigns and Quasi-Sovereigns denominated in local currencies, including also investing in financial derivative instruments and related synthetic structures or products. The Sub-Fund focuses on issuers satisfying the relevant ESG (as described below) performance criteria.

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 or Sovereigns. 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 (other than the Permitted Bonds) 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 Permitted Bonds, 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. 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 Quasi-Sovereign issuers which are 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	
Corporate issuers	Sovereign issuers
Impact on the global environment (including GHG emissions)	Environmental footprint
Local impact (including water and waste management)	Clean energy initiatives
Incidents of environmental pollution	Utilisation of natural resources
Use of green energy	Natural disasters risk
Policies and innovations to limit negative environmental impact	Incidents of environmental impact
Social	
Corporate issuers	Sovereign issuers
Employee diversity and inclusion	Inequality and social disparity
Impact on customers	Ability to meet populations’ basic needs
Impact on community	Social stability
Labour practices (including health and safety)	Political liberties

Supply chain management (including risk of child labour)	
Materiality of philanthropy spend	
Governance	
Corporate issuers	Sovereign issuers
Transparency and disclosure	Societal infrastructure and delivery of services
Governance structure	Government effectiveness and accountability
Minority interests fair representation	Regulatory environment
Separation of executive roles	Strength of institutions (including corruption)
Management Accessibility	Rule of law
Long-term Incentive scheme KPIs	Measures to improve sustainability (e.g. habitat protection)

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, other than Permitted Bonds, which for the avoidance of doubt are excluded from the binding elements of the Sub-Fund's investment strategy for promoting environmental and/or social characteristics. This is 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 or 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 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.