

ANNEX I

Template pre-contractual disclosure for the financial products referred to in Article 9, paragraphs 1 to 4a, of Regulation (EU) 2019/2088 and Article 5, first paragraph, of Regulation (EU) 2020/852

Product name: Guinness Global Environment Fund

Legal entity identifier: 984500ADAF4EFB1CDS63

Sustainable investment objective

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.

Sustainability indicators measure how the sustainable objectives of this financial product are attained.



Does this financial product have a sustainable investment objective?

<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
<p><input checked="" type="checkbox"/> It will make a minimum of sustainable investments with an environmental objective: 80%</p> <ul style="list-style-type: none"> <input type="checkbox"/> in economic activities that qualify as environmentally sustainable under the EU Taxonomy <input checked="" type="checkbox"/> in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy <p><input type="checkbox"/> It will make a minimum of sustainable investments with a social objective: ___%</p>	<p><input type="checkbox"/> 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</p> <ul style="list-style-type: none"> <input type="checkbox"/> with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy <input type="checkbox"/> with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy <input type="checkbox"/> with a social objective <p><input type="checkbox"/> It promotes E/S characteristics, but will not make any sustainable investments</p>

What is the sustainable investment objective of this financial product?

The investment objective of the Fund is to achieve long-term capital appreciation by investing in a global portfolio of equity or equity-related securities of companies actively engaged in providing environmental solutions, which contribute to reducing environmental resource use or intensity, or to protecting and enhancing environmental resource supply. Please refer to the table under "What sustainability indicators are used to measure the attainment of the sustainable investment objective of this financial product?", which outlines the types of environmental solutions considered.

The environmental resources targeted by this Fund are food, water, climate, waste, land, and their adjacent supply chains.

The investment manager will invest in solutions targeting at least one of the aforementioned environmental resource themes.

What sustainability indicators are used to measure the attainment of the

sustainable investment objective of this financial product?

The Investment Manager will conduct analysis on “Environmental Impact Indicators” which will include at least one of the named in the table below. These indicators are assessed in respect of the products and services of the investee companies, where such assessment is deemed relevant to the portfolio holdings and where company disclosures and data are reasonably available. Whilst the Investment Manager does not apply threshold levels in respect of the impact indicators, the Investment Manager will monitor and track company specific impact metrics over the long term in order to assess if a company is improving its impact metrics over time. Subject to available data, the Investment Manager seeks to identify at least one impact metric for each company and monitor changes over time. As part of the annual impact review, the Investment Manager evaluates year-on-year variations in these metrics and investigates any declines. Where a decline is assessed to be attributable to temporary factors (e.g. a cyclical downturn) the holding may be maintained. However, if an observed decline is due to a change in corporate strategy, which may result in sustained declines going forward, the Investment Manager will reassess the holding. If the change in corporate strategy is no longer aligned with the sustainable investment objective of the Fund, this will ultimately result in divestment of the position. Where the Investment Manager identifies multiple positive impact indicators for a company, the Investment Manager may continue to hold the company if an indicator declines, provided the holding continues to constitute a ‘sustainable investment’.

Resource Theme	Types of Environmental Solutions	Types of Environmental Impact Indicators
Food	Precision Agriculture, Livestock Efficiency, Food Processing, Distribution Efficiency, Food Technology, etc.	(Food) Waste Avoided (Tonnes), etc.
Water	Remediation, Utilities, Efficiency Tech, Efficiency Services, Infrastructure, etc.	Total water saved / treated (m ³), etc.
Climate	Building Energy Efficiency, Industrial Energy Efficiency, Low Carbon Energy, Clean Mobility, etc.	Gross carbon dioxide emissions avoided (Tonnes CO ₂), etc.
Waste	Technology & Testing, Input Reduction Products / Services, Recycled & Recyclable Products, Sharing Economy, etc.	Waste Recycled / Recovered (Tonnes), etc.
Land	Forest Land Efficiency, Urban Land Efficiency, Remediation, Green Buildings, etc.	Land Use Avoided (KM ²), etc.

The Investment Manager uses qualitative and quantitative analysis of company, third

party and internal data in conducting such assessments. Qualitative analysis may include a review of company disclosures, policies, as well as engagement with company management where relevant. Quantitative analysis may include the use of reported company metrics, industry benchmarks and third party data and internal analysis informed by, but not limited to, company disclosures, broker and industry research and engagement insights, to model potential environmental outcomes. The Investment Manager's internal analysis is proprietary and unaudited.

The Investment Manager implements this strategy on a continuous basis and prepares periodic reports to document the positive environmental outcomes (defined by the Environmental Impact Indicators, as described in the table above) attributable to the investments held within the Fund.

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.

How do sustainable investments not cause significant harm to any environmental or social sustainable investment objective?

The Investment Manager considers all mandatory principal adverse impact indicators on sustainability factors when assessing whether a sustainable investment does not cause significant harm to any environmental or social sustainable objective, as described above.

Screening

The Fund will apply an exclusionary screen to the universe of investments using third party data and internal analysis. Third-party research and data are sourced from multiple sources including but not limited to company disclosures, ESG data providers, sell-side research and industry reports. The Investment Manager may also supplement third party data with internal analysis and insights from engagement activities. The Investment Manager has regard to multiple data sources in seeking to validate data for the purpose of applying an exclusionary screen. In addition, all third-party ESG data providers are subject to continuous due diligence to maintain data integrity and provider oversight. The Fund will not invest in companies as per the Investment Manager's exclusion policy which incorporates the EU Paris-Aligned Benchmark "PAB" exclusions. The Fund shall not be invested in the equity securities of companies involved in any activities related to controversial weapons, or companies that generate more than 30% of revenues via thermal coal extraction or thermal coal power generation. The exclusion criteria may be subject to change at the discretion of the Investment Manager and/or in order to comply with legislative requirements. Any updates to the exclusion criteria will be reflected in an updated Supplement and in the Investment Manager's exclusion policy.

ESG Analysis

Prior to investment, company ESG analysis is carried out to confirm that a proposed investment does not cause significant harm to any environmental or social sustainable investment objective. The ESG analysis will include, i) a materiality assessment of ESG risk and opportunities based on the Investment Manager's own proprietary analysis as well as the assessment of the company and third-party providers and ii) an assessment of how the Investment Manager considers the company is able to manage these risk and opportunities. Examples of ESG risk and opportunities will include one

or more of the following: opportunities in environmental solutions, climate and environmental related indicators, social and human capital considerations, and corporate governance. The ESG analysis is proprietary, based on information provided by the investee company and third-parties.

Stewardship

The investment manager assumes a stewardship role over the portfolio assets. Specifically, the Investment Manager's engagement efforts seek to ensure that the strategies of portfolio companies are aligned with delivering positive environmental outcomes, whilst not causing significant harm to any environmental or social sustainable investment objective. The Investment Manager's engagement framework revolves around three key pillars:

- **Disclosure:** The Investment Manager may engage with companies to produce environmental and/or social sustainable related disclosures. Once a risk is identified, it can be managed through target setting.
- **Target setting:** The Investment Manager may engage with investee companies to set targets relating to environmental and/or social practices. Once a target has been set, it can be incentivised through remuneration.
- **Governance and Incentivisation:** The Investment Manager may engage with companies to ensure there is board level oversight of these practices, and disclose which metrics are used in management pay, or consider incorporating environmental and/or social metrics in their remuneration plans. Once a target is incentivised, it is more likely to be achieved.

The Investment Manager systematically records and tracks engagement activities (for example, emails, calls, meetings) using an in-house engagement log.

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

The Investment Manager considers all mandatory principal adverse impact indicators on sustainability factors when assessing whether a sustainable investment does not cause significant harm to any environmental or social sustainable objective, as described above.

Prior to investment, the company ESG analysis described above is carried out to take into account and monitor adverse impacts on sustainability factors.

Principal adverse impacts are monitored on an ongoing basis in order to mitigate or reduce principal adverse impacts. Should the Investment manager consider that any one of its holdings may, or has the potential to, cause significant harm to any environmental or social sustainable investment objective, the Investment Manager will initiate a structured escalation process.

Escalation activities include the following non-exhaustive actions: direct dialogue with company representatives, collaborative efforts with other investors, or the use of voting rights at AGMs. Should these steps yield adequate progress, to clarify, mitigate or reduce potential principal adverse impacts, the holding may remain in the Fund.

Divestment, although an action that can be taken, will be the last resort and when the Investment Manager is not satisfied that the sustainable investment is not causing significant harm to any environmental or social sustainable investment objective.

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

The Investment Manager's ESG analysis (as described above) assesses whether sustainable investments are aligned with the OECD Guidelines for Multinational Enterprises and UN Guiding Principles on Business and Human Rights. The Investment Manager assesses policies, practices, and controversies as part of the analysis.



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

X

Yes

The Investment Manager considers all mandatory principal adverse impact indicators on sustainability factors as set out in Table 1 of Annex I of SFDR regulatory technical standards (and detailed below) when assessing whether a sustainable investment does not cause significant harm to any environmental or social sustainable objective, as described above.

Category	Indicator	Description
Greenhouse gas emissions	1. GHG Emissions	Scope 1, 2, and 3 greenhouse gas emissions of investee companies
	2. Carbon Footprint	Carbon footprint
	3. GHG Intensity of investee companies	GHG intensity of investee companies
	4. Exposure to companies active in the fossil fuel sector	Share of investments in companies active in fossil fuel sector
	5. Share of non-renewable energy consumption and production	Share of non-renewable energy consumption and non-renewable energy production of investee companies from non-renewable energy sources compared to renewable energy sources, expressed as a percentage of total energy sources
	6. Energy consumption intensity per high impact climate sector	Energy consumption in GWh per million EUR of revenue of investee companies, per high impact climate sector
Biodiversity	7. Activities negatively affecting biodiversity-sensitive areas	Share of investments in investee companies with sites/operations located in or near to biodiversity-sensitive areas where activities of those investee companies negatively affect those areas
Water	8. Emissions to water	Tonnes of emissions to water generated by investee companies per million EUR invested, expressed as a weighted average
Waste	9. Hazardous waste and radioactive waste ratio	Tonnes of hazardous waste and radioactive waste generated by investee companies per million EUR invested, expressed as a weighted average
Social and employee	10. Violations of UN Global Compact principles and Organisation for Economic Cooperation and	Share of investments in investee companies that have been involved in violations of the UNGC principles or OECD Guidelines for

Category	Indicator	Description
matters	Development (OECD) Guidelines for	Multinational Enterprises
	11. Lack of processes and compliance mechanisms to monitor compliance with UN Global Compact principles and OECD Guidelines for Multinational Enterprises	Share of investments in investee companies without policies to monitor compliance with the UNGC principles or OECD Guidelines for Multinational Enterprises or grievance/complaints handling mechanisms to address violations of the UNGC principles or OECD Guidelines for Multinational Enterprises
	12. Unadjusted gender pay gap	Average unadjusted gender pay gap of investee companies
	13. Board gender diversity	Average ratio of female to male board members in investee companies, expressed as a percentage of all board members
	14. Exposure to controversial weapons (anti-personnel mines, cluster munitions, chemical weapons and biological weapons)	Share of investments in investee companies involved in the manufacture or selling of controversial weapons

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?

Investment Policy

In seeking to achieve its investment objective, the Fund intends to invest primarily over 80% in equity and equity related securities of globally based companies (which may include emerging markets, however emerging market exposure is not expected to exceed 30% of the Net Asset Value of the Fund) with the majority, over 50%, of their business activity (assessed against relevant company metrics such as revenues, profits, cashflows, assets, and capital expenditure based on an internal assessment carried out by the Investment Manager) exposed to the provision and/or adoption of environmental solutions.

Environmental solutions are defined as business activities which reduce environmental resource or intensity, or protect and enhance environmental resource supply. Environmental solutions can include energy efficiency, water supply & technology, waste management & recycling, sustainable land use, and dematerialized economy. Environmental resources include food, water, climate, waste, land, and their adjacent supply chains.

Investment Strategy

The Fund intends to invest at least 80% of its net assets in equity and equity related

securities of globally based companies involved in environmental solutions. Environmental solutions can include, energy efficiency, water supply & technology, waste management & recycling, sustainable land use, and dematerialized economy.

The Fund will seek to achieve its objective of sustainable investment by investing principally in 'sustainable investments' within the meaning of Article 2(17) of the SFDR which are involved in the provision of environmental solutions.

Screening

The Fund will apply an exclusionary screen to the universe of investments using third party research and internal analysis. Third-party research and data are sourced from company disclosures, ESG data providers, sell-side research, industry reports, engagement activities, and the Investment Manager's internal analysis. The Investment Manager has regard to multiple data sources in seeking to validate data for the purpose of applying an exclusionary screen. In addition, all third-party ESG data providers are subject to continuous due diligence to maintain data integrity and provider oversight. The Fund will not invest in companies as per the Investment Manager's exclusion policy which incorporates the EU Paris-Aligned Benchmark "PAB" exclusions. The Fund shall not be invested in the equity securities of companies involved in any activities related to controversial weapons, or companies that generate more than 30% of revenues via thermal coal extraction or thermal coal power generation. The exclusion criteria may be subject to change at the discretion of the Investment Manager and/or in order to comply with legislative requirements. Any updates to the exclusion criteria will be reflected in an updated Supplement and in the Investment Manager's exclusion policy.

ESG Analysis

Prior to investment, company ESG analysis is carried out to confirm that a proposed investment does not cause significant harm to any environmental or social sustainable investment objective. The ESG analysis will include, i) a materiality assessment of ESG risk and opportunities based on the Investment Manager's own proprietary analysis as well as the assessment of the company and third-party providers and ii) an assessment of how the Investment Manager considers the company is able to manage these risk and opportunities. Examples of ESG risk and opportunities will include one or more of the following: opportunities in environmental solutions, climate and environmental related indicators, social and human capital considerations, and corporate governance. The ESG analysis is proprietary, based on information provided by the investee company and third-parties.

Stewardship

The investment manager assumes a stewardship role over the portfolio assets. Specifically, the Investment Manager's engagement efforts seek to ensure that the strategies of portfolio companies are aligned with delivering positive environmental outcomes, whilst not causing significant harm to any environmental or social sustainable investment objective. The Investment Manager's engagement framework revolves around three key pillars:

- **Disclosure:** The Investment Manager may engage with companies to produce

environmental and/or social sustainable related disclosures. Once a risk is identified, it can be managed through target setting.

- **Target setting:** The Investment Manager may engage with investee companies to set targets relating to environmental and/or social practices. Once a target has been set, it can be incentivised through remuneration.

- **Governance and Incentivisation:** The Investment Manager may engage with companies to ensure there is board level oversight of these practices, and disclose which metrics are used in management pay, or consider incorporating environmental and/or social metrics in their remuneration plans. Once a target is incentivised, it is more likely to be achieved.

● ***What are the binding elements of the investment strategy used to select the investments to attain the sustainable investment objective?***

The binding elements of the investment strategy are as follows:

- The Investment Manager positively screens for companies where it has identified that “Environmental Solutions” constitute the majority of business activity and will therefore be one of the key drivers of equity value. Business activity exposure will be assessed against relevant company metrics such as revenues, profits, cashflows, assets, and capital expenditure. For each theme and relevant sub-theme the screening process involves examining factors such as: cost of technology, availability of financing, raw materials costs, subsidy regimes, geo-political developments and the latest technology developments.
- The Fund will not invest in companies as per the Investment Manager's exclusion policy which incorporates the EU Paris-Aligned Benchmark “PAB” exclusions. The policy includes, inter alia, the exclusion of companies involved in any activities related to controversial weapons. The Fund also excludes companies that generate more than 30% of revenue, as determined by the Investment Manager, via thermal coal extraction or thermal coal power generation. A copy of the exclusion policy can be found at <https://www.guinnessgi.com/funds/guinness-global-environment-fund#tab-literature>.
- The Investment Manager's ESG analysis. Prior to investment, company ESG analysis is carried out to confirm that a proposed investment does not cause significant harm to any environmental or social sustainable investment objective. The ESG analysis will include, i) a materiality assessment of ESG risk and opportunities based on the Investment Manager's own proprietary analysis as well as the assessment of the company and third-party providers and ii) an assessment of how the Investment Manager considers the company is able to manage these risk and opportunities, as further detailed above.
 - The analysis of “Environmental Impact Indicators” (namely (Food) Waste Avoided (Tonnes), etc, Total water saved / treated (m³), etc., Gross carbon dioxide emissions avoided (Tonnes CO₂), etc., Waste Recycled / Recovered (Tonnes), etc. and Land Use Avoided (KM²), etc.) as described in the table

- above in the section headed “*What sustainability indicators are used to measure the attainment of the sustainable investment objective of this financial product?*”.

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

Good governance practices are assessed by the Investment Manager using company and third-party data.

In assessing good governance the Investment Manager considers management structures, employee relations, staff remuneration, and tax compliance covering some or all of the following factors:

- **sound management structures** (consisting of an assessment of board composition having regard to ownership structure, protection of minority interests, and knowledge of the company’s industry).
- **employee relations** (consisting of an assessment of workforce disclosures, third party employee review data, and controversies relating to labour rights and human capital management).
- **remuneration of staff** (consisting of an assessment of executive remuneration policies, controversies relating to pay practices, and ratio between top management remuneration and average remuneration).
- **tax compliance** (consisting of an assessment of instances of illegal or high-risk tax practices).

This is included as a section in each portfolio holdings ESG assessment.

As part of the wider assessment of corporate governance, the Investment Manager may also consider further elements including, but not limited to, capital allocation, shareholder rights, risk management, bribery and corruption, related party transactions, stakeholder management, community engagement and voting outcomes. The Investment Manager’s good governance policy provides these details on how the Investment Manager assesses investee companies against the above criteria and is available at (<https://www.guinnessgi.com/about-us/responsible-investment#tab-literature>).

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



To comply with the EU Taxonomy, the criteria for **fossil gas** include limitations on emissions and switching to fully 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.

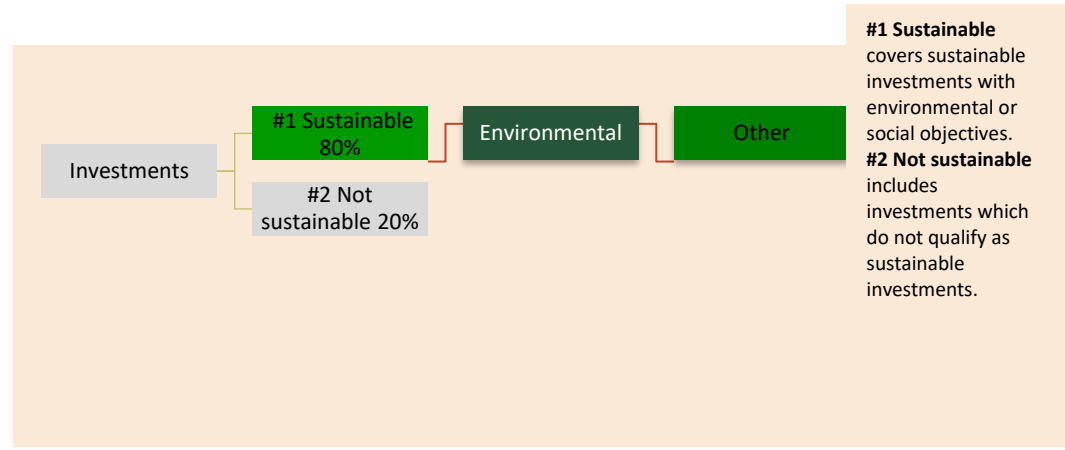
Transitional activities are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.

- **revenue** 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.

What is the asset allocation and the minimum share of sustainable investments?



The Fund allocates at least 80% of its assets to Sustainable investments (#1 Sustainable) and up to 20% to Not sustainable investments (#2 Not sustainable). The 20% not sustainable includes investments such as cash held as ancillary liquidity or derivatives used for hedging purposes, in accordance with the provisions in the Supplement for the Fund.

The above asset allocation is a minimum asset allocation and allocations may be higher than the minimum disclosed at any given time.

How does the use of derivatives attain the sustainable investment objective

The Fund does not use derivatives to attain its sustainable investment objective.

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

The Fund does not currently commit to invest in sustainable investments with an environmental objective aligned with the EU Taxonomy, however, these investments may form part of the portfolio.

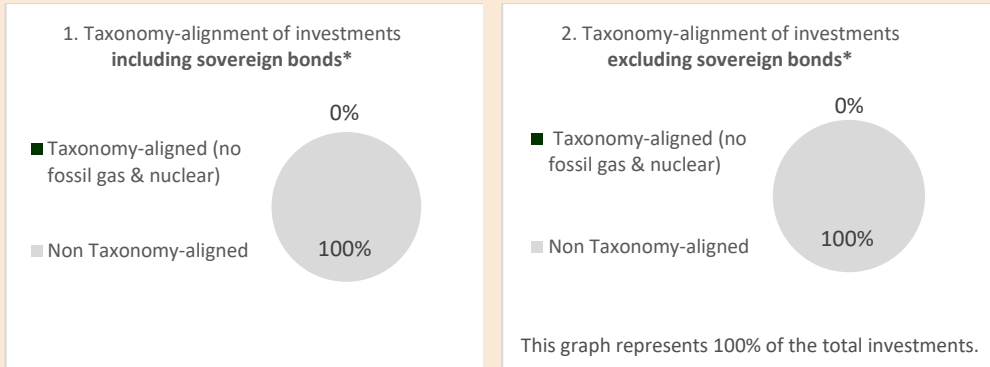
Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy?

Yes: In fossil gas In nuclear energy

No X



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.

Reference benchmarks are indexes to measure whether the financial product attains the sustainable investment objective.

What is the minimum share of investments in transitional and enabling activities?
0%



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

The minimum share of sustainable investments not aligned with the EU Taxonomy is 80% of net assets.


The Investment Manager cannot currently satisfy itself that the investments within the portfolio meet the necessary criteria in order to be considered Taxonomy aligned.

What is the minimum share of sustainable investments with a social objective?

0%. The Fund does not invest in sustainable investments with a social objective.

What investments are included under “#2 Not sustainable”, what is their purpose and are there any minimum environmental or social safeguards?

#2 Not Sustainable may include investments such as cash held as ancillary liquidity or derivatives used for hedging purposes, in accordance with the provisions in the Supplement for the Fund.

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



Is a specific index designated as a reference benchmark to meet the sustainable investment objective?

No

● **How does the reference benchmark take into account sustainability factors in a**

way that is continuously aligned with the sustainable investment objective?

NA

- *How is the alignment of the investment strategy with the methodology of the index ensured on a continuous basis?*

NA

- *How does the designated index differ from a relevant broad market index?*

NA

- *Where can the methodology used for the calculation of the designated index be found?*

NA



Where can I find more product specific information online?

More product-specific information can be found on the website:

<https://www.guinnessgi.com/funds/guinness-global-environment-fund>