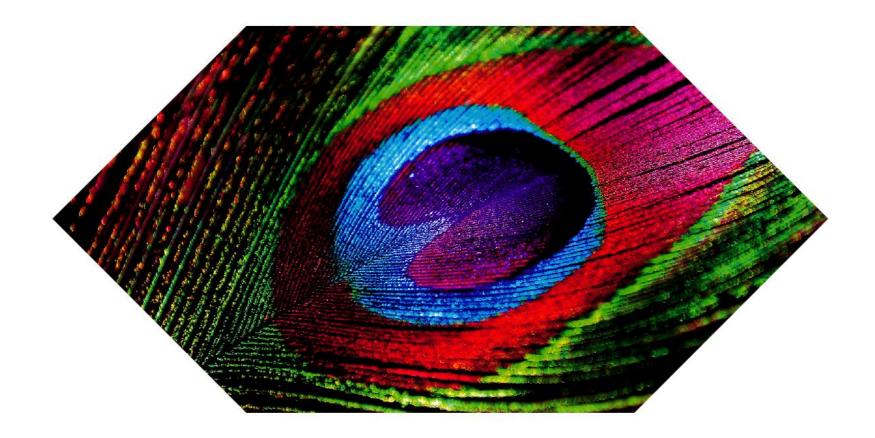
Asset Management

SFDR and HK recognised ESG funds

October 2022



What is SFDR?

◆ The Sustainable Finance Disclosure Regulation ("SFDR") is an EU regulation which introduced requirements for financial market participants to provide standardized sustainability disclosure to investors. This regulation aims to help investors compare Sustainable/ESG characteristics of funds and to enable them to make informed investment decisions.

◆ This regulation applies to <u>all EU domiciled</u> funds which must be classified into one of the three categories below. Funds which are Article 8 or Article 9 require material additional disclosure in their offering documents (as well as supporting periodic reports) which the <u>investment manager (including non-EU delegates)</u> will need to meet and incorporate into their investment strategy.

Article 6	Article 8	Article 9
A product which does not fall under Article 8 or Article 9	A product which promotes, among other characteristics, environmental and/or social characteristics and invests in companies with good governance	A product which has a sustainable investment objective
Such product has to disclose how it integrates sustainability risks into its investment process although sustainability is not a significant focus	Broad spectrum of ESG approaches: - Sustainability-themed such as climate change, environment Products which aim to achieve a specific outcome vs their benchmark using ESG metrics such as carbon footprint, ESG scores	Highest ESG standards: The product has to invest only in sustainab investments*

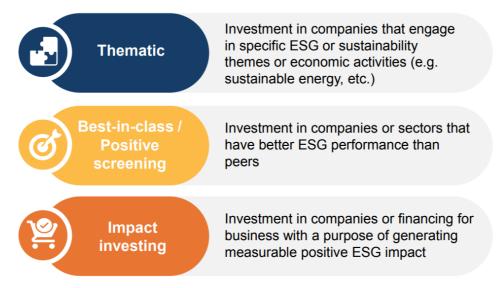
Notes:

^{*}A sustainable investment as defined by SFDR is an investment in an economic activity that contributes to an environmental or social objective, provided that such investments do not significantly harm any of those objectives and that the investee companies follow good governance practices.

What is an "ESG Fund" in HK?

◆ Within a Circular dated 29 June 2021, the SFC sets out the requirements for an SFC-authorized fund to be considered as an ESG* Fund

- The fund should incorporate ESG factors** as key investment focus ("Eligibility" criteria)
- The fund should reflect such in its investment objective and/or investment strategy ("Disclosure" criteria)
- ◆ An ESG Fund may adopt different ESG strategies to fulfil its key ESG investment objective. Some examples are set out below.



Source: SFC Industry Workshop on ESG Fund applications – March 2022

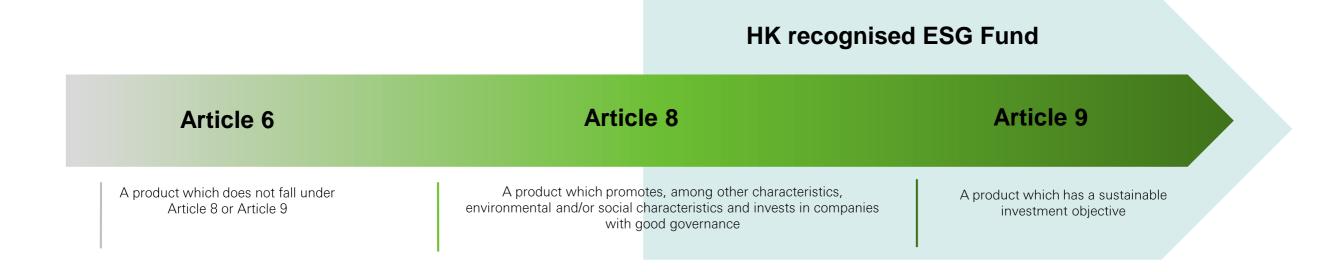
• The list of SFC-authorized funds which are ESG Funds can be found on the SFC website: https://www.sfc.hk/TC/Regulatory-functions/Products/List-of-ESG-funds

Notes:

^{*}The SFC uses "ESG" as an umbrella term for all ESG/Sustainable and related concepts.

^{**}ESG factors may include those that are aligned with one or more of the ESG criteria or principles recognised globally or nationally.

- Since the SFDR regulation aims to enhance disclosures, it purposely captures a wider spectrum of products in Article 8 and Article 9 categories, whereas the SFC requires that ESG should be a key investment focus of an ESG Fund.
- For example, some Article 8 funds may not consider ESG as their key or sole investment focus and therefore may not meet the SFC's definition of an ESG Fund.



• A fund which is Article 8 or 9 but which is not an ESG Fund under the SFC must not be promoted as a sustainable or ESG fund to investors in HK. Investors should carefully review the fund's offering documents to better understand its ESG strategy and to make sure it is aligned with the investors' sustainability preferences.

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