

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

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

## Environmental and/or social characteristics

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 EU the 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.

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## What environmental and/or social characteristics are promoted by this financial product?

By virtue of investing at least 85% of its net assets in the HSBC MSCI Emerging Markets Small Cap ESG UCITS ETF (the “**Master Fund**”), the Sub-Fund promotes the same characteristics as the Master Fund, being the investment in companies with an improvement of ESG rating compared to those of the MSCI Emerging Markets Small Cap Index (the “**Parent Index**”) such that the Master Fund invests in companies with more favourable ESG ratings compared to the Parent Index and that take account of the sustainable agenda, support the transition to a sustainable economy and a reduction in greenhouse gas (“**GHG**”) emissions and carbon footprint and have not committed severe ESG controversies.

The Master Fund seeks to achieve the promotion of these characteristics by replicating the performance of the MSCI Emerging Markets Small Cap SRI ESG Universal Select Index (the “**Master Fund Index**”). The improvement of the ESG rating against the Parent Index is achieved by the Master Fund Index through the removal of companies from the Parent Index based on sustainability exclusionary criteria and United Nations Global Compact exclusionary criteria so as to improve the exposure of the Master Fund Index (and the Master Fund) to companies with more favourable ESG ratings compared to those in the Parent Index. Further detail on the manner in which the companies comprising the Master Fund Index and in which the Master Fund invests offer an improved ESG rating against the Parent Index can be found below and in the section of the Supplement for the Fund titled “Master Fund Index Description”.

The Sub-Fund does not use a reference benchmark to attain its environmental and/or social characteristics.

### Sustainability indicators

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

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

The sustainability indicator is HSBC Asset Management’s ESG ratings system which is used to measure the attainment of the ESG characteristics promoted by the Master Fund and therefore that of the Sub-Fund, specifically measuring:

- ESG score relative to the Parent Index.

- **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?**

Not applicable.

- **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?**

Not applicable.

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

### 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.

Not applicable.

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

Not applicable.

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.



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

- ☒ Yes, the Master Fund Index is constructed using MSCI proprietary data on each securities business involvement. The Business Involvement Screening Research (“**BISR**”) highlights each securities involvement or adherence to global sanctions, controversies and global norms (PAI 10, 13), carbon and sustainable impact (positive screening) (PAI 8,9).

In addition, a separate controversy screen is applied to the starting universe to remove any security in violation of UNGC principles (PAI 10).

In addition, securities involved in thermal coal mining and generation, and oil and gas and controversial weapons (PAI 14) are removed before the final Index is calculated.

Furthermore, active ownership, through engagement and global proxy voting, is a key pillar of the Investment Manager’s approach to responsible investments. The Investment Manager’s stewardship activity is focused on protecting and enhancing its client’s investments. The Investment Manager engages with companies on a range of ESG issues and it has the following clear set of engagement objectives:

- improve our understanding of company business and strategy;
- monitor company performance;
- signal support or raise concerns about company management, performance or direction;  
and
- promote good practice.

Engagement issues range from corporate governance concerns such as the protection of minority shareholder rights, director elections and board structure to environmental issues, including climate change adaptation and mitigation and the low-carbon energy transition, to social issues including human capital management, inequality and data privacy.

The Investment Manager has a dedicated stewardship team with engagement specialists. Engagement is also integral to the fundamental research process. The Investment

Manager's analysts and portfolio managers engage with issuers as part of the investment process and cover relevant ESG issues in their research and discussions.

The Investment Manager is fully transparent in its reporting of its engagement and voting activity, publishing its voting on a quarterly basis and summary information about its engagement activity annually.

How PAI indicators were considered will be included in the Sub-Fund's year-end report and accounts.

Further information is available on request.

☐ No



### **What investment strategy does this financial product follow?**

The Sub-Fund will aim to invest at least 85% of its assets in the Master Fund.

The investment objective of the Master Fund is to replicate the performance of the Master Fund Index, which provides investors the opportunity to gain specific exposure to small-cap equity securities from certain emerging market countries (as determined by the Index Provider) while integrating ESG metrics within an emerging markets equity index, while minimising as far as possible the tracking error between the Master Fund's performance and that of the Master Fund Index.

Investors should read this section in conjunction with the Master Fund's investment strategy (as set out in the supplement for the Master Fund under the heading "Investment Objective and Policies").

In investing at least 85% of assets in the Master Fund, the Fund promotes certain environmental, social and/or governance characteristics (as set out in the section titled "Master Fund Index Description") and has been categorised as an Article 8 fund for the purpose of the SFDR.

The Master Fund Index seeks to achieve an improvement of the MSCI ESG rating against that of the Parent Index.

The Master Fund Index achieves this in the following ways:

1. Excluding securities of companies with exposure (as defined by the Index Provider in the Master Fund Index methodology) to any of the following characteristics (each characteristic will apply thresholds, as defined by the Index Provider and set out in the Master Fund Index methodology and which may be amended from time to time).

- controversial weapons;
- conventional weapons/civilian firearms;
- nuclear weapons;
- adult entertainment;
- genetically modified organisms;
- alcohol;
- gambling;
- nuclear power;
- fossil fuel reserves ownership;
- fossil fuel extraction;
- thermal coal power; and
- tobacco.

2. The Master Fund Index applies the MSCI ESG Universal methodology (which is available on the Index Provider's website) to achieve its ESG objective by re-weighting free-float market cap weights based upon certain ESG metrics, in order to increase exposure to those companies demonstrating both a robust ESG profile as well as a positive trend in improving that profile, while seeking to minimise exclusions from their parent index.

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

- **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 binding elements of the investment strategy are as follows:

The Master Fund Index is constructed from the Parent Index by excluding securities of companies with exposure (as defined by the Index Provider in the Master Fund Index methodology) to any of the following characteristics (each characteristic will apply thresholds, as defined by the Index Provider and set out in the Master Fund Index methodology and which may be amended from time to time:

The Master Fund Index is constructed from the Parent Index by applying the following values- and climate-based exclusionary criteria:

- controversial weapons;
- conventional weapons/civilian firearms;
- nuclear weapons;
- adult entertainment;
- genetically modified organisms;
- alcohol;
- gambling;
- nuclear power;
- fossil fuel reserves ownership;
- fossil fuel extraction;
- thermal coal power; and
- tobacco.

Furthermore, the Master Fund Index applies the MSCI ESG Universal methodology (which is available on the Index Provider's website) to achieve its ESG objective. To achieve this, the Index Provider applies the following steps: (i) the Index Provider excludes the securities with the weakest ESG profile from the Parent Index; (ii) the Index Provider defines an ESG re-weighting factor that reflects an assessment of both the current ESG profile, based on the current MSCI ESG Rating, as well as the trend in that profile; and (iii) the Index Provider re-weights securities from the free-float market cap weights of their parent index using this combined ESG score to construct the Master Fund Index

The Master Fund Index is constructed by excluding securities based on the following criteria:

- unrated companies – companies not assessed by MSCI ESG Research on MSCI ESG controversies;
- missing ESG rating – companies not rated by MSCI ESG Research for an ESG assessment;
- severe ESG controversies - companies having faced very severe controversies pertaining to ESG issues in the last three years; and
- companies involved in controversial weapons businesses companies involved in

controversial weapons (i.e. cluster munitions, landmines, depleted uranium weapons, biological/chemical weapons, blinding lasers, non-detectable fragments and incendiary weapons), as defined by the methodology of the MSCI Ex-Controversial Weapons Indexes.

**Good governance**

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

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

The Sub-Fund does not have a committed minimum rate to reduce the scope of investments.

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

MSCI captures good governance practices through its MSCI ESG Controversies and MSCI ESG Ratings models, both of which are incorporated into the Master Fund Index's methodology. MSCI ESG Controversies covers "Labor Rights and Supply chain" and "Governance", among others, and MSCI ESG Ratings incorporates Corporate Governance, Corporate Behavior and Human Capital.

Governance is assessed against criteria specified in the investment process which includes, among other things, business ethics, culture and values, corporate governance and bribery and corruption. Controversies and reputational risks are assessed through enhanced due diligence as well as screening which are used to identify issuers that are considered to have low governance scores. Those companies will then be subjected to further review, action and/or engagement by the Investment Manager.

Good corporate governance has long been incorporated in HSBC's proprietary fundamental company research. The HSBC's Stewardship team meets with companies regularly to improve its understanding of their business and strategy, signal support or concerns the Investment Manager has with management actions and promote best practice. HSBC believes that good corporate governance ensures that companies are managed in line with the long-term interests of their investors.



**Asset allocation**  
describes the share of investments in specific assets.

### What is the asset allocation planned for this financial product?

The Sub-Fund will aim to invest at least 85% of its assets in the Master Fund to meet the environmental or social characteristics promoted by the Sub-Fund.

The Sub-Fund may also invest up to 15% of net assets, in aggregate, in the following assets which are not the Master Fund, which are not used to meet the environmental or social characteristics: (a) money market instruments including bills, commercial paper and certificates of deposits for ancillary liquidity purposes; and (b) financial derivative instruments for hedging purposes only.

The Sub-Fund promotes environmental and/or social characteristics and it does not have a minimum proportion of sustainable investments.

Taxonomy-aligned activities are expressed as a share of:

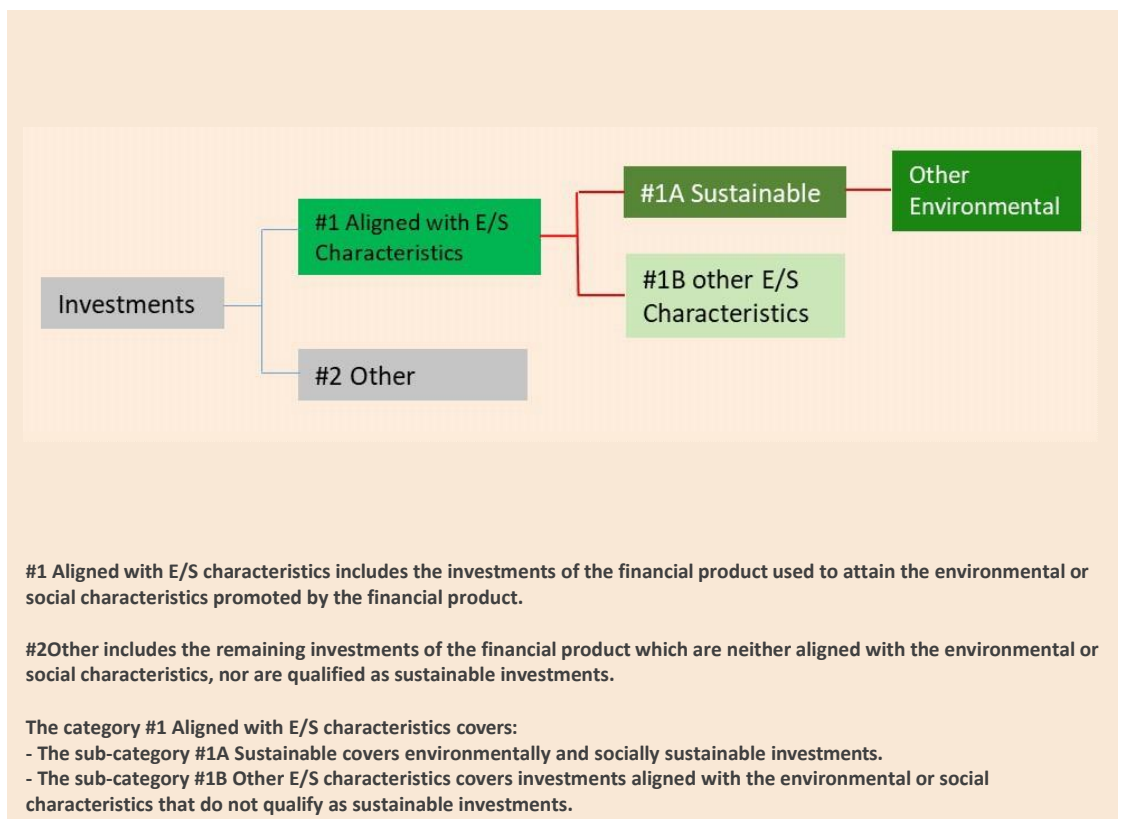
#### - turnover

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.



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

The Sub-Fund will not use derivatives to attain the environmental and/or social

characteristics of the Sub-Fund.

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



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

N/A. The Sub-Fund does not intend to commit to a minimum share of sustainable investments with an environmental objective that are aligned with the EU Taxonomy.

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

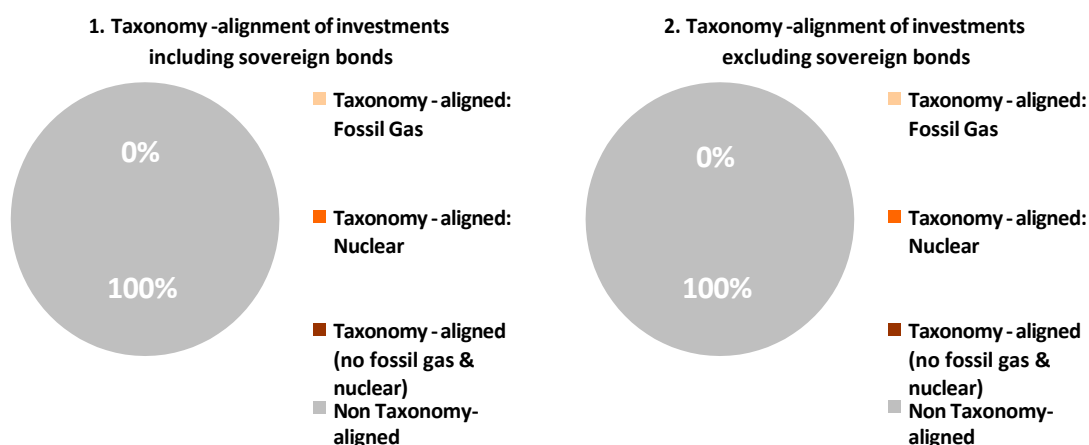
☐ Yes

☐ in fossil gas

☐ In nuclear energy

☒ No

**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.



- **What is the minimum share of investments in transitional and enabling activities?**

N/A. The Sub-Fund does not have a specific minimum share of transitioning and enabling activities.



are sustainable investments with an environmental objective that do not take into account the criteria for environmentally sustainable economic



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

N/A. The Sub-Fund does not intend to commit to a minimum share of sustainable investments with an environmental objective that are not aligned with the EU Taxonomy.



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

N/A. The Sub-Fund does not intend to commit to a minimum share of socially sustainable investments.



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

Cash and other instruments and/or financial derivative instruments may be used for liquidity and hedging purposes in respect of which there are no minimum environmental and/or social safeguards.



**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?**

Not applicable.

- **How is the reference benchmark continuously aligned with each of the environmental or social characteristics promoted by the financial product?**

Not applicable.

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

Not applicable.

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

Not applicable.

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

**Reference benchmarks** are indexes to measure whether the financial product attains the environmental or social characteristics that they promote

Not applicable.



**Where can I find more product specific information online?**

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

More product-specific information can be found on the website:  
[www.assetmanagement.hsbc.com](http://www.assetmanagement.hsbc.com)