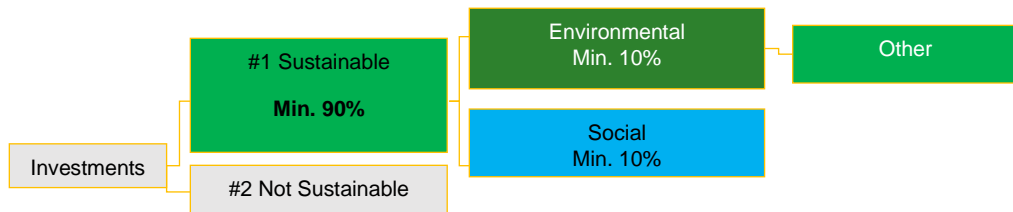


## AMO Japan Sustainable Equity Portfolio

Sustainability-related disclosures required for Article 9 financial products under the EU Sustainable Finance Disclosure Regulation (EU) 2019/2088

<p><b>I. No significant harm to the sustainable investment objective</b></p>
<p>The assessment of “Do No Significant Harm” is part of the investment due diligence and ongoing monitoring and is based on a proprietary Materiality Map. The Materiality Map considers both Sustainable Materiality and Financial Materiality and is used to identify and prioritise key sustainability factors across different industries, and to assess the environmental and social impact of the investee companies. The assessment of the DNSH principle is systematically documented for every investee company. The strategy has adopted all the 14 indicators applicable to investments in investee companies that are set as mandatory under SFDR as well as additional indicators as optional choices. In the investment due diligence, the principal adverse impacts of investment decisions on sustainability factors are considered with respect to mandatory and optional indicators. Changes are actively monitored during the holding period. Specific thresholds are set for each PAI in order to assess and determine eligibility of an investment for the financial product.</p>
<p><b>II. Sustainable investment objective of the financial product</b></p>
<p>The financial product intends to positively contribute to tackling of environmental challenges associated with climate change, sustainable consumption and the use of water resources as well as waste management. With respect to social challenges, the positive contribution is targeted to support a resilient, equitable, safe and healthy society. The sustainable investment objectives are based on the UN Sustainable Development Goals (“SDGs”).</p>
<p><b>III. Investment strategy</b></p>
<p>The financial product will pursue an equity strategy as its main investment strategy with the possibility to invest on an ancillary basis into other asset classes. The financial product’s assets are allocated into investments that comply with defined sustainability standards regarding the pursued environmental and social objectives.</p> <p>The financial product pursues the following sustainability investment strategy:</p> <ul style="list-style-type: none"> <li>(i) Exclusion strategy.</li> <li>(ii) Sustainable investments according to art. 2 (17) SFDR.</li> <li>(iii) Monitoring and engagement process on the Sustainability KPIs.</li> </ul>
<p><b>IV. Proportion of investments</b></p>
<p>The financial product plans to invest an aggregate of at least 90% (or at least 80% under exceptional circumstances, such as large redemptions or subscriptions, and/or times of market turmoil) of its assets in investments that are aligned with the pursued environmental and social objectives and qualify as sustainable investments under article 2 (17) SFDR, whereby at least 10% of its assets shall always be used for sustainable investments with an environmental objective, and at least another 10% of its assets shall always be used for sustainable investments with a social objective. The proportion of non-sustainable investments is expected to be minor (less than 10%). The financial product is only investing directly into issuers and is neither investing into investment funds nor derivatives.</p>
 <p>The diagram illustrates the investment allocation process. It starts with a box labeled 'Investments' on the left. A line from this box splits into two paths: one leading to a green box labeled '#1 Sustainable Min. 90%' and another leading to a grey box labeled '#2 Not Sustainable'. From the '#1 Sustainable Min. 90%' box, a line further splits into two paths: one leading to a green box labeled 'Environmental Min. 10%' and another leading to a blue box labeled 'Social Min. 10%'. A final line from the 'Environmental Min. 10%' box leads to a green box labeled 'Other'.</p>
<p><b>V. Monitoring of the sustainable investment objective</b></p>
<p>To attain the sustainable investment objectives, the eligibility of candidate companies is assessed based on a two-step process, where step 1 is determining the eligibility itself and step 2 is defining specific Sustainability metrics for the monitoring of investee companies’ contribution to the environmental and/or social objectives of the financial product.</p>

<p>Further multiple internal controls in respect of investment decision making and monitoring have been established for this financial product. If investee companies are not contributing to the financial product’s sustainable investment objectives as planned, the investment manager will engage with the investee company to identify improvement opportunities when appropriate. If an investment continues to fail to deliver the required contribution, this may lead to divestment as a last resort.</p>
<p><b>VI. Methodologies</b></p>
<p>The measurement of the attainment of the sustainable investment objectives of the financial product is performed by ensuring that the investee companies comply with the below indicators:</p> <ul style="list-style-type: none"> <li>(i) <u>Alignment to UN SDGs – Selection indicator</u> Companies must meet at least one of the following inclusion criteria to be eligible for investment: <ul style="list-style-type: none"> <li>1. Share of turnover or profit linked to at least one UN SDG,</li> <li>2. “Best in Class” contribution in at least one UN SDG, or</li> <li>3. Net Zero Alignment (Scope 1, 2) contributing to UN SDG 13 (Climate action).</li> </ul> </li> <li>(ii) <u>Measurement by Sustainability KPIs – Monitoring indicators</u> For each investment linked to at least one SDG, a sustainability indicator is used as a Key Performance Indicators (“KPIs”) assigned to each of the invested companies.</li> </ul> <p>Sustainability KPIs evolve over time, therefore the investment manager will ensure their ongoing relevance with respect to the investments of this financial product. As the Sustainability KPIs to be assessed may differ from investment to investment, the Sustainability KPIs detailed above are to be understood as in principle relevant and dependent on the specific investment.</p>
<p><b>VII. Data sources and processing</b></p>
<p>For the financial product a variety of data sources are used in the process of research, selection and monitoring of investments. The data sources used to ascertain the attainment of the sustainable investment objective of the financial product include, inter alia publicly available reports, public announcements, information directly obtained from the company or external data vendors. Data sources obtained from external data vendors are subject to quality assessment.</p>
<p><b>VIII. Limitations to methodologies and data</b></p>
<p>The limitations to methodologies and data arise from the financial product’s geographic and investment focus. The financial product invests in equity securities listed in Japan. The world’s third largest economy, Japan has in excess of 3,000 listed companies. They are subject to extensive and evolving corporate disclosure rules. Companies at the smaller end of the capitalization spectrum may provide more limited disclosure. Similarly, external vendor data coverage may be limited or non-existent for some issuers.</p>
<p><b>IX. Due Diligence</b></p>
<p>A detailed due diligence of all assets, including sustainability aspects, is an integral part of the investment process. During the due diligence, all relevant sustainability aspects and indicators are reviewed and it is ensured that they are compliant with the applicable investment restrictions. Multiple internal controls are in place in respect of investment decision making for the financial product.</p>
<p><b>X. Engagement policies</b></p>
<p>A corporate engagement process is established for the financial product and is guided by the “Sustainable Investment Framework” which governs the engagement, proxy voting, and applicable exclusions lists. The scope for the engagement process is first the determination of the relevant materiality for each. Based on this initial identification, the progress of the issuer with respect to the relevant materiality is measured and monitored on a periodic basis. The engagement process takes place at least once a year and the usual engagement period for defined actions is between 2 – 4 years.</p>
<p><b>XI. Attainment of the sustainable investment objective</b></p>
<p>The financial product does not use a reference benchmark for the purpose of attaining the sustainable investment objective.</p>