

Socially Responsible Investment Guidelines

FP Carmignac Emerging Markets



Carmignac's Overarching Sustainable Framework¹



- Our operations are Carbon neutral 2019²
- Office Environmental practices
- UNPRI signatory 2012

- Climate Change
- Human Capital
- Entrepreneurship

- Tobacco Free supporter
- Coal exclusions and total coal exit 2030
- Energy investments aligned to Paris Agreement

- All portfolio managers and analysts are responsible for ESG integration

- Fulfil our fiduciary duty
- Represent our shareholders rights

- Rigorous 3rd party audit
- French ISR³
- Belgian Towards Sustainability³

- Multiple source ESG indicators
- Proprietary scoring and analysis
- Smart interface for all PM ESG requirements

¹ All the funds and underlying issuers are not concerned by this statement. For more details, please refer to: https://www.carmignac.lu/en_GB/responsible-investment/in-practice-4744

² Scope 1, 2 and Scope 3 (business travel and IT services). For more information please consult https://www.carmignac.lu/en_GB/responsible-investment/snapshot-4742

RI Labels: Not all Carmignac funds are concerned with this statement

³ French Label ISR. For further information, please visit <https://www.llelabelisr.fr/en/>

Belgian Label Towards Sustainability. For further information, please visit: <https://www.towardsustainability.be>

⁴ The proprietary ESG system START combines and aggregates market leading data providers ESG indicators. Given the lack of standardisation and reporting of some ESG indicators by public companies, not all relevant indicators can be taken into consideration. START provides a centralised system whereby Carmignac's proprietary analysis and insights related to each company are expressed, irrespective of the aggregated external data should it be incomplete.

Carmignac Emergents – Article 8 Fund with the French and Belgian sustainability labels accreditations

A strategy replicated in FP Carmignac Emerging Markets

The fund has environmental (E) and social (S) characteristics according to Article 8 of EU REGULATION 2019/2088 (SFDR Sustainable Finance Disclosure Regulation)

Labels supported respectively by the French* government and Belgian Financial Sector Federation Febelfin**

Accredited upon a strict audit run by an independent body

Labels renders SRI*** products more visible for investors in France and Belgium and across Europe



Source: <https://eur-lex.europa.eu/eli/reg/2019/2088/oj>

*Label obtained in January 2019. For further information, please visit <https://www.lelabelisr.fr/en/>

**Label obtained in March 2020. For further information, please visit <https://www.towardsustainability.be/>

***<https://www.febeffin.be/fr>

***Socially Responsible Investment

Our ESG Guidelines



Portfolio construction objective

- ▶ The fund employs an environmental and social approach as is defined in the fund's prospectus and is classified as Art 8 under the SFDR EU regulation.
- ▶ 20% of Fund's investment universe (MSCI EM NR) is excluded based on ESG criteria
- ▶ The Fund aims to achieve carbon emissions 30% lower than its reference indicator (MSCI EM NR USD Index)¹



Integration of ESG criteria and engagement with companies

- ▶ Minimum 90% of portfolio holdings are analysed for ESG risks and opportunities
- ▶ ESG research system START² used to centralise raw ESG Data, proprietary scoring and revenue impact
- ▶ We commit to a strengthened dialogue with companies to improve their approach to ESG issues aligned with our corporate themes³



Voting Policy engagement

- ▶ An objective of participation rate of 100%⁴

¹CO2 emissions: The Sub-Fund aims to achieve carbon emissions 30% lower than the reference indicator as measured by carbon intensity (tCO2/ mUSD revenue converted to Euros; aggregated at portfolio level (Scope 1 and 2 of GHG Protocol))

²The proprietary ESG system START combines and aggregates market leading data providers ESG indicators . Given the lack of standardisation and reporting of some ESG indicators by public companies, not all relevant indicators can be taken into consideration. START provides a centralised system whereby Carmignac's proprietary analysis and insights related to each company are expressed, irrespective of the aggregated external data should it be incomplete.

³Please refer to our ESG-related themes at https://www.carmignac.lu/en_GB/responsible-investment/our-approach-4743 .

⁴Excluding warrants/ P-Notes and preference shares

Source: Carmignac, <https://eur-lex.europa.eu/eli/reg/2019/2088/oj>, March 2021

An Investment Process Taking into Account Financial and Extra Financial Criteria¹

Macro Level

Micro Level

EMERGING UNIVERSE²

≈ 1365 stocks



Country Selection

Strong macro fundamentals



Sector Selection

Underpenetration & positive impact screening



Stock Selection

Sustainable FCF, self financed growth

INVESTABLE UNIVERSE ACCORDING TO FINANCIAL & EXTRA FINANCIAL CRITERIA

≈ 580 stocks



Detailed ESG analysis based on trajectory & best efforts approach



Add. exclusions based on sectorial & controversy considerations



Active voting & engagement

SUSTAINABLE EMERGING UNIVERSE

≈ 460 STOCKS

© FP Carmignac Emerging Markets

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² Universe: MSCI Emerging Markets Index (USD). Portfolio composition may vary overtime. *The investable universe is reviewed on a quarterly basis. Data as of 30/09/2020. Source: Carmignac October 2020

Sustainability is at the heart of FP Carmignac Emerging Markets' investment process*

OUR COMMITMENT TO INVESTORS

Generating attractive returns with a low turnover...

By selecting the right:

- ▶ **Countries with healthy macro-economic fundamentals** and sound balance of payments
- ▶ **Underpenetrated sectors** that stand to benefit from long-term growth themes
- ▶ **Capital-light companies** offering attractive and sustainable cash generation capable of self-financing their growth

... while contributing to sustainable development

- ▶ **Systematically taking into account environmental, social and governance criteria (ESG)** when analyzing companies and when making our investment decisions
- ▶ **Positively impacting society** by favoring companies that bring solutions to social and environmental challenges
- ▶ **Identification and exclusion** of controversial sectors

*All the funds and underlying issuers are not concerned by this statement. For more details, please refer to: https://www.carmignac.lu/en_GB/responsible-investment/in-practice-4744

Favoring companies that bring solutions to social and environmental challenges*

FINANCING THE FUTURE

OFFERING INNOVATIVE
TECHNOLOGIES



FINANCING SUSTAINABLE
TECHNOLOGIES

IMPROVING
LIVING STANDARDS

*All the funds and underlying issuers are not concerned by this statement. For more details, please refer to: https://www.carmignac.lu/en_GB/responsible-investment/in-practice-4744

ESG criteria are embedded in our decision-making process and our financial analysis*



Step 1 Setting the investment universe



All companies eligible to our investment universe must meet both our country, sector and company criteria as well as our **ESG standards guidelines and exclusion policy**.



Step 2 Analysis



Stock selection is made through a **long-term, sustainable approach**, which includes consultation of external and independent ESG reports and ratings and is implemented through our proprietary ESG system START¹. Our teams carry out detailed financial and ESG assessments of companies held in portfolio.



Step 3 On-the-ground visits



We complete this analysis by **regular on-site visits** of production sites and **one-to-one meetings** with the companies' management in order to understand their strategy as well as their long-term engagements.



Step 4 Monitoring



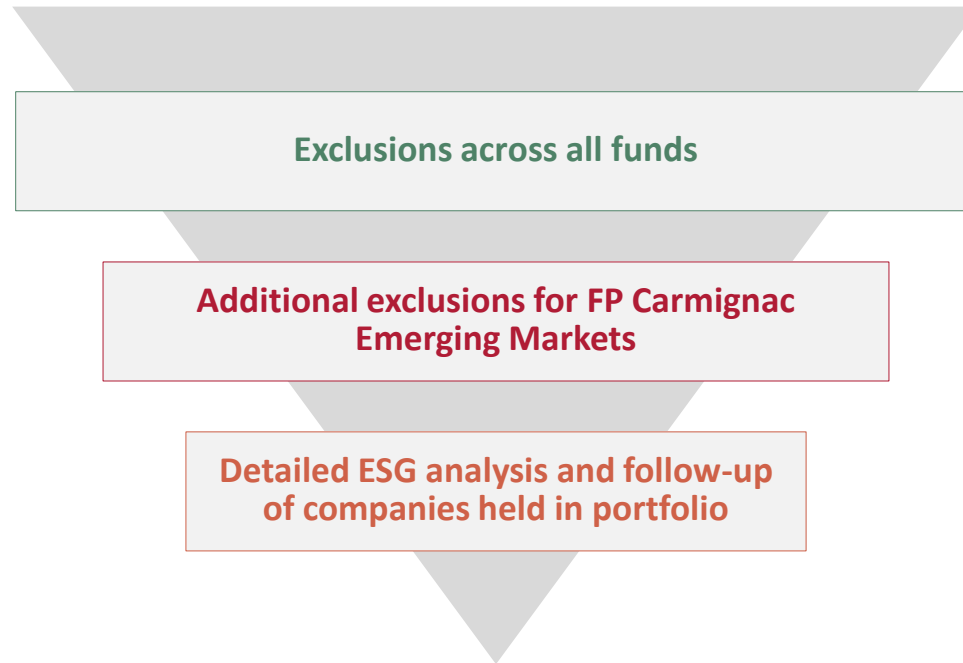
Consideration of ESG issues does not end when the investment decision is made. The Emerging Market (EM) Equity team continuously reviews the investment thesis of companies held in portfolio, including a **review of ESG criteria**.

*All the funds and underlying issuers are not concerned by this statement. For more details, please refer to: https://www.carmignac.lu/en_GB/responsible-investment/in-practice-4744

¹The proprietary ESG system START combines and aggregates market leading data providers ESG indicators. Given the lack of standardisation and reporting of some ESG indicators by public companies, not all relevant indicators can be taken into consideration. START provides a centralised system whereby Carmignac's proprietary analysis and insights related to each company are expressed, irrespective of the aggregated external data should it be incomplete.

Exclusion Policy

The Emerging Market Equity team has extended the exclusion list with its own specific convictions



Exclusions Across All Funds



Exclusions

Our exclusions policy

Our exclusion list contains companies and sectors that are excluded due to their **activities** or their **business norms**.

This policy applies to **all funds** where Carmignac acts as an investment manager

Firm-wide hard restrictions

(transactions are prohibited and blocked on trading tools)

- ✘ **Controversial weapon manufacturers** that produce products that do not comply with treaties or legal bans*
- ✘ **Tobacco producers, wholesale distributors and suppliers** with revenues over 5% from such products
- ✘ **Thermal coal miners** with over 10% revenues from extraction or 20 million tonnes from extraction
- ✘ **Power generators** that produce more CO₂/kWh than the defined threshold**
- ✘ **Adult entertainment and pornography** producers and distributors with over 2% revenues from such product
- ✘ **International Global Norms violations** including OECD Business Principle, ILO Principles and UNGC Principles.

*Companies that do not comply with: 1) The Ottawa Treaty (1997) which prohibits the use, stockpiling, production and transfer of anti-personnel mines; 2) The Convention on Cluster Munitions (2008) which prohibits the use, stockpiling, production and transfer of cluster munitions; 3) The Belgian Loi Mahoux, the ban on uranium weapons; 4) The Chemical Weapons Convention (1997) which prohibits the use, stockpiling, production and transfer of chemical weapons; 5) The Treaty on the Non-Proliferation of Nuclear Weapons (1968), which limits the spread of nuclear weapons to the group of so-called nuclear weapons states (USA, Russia, UK, France and China); 6) Biological Weapons Convention (1975) which prohibits the use, stockpiling, production and transfer of biological weapons

**In line with the 2 ° C scenario suggested by the IEA or new coal/nuclear build or Gas>30%, Coal >10%, Nuclear >30% revenues if CO₂ data not available

Please refer to Carmignac's exclusion policy for further detail
https://www.carmignac.lu/en_GB/responsible-investment/policy
Exclusion lists are updated on a quarterly basis

FP Carmignac Emerging Markets Exclusion Policies*



ENERGY EXCLUSION POLICY

- ✘ **Thermal Coal** producing companies with more than 10% sales directly derived from coal extraction
- ✘ **Unconventional energy** ⁽¹⁾ companies deriving more than 1% of total production from unconventional energy sources
- ✘ **Conventional energy production** ⁽²⁾ companies must have a minimum 40% revenue from **Gas and/or Renewable Energy** ⁽³⁾
- ✘ **Conventional oil energy production** companies are limited to 3% of the portfolio
- ✘ **Power generation** companies must not exceed 408 gCO₂/kWh carbon intensity or if data is not available cannot exceed:
 - **Gas-fired** – 30% production or revenue
 - **Coal-fired** – 10% production or revenue
 - **Nuclear-fired** – 30% production or revenue

ETHICAL EXCLUSION POLICY

- ✘ **All Controversial weapon** companies ⁽⁴⁾
- ✘ **Conventional Weapons including components** companies (10% revenue hurdles)
- ✘ **All Tobacco** producers. Wholesale distributors and suppliers 5% revenue threshold
- ✘ **Norms based** exclusion including UN Global Compact violations human rights, labour rights, environment and corruption
- ✘ **Adult Entertainment** companies (2% revenue hurdle)
- ✘ **Meat-processing companies** whose revenues derive partially or completely from the processing of cattle, pork, lamb or poultry
- ✘ **Companies in the PETA** (People for Ethical Treatment of Animals) exclusion list

*Our Energy and Ethical policies are aligned with the Quality Standards of the Belgian SRI label
(1) Unconventional energy extraction sources: Tar/oil sands, shale oil, shale gas and Arctic drilling.

(2) Conventional energy extraction sources: oil and gas

(3) Renewable energy: biofuel, wind, solar, wave, geothermal, hydro, tidal.

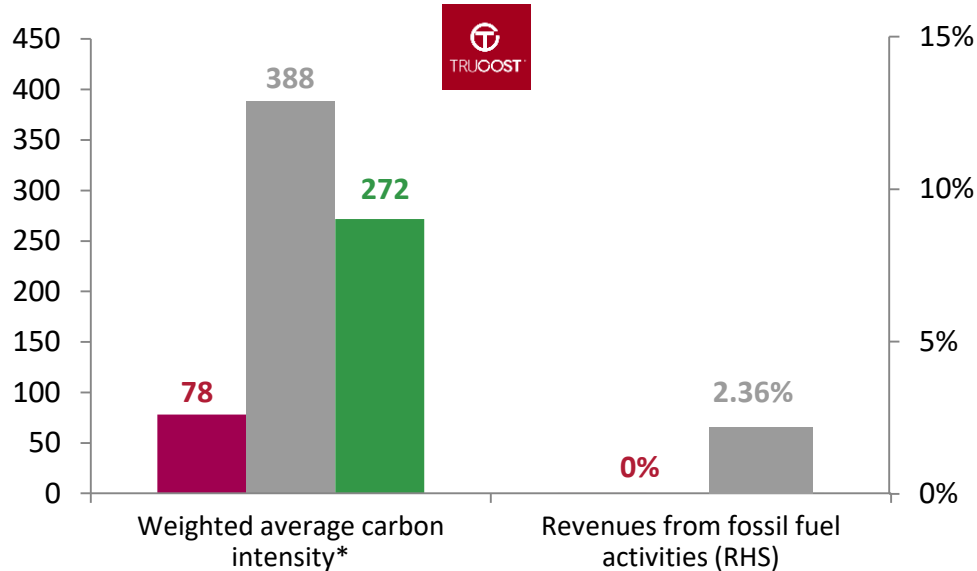
(4) Companies that do not comply with: 1. The Ottawa Treaty (1997) which prohibits the use, stockpiling, production and transfer of anti-personnel mines; 2. The Convention on Cluster Munitions (2008) which prohibits the use, stockpiling, production and transfer of cluster munitions; 3. The Belgian Loi Mahoux, the ban on uranium weapons; 4. The Chemical Weapons Convention (1997) which prohibits the use, stockpiling, production and transfer of chemical weapons; 5. The Treaty on the Non-Proliferation of Nuclear Weapons (1968), which limits the spread of nuclear weapons to the group of so-called nuclear weapons states (USA, Russia, UK, France and China); 6) Biological Weapons Convention (1975) which prohibits the use, stockpiling, production and transfer of biological weapons

Exclusion lists are updated on a quarterly basis

Source : Carmignac, October 2020

A Low Carbon Emission Portfolio

FP Carmignac Emerging Markets Footprint as of 31/12/2020



- FP Carmignac Emerging Markets
- MSCI EM NR Index (USD) benchmark
- Low Carbon Target (Emissions 30% lower vs MSCI EM NR USD)

Carbon emission investment strategy

- We aim to achieve carbon emissions 30% lower than our reference indicator (MSCI EM NR Index USD)
- Limiting investments in companies owning fossil fuel reserves
- Selecting companies that follow a more ambitious carbon risk management policy than their industry peers
- Investing in companies that offer clean technology solutions

*To calculate the portfolio carbon emissions, the companies' carbon intensities (tonnes of CO₂e /USD mn revenues converted to Euros, (Scope 1 and 2 GHG Protocol), S&P Trucost) are weighted according to their portfolio weightings (adjusted for holdings for which carbon emissions are not available), and then summed. To know more about S&P Trucost methodology, see following page. Source: S&P Trucost, Carmignac, 31/12/2020.

Carbon calculations methodology

- ▶ Carbon emission figures are based on S&P Trucost data. The analysis is conducted using estimated or declared data measuring Scope 1 and Scope 2 carbon emissions, excluding cash and holdings for which carbon emissions are not available.
- ▶ To determine carbon intensity, the amount of carbon emissions in tonnes of CO₂ is calculated and expressed per million dollar of revenues (converted to Euro). This is a normalized measure of a portfolio's contribution to climate change that enables comparisons with a reference indicator, between multiple portfolios and over time, regardless of portfolio size.
- ▶ Fossil fuel % revenue is derived weighted average of % revenues excluding cash of each holding within the portfolio
- ▶ S&P Trucost methodology: Trucost uses company disclosed emissions where available. In the instance it is not available, they use their proprietary EEIO model. The model uses the revenue breakdown of the company by industry sector to estimate the carbon emissions. For further information, please visit: www.spglobal.com/spdji/en/documents/additional-material/faq-trucost.pdf. Although S&P Trucost does report Scope 3 emissions where available, such emissions are commonly considered to be poorly defined and inconsistently calculated by companies. As a result, we have chosen not to include them in our portfolio emission calculations.

Definitions:

- ▶ Scope 1: Greenhouse gas emissions generated from burning fossil fuels and production processes which are owned or controlled by the company.
- ▶ Scope 2: Greenhouse gas emissions from consumption of purchased electricity, heat or steam by the company
- ▶ Scope 3: Other indirect Greenhouse gas emissions, such as from the extraction and production of purchased materials and fuels, transport-related activities in vehicles not owned or controlled by the reporting entity, electricity-related activities (e.g. T&D losses) not covered in Scope 2, outsourced activities, waste disposal, etc

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