

Submission ID

F03004

Region

Hong Kong

Category

Corporate Practice

Name of firm

GaoTeng Global Asset Management Limited

1. Firm-level Commitment to active engagement/stewardship. Please select the statement(s) that

We do NOT yet have an explicit, clearly spelled out stewardship policy/framework/principle, but we are in the process of finalizing one within the next 12 months

2. Which ESG materiality framework are you currently using for benchmarking and/or using for reporting?

My local regulators' guideline

Additional remarks, if any (maximum 250 words)

Though we do not have a formal ESG materiality criteria in place currently, we are increasingly aware to integrate ESG elements throughout our investment process, from idea generation to analysis and portfolio construction. Material ESG issues are central to a company's business model and financial success, as they affect its short-, medium- and long-term competitiveness. For example, we assess how sustainable is a company's value creation which is crucial for credit analysis that cash level is highly important in evaluating its payment ability.

3. Are you a Signatory/Member of the following sustainable programs?

No, we are not a signatory of any other similar initiatives, but we are in the process of applying to be a signatory of a responsible investing initiative/s

4. Firm-level Responsible Investment Policy: Our firm has a clear responsible investment policy set out to govern our organization's stewardship policy [iv]:

Conflicts of interest

(A) Listed equity

1.7

(B) Fixed income

98.3

(C) Private equity

0

(D) Real estate

0

(E) Infrastructure

0

(F) Hedge funds

15.1

6. Firm-level Responsible Investment Policy Disclosure [iv]: Indicate which of your responsible investment policy elements are publicly available and provide links:

* Our responsible investment policy elements are not publicly available

7. Governance Oversight [iv]: Who, in your organization's board, chief-level staff, investment committee, and/or head of a department have formal oversight and accountability for responsible investment?

* Chief-level staff (e.g., Chief Executive Officer (CEO), Chief Investment Officer (CIO), or Chief Operating Officer (COO))

* Investment committee

8. Governance Implementation [iv]: In your organization, which internal or external roles have responsibility for implementing responsible investment?

* Investment committee

* Portfolio managers

* Investment analysts

9. Corporate Risk Management: Please select all statements that apply to your firm:

* We have clear, unambiguous procedures AND protections for whistleblowing

10. Corporate Citizenship: Please select all statements that apply to your firm:

* Our firm participates in or organizes investor education (or financial literacy) events/resources for children, youth, and/or women at least two times a year -- WITHOUT presenting our products and services.

Additional remarks, if any (maximum 250 words).1

As a responsible investment manager, we have continuously adopted investor education as a key strategy to enhance investor protection and foster investor engagement in decision-making, helping investors better assess the relevance and suitability of investment advice. We have been actively participated in and organized various investor education activities including industry panel, investment outlook seminar and media interview without presenting our products and services but to help both retail investors and institutional investors to be better equipped amidst times of heightened uncertainty.

11. Transparency about material redemptions[i]: This question relates to your firm's duty of care toward intermediaries and, ultimately, end investors. When a fund experiences material redemptions, when does your firm inform investors and/or intermediaries[ii]?

We do not inform investors/intermediaries

12. Transparency about key man events: When the key manager/s responsible for a Fund have resigned, are retiring, will be transferred to a different responsibility, are indisposed, seriously ill, going on maternity leave, or are otherwise incapacitated, when do you inform investors[ii]?

We inform investors/intermediaries only as part of our scheduled reporting, such as monthly factsheets, quarterly reviews, etc.

13. Skin in the game: Does your firm have a policy requiring the key portfolio managers to invest their personal wealth into the funds they manage, as external investors, with no special concessions on the SAME terms?

Yes

Additional remarks, if any (maximum 250 words).2

We have advocated and established an Interests and Incentive Mechanism to encourage portfolio managers to invest personal wealth into funds/managed accounts, ensuring that the interests of fund manager and investors are fully aligned. Key Investment Managers (including Daniel Li, Desmond How and Wonnie Chu) have proactively volunteered to invest into their strategies.

14. AUM change, 3Y: How has your firm's total assets under management (AUM)[iii] changed in the last 3 years?

Increased more than 30%

15. Distribution channel mix: This question applies to ALL of your firm's COMINGLED fund products distributed in Asia ex-Japan, including funds not participating in this exercise; please exclude segregated mandates. What channels are the products distributed through currently?

*Private banks

*Retail banks

*Financial advisors

*Online platforms (traditional, not artificial intelligence advisors)

*Direct distribution to institutional asset owners (family offices, pension funds, insurance companies' general assets, corporates, sovereign wealth funds, official institutions, foundations, endowments, and other institutions). Please note this relates to commingled funds, NOT segregated mandates.

16. Distribution channel growth, 3Y: This question relates to ALL your firm's commingled funds distributed in Asia ex-Japan, including funds not participating in this exercise; please exclude segregated mandates. How many new distribution channels were gained or lost in the last 3 years?

Gained more than 10 distribution channels

17. Compliance: Has your firm, or its officers, breached any regulatory, legal or other compliance thresholds in the last 5 years?

No, we have not made any breaches ☐