

Submission ID

F25019

Region

Hong Kong

Category

Corporate Responsibility and Strength

Name of firm

First Sentier Investors

1. Firm-level Commitment to active engagement/stewardship. Please select the statement(s) that describe your approach to stewardship[i].

We have a clearly articulated, explicit, publicly available policy/framework on investing responsibly across ALL our strategies, including non-ESG, non-SRI strategies

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

The Sustainability Accounting Standards Board (SASB)

The Task Force on Climate-Related Financial Disclosures (TCFD)

EU Sustainable Finance Disclosure Regulation (SFDR)

SDG indicators

My local regulators' guideline

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

Yes

Selected: Yes - Please select relevant sustainable programs.

Principle Responsible Investment (PRI)

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

Key stewardship objectives

A specific approach to climate-related risks and opportunities

Approach to collaboration on stewardship

Escalation strategies

Conflicts of interest

Details on how the stewardship policy is implemented and which elements are mandatory, including how and when the policy can be overruled

How stewardship efforts and results should be communicated across the organization to feed into investment decision-making and vice versa

(A) Listed equity

100

(B) Fixed income

100

(C) Private equity

0

(D) Real estate

100

(E) Infrastructure

100

(F) Hedge funds

0

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

* The overall approach to responsible investment

* Guidelines on environmental factors

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?

* Investment committee

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

* Board and/or trustees

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

* Investment committee

* Other chief-level staff

* Head of a department

* Portfolio managers

* Investment analysts

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

*The annual bonus, both for investment and non-investment staff, is based partly on meeting investors' needs. Factors such as defending investors' interests, refraining from taking risks that are out of line with target investors' profiles, product innovation to meet investors' unmet needs, and other actions aligned with investors weight 30% or more in determining bonuses

*The annual bonus may be clawed back if a staff member has acted out of alignment with investors' interests during any year. Examples include, but are not limited to, taking risks exceeding target investors' risk profile, trading for personal benefit over investors', making representations to distributors/investors/the public/regulators/other parties that obscure the actual situation of a fund or the firm, among other possible infringements of fiduciary or moral responsibility to investors

*An independent director leads our compensation committee to ensure objectivity and fairness for employees at all levels

*Members of our board of directors include our Chief Risk Officer (who is NOT also concurrently playing the role/s of CEO, Chairman, or another individual who is already on the board)

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

*Our company has a matching program for staff's donations to various pre-approved philanthropic efforts

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

Yes

Selected: Yes - Please select to reflect your policy:

Our key portfolio managers are required to invest 10-15% of their annual bonus (or equivalent) into the fund/s they manage

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

Increased 16-20%

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
- *Priority/affluent banks
- *Retail banks
- *Insurers (via the insurer's fund platforms)
- *Financial advisors
- *Online platforms (traditional, not artificial intelligence advisors)
- *Artificial intelligence (AI) advisory platforms
- *Funds of funds
- *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 7-10 distribution channels

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

Yes, but we choose NOT to explain the breach and any remedial, preventative steps taken ☒