



# Article 10 (SFDR)

## Website disclosure for an Article 9 fund

### Ruth Global Change Equities

Version	Date	Explanation
1.0	June 28, 2024	First version

Does this financial product have a sustainable investment objective?	
<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
<input checked="" type="checkbox"/> It will make a minimum of <b>sustainable investments with an environmental objective: 25%</b> <ul style="list-style-type: none"> <li><input type="checkbox"/> in economic activities that qualify as environmentally sustainable under the EU Taxonomy</li> <li><input checked="" type="checkbox"/> in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy</li> </ul>	<input type="checkbox"/> It <b>promotes Environmental/Social (E/S) characteristics</b> and while it does not have as its objective a sustainable investment, it had a proportion of __% of sustainable investments <ul style="list-style-type: none"> <li><input type="checkbox"/> with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy</li> <li><input type="checkbox"/> with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy</li> <li><input type="checkbox"/> with a social objective</li> </ul>
<input checked="" type="checkbox"/> It will make a minimum of <b>sustainable investments with a social objective: 25%</b>	<input type="checkbox"/> It promotes E/S characteristics, but <b>will not make any sustainable investments</b>



## A. Summary

### **Inget mål för hållbar investering**

För att säkerställa att hållbara investeringar inte orsakar betydande skada för något miljömässigt eller socialt mål för hållbara investeringar inkluderas de obligatoriska huvudsakliga negativa konsekvenser för hållbarhetsfaktorer ("PAI") och OECD:s riktlinjer för multinationella företag samt FN:s vägledande principer om företagande och mänskliga rättigheter i flera steg i investeringsprocessen.

### **Den finansiella produktens mål för hållbar investering**

Fondens mål för hållbar investering är att ge långsiktig kapitaltillväxt genom att investera globalt i aktier som förvaltaren anser bidrar positivt till sociala och miljörelaterade faktorer.

### **Investeringsstrategi**

Fonden har en global exponering som huvudsakligen investerar i aktiefonder med en tydlig hållbarhetsprofil. Vid val av underliggande fonder för investering arbetar fonden med tre metoder för att integrera huvudsakliga negativa effekter för hållbarhetsfaktorer i investeringsbeslutsprocessen som består av:

1. välja in
2. välja bort och
3. påverka

### **Andel av investeringar**

Fonden kommer att investera mellan 60 % och 100 % av sina tillgångar i andra aktierelaterade fonder. Fonden kommer att göra minst 25 % hållbara investeringar med ett miljömål och minst 25 % hållbara investeringar med ett socialt mål.

### **Övervakning av mål för hållbar investering**

Följande hållbarhetsindikatorer används för att mäta uppnåendet av fondens mål för hållbar investering:

- Klassificering av underliggande fonder enligt SFDR.
- Investeringar som bidrar till FN:s globala mål för hållbar utveckling (SDGs).
- Andel investeringar som bryter mot internationella normer och konventioner enligt FN:s Global Compact, OECD:s riktlinjer för multinationella företag och FN:s vägledande principer om företagande och mänskliga rättigheter.

### **Metoder**

Fonden följer regelbundet upp hållbarhetsindikatorerna och uppfyllelsen av hållbarhetsmålet. Detta görs genom att samla in data från tredje part.

### **Datakällor och databehandling**

Förvaltaren använder sig av både extern och internt genererad data. Förvaltarens arbete med bolagsspåverkan kartläggs löpande och dokumenteras i en engagemangslogg, vilket genererar intern data. De huvudsakliga dataleverantörerna för extern data är Bloomberg, Sustainalytics, CDP och Science Based Targets initiative (SBTi).

### **Begränsningar för metoder och data**

Det finns olika typer av begränsningar när det gäller de metoder och datakällor som används. Den primära begränsningen är bristen på data. Upplysningar om bolags hållbarhetsarbete är till stor del frivilliga och därför är det många bolag som inte rapporterar hur de hanterar hållbarhetsfrågor. I de fall där rapporterad data saknas används uppskattad data från etablerade leverantörer. Data från dessa leverantörer anses vara tillförlitliga. Om förvaltaren fortfarande saknar information kontaktas bolagen med frågor för att säkerställa att de uppfyller de förväntningar som ställts.

### **Due diligence**

Se Bolagets Due diligence-policy som finns tillgänglig på [www.ruthassetmanagement.com](http://www.ruthassetmanagement.com) för ytterligare information: <https://www.ruthassetmanagement.com/media/wzhlqn24/policy-for-due-diligence-2024.pdf>

### **Engagemangspolicier**

Engagemang är inte en del av den miljömässiga eller sociala investeringsstrategin.

### **Valt referensvärde**

Inget specifikt index har valts som referensvärde.



## **B. No significant harm to the sustainable investment objective**

**How do the sustainable investments not cause significant harm to any environmental or social sustainable investment objective?**

In order not to cause significant harm to environmental and social objectives, the fund excludes investments that:

- Deliberately and repeatedly violates international norms and conventions. These include the UN Global Compact, the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights.
- Operate in industries with a high risk of principal adverse impacts on sustainability factors. These include thermal coal, controversial weapons (e.g. nuclear weapons and cluster bombs), oil sands, pornography and arctic drilling, gambling and alcohol.

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

The indicators are taken into account by norms-based exclusions of companies that violate the UN Global Compact and OECD Guidelines for Multinational Enterprises. Furthermore, investments in companies with activities or products industries that cause severe negative externalities to society are also excluded. Thresholds for such activities are presented in the section ‘What are the binding elements of the investment strategy used to select the investments to attain the sustainable investment objective?’

The fund's manager regularly follows up the PAIs (see Appendix 1, Table 1 in the SFDR) and engages in dialogue with the underlying managers regarding these.

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

The fund's sustainable investments are adapted to the above in that the fund does not invest in companies that, according to a third-party data provider intentionally and repeatedly violate rules established by national authorities in the markets where the fund is active. This includes but is not limited to the UN Global Compact and the OECD Guidelines for Multinational Enterprises as well as the UN Guiding Principles on Business and Human Rights relating to issues of the environment, human rights, working conditions and business ethics. The fund uses MSCI to screen norm-based and controversial sectors. Initially, the fund's manager conducts a dialogue with companies and/or underlying managers. In the event results from this dialogue indicate there will be no improvement or the underlying fund will not divest, the fund divests the underlying holding or manager



**C. Sustainable investment objective of the financial product**

**What is the sustainable investment objective of this financial product?**

The fund's sustainable investment objective is to provide long-term capital growth, investing globally in stocks that the manager believes contribute positively to social and environmental factors. The fund aims to achieve its objective by investing in underlying funds that have sustainability investment as an objective (also known as Article 9 of Regulation (EU)

2019/2088 (“SFDR”)) and where the managers have incorporated sustainability as a critical part of the investment process.  
 The fund's environmental objective consists of reduced emissions of greenhouse gases and more efficient use of energy.  
 The fund's social objective consists of improved health and well-being and increased social cohesion.



## D. Investment strategy

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

The fund has a global exposure that mainly invests in equity funds with a clear sustainability profile. When selecting underlying funds for investment the fund works with three methods to integrate principal adverse impacts for sustainability factors in the investment decision-making process which consists of:

1. opt in
2. opt out and
3. influence.

Environmental, social and corporate governance aspects are decisive for the investments. This means that the managers invest in companies that contribute to or benefit from the transition to a more sustainable world by producing sustainable products or services with a positive effect on environmental or social objectives according to Article 2.17 of the SFDR.

### What are the binding elements of the investment strategy used to select the investments to attain the sustainable investment objective?

The fund does not invest in companies that deliberately and repeatedly violates international norms and conventions. These include the UN Global Compact, the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights

The fund will also exclude the following industries/ subsectors:

<b>Exclusion criteria and thresholds for industry/subsectors</b>	<b>Exclusion criteria and thresholds for industry/subsectors</b>
<b>Tobacco</b>	Companies that manufacture tobacco products. 0% revenue is the limit.
<b>Thermal coal</b>	Companies that derive 5% or more of their revenue from the mining of thermal coal and its sale to external parties.

<b>Nuclear weapons</b>	Companies with primary involvement in nuclear warheads and missiles, nuclear systems, components for intended use of nuclear power and exclusive nuclear delivery platforms, components of nuclear exclusive delivery platforms, nuclear fissile material. 0% revenue is the limit.
<b>Controversial weapons</b>	Companies with industry links to landmines, cluster munitions, chemical weapons or biological weapons. Note, industry affiliation includes ownership, manufacturing or investment. Landmines do not include related security products. 0% revenue is the limit.
<b>Extraction of oil sands</b>	Companies that derive 5% or more of their revenue from oil sands extraction.
<b>Pornography</b>	Companies that derive 5% or more of their revenue from the production and/or distribution of pornography. Companies that receive revenue from selling pornography are not excluded.
<b>Arctic drilling</b>	Companies that derive 5% or more of their revenue from onshore or offshore oil and gas production in the Arctic region. The definition of the Arctic is geographic and includes production activities north of latitude 66.5.

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

The Fund excludes companies that, according to a third-party data provider intentionally and repeatedly violate rules established by national authorities in the markets in which the Fund operates or by key international organizations generally recognized by the global community. This includes the UN Global Compact and the OECD Guidelines for Multinational Enterprises as well as the UN Guiding Principles on Business and Human Rights

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

Yes, Principal adverse impacts are taken into account in the norm-based and industry exclusions related to fossil fuels and emissions, controversial weapons and violations of UN Global Compact and OECD Guidelines for multi-national companies.

More information on principal adverse impacts on sustainability factors will be reported in the annual report of the fund in accordance with Article 11 (2) of the SFDR.

No



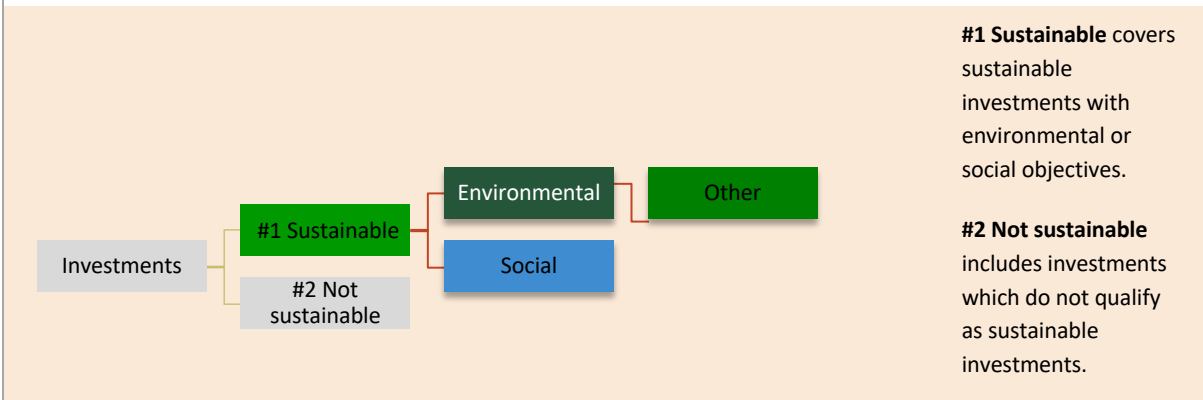
**E. Proportion of investments**

**What is the asset allocation and the minimum share of sustainable investments?**

The Fund invests between 60% and 100% of its assets in other equity-related funds, including exchange-traded funds (ETFs), mutual funds, special funds and alternative investment funds that meet the criteria of the UCITS Law.

A minimum of 80% of the Net Asset Value (“NAV”) of the fund is expected to be invested in sustainable investments (#1 Sustainable), within the meaning of Article 2(17) SFDR. Within this category, at least 25% of the NAV is intended to be invested in sustainable investments with a social objective, whereas 25% of the NAV is intended to be invested in sustainable investments with an environmental objective, as the distribution between these two categories may vary over time.

The proportion allowable to be held in cash, liquid assets, derivative and hedging instruments (#2 Not sustainable) is expected to be 20% of the NAV of the fund.



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

The fund commits to make a minimum 25% of sustainable investments with an environmental objective aligned with SFDR. Some of the sustainable investments made by the fund may be aligned with the EU Taxonomy, however the manager is not currently in a position to calculate the share of sustainable investments aligned with the EU Taxonomy. The minimum share of EU Taxonomy-aligned sustainable investments is therefore 0%.

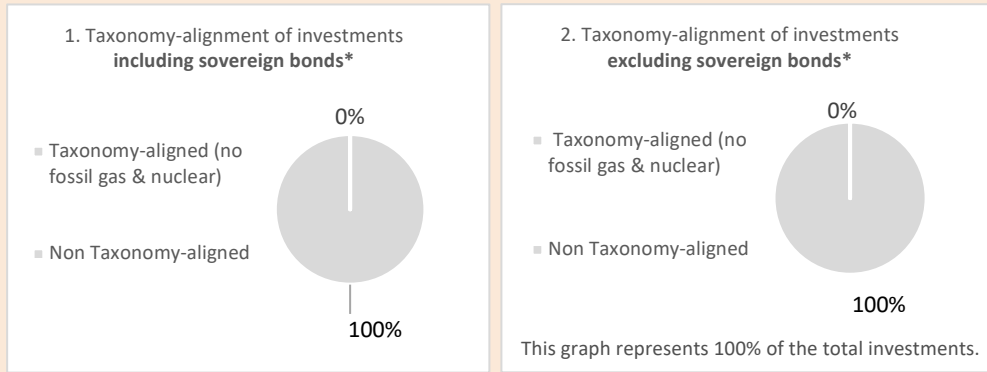
Because the data coverage and data quality improve over time, the portfolio manager expects to increase the minimum proportion of sustainable investment aligned with the EU Taxonomy.

**Does the financial product invest in fossil gas and/ or nuclear energy related activities that comply with the EU Taxonomy<sup>1</sup>?**

- Yes:
- In fossil gas     In nuclear energy
- No

<sup>1</sup> Fossil gas and/or nuclear related activities will only comply with the EU Taxonomy where they contribute to limiting climate change (“climate change mitigation”) and do not significantly harm any EU Taxonomy objective. The full criteria for fossil gas and nuclear energy economic activities that comply with the EU Taxonomy are laid down in Commission Delegated Regulation (EU) 2022/1214.

*The two graphs below show in green the minimum percentage of investments that are aligned with the EU Taxonomy. As there is no appropriate methodology to determine the Taxonomy-alignment of sovereign bonds\*, the first graph shows the Taxonomy alignment in relation to all the investments of the financial product including sovereign bonds, while the second graph shows the Taxonomy alignment only in relation to the investments of the financial product other than sovereign bonds.*



\* For the purpose of these graphs, 'sovereign bonds' consist of all sovereign exposures.

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

The Fund does not commit to invest in transitional and enabling activities. As a result, the minimum share of investments in transitional and enabling activities within the meaning of the EU Taxonomy is set at 0%.

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

The Fund commits to make at least 25% of sustainable investments with an environmental objective. These investments could be aligned with the EU Taxonomy but the manager is not currently in a position to specify the exact proportion. However, the position will be kept under review as the underlying rules are finalized and the availability of reliable data increases over time.

**What is the minimum share of sustainable investments with a social objective?**

The Fund commits to make at least 25% of sustainable investments with a social objective.

**What investments are included under “#2 Not Sustainable”, what is their purpose and are there any minimum environmental or social safeguards?**

The investments classified as "#2 Not Sustainable" (which includes investments that do not qualify as sustainable investments) are used for efficient portfolio management, liquidity management or hedging purposes, and includes cash and liquid assets. No minimum safeguards is applied.





## F. Monitoring of the sustainable investment objective

### What sustainability indicators are used to measure the attainment of the sustainable investment objective by this financial product?

The following sustainability indicators are monitored to measure the attainment of the sustainable investment objectives of the fund:

- Classification of underlying funds according to the SFDR
- Investments contributing to the UN Sustainable Development Goals (UN SDGs)
- Percentage of investments that violate international norms and conventions according to the UN Global Compact, the OECD's Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights.

### How are the sustainable investment objective and the sustainability indicators monitored throughout the lifecycle of the financial product?

The sustainability indicators used to measure the attainment of the sustainable investment objective are monitored on a regular basis throughout the lifecycle of the Fund. This is done by collecting third party data through ex-post evaluation.



## G. Methodologies

### What are the methodologies used to measure the attainment of the sustainable investment objective?

The fund monitors the sustainability indicators and the attainment of the sustainability objective on a regular basis. This is done by collecting third party data.



## H. Data sources and processing

### What are the data sources used to attain the sustainable investment objective of the financial product?

The manager uses both external and internally generated data. The manager's work on corporate impact is continuously mapped and documented in an engagement log, which generates internal data. The main data providers for external data are Bloomberg, Sustainalytics, CDP, and the Science Based Targets initiative (SBTi). By only using established providers, the manager has ensured the quality to the best of their judgment. The data is primarily used as a basis in internal analysis tools

and in internal controls to ensure compliance for all holdings in line with policy, such as regarding exclusions.

The proportion of estimated data varies between different metrics. For metrics such as indicators of negative consequences and carbon intensity, both reported data from companies and estimated data are used in cases where reported data is not available. When estimated data is used, it comes from third-party providers whose methods are considered robust and reliable. For some metrics, estimated data may account for up to 100%.



### I. Limitations to methodologies and data

#### What are the limitations to the methodologies and data sources?

There are various types of limitations regarding the methods and data sources used. The primary limitation is the lack of data. Disclosures about companies' sustainability efforts are largely voluntary, and therefore many companies do not report how they handle sustainability issues. In cases where reported data is missing, estimated data from established providers is used. Data from these providers is considered reliable. If the manager still lacks information, companies are contacted with questions to ensure they meet the set expectations.



### J. Due diligence

#### What is the due diligence carried out on the underlying assets?

The fund management company has due diligence procedures in place to ensure that sustainability risks and the sustainability requirements established for each fund are considered in investment decisions. See the fund management company's due diligence policy for further information:  
<https://www.ruthassetmanagement.com/media/wzhlqn24/policy-for-due-diligence-2024.pdf>



### K. Engagement policies

#### Is engagement part of the sustainable investment objective?

- Yes  
 No



### L. Attainment of the sustainable investment objective

Has a specific index designated as a reference benchmark to meet the sustainable investment objective?

Yes

No

### Where can more product-specific information be found?

More product-specific information can be found in the periodic reports:

<https://www.ruthassetmanagement.com/media/k15dztko/a-rsbera-ttelse-2023.pdf>