

This document comprises the website disclosure required under the Sustainable Finance Disclosure Regulation (SFDR) for **Jupiter Global Fund - Jupiter Global Ecology Diversified** (the “fund”). It describes, first in summary and then in full, how the fund attains its sustainable investment objective through its investment strategy and how this monitored and overseen at Jupiter. Throughout this document, all references to “Jupiter” are to Jupiter Asset Management Limited. Jupiter Asset Management Limited has been appointed as the Investment Manager to the Fund by the management company, Jupiter Asset Management International S.A.

## Summary disclosures

### No significant harm to the sustainable investment objective

The investment manager has a process whereby the fund’s principal adverse impacts (PAIs) are referenced against a broad global index, taking account of regional variations to help provide a relevant assessment. The fund’s impact indicators are scrutinised against global peers, subject to an internal threshold.

It is important to note that decisions concerning the ‘do no harm’ status of a portfolio company do not solely rest with the outcomes of the above data assessment, but this aspect forms one stage of the monitoring process. The ultimate decision on whether a portfolio company is impinging the sustainable investment objective is determined by the investment manager’s assessment about whether the company is committing significant social or environmental harm.

### Environmental or social characteristics of the financial product

The fund seeks to generate long-term capital appreciation and income investing primarily in global equity and fixed income securities, that focus on making a positive impact towards environmental and sustainable objectives.

### Investment strategy

Investments will be substantially orientated towards the following sustainable solution themes: Clean energy; Green mobility; Green buildings and industry; Sustainable agriculture and land ecosystems; Sustainable oceans and freshwater systems; Circular economy.

The investment manager also formally excludes investments in companies that generate more than 5% of revenues from: oil sands or shale extraction; alcohol production; adult entertainment; conventional weapons (small arms and/or military contracting for weapons purposes); gambling; tobacco production; and nuclear energy generation and uranium mining.

The Investment Manager conducts research and due diligence when identifying issuers for investment and as part of ongoing monitoring of portfolio holdings in order to ensure companies the Fund invests in follow good governance. This can include but is not limited to: global norms; stakeholder relations; corporate governance and management structures. Shortcomings or incidents linked to these aspects will be assessed on their own merits with due consideration to materiality, the company’s response and ongoing assurances.

## Proportion of investments

The minimum share of sustainable investments with environmental objectives is 70%. The remaining portion of the Fund's investment portfolio will consist of other investments.

## Monitoring of environmental or social characteristics and independent oversight

**Monitoring:** The monitoring of environmental and social characteristics is covered under methodologies.

**Independent oversight:** Jupiter's Risk and Compliance functions provide objective oversight, monitoring and challenge to investment management. They are functionally and hierarchically independent and report into the Chief Financial Officer.

## Methodologies

The fund seeks to support the making of a positive impact towards environmental and sustainable objectives by investing in sustainable investments, as measured by the proportion of activity issuers contribute to the EU Taxonomy objectives and/or relevant environmental UN Sustainable Development Goal targets.

The Investment Manager uses a revenue or capital expenditure test to determine whether an issuer is substantially focused on activities generating or enabling a positive impact against one or more of the Fund's sustainable solution themes:

- Clean energy: Generation and enabling equipment for renewable energy sources including Wind, Solar, Geothermal, Hydro and Waste-to-energy.
- Green mobility: Transport equipment, infrastructure and services supporting low emission road vehicles, aviation and railway transport, and logistics.
- Green buildings and industry: Energy and materials efficiency solutions.
- Sustainable agriculture and land ecosystems: Activities including alternative protein, reforestation, and sustainable packaging.
- Sustainable oceans and freshwater systems: Products and supporting services for water infrastructure, treatment, including flood control; and
- Circular economy: Recyclable products/materials, and waste management services.

The Investment Manager applies a "pass-fail approach" in determining whether an issuer is substantially focused on activities generating or enabling a positive impact against one or more of the above sustainable solution themes, considering an investment substantially focused on such activities to the extent that the revenues generated from such activities or the capital expenditure attributable to such activities is a minimum of 20%.

## Data sources and processing

Analysis is based on proprietary research, undertaken by Jupiter's in-house teams, as well as external research from specialised providers. Third-party specialist carbon data providers may be used to complement other sustainability data with carbon-specific insights, such as induced and avoided carbon emissions.

## Limitations to methodologies and data

There are several limitations to the methodologies and data. Firstly, as it relates to carbon emissions, robust calculation methodologies of avoided emissions remain at early stage and lack standardisation. Secondly, as the fund seeks to invest in different sustainable solution themes that extend beyond climate change mitigation, relevant environmental performance metrics also extend beyond induced and avoided carbon, into areas with weaker data availability and reporting requirements. Thirdly, sustainability-related data may be updated with long time lags.

The investment manager recognises the current limitations associated with sustainability data outlined above. Therefore, the sustainability analysis incorporates both qualitative and quantitative assessments to ensure holdings contribute to the sustainable investment objective.

## Due diligence

Prior to investment each company must be approved as one that provides an environmental solution at the core of its business. This process is referred to as 'positive' screening as it determines whether a company can be included in the portfolio.

In addition, each company must also pass a 'negative' screen. Companies fail a negative screen if they derive over 5% of revenues from: oil sands or shale extraction; alcohol production; adult entertainment; conventional weapons (small arms and/or military contracting for weapons purposes); gambling; tobacco production; and nuclear energy generation and uranium mining.

## Engagement policies

Please refer to Jupiter's Responsible Investment Policy which discusses active ownership and engagement policies and prioritisation around environmental and social areas. The approach to sustainability related controversies and management procedures is discussed under due diligence.

## Attainment of the sustainable investment objective

The fund attains its sustainable investment objective by implementing the thematic approach described. No reference benchmark has been designated for the purpose of attaining the sustainable investment objective.

# Full disclosures

## No significant harm to the sustainable investment objective

The investment manager has a process whereby the fund's principal adverse impacts (PAIs) are scrutinised against global peers, taking account of regional variations, and subject to an internal threshold.

This process utilises third-party data and is not designed as an exclusionary process but serves as an internal flag. Portfolio companies that exceed the internal threshold and are shown to have a deeper negative impact than the comparator will be further scrutinised.

It is important to note that decisions concerning the 'do no harm' status of a portfolio company do not solely rest with the outcomes of the above data assessment, but this aspect forms one stage of the monitoring process. The ultimate decision on whether a portfolio company is impinging the sustainable investment objective is determined by the investment manager's assessment about whether the company is committing significant social or environmental harm.

A company is not automatically judged to be committing significant environmental or social harm if it is flagged for one or more impact indicators under the internal monitoring system. However, these cases are further assessed and considered in terms of a company's strategy, operations, and wider impact. This evaluation may require further stages of research, verification, and direct / collaborative engagement with issuers.

The above process is dependent on third-party data but coverage from external sources may not be comprehensive, especially for the fixed income asset class. In cases where securities are not covered, the investment manager will apply a basic assessment of material PAIs within the ESG integration and research approach. This process will be developed as data and company disclosures improve.

Sustainable investments are monitored and assessed for these considerations. The fund uses third-party datasets that incorporate research and analysis into the abovementioned global norms. The fund does not rely on the conclusions drawn from third parties alone and this serves as a flag. The investment manager will review adverse findings and where relevant engage directly / collaboratively to obtain deeper insights and understand company actions and policies.

## Environmental or social characteristics of the financial product

The fund seeks to generate long-term capital appreciation and income investing primarily in global equity and fixed income securities, that focus on making a positive impact towards environmental and sustainable objectives.

## Investment strategy

This section describes:

*(a) the investment strategy used to meet the environmental or social characteristics promoted by the financial product*

The fund invests in companies, through both global equity and fixed income securities, whose products and services are focused on enabling a positive impact across a number of sustainable themes. Investments will comprise companies considered by the investment manager to enable the transition to a sustainable economy and will meet the criteria of the thematic strategy.

These themes can be broadly categorised as follows;

- **Clean energy:** generation, storage, and distribution.
- **Water:** conservation and management
- **Circular economy:** solutions for sustainable materials and resource stewardship
- **Sustainable mobility:** technologies and services for sustainable movement
- **Environmental services:** pollution control, testing and impact management
- **Energy efficiency:** enabling a low-carbon transition
- **Sustainable nutrition, agriculture, and health:** solutions protecting natural resources and wellbeing

To qualify for investment, companies or securities should be substantially orientated towards solutions in these themes (typically contributing the majority of revenue generation) which in turn focuses the investment universe on a sub-set of global equity and fixed income securities. The anticipated investment universe is considered to be less than half of global equity and fixed income securities.

Companies are screened to exclude investment into activities and operations contradicting the UN Global Compact (UNGC) Principles. Sovereign green bonds are also screened using the UNGC as a framework to exclude them unless a viable engagement strategy can be implemented. The investment manager also formally excludes investments in companies that generate more than 5% of revenues from alcohol, tobacco, gambling, pornography, or armaments, as well as companies carrying out animal testing for cosmetic and toiletry products.

Investments in labelled bonds, such as green bonds, follow an internal verification process requiring the bonds to follow the ICMA Green Bond Principles guidelines and consistency with the Investment Manager's sustainability principles.

Analysis is based on proprietary research, undertaken by Jupiter's in-house teams, as well as external research from specialised providers. Jupiter has selected a range of providers to enhance the overall selection and monitoring process, including ISS, Sustainalytics and RepRisk amongst others. Their role is principally to collect data provided by companies, the media, and other relevant sources.

By following this thematic approach, the fund does not attain its sustainable investment objective in reference to a specific benchmark.

*(b) the policy to assess good governance practices of the investee companies, including with respect to sound management structures, employee relations, remuneration of staff and tax compliance*

The approach to ensure investee companies follow good governance practices is embedded in the investment team's fundamental analysis when identifying issuers for investment and ongoing monitoring of portfolio holdings. It can include, but is not limited to;

- **Global norms:** assessment of UN Global Compact and OECD guidelines for multinational enterprises to consider outcomes that may be in breach of these provisions.
- **Stakeholder relations:** assessment of practices and controversies relating to i) regulatory matters, ii) employee remuneration and relations, iii) tax compliance
- **Corporate governance and management structures:** a company's approach is considered in the context of local market best practice corporate governance, also acknowledging variations and practical considerations may be linked to company size, ownership structure, development stage and business circumstances. The investment team's focus is on what is best for the company's particular circumstances rather than applying one-size-fits-all policies.

Shortcomings or incidents linked to these aspects will be assessed on their own merits with due consideration to materiality, the company's response, and ongoing assurances. The investment manager may engage directly or collaboratively with investee companies to encourage outcomes that are aligned to good governance practices and stakeholder relations. The investment manager will also utilise voting rights to hold boards to account on governance and stakeholder relations and where relevant support shareholder proposals that promote good practices.

## Proportion of investments

The minimum share of sustainable investments with environmental objectives is 70%. These sustainable investments include investments that contribute to an environmental objective as outlined in UN SDGs and/or the EU Taxonomy and qualify as sustainable investments under SFDR article 2(17). The remaining portion of the fund's investment portfolio will consist of deposits at sight, deposits, money market instruments and money market funds held on an ancillary basis.

## Monitoring of environmental or social characteristics

The monitoring of environmental and social characteristics is covered under methodologies.

## Independent Oversight

Jupiter's Risk and Compliance Functions provide objective oversight, monitoring and independent challenge to the first line. Risk and Compliance are functionally and hierarchically independent from the investment management function and report into the Chief Financial Officer. Risk and Compliance are consulted on an ongoing basis where eligibility questions arise around assets to be held within the fund, or their compliance with the environmental or social characteristics promoted by the fund.

Investment restrictions and regulatory rules are stored in Jupiter's electronic order management system (OMS). The system will produce a warning both at the pre-trade stage and where on an ongoing basis, market or investment manager activity would likely breach a restriction.

Investment restrictions alerting to potential breaches are monitored daily by Compliance and any identified breaches are escalated and rectified in a timely manner. Any investment restrictions that cannot be coded into the OMS and require further interpretation or oversight are diligently monitored manually across the business.

The effectiveness of Jupiter's control environment including its investment and stewardship activities as well as regulatory compliance are assessed as part of regular thematic monitoring reviews in addition to performance of ongoing monitoring and surveillance activity.

## Methodologies

This section describes the methodologies used to measure how the social or environmental characteristics promoted by the financial product are met.

The Investment Manager uses a revenue or capital expenditure test to determine whether an issuer is substantially focused on activities generating or enabling a positive impact against one or more of the Fund's sustainable solution themes:

- Clean energy: Generation and enabling equipment for renewable energy sources including Wind, Solar, Geothermal, Hydro and Waste-to-energy.
- Green mobility: Transport equipment, infrastructure and services supporting low emission road vehicles, aviation and railway transport, and logistics.
- Green buildings and industry: Energy and materials efficiency solutions.
- Sustainable agriculture and land ecosystems: Activities including alternative protein, reforestation, and sustainable packaging;
- Sustainable oceans and freshwater systems: Products and supporting services for water infrastructure, treatment, including flood control; and
- Circular economy: Recyclable products/materials, and waste management services.

The Investment Manager applies a "pass-fail approach" in determining whether an issuer is substantially focused on activities generating or enabling a positive impact against one or more of the above sustainable solution themes, considering an investment substantially focused on such activities to the extent that the revenues generated from such activities or the capital expenditure attributable to such activities is a minimum of 20%.

## Data sources and processing

This section describes:

*(a) the data sources used to attain each of the environmental or social characteristics promoted by the financial product*



*(b) the measures taken to ensure data quality*

*(c) how data are processed*

*(d) the proportion of data that are estimated*

Analysis is based on proprietary research, undertaken by Jupiter's in-house teams, as well as external research from specialised providers. Jupiter has selected a range of providers to enhance the overall selection and monitoring process, including ISS, Sustainalytics and RepRisk amongst others. Their role is principally to collect data provided by companies, the media, and other relevant sources.

Third-party specialist carbon data providers may be used to complement other sustainability data with carbon-specific insights, such as induced and avoided carbon emissions.

Calculation of induced emissions is mainly derived from the turnover generated by all products and services delivered by a company. For certain cases (building construction, energy generation, etc.), it is possible to estimate induced emissions based on volumes produced during the year (square meters of buildings built, energy generated, etc.) and the carbon intensity data available for these activities.

Emissions savings are usually calculated by comparing emissions of existing products to emissions of low or zero carbon products over their lifetime, with an estimation of what fraction of products sold will replace existing products. For instance, if a company generates electricity from zero-carbon energy sources (e.g. wind), emissions savings are calculated as the difference between the emissions from the zero-carbon generation source and the average local grid emissions from the generation of an equivalent amount of energy, multiplied by the amount of energy generated.

Sustainability data is accessed, sourced, and processed on as-needed basis. Relevant uses may include (but are not limited to) sustainability analysis of individual securities, sustainability analysis of the portfolio, ensuring compliance with do no significant harm policies, negative and positive screening, impact reporting and other sustainability-related regulatory reporting.

The majority of sustainability data used in the analysis is sourced directly from companies and from specialised data providers, which may incorporate some degree of estimation. The Investment Manager seeks to avoid self-estimation of sustainability data, unless sufficient conviction to support an estimation can be built. Self-estimated sustainability data represents a small proportion of all sustainability data used in the analysis.

## Limitations to methodologies and data

This section describes:

*(a) any limitations to the methodologies and data sources referred to above;*

*(b) how such limitations do not affect how the environmental or social characteristics promoted by the financial product are met*

There are several limitations to the methodologies and data sources referenced above. Firstly, as it relates to carbon emissions, robust calculation methodologies of avoided emissions remain at early stage and lack standardisation. One of the main challenges in such calculations remains the



difficulty to ensure that fair proportional attribution of avoided emissions along the value chain is performed. Secondly, as the fund seeks to invest in different sustainable solution themes that extend beyond climate change mitigation, relevant environmental performance metrics also extend beyond induced and avoided carbon. Standardised sustainability data as it relates to environmental challenges such as climate change adaptation and natural capital & biodiversity restoration is rarely available, even though it may be critical part of a company's sustainability proposition. Thirdly, sustainability-related data may be updated with long time lags. This may be an issue where specialised data providers have provided sustainability data for some companies based on updated methodologies, but not for all, thereby causing discrepancies in sustainability performance metrics.

The investment manager recognises the current limitations associated with sustainability data outlined above. Therefore, the sustainability analysis incorporates both qualitative and quantitative assessments to ensure holdings contribute to the sustainable investment objective, with focus placed on completing a strong qualitative evaluation of the fundamental technology contribution provided by the products and services of a company. As a result, the limitations outlined above do not affect the attainment of the sustainable investment objective.

## Due diligence

This section describes the due diligence carried out on the underlying assets of the financial product, including the internal and external controls on that due diligence.

Fundamental analysis is undertaken to help ensure that the fund's investments are consistent with its policy of seeking to invest in companies addressing environmental and sustainability challenges. As noted above, the fundamental analysis is primarily centred on assessments of a company's revenue alignment with environmental solutions activities and performance in relevant environmental impact metrics.

Prior to investment each company must be approved as one that provides an environmental solution at the core of its business. This process is referred to as 'positive' screening as it determines whether a company can be included in the portfolio.

In addition, each company must also pass a 'negative' screen. Companies fail a negative screen if they derive over 5% of revenues from: oil sands or shale extraction; alcohol production; adult entertainment; conventional weapons (small arms and/or military contracting for weapons purposes); gambling; tobacco production; and nuclear energy generation and uranium mining. Given the Fund's investment themes, it is rare for candidate companies to pass the positive screen but fail the negative screen. The negative screens therefore do not typically constrict the fund's investment universe.

The positive and negative screening processes are also integrated into the ongoing monitoring of every holding. Any ESG considerations that have been identified in the selection or ongoing monitoring of a company will be discussed and monitored as part of the Investment Manager's regular and targeted engagement with company management.

## Engagement policies

Please refer to Jupiter's Responsible Investment Policy which discusses active ownership and engagement policies and prioritisation around environmental and social areas. The approach to sustainability related controversies and management procedures is discussed under due diligence.

## Attainment of the sustainable investment objective

The fund attains its sustainable investment objective by implementing the thematic approach described. No reference benchmark has been designated for the purpose of attaining the sustainable investment objective.