

# WEBSITE DISCLOSURE UNDER ARTICLE 10 OF SFDR

FOR A FINANCIAL PRODUCT WHICH PROMOTES ENVIRONMENTAL AND/OR SOCIAL CHARACTERISTICS ACCORDING TO ARTICLE 8 OF SFDR

PRODUCT NAME:	Paris Aligned Global Equity Fund
LEGAL ENTITY IDENTIFIER   ISIN:	213800ZY8M3LMDADHV29
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### A. Summary

This section provides detailed sustainability-related disclosures regarding the **Paris Aligned Global Equity Fund** (hereinafter referred to as "the Fund") which is categorised as Article 8 as outlined in Article 10 of the Sustainable Finance Disclosure Regulation ("SFDR"):

Cantor Fitzgerald Ireland (CFIL) is part of leading global financial services firm Cantor Fitzgerald. With a proud history of stockbroking and servicing our private clients and financial advisors in Ireland since 1995, CFIL provides a full suite of investment services, primarily in personalised share dealing, pensions and wealth management, fund management, debt capital markets and corporate finance. CFIL is recognised as a primary dealer in government bonds, and always aims to put clients first and ensure they are at the forefront of every decision made. With the introduction of this Paris Aligned Global Equity Fund, CFIL maintains its priority of meeting client interests by introducing a new environmentally and socially promoting fund.

The Paris Aligned Global Equity Fund is a fund that gains exposure to a range of companies through investments in underlying funds and/or direct investments in the equities of such companies, integrating sustainability criteria throughout the investment selection process. The selection of these investments range across all sectors and focuses on maximising the rate of capital appreciation whilst considering the impact made by the investee company on the environment and society. In selecting its investments, the Investment Manager uses a screen to identify companies that do not align with the characteristics promoted by the Fund. Using this criterion, the Fund promotes environmental and social characteristics and is categorised in accordance with Article 8(1) of the SFDR.

Although the Fund does not have a sustainable investment objective, it does promote environmental and social characteristics. The Fund promotes climate change mitigation, the protection and restoration of biodiversity and ecosystems, universal human rights, prohibition of forced labour, social responsibility, as well as the good governance practices. The Fund dedicates at least 90% of its net assets to investments that are aligned with the promoted environmental and social characteristics. To ensure achievement of this capital allocation, the Fund uses a series of sustainability indicators from external ESG data providers, which are listed below in section F. Additionally, the Fund ensures good governance practices through a screening process to ensure alignment with the Investment Manager's standards.

The Fund does not use a benchmark to assess its environmental or social performance but uses the indicators mentioned to assess such performance of investee companies. In addition, the Fund uses third-party software, which the Investment Manager actively uses to engage with investee companies with very severe global norms violations where there is a reasonable chance of influencing a company's behaviour positively.



# B. No Sustainable Investment Objective

The Fund promotes environmental and social characteristics but does not have a sustainable investment objective.

# C. Environmental or Social Characteristics of the Financial Product

The Fund promotes the following environmental and social characteristics:

- 1. Environmental
  - a. <u>Climate change mitigation:</u> the Fund will promote this characteristic by looking to align its portfolio of investments with the goals of the Paris Agreement;
  - b. <u>The protection an restoration of biodiversity and ecosystems</u>; the Fund will promote this characteristic by removing from its investable universe any companies that are assessed to have controversies in regard to protection and restoration of biodiversity and ecosystems.
- 2. <u>Social</u>
  - a. Promotion of universal human rights;
  - b. Prohibition of forced labour;
  - c. Promotion of social responsibility.
- 3. <u>Governance</u>
  - a. Prevention of fraud and bribery;
  - b. Composition of board of directors (diversity and independence)

No reference benchmark has been designated for the purpose of attaining the above referenced characteristics.

# D. Investment Strategy

The Fund pursues an actively managed investment strategy that gains exposures to a range of companies whilst integrating sustainability criteria throughout the investment selection process. The selection of these investments range across all sectors and focuses on identifying companies which have been positively rated by the Sub-Investment Manager's Investment Ranking Process. That process seeks to identify (i) Quality Investments; (ii) that exhibit a strong alignment with the Paris Agreement; (iii) and score positively under other ESG criteria determined by the Sub-Investment Manager.

The Fund will invest with a view to meeting the provisions of the Paris Agreement, such that the portfolio of equities held by the Fund, if they constituted the entire world economy, would produce a rise in global temperatures of substantially less than 2 degrees Celsius by 2050 over pre-industrial times.

In selecting its investments, and in looking to determine whether an issuer exhibits a strong alignment with the goals of the Paris Agreement, the Sub-Investment Manager also has regard to the climate metrics and minimum standards that apply to EU Paris-Aligned Benchmarks as set out within EU Commission Delegated Regulation 2020/1818 (notwithstanding that this regulation is not applicable to actively managed funds such as the Fund). As such, the Sub-Investment Manager will look to ensure that the Fund's portfolio meets no less than three of the following criteria, all of which are consistent with the Fund's investment strategy:

1. The projected climate change metrics of the Fund's equity portfolio shall show limited or no overshoot of the 1.5 degree Celsius climate change target set by the IPCC;



- 2. The Fund's exposure to sectors that are highly exposed to climate change solutions shall be at least equal to global equity markets exposure to such sectors;
- The companies within the Fund's investible universe shall reduce their aggregate carbon emissions by 7% per annum in line with the net zero trajectory from the IPCC 1.5 degree Celsius scenario; and
- 4. The weighted average Scope 1, 2, and 3 carbon intensity of the equities held within the Fund's portfolio shall, on an aggregated basis, be at least 50% below the aggregated Scope 1, 2, and 3 carbon intensity of the companies within global equity markets.

In addition to seeking to align the Fund's investments with the goals of the Paris Agreement, the Sub-Investment Manager will also incorporate environmental, social and governance risks into its Investment Ranking Process. This shall include a consideration of a range of factors including (but not limited to):

- Environmental risks;
- Social risks; and
- Governance risks.

# E. Proportion of Investments

The Fund invests at least 90% of its net assets in investments that are aligned with the promoted environmental and social characteristics (#1 Aligned with E/S characteristics). The asset allocation is constantly monitored by the Investment Manager and reviewed quarterly.

Up to 10% of the investments are not aligned with these characteristics (#2 Other). These assets consist of ETFs, derivatives, cash, and other cash equivalents. No minimum safeguards are applicable to these assets.



**#1 Aligned with E/S characteristics** includes the investments of the financial product used to attain the environmental or social characteristics promoted by the financial product. **#2 Other** includes the remaining investments of the financial product which are neither aligned with the environmental or social characteristics, nor are qualified as sustainable investments.

The category #1 Aligned with E/S characteristics covers:

- The sub-category #1A Sustainable covers sustainable investments with environmental or social objectives.
- The sub-category #1B Other E/S characteristics covers investments aligned with the environmental or social characteristics that do not qualify as sustainable investments.



# F. Monitoring of Environmental or Social Characteristics

The Fund uses the following sustainability indicators to measure the attainment of each of the above-mentioned characteristics:

- 1. Environmental
  - a) <u>Climate change mitigation:</u>
    - 1. Greenhouse Gas emissions (Scope 1, 2 and Scope 3) in tCO2 equivalent gases;
    - 2. GHG intensity of investee companies in tCO2 equivalent gases per €1m of revenue;
    - 3. Exposure to sectors highly exposed to climate change solutions;
    - 4. % of company revenues from exploration, mining, extraction, distribution or refining of hard coal and lignite;
    - 5. % of company revenues from the exploration, extraction, distribution or refining of oil fuels;
    - 6. % of company revenues from the exploration, extraction, manufacturing or distribution of gaseous fuels;
    - 7. % of company revenues from electricity generation with a GHG intensity of more than 100 g CO2 e/kWh.
    - 8. Assessment of whether the company has any controversies in relation to
      - a. land use and biodiversity;
      - b. to water usage
      - c. pollution and waste
  - b) The protection and restoration of biodiversity and ecosystems:
    - 1. Material company controversies in regard to protection and restoration of biodiversity and ecosystems.

#### 2. Social

- a) Promotion of universal human rights;
  - 1. Violation the UNGC, ILO or OECD Guidelines for Multinational Enterprises assessment of having material controversies related to a firm's impact on the communities in which it does business; and
  - 2. Assessment of having material controversies related to support for controversial regimes, freedom of expression and censorship, and other human rights abuses.
- b) Prohibition of forced labour;
  - i. Violation the UNGC, ILO or OECD Guidelines for Multinational Enterprises;
- ii. Assessment of having material controversies related to a firm's impact on Customers, Human Rights & Community, and Labour Rights & Supply Chain
- c) <u>Promotion of social responsibility.</u>
  - i. Assessment of having material controversies related to a firm's impact on customers, Human Rights & Community, and Labour Rights & Supply Chain;
  - ii. Compliance with the United Nations Global Compact principles;
  - iii. Material activities in the following areas:
    - (i) Production of alcoholic beverages;
    - (ii) Provision of gambling services;
    - (iii) Pornography;
    - (iv) Production of weapons or firearms;
    - (v) Production or maintenance of nuclear weapons
    - (vi) Production of tobacco



#### 3. Good Governance

- a) % of the Fund's portfolio that is invested in underlying issuers that have been found to have inappropriate practices in:
- b) Prevention of fraud and bribery; and
- c) Composition of board of directors (diversity and independence).

The Investment Manager does not use external control mechanisms to review monitoring of the sustainability indicators.

Additionally, the Investment Manager has direct communication lines with Cantor Fitzgerald Ireland's ("the group") Sustainable & Responsible Investing Team to discuss any changes or trends in environmental or social characteristics.

### G. Methodologies

The Fund uses a variety of methodologies and data sources to help measure how the environmental or social characteristics promoted by the Fund are met.

For example, the Fund uses an ESG Framework to ensure alignment with the Investment Manager's promoted environmental and social characteristics. The process begins with a negative screen, which identifies any investment not meeting the Investment Manager's criteria/promoted environmental and social characteristics. After the screen, the Investment Manager will identify the remaining securities norm-based alignment (further described below). In cases where norm-based criteria are violated, the Investment Manager will engage with a company. For further details please see the Investment Manager's engagement policy. Finally, the Investment Manager utilises an in-house principal adverse impact (PAI) scoring file that helps the Investment Manager view how a company is performing in all areas of the PAIs.

# H. Data Sources and Processing

The Fund uses a third-party ESG data provider, which acquires data by monitoring company research reports, news, and information from financial statements. The data provider used, MSCI ESG, is an industry leading provider and has the largest ESG data coverage universe of any provider.

The Investment Manager uses MSCI ESG data to fact check implied temperature raise methodologies, and as well to screen out companies that do not align with the Funds promoted environmental and social characteristics. When using ESG data from the selected provider, the Investment Manager scrutinises available data in order to perform proper due diligence. This includes both checking data discrepancies/accuracy between the data provider data with that of publicly available data on a particular company. If conflicting data is identified between publicly available data and data from MSCI ESG, the Investment Manager will query and seek to remedy the data issues in order to achieve a consensus on the ESG performance of a company.

Data processing takes places in different forms, with the preferred method being automation, to avoid operational risks as well as human intervention. The Investment Manager uses a combination of the data from MSCI ESG research and automated excel spreadsheets that display relevant metrics, as well as the data availability for each metric. The Investment Manager has chosen data providers with high amounts of data availability. As it stands now, evaluating the proportion of vendor sourced data that is estimated is difficult due to insufficient metadata.



# I. Limitations to Methodologies and Data

ESG data is reliant on a third party data provider, which compared to other data providers may have a different assessment of what ESG risks are financially material to a company. Additionally, in cases of insufficient data, the ESG data provider may rely on estimates and approximations using internal methodologies that may be subjective and varies from other providers. Such limitations do not affect how the promoted characteristics are met, even if returns are negatively impacted. In addition, it should be noted that the consideration of non-financial data when constructing portfolios may lead to the exclusion of certain issuers and imply the foregoing of certain investment opportunities that would nevertheless be available to a fund not considering such data.

### J. Due Diligence

The Investment Manager performs due diligence prior to any investment. Such due diligence includes the internal control mechanism of applying a negative ESG screener before making an investment, as well as ensuring a company meets the Investment Manager's good governance criteria. Additionally, the Investment Manager uses an internal PAI scoring file that provides a score of a company's performance on the mandatory PAI's. The outcome of the due diligence, including any information on sustainability risks and opportunities, guides the Investment Manager's investment decision. The Investment Manager does not use any external control mechanisms.

# K. Engagement Policies

A key part of the Investment Manager's approach to ESG is actively engaging with companies which violate global norms. The Fund will engage with any company that breaches the United Nations Guiding Principals (UNGPs), International Labour Organizations (ILO) standards, United Nations Global Compact (UNGC) or Organization for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises. The Investment Manager uses the engagement standards set out by Merrion Investment Managers <u>Shareholder Engagement Policy</u>.

# K. Designated Reference Benchmark

No reference benchmark has been designated for the purposes of attaining the environmental or social characteristics promoted by the Fund.