



Société d'Investissement à Capital Variable
Registered Office: 2-4 rue Eugène Ruppert
L-2453 Luxembourg, Grand Duchy of Luxembourg
R.C.S. Luxembourg B157.442

DISCLOSURES FOR THE EU SUSTAINABLE FINANCE DISCLOSURE REGULATION

Product: Global Evolution Funds – Emerging Markets Short Duration Debt (*Hereinafter, the “Sub-Fund”*)
LEI: 529900H84YPJGNJU3U03

As of: 17 September 2024

This disclosure shall provide information on how the environmental, social and governance (the “E, S and G”) criteria promoted are met and in which way they are considered when selecting financial instruments for the Sub-Fund. Please read the following information carefully before investing into the Sub-Fund.

a) Summary

This Sub-Fund promotes E, S and G characteristics, qualifies as product in accordance with Article 8 (1) of Regulation (EU) 2019/2088 and does not have as its objective or aims to invest in sustainable investments within the meaning of the Sustainable Finance Disclosure Regulation (the “SFDR”).

Global Evolution Funds’ (the “Company”) overall objective is to generate attractive returns for investors whilst contributing to sustainability where it invests. It is presumed that the promotion of sustainability has the potential to increase the resilience of the real economy and the stability of the financial system. This type of stimulus might be relevant for the Company and its investors as it may also impact the risk-return of the Sub-Fund. The Company’s management company Global Evolution Asset Management A/S (the “Management Company”) has a strategic commitment to the application of E, S and G characteristics, which is a wholly integrated part of the investment approach. E, S and G characteristics are applied quantitatively through proprietary applications and qualitatively through analyst research and positive engagement with investee companies.

This financial product adheres to the vision and mission outlined above and is described from a sustainability perspective in this disclosure with an emphasis on its ambition to achieve sustainability related outcomes.

This document aims to give investors a general overview about E, S and G characteristics that this Sub-Fund is promoting as well as information relating to the assessment, measurement and monitoring of applied methodologies; relevant data sources; applied screening criteria and the applicable indicators for the measurement of E, S and G characteristics.

The investment objective of the Sub-Fund is to achieve stable income and returns by focusing on a diversified selection of short-duration debt securities and money market instruments from Emerging Markets. This portfolio will primarily consist of transferable debt securities issued by sovereigns, corporates, supra-nationals, and multilaterals, denominated in hard currencies. It may also invest in credit-linked notes, loan participation notes and sukuks, but also in financial derivatives instruments which will mainly be used hedging purposes. Additionally, a portion of the assets may be held in money market instruments, including cash and short-term deposits, with no exposure to asset-backed or mortgage-backed securities. Short duration instruments have a short time to maturity; typically a residual maturity of three years or less.

The investment approach utilized by the Management Company is active risk management, team-oriented, disciplined, conviction-based, and combines top-down as well as bottom-up analysis to identify attractive investment opportunities in emerging and frontier markets. The Management Company uses a top-down approach to exploit opportunities arising from macro dynamics as well as global investment themes and a bottom-up approach to identify dynamically improving valuations. E, S and G characteristics are applied quantitatively through the proprietary models and qualitatively through positive engagement with policy makers and investee countries and companies. To assess the fulfilment of social and environmental characteristics promoted by financial products, a combination of quantitative and qualitative methodologies is necessary which involves utilizing raw data, monitoring of news and media as well as the use of artificial intelligence (the “AI”).

b) No sustainable investment objective

This financial product promotes environmental or social characteristics and does not have as its objective or aims to invest in sustainable investments within the meaning of the SFDR.

c) Environmental or social characteristics of the financial product

Depending on the availability of adequate information and data the Management Company aims to monitor the following list of indicators to meet environmental, social and governance characteristics promoted by the Sub-Fund and to measure the progress made by the companies:

<i>Pillar</i>	<i>Topic</i>	<i>Indicator</i>
<i>Environment</i>	<i>Carbon Emission</i>	<i>Industry level assessment of carbon emission</i>
		<i>Issuer absolute level of Scope 1&2 emission</i>
		<i>Measures of carbon intensity vs. peers and carbon intensity trend</i>
		<i>Carbon intensity reduction targets</i>
<i>Environment</i>	<i>Environmental Impact</i>	<i>Industry level assessment of environmental risk</i>
		<i>Issuer absolute level of waste and pollution</i>
		<i>Historic trend of environmental impact</i>
<i>Social</i>	<i>Employee relations</i>	<i>Health & Safety</i>
		<i>Risk of strikes</i>
<i>Social</i>	<i>Impact on communities</i>	<i>Operational disruptions caused by protests/boycotts</i>
<i>Governance</i>	<i>Quality of management</i>	<i>Board structure and independence</i>
<i>Governance</i>	<i>Risk of corruption/fraud</i>	<i>Government intervention, corporate governance</i>

d) Investment strategy

Global Evolution's E, S and G approach is grounded in its screening process which focuses both on negative screening and more importantly on positive screening where E, S, and G indicators are directly integrated into the investment process.

E, S and G characteristics are applied by the Management Company quantitatively through proprietary models and qualitatively through positive engagement with policy makers and investee countries and companies. Investments of this financial product undergo negative and positive E, S and G screening.

The Management Company takes principal adverse impact (the "PAI") indicators into account by monitoring, evaluating, and integrating these indicators as part of its screening process as well as the essential sovereign learning and knowledge process which is one of the cornerstones of its investment process. Additionally, PAI indicators are treated in the investment process alongside ESG indicators, macroeconomic and financial indicators to attain each of the environmental or social characteristics promoted by this financial product.

For the sovereign part of the investment process the Management Company's quantitative E, S and G approach is grounded in its screening process, which focuses both on negative screening and more importantly on positive screening which integrates E, S, and G indicators directly into the investment process through quantitative valuation models. For the corporate debt securities, a qualitative screening process is utilized. Qualitative screening for the corporate debt component of the portfolio integrates individual corporate E, S and G indicators determined by the Management Company considering company disclosed information (e.g. financials, earnings calls, sustainability related disclosures, etc.), non-company disclosed information (e.g. press articles, sector data, etc.), third-party research data as well as results of engagement with the investee company's management respectively specific due diligence visits.

Both phases are integrated in the Management Company's investment process as follows:

1. The first phase involves a negative screening that takes a holistic view on E, S, and G dynamics using a quantitative model that estimates their proprietary E, S and G ratings. Their entire investment universe is screened, and issuers are excluded when indicators such as political rights, corruption, etc. fall below certain extreme thresholds. The Management Company's approach is one of positive engagement as the Management Company believes engagement is a more valuable approach to encourage emerging market issuers to act in the most beneficial way to improve E, S and G issues. The negative screening phase results in a negative list of countries in which no investments are pursued.
2. The second phase involves positive screening and integrates individual E, S, and G indicators into the Management Company's quantitative valuation models. The Management Company incorporates these E, S and G indicators to the extent that they are supposed to enhance the quality of investment decision making. It is binding for the Management Company to make considerations related to quantitative signals extracted with positive screening together with other quantitative and qualitative indicators at its disposal, however with no obligation to automatically follow any single indicator.

For the sovereign part of the portfolio the Management Company operates with a framework for estimating proprietary E, S, and G ratings. The Management Company applies equal weighting approach to their proprietary E, S and G ratings. Thus, the model gives the same importance to underlying E, S or G characteristics. Any country having an E, S and G ratings that falls below the minimum threshold of 2.5 out of 10 will be excluded from the investable universe. As the Management Company utilizes Verisk- Maplecroft - indexes and PAIs, the E, S and G ratings constructed to a scale with a range from zero to ten regardless of the source for easier comparison, where:

- 0 - 2.5: extremely ESG risk
- 2.5 - 5: high ESG risk
- 5 - 7.5: medium ESG risk
- 7.5 - 10: low ESG risk

The selected indicators reflect the Management Company’s corporate ethical values related to countries' careful consideration of the environment, human rights, democracy and efficiently and fairly managed public institutions which are subsequently used as part of the proprietary valuation models to identify investment opportunities and threats, so as to enhance and support the investment decision-making.

For the corporate part of the portfolio investee companies are subject to qualitative analysis with different levels of exclusion including sanctions, specific sectors and/ or high-risk assessments.

Within this qualitative screening phase, the corporate investments are subject to the following levels of exclusion (all together the “Exclusion List”):

- a. First, companies under EU, UNGC principles, OECD, US/OFAC and UK sanctions/violations – or those at high risk of being subjected to sanctions/violations – are excluded.
- b. Second, companies that derive any of their revenues from controversial sectors (e.g. weapons, tobacco, pornography) or more than 25% of revenues from coal mining or Tar sands are excluded.
- c. Lastly, companies are excluded when the Management Company’s qualitative E, S and G due diligence identifies a company to be as high risk and with a negative outlook for one of the E, S or G indicators.

Based on the results of this qualitative due diligence process, the Management Company rates investee companies by providing an individual risk score for each E, S and G indicator (high, medium or low) as well as an outlook (positive, stable or negative) with a maximum score of 9 for each indicator. To calculate the overall E, S and G score the individual scores of each E, S and G indicator are summed up and the results are used as basis to measure the asset eligibility relative to the Management Company’s internal scoring range. Out of a maximum score of 27 all corporate assets with a score between 3 and 20 are considered as E, S and G eligible for the Sub-Fund, corporate assets with an overall score of 21 to 24 are considered as offering low E, S and G characteristics and possible exposure in these securities is limited. Assets with screening results above 24 are not eligible and the Management Company will refrain from investing in these securities.

ESG Risk	Outlook	Score
High	Negative	9
High	Stable	8
High	Positive	7
Medium	Negative	6
Medium	Stable	5
Medium	Positive	4
Low	Negative	3
Low	Stable	2
Low	Positive	1

e) Proportion of investments

This Sub-Fund promotes E, S and G characteristics and does not have as its objective or aims to invest in sustainable investments within the meaning of the Article 8 (1) SFDR.

The Management Company aims to strive for positive economic results, while at the same time taking into account environmental, social and governance characteristics. Positive and negative E, S and G screening indications for the assessment of countries as well as investee companies and selection of securities are considered within the investment process.

The “do no significant harm” principle applies only to those investments underlying the Sub-Fund that take into account the EU criteria for environmentally sustainable economic activities. The investments underlying the remaining portion of this Sub-Fund do not take into account the EU criteria for environmentally sustainable economic activities.

A minimum percentage of 75% will be made in asset types that are aligned with environmental and social characteristics.

f) Monitoring of environmental or social characteristics

To measure the attainment of the environmental and social characteristics promoted by this financial product, the Company’s Management Company will control:

1. Compliance of new investments with the eligible universe: The investment universe is built up by the Management Company, following certain decision rules (i.e. negative screening leveraging on defined E, S and G factors, etc.). The Management Company determines that investments are aligned with the E, S and G guidelines or constraints. These eligibility controls are conducted via the investment compliance system of the Management Company and subsequent controls are performed by the Management Company.
2. Compliance with internally constructed E, S and G ratings: The Management Company utilizes its proprietary E, S and G ratings for investment purposes. The Management Company aims to control an overall consistency of E, S and G risk exposures of investments with respect to E, S and G ratings defined by the Management Company. The Management Company does not intend to recreate E, S and G

scorings using a different source of data or different methodology, but rather to control for an alignment of Sub-Fund's investments against internally constructed E, S and G ratings.

3. While the investment universe is constructed by the Management Company following a sequence of decision rules leveraging on E, S and G data, the Management Company will reprocess the negative screening(s) applied on investments. As a baseline, the Management Company controls that, with respect to the minimum percentage of 75% of the Sub-Fund's assets which will be made in asset types which are aligned with E, S and G characteristics, the Management Company does not invest in instruments issued by entities (i.e. sovereigns or corporates) located in countries for which the individual E, S and G country rating is under 2.5/10 (based on the average of 5 Verisk-Maplecroft's indices). Therefore, a systematic negative screening is applied to positions using the E, S and G country rating. The Management Company may apply additional screening methods while following a risk-based approach (e.g. including, but not be limited to, a priori E, S and G risk exposure at Sub-Fund level, appropriateness of available E, S and G corporate ratings, considerations such as potential conflict of interests from reliance on the delegated Management Company's E, S and G database, etc.).

Deteriorations of these indicators may lead to exclusion from the investable universe.

The Management Company assesses the investment allocations to control if the acquisitions made meet the prescribed E, S and G characteristics' goals of the Sub-Fund. Subsequently, the allocation of the E, S and G risk scoring is monitored by the Management Company's risk manager.

g) Methodologies

E, S and G characteristics are anchored and integrated within the Management Company's investment process as well as the process of selecting countries and issuers.

The Management Company utilizes a top-down approach to exploit opportunities arising from macro dynamics and global investment themes and a bottom-up approach to identify dynamically improving valuations. The systematic integration of E, S and G characteristics and the level of sophistication supported by artificial intelligence is considered fundamental to the Management Company's investment process.

In the research aspect of the process the Management Company employs both a quantitative and qualitative approach to identify sustainability risks and opportunities across the E, S and G areas. The Management Company's quantitative approach involves subscribing to raw data sets for E, S and G indicators that the Management Company integrates through its proprietary database in order to systematically monitor and analyse the data. The Management Company utilizes a proprietary quantitative approach driven through artificial intelligence and high-frequency tracking of sustainability-related news as well as the market sentiment by using Natural Language Processing (the "NLP") to identify market sentiment towards a specific sustainability theme.

The qualitative identification of sustainability risk emerges from on the ground due diligence visits to the countries in the emerging markets universe where the Management Company conducts an in-depth due diligence including an assessment of the relevant E, S and G characteristics.

The sovereign part of the investment process is initiated and supported by research in E, S and G sovereign debt and E, S and G sovereign investment integration. Utilizing both quantitatively and qualitatively derived data on sustainability risk, the Management Company aggregates its views into a proprietary E, S and G ratings across all countries resulting in an E, S and G score. The close monitoring of these scores and their underlying E, S and G indicators is vital to the investment process as changes in E, S and G scores and the identification of the drivers are the basis of the Management Company's sustainability risk assessments; of whether a country faces higher or lower sustainability risk dynamic.

Before selection, emerging markets and frontier markets issuers of sovereign bonds are screened using E, S and G factors for failures and breaches of international guidelines and standards. Screening (negative as well as positive) is used as a tool to identify countries and issuers that exhibit harmful E, S and G practices and who contribute, support or foster, for example, inadequate or inefficient governance and social policies on human rights issues, labour standards or gender equality; to clean water and sanitation; affordable and clean energy, etc. Lastly, the Management Company also operates with an exclusion list which is comprised of countries that do not meet the Management Company's minimum criteria across the E, S and G areas.

For the corporate part of the investment process the Management Company established an investment committee which reviews and analyses credit/ sector views based on dedicated corporate E, S and G reports integrating relevant corporate E, S and G factors.

h) Data sources and processing

In the research aspect of the investment process, the Management Company employs both a quantitative and qualitative approach to identify opportunities across the E, S and G areas, which forms the basis of the investment decisions. Additionally, the Management Company utilizes the Global Carbon Project as a source of raw carbon-related data to analyse sovereign carbon emission and uses Bloomberg GHG estimates to calculate the Sub-Fund's carbon footprint.

In case of the quantitative approach, the primary data source for E, S and G data is Verisk Maplecroft which is the main E, S and G-related data provider utilized as part of the internal research.

The Management company uses E, S and G-related data from Verisk Maplecroft for its proprietary E, S and G ratings as well as quantitative valuation models; further, the Management Company uses NLP driven indices for sentiment scores towards E, S, and G themes. The NLP driven indices are based on data scraping from Dow Jones news article database. Obtained data is processed to generate E, S and G ratings, but the data is also used directly to underpin internal E, S and G discussions. Furthermore, NLP driven indices are processed from raw text information to yield E, S and G indicators that are proprietary in nature.

As it pertains to the qualitative process, the Management Company's due diligence process for the E, S and G data (and other data) includes a thorough E, S and G assessment ahead of acquisition and a phase of continuously monitoring the quality with the existing and potential competing providers.

It should be noted that due to the lack of reliability and availability of E, S and G data, a significant proportion of the PAI and E, S and G related data is estimated at this time.

The Management Company has access to the various data sets and controls the calculation of the E, S and G scoring.

i) Limitations to methodologies and data

Due to the lack of reliability and availability of the data for certain asset types, it may not be possible to precisely identify the environmental or social characteristics with which the Sub-Fund is aligned. Added to this, certain types of assets are out of scope as they are not considered as E, S and G relevant for the time being (e.g., cash).

Therefore, the Management Company subscribes to what it considers the best available E, S and G data in the market but acknowledges ongoing challenges with data frequency, the degree of objectivity vs. subjectivity of the indicators created, and the degree of nuance in the indicators. As a result, the E, S and G process prioritizes the improvement of existing data quality.

To mitigate potential data limitations, the Management Company conducts continuous data validation to ensure the accuracy and reliability of the data used as the basis for investment decisions.

For the PAI calculations, the Management Company uses data from Verisk-Maplecroft and/or other data vendors as well as other methodologies (e.g., employees-derived estimations). Please note that there is a limited coverage on the PAI indicators as of today.

j) Due diligence

The Management Company conducts country-specific research with regards to E, S, and G indicators and all countries that the Sub-Fund is allowed to invest in have undergone extensive research. Prior to making any investment decision, the Management Company is required to perform due diligences activities and to gather facts from diverse data sources on the proposed investment ideas; these are embedded steps within the investment process.

The Management Company has an internal research department which delivers market and country specific analysis. As a result, amongst others, models are applied on debt sustainability, foreign exchange, E, S and G characteristics, valuation, etc. Further, representatives of the Management Company are actively engaging with policy makers and investee countries and companies. Members of the research department as well as the investment team actively participate in investor trips worldwide; results are also provided to clients upon request.

Another source of research are external providers, especially global investment banks which deliver both country specific research, macroeconomic and general market coverage. On the backbone of its research process, the Management Company applies its own proprietary systems for collecting, grouping, and analysing all relevant market data and research. This research and data collection is supposed to cover all countries and investee companies of the investment universe.

The Management Company can pursue engagement directly, via ongoing individual relationships with governments whose debt instruments may be purchased or are already held by the Sub-Fund, or indirectly, via the community of like-minded emerging markets investors and international financial institutions such as the International Monetary Fund (the "IMF") and the World Bank. This approach offers the Management Company's philosophy on sovereign engagement and a couple of examples from the Management Company's portfolio.

Other controls are described in process and procedure documents.

k) Engagement policies

On behalf of the Sub-Fund, the Management Company embarks on a range of engagement activities (direct and indirect) with sovereign governments and companies.

Sovereign Engagement

At Global Evolution, the Management Company strives to support the world's poorest nations by providing development finance to their governments. Through its financial contributions, the Management Company enables the construction of essential physical and human infrastructure, helping millions rise above extreme poverty.

The Management Company's approach emphasizes engagement with emerging market governments to achieve positive outcomes. It advocates for policies believed to benefit the majority to their citizens. This engagement includes regular dialogues and meetings with policy makers, where the Management Company, alongside other investors in emerging market sovereign debt, seeks to influence the terms under which these governments raise debt.

Interactions with policy makers occur in various settings: individual engagements, participation in investor groups, collaboration with advocacy groups like the Emerging Market Investor Alliance, the involvement with international institutions such as the IMF and World Bank.

Direct Engagement

Significant part of the Management Company's engagement with policy makers happens within investor groups, often organised by investment banks or advisory firms. These interactions range from issuer visits during debt issuances to investors visiting countries of issuance. The IMF annual meetings have become a key venue for these exchanges, which increasingly occur virtually. As the importance of E, S and G issues grows among emerging markets investors, these forums are crucial for discussing E, S and G concerns.

Indirect Engagement

Global Evolution, as a Management Company, is an active member of the Emerging Market Investor Alliance (the "EMIA"), which supports good governance and sustainable development in emerging markets. Through committees like the sovereign transparency committee, the Management Company contributes to EMIA's initiatives, including innovative strategies like pre-issuer E, S and G engagement notes.

The Management Company engages with international bodies such as the IMF, collaborating on joint visits to countries to encourage improved E, S and G policies. Additionally, partnerships with organizations like the UN Principles for Responsible Investments, UN Global Compact, and the Task Force on Climate-Related Financial Disclosures provide indirect avenues to promote responsible decision-making within government bodies of its investment countries.

Global Evolution believes that its engagement has positively influenced governmental reforms and aims to continue advocating for broad-based socioeconomic development, inclusive growth, and responsible governance at all levels. The Management Company ensures that its investments carefully consider their potential adverse impacts.

I) Designated reference benchmark

Not applicable, there is no index designated as reference benchmark to attain environmental or social characteristics promoted by this financial product.