

Template periodic disclosure for the financial products referred to in Article 8, paragraphs 1, 2 and 2a, of Regulation (EU) 2019/2088 and Article 6, first paragraph, of Regulation (EU) 2020/852

Product name: AGCM Fund - Asia Dividend sub-fund

Legal entity identifier: LEI 5299005XMQP4HD2W4K13

Environmental and/or social characteristics

Did this financial product have a sustainable investment objective?

<input checked="" type="radio"/> <input type="radio"/> Yes	<input checked="" type="radio"/> <input type="radio"/> <input checked="" type="radio"/> No
<input type="checkbox"/> It made sustainable investments with an environmental objective: ____% <ul style="list-style-type: none"> <input type="checkbox"/> in economic activities that qualify as environmentally sustainable under the EU Taxonomy <input type="checkbox"/> in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy 	<input type="checkbox"/> It promoted Environmental/Social (E/S) characteristics and while it did not have as its objective a sustainable investment, it had a proportion of ____% of sustainable investments <ul style="list-style-type: none"> <input type="checkbox"/> with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy <input type="checkbox"/> with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy <input type="checkbox"/> with a social objective
<input type="checkbox"/> It made sustainable investments with a social objective: ____%	<input checked="" type="checkbox"/> It promoted E/S characteristics, but did not make any sustainable investments



To what extent were the environmental and/or social characteristics promoted by this financial product met?

The sub-fund promoted environmental and social characteristics by investing in companies which make a contribution to one or more of the five goals AGCM has selected from the UN 2030 Agenda for Sustainable Development and its 17 Sustainable Development Goals.

The sub-fund has been screened for exclusion of companies engaged in activities with a significant negative impact on society, human health or the environment or non-adherence to international norms, principals or guidelines.

The Investment Manager conducted active ownership by proxy voting of an external ESG advisor.

In the period under review, the share of holdings which complied with binding elements of the sub-fund's investment strategy to promote environmental or social characteristics was 95.6%.

● ***How did the sustainability indicators perform?***

Promoting investments in companies with environmental or social characteristics

The contribution to one or more of the UN SDGs of the sub-fund's holdings is shown below. Where an activity may be measurable in terms of revenue, a positive contribution is defined as deriving more than 5% of the turnover from one of the five SDGs prioritized by the sub-fund. Where the activity is generating a substantial positive contribution to a social characteristics, it may not be quantifiable in terms of revenue but may be gauged in terms of engagement in policies and activities which have a positive effect on employee health, safety and development. A positive contribution may also be evidenced by large-scale involvement in societal improvement programs such as inclusive financing in poor rural areas, re-development of shanty towns and cleaning up of the environment, emission reduction and flooding prevention infrastructure or education in digital literacy.

The five prioritized UN Sustainable Development Goals, contribution by investee companies:

No. 3 – Good health and well-being: 19% (19)

No. 8 – Decent work and economic growth: 45% (22)

No. 9 – Industry, innovation and infrastructure: 31% (20)

No. 11 – Sustainable cities and infrastructure: 58% (52)

No. 13- Climate action: 81% (66)

Negative screening of assets

Negative screening of investee companies has been performed to ensure that they have met the criteria for non-involvement in harmful activities for human health, society or the environment. All the investee companies are compliant with the value based exclusion criteria.

None of the companies are involved in fossil fuels or controversial weapons. None of the investee companies have been reported to be in violation of UN Global Compact.

● ***...and compared to previous periods?***

The investee companies' contribution to each of the five Sustainable Development Goals accounted for in the period under review improved on four goals and remained the same for one goal.

All of the investee companies complied with the exclusion criteria in the period under review as in the previous year.

None of the companies were in violation of UN Global Compact in the period under review as in the previous year.

- **What were the objectives of the sustainable investments that the financial product partially made and how did the sustainable investment contribute to such objectives?**

N/A

- **How did the sustainable investments that the financial product partially made not cause significant harm to any environmental or social sustainable investment objective?**

N/A

How were the indicators for adverse impacts on sustainability factors taken into account?

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

The sub-fund was screened by an external advisor for adherence to international norms and the result showed no negative deviances for alignment with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights.

Principal adverse impacts are the most significant negative impacts of investment decisions on sustainability factors relating to environmental, social and employee matters, respect for human rights, anti-corruption, and anti-bribery matters.

The EU Taxonomy sets out a “do not significant harm” principle by which Taxonomy-aligned investments should not significantly harm EU Taxonomy objectives and is accompanied by specific Union criteria.

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

Any other sustainable investments must also not significantly harm any environmental or social objectives.



How did this financial product consider principal adverse impacts on sustainability factors?

The Investment Advisor has reviewed the development and alignment of the below Principal Adverse Impacts “PAI” on sustainability factors and the result is published with a comparison with the previous year. The PAIs below have been selected on the basis of available data from external information providers.

The adverse impacts on sustainability factors considered by the Investment Manager were:

- GHG emissions: Scope 1, Scope 2, Scope 3 and Total GHG emissions
- Carbon footprint
- GHG intensity of investee companies
- Exposure of investments in companies active in fossil fuels
- Share of non-renewable energy consumption and production
- Energy consumption intensity per high impact climate sector
- Activities negatively affecting biodiversity-intensive areas
- Emission to water
- Hazardous waste and radioactive waste ratio
- Violations of UN Global Compact principles and OECD Guidelines for Multinational Enterprises
- Lack of processes and compliance mechanisms to monitor compliance with UN Global Compact principles and OECD Guidelines for Multinational Enterprises.
- Unadjusted gender pay gap
- Board gender diversity
- Exposure to controversial weapons
- Investments in companies without carbon emission reduction initiatives
- Lack of anti-corruption and anti-bribery policy

The Investment Manager monitors the investee companies' progress in reducing greenhouse gas emissions and it is a part of the consideration in continuing to be invested. The sub-fund does not invest in companies which are active within fossil fuels. If a company has more than 5% of revenue derived from production of fossil fuels it is basis for exclusion. The investee companies are expected to adhere to the UNGC principles and OECD Guidelines for Multinational Enterprises. Companies active with controversial weapons are excluded.

Discussion of changes in Principal Adverse Indicators compared to the previous year:

The Investment Manager reports on all of the 14 mandatory PAIs and two additional indicators. The comparison of coverage with the previous year for which the indicators were reported is shown within parenthesis next to the current data.

Some industries have higher overall emissions related to their activities as a part of the nature of their business. This may have a negative impact on the sub-fund's reported emission. The change in the number of companies reporting on a PAI may have a positive or a negative impact on a PAI. Any change in the composition of the investee companies will consequently have a direct impact.

The majority of investee companies are showing a declining trend in emissions of Greenhouse gases year-over-year. The sub-fund reported a decline of -0.2157 tCO₂e in total Green House Gas emissions y-o-y. The Carbon Footprint of the sub-fund declined by -0.0101 tCO₂e /EUR m invested.

None of the investee companies were involved in the commercialization of fossil fuels.

There were no investee companies showing a violation of UNGC principles in the period under review as in the previous year.

None of the companies were exposed to controversial weapons.

Table 1 Indicators for Principal Adverse Impacts

AGCM Fund - Asia Dividend sub-fund, LEI 5299005XMQP4HD2W4K13,, considers Principal Adverse Impacts of investment decisions on sustainability factors.

This account of principal adverse impacts on sustainability factors comprise the period 1 January - 31 December 2024.

Indicators for Principle Adverse Impacts	Adverse sustainability indicator	Metric	Year 2022	Year 2023	Year 2024	Change	Coverage of investee companies 2024 (23)	Explanation, actions taken, and planned for and targets set for the next reference period
Greenhouse gas emissions	1. GHG emissions	Scope 1 GHG emissions	0.0280 tCO2e	0.0308 tCO2e	0.0236 tCO2e	-0.0036 tCO2e	100% (100)	We expect that all companies we invest in work to reduce green house gas emissions and have a plan to reduce them significantly.
		Scope 2 GHG emissions	0.4214 tCO2e	0.3966 tCO2e	0.1543 tCO2e	-0.1812 tCO2e	100% (100)	
		Scope 3 GHG emissions	0.3116 tCO2e	0.2097 tCO2e	0.1381 tCO2e	-0.0304 tCO2e	100% (97)	
		Total GHG emissions	0.7588 tCO2e	0.6215 tCO2e	0.3057 tCO2e	-0.2157 tCO2e	100% (97)	
	2. Carbon footprint	Carbon footprint	0.0897 tCO2e/ EUR m invested	0.0825 tCO2e/ EUR m invested	0.0580 tCO2e/ EUR m invested	-0.0101 tCO2e/ EUR m invested	100% (97)	regarding emissions and it is part of our
	3. GHG intensity of investee companies	GHG intensity of investee companies	86.8731 tCO2e/ EUR m revenue	82.8802 tCO2e/ EUR m revenue	65.8054 tCO2e/ EUR m revenue	-11.2945 tCO2e/ EUR m intäkter	100% (97)	consideration if continuing to be invested.
	4. Share of investments in companies active within fossil fuels	Share of companies active in the fossil fuel sector	0%	0%	0,0%	0%	100% (100)	We don't invest in companies active within fossil fuels. If a company has >5% of revenue or production from fossil fuels it will be excluded.
	5. Share of non-renewable energy consumption and production	Share of non-renewable consumption and production of investee companies from non-renewable energy sources compared to renewable energy sources,		81.4%	82%	0.6%	87% (83)	
	6. Energy consumption intensity per high impact climate sector.	Energy consumption in GWh/EUR m of revenue in investee companies per high impact climate		12.98	9.72	-3.26	87% (83)	
Pollution	7. Activities negatively affecting bio-diversity sensitive areas.	Share of investments in investee companies with sites/operations located in or near to biodiversity sensitive areas where		n.a	n.a.	n.a.		
	8. Emission to water	Tonnes of emissions to water generated by investee companies per million of EUR invested, expressed as a weighted		0.0000	0.00025	0.00027	3% (3)	The increased amount of emissions to water is a function of larger investments in sectors with higher waste emissions.
	9. Hazardous waste and radioactive waste ratio.	Tonnes of hazardous waste and radioactive waste generated by investee companies per m Euro invested, expressed		0.0838	0.1342	0.0504	61% (54)	The increased amount of hazardous waste generated is a function of more companies reporting waste figures.
Social and employee matters	10. Violations of UN Global Compact principles and OECD Guidelines for Multinational Enterprises	Share of investees which have been involved in violations of the UNGC principles of OECD Guidelines for Multinational Enterprises	2.00%	0,00%	0,00%	0.00%	100% (100)	We expect that all companies we invest in adhere to the UNGC principles and OECD Guidelines for Multinational Enterprises.
	11. Lack of processes and compliance mechanisms to monitor compliance with UN Global Compact principles and OECD Guidelines for Multinational Enterprises.	Share of investments in investee companies without policies to monitor compliance with the UNGC principles of OECD Guidelines for Multinational Enterprises of grievance/complaints handling mechanisms to address violations		14.7%	9.49%	-4.72%	100% (100)	
	12. Unadjusted gender payment gap.	Average unadjusted gender pay gap of investee companies.		3.1%	14.12%	11.22%	22% (17)	The increased unadjusted payment gap is a function of a changed composition of holdings and more companies
	13. Board gender diversity	Average ratio of female to male board members in investee companies, expressed as a percentage of all board		11.8%	84%	70.13%	89% (93)	
Governance	14. Exposure to controversial weapons anti-personal mines, cluster munitions, chemical weapons and biological weapons)	Share of investments in investee companies involved in the manufacture or selling of controversial weapons	0%	0%	0%	0%	100% (100)	Companies active with controversial weapons are excluded.
	15. Investments in companies without carbon emission reduction initiatives	Share of companies without carbon emission reduction alternatives.		0%	10.98%	10.98%	100%	A few of the holdings have not published updated policies for the year.
	16. Lack of anti-corruption and anti-bribery policy	Share of investee companies without anti-bribery policy.		0%	13.12%	13.12%	100%	A few of the holdings have not published updated policies for the year.



What were the top investments of this financial product?

AGCM-Asia Dividend Fund 2024

China Railway Construction	5,32%	Industrial	China
China Construction Bank	5,02%	Financial	China
DBS Group	4,85%	Financial	Singapore
JD.com	4,81%	Consumer	China
Alibaba Group	4,74%	Consumer	China
Telekom Indonesia	4,63%	Communication	Indonesia
Tencent	4,61%	Consumer	China
China Resources Land	4,49%	Real estate	China
Bank Mandiri	4,26%	Financial	Indonesia
Sinopharm Group	4,24%	Healthcare	China
China Telecom	4,09%	Communication	China
Industrial & Com Bank of China	4,03%	Financial	China
Bank of China	3,95%	Financial	China
China Mobile	3,39%	Communication	China
United Overseas Bank	3,20%	Financial	Singapore
	65,63%		

The list includes the investments constituting **the greatest proportion of investments** of the financial product during the reference period which is: 2024/25.



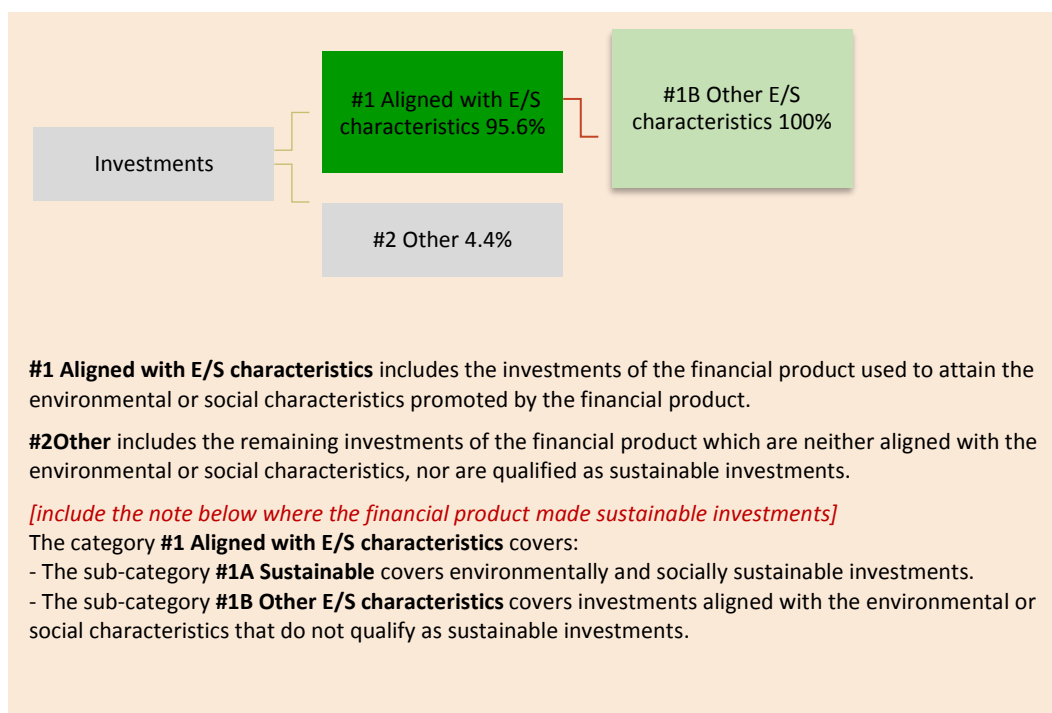
What was the proportion of sustainability-related investments?

N/A

What was the asset allocation?

For the period under review, 95.6% of the holdings were #1 Aligned with E/S characteristics and 4.4% were #2 Other holdings. All holdings (100%) aligned with E/S characteristics were #1B Other E/S characteristics.

Asset allocation describes the share of investments in specific assets.



To comply with the EU Taxonomy, the criteria for **fossil gas** include limitations on emissions and switching to fully renewable power or low-carbon fuels by the end of 2035. For **nuclear energy**, the criteria include comprehensive safety and waste management rules.

Enabling activities directly enable other activities to make a substantial contribution to an environmental objective.

Transitional activities are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.

In which economic sectors were the investments made?

The investments were made in companies active in consumer goods and services, financials including insurance, communication, real estate, info tech, healthcare and industrials. The investments contributed to one or more of the UN Sustainable Development Goals. There were no investments in companies involved in extraction, production or distribution of fossil fuels.

Taxonomy-aligned activities are expressed as a share of:

- **turnover** reflecting the share of revenue from green activities of investee companies.
- **capital expenditure** (CapEx) showing the green investments made by investee companies, e.g. for a transition to a green economy.
- **operational expenditure** (OpEx) reflecting green operational activities of investee companies.

Asia Dividend Fund (As of end of September 2025)		
Communication Services		13,93%
	Diversified Telecommunication	5,02%
	Interactive Media & Services	5,90%
	Wireless Telecommunication Ser	3,01%
Consumer Discretionary		15,76%
	Automobiles	2,98%
	Broadline Retail	9,62%
	Household Durables	3,16%
Financials		40,56%
	Banks	23,92%
	Capital Markets	2,57%
	Insurance	14,07%
Health Care		5,35%
	Health Care Providers & Servic	5,35%
Industrials		4,09%
	Construction & Engineering	4,09%
Information Technology		5,17%
	Technology Hardware, Storage &	5,17%
Real Estate		9,11%
	Real Estate Management & Devel	9,11%



To what extent were the sustainable investments with an environmental objective aligned with the EU Taxonomy?

N/A



Did the financial product invest in fossil gas and/or nuclear energy related activities complying with the EU Taxonomy¹?



Yes:



In fossil gas



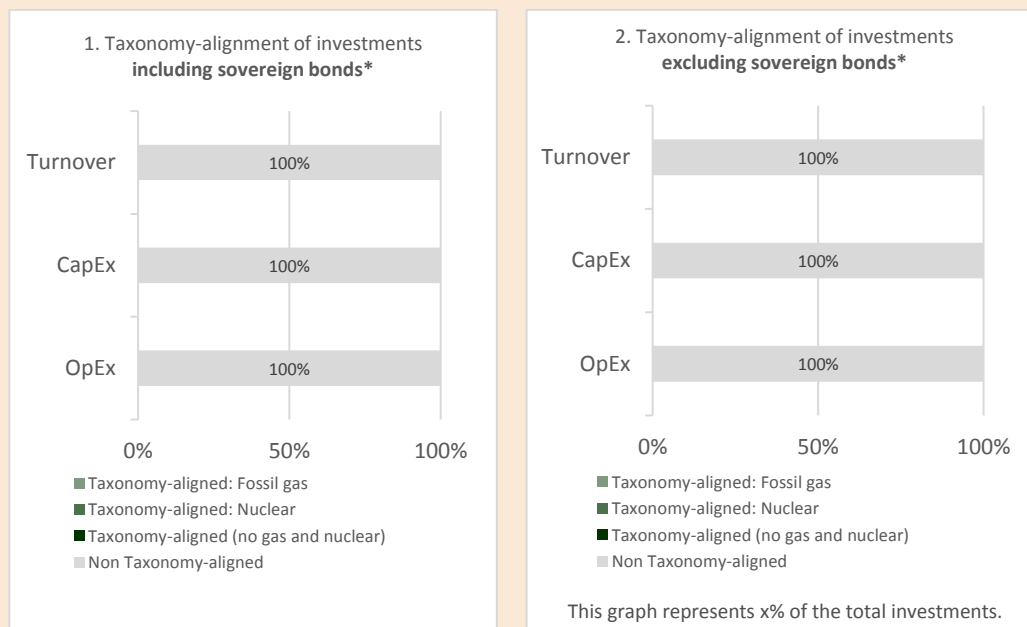
In nuclear energy



No

¹ 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 - see explanatory note in the left hand margin. 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 graphs below show in green the percentage of investments that were 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.

Reference benchmarks are indexes to measure whether the financial product attains the environmental or social characteristics that they promote.

● **What was the share of investments made in transitional and enabling activities?**

N/A

● **How did the percentage of investments that were aligned with the EU Taxonomy compare with previous reference periods?**

N/A



What was the share of sustainable investments with an environmental objective not aligned with the EU Taxonomy?

N/A



What was the share of socially sustainable investments?

N/A

are sustainable investments with an environmental objective that **do not take into account the criteria** for environmentally sustainable economic activities under Regulation (EU) 2020/852.



What investments were included under “other”, what was their purpose and were there any minimum environmental or social safeguards?

Other investments were entirely cash.



What actions have been taken to meet the environmental and/or social characteristics during the reference period?

The Investment Manager has screened all investee companies inhouse for E/S characteristics as well as periodically through an ESG consultant for adherence to international norms as well as value-based screening for compliance with limits for exclusion criterias. The sub-fund makes use of proxy voting through an external ESG consultant and has voted on all issues during the year.



How did this financial product perform compared to the reference benchmark?

N/A

- *How does the reference benchmark differ from a broad market index?*

N/A

- *How did this financial product perform with regard to the sustainability indicators to determine the alignment of the reference benchmark with the environmental or social characteristics promoted?*

N/A

- *How did this financial product perform compared with the reference benchmark?*

N/A

- *How did this financial product perform compared with the broad market index?*

N/A