

## Article 8 Website Product Disclosure | December 2025

### Summary

This fund complies with Article 8 of the Regulation (EU) 2019/2088 on sustainability-related disclosures in the financial sector. This fund promotes environmental or social characteristics as part of investment objectives.

**Best-in-class criteria:** We apply a best-in-class methodology to ensure portfolio companies exhibit good environmental and/or social characteristics. Based on the Shikhara ESG Scorecard, companies within the portfolio must have an environmental and/or social score greater than 2.5. In addition, companies must also have good corporate governance practices, requiring a governance score of greater than 2.5 on the Shikhara ESG Scorecard. This best-in-class ESG criteria is binding for investments made by a minimum of 70% of the Fund's net assets.

**Exclusions:** We exclude investments in companies that have significant exposure (based on revenue thresholds) to controversial weapons, tobacco, adult entertainment, fossil fuels, and thermal coal. Companies that fall in these industries are monitored in the ESG Restrictive List that is reviewed in monthly risk meetings and meetings with the Investment Committee.

### No sustainable investment objective

This financial product promotes environmental or social characteristics but does not have sustainable investment as its objective.

### Environmental or social characteristics of the financial product

This fund aims to invest in companies with good environmental and/or social characteristics based on our proprietary ESG Scorecard. Among others, the Scorecard considers the following environmental and social characteristics:

- Environmental characteristics promoted –
  - Climate change mitigation: Companies with credible carbon reduction targets, renewable energy investments, and comprehensive climate risk management strategies
  - Environmental stewardship: Companies with robust environmental management systems, effective waste and water management practices, and biodiversity protection measures
  - Environmental compliance: Companies with clean track records and no significant environmental controversies or regulatory breaches
- Social characteristics promoted –
  - Human capital management: Companies demonstrating fair employee treatment, and comprehensive health and safety standards

- Stakeholder engagement: Companies with strong community relations, responsible product development, and effective stakeholder engagement practices
- Social responsibility: Companies with clean track records regarding social controversies and adherence to recognized social standards

## Investment strategy

### 1) Shikhara ESG Scorecard

A central element of our strategy is the Shikhara ESG Scorecard, developed to tailor ESG scoring to the companies within the Sub-Fund's portfolio, considering their specific sectors and markets. The Scorecard utilizes a 1 to 5 rating scale, where 1 signifies poor performance and 5 indicates top performance. This proprietary ESG scoring system evaluates a company's ESG performance by integrating both internal company data and third-party data sources. The selection of environmental and social criteria is based on their financial materiality (the impact of an activity on a company's profits) and sustainability materiality (the positive or negative effects of a company's actions on the environment and society).

Company scores from the Shikhara ESG Scorecard are audited against third-party ESG scores. This ensures quality, control, and that our scores accurately reflect each company's ESG performance based on our firsthand knowledge and expertise. Recognizing that third-party ESG scores may not encompass all stocks in our Sub-Fund—especially those invested in young, growth-oriented companies in emerging markets—Shikhara relies primarily on its proprietary ESG scoring system to maintain consistency and comprehensive coverage. ESG scores for all active portfolio holdings are updated annually. Additionally, in the event of material ESG controversies or significant events, a company's ESG score is promptly reviewed and updated within three months to ensure it remains current and accurate.

### 2) Best-in-class methodology

We apply a best-in-class methodology to ensure portfolio companies exhibit good environmental and/or social characteristics. Based on the Shikhara ESG Scorecard, companies within the portfolio must have an environmental and/or social score greater than 2.5. In addition, companies must also have good corporate governance practices, requiring a governance score of greater than 2.5 on the Shikhara ESG Scorecard.

### 3) Exclusions

We exclude investments in companies that have significant exposure (based on revenue thresholds) to controversial weapons, tobacco, adult entertainment, fossil fuels, and thermal coal. Companies that fall in these industries are monitored in the ESG Restrictive List that is reviewed in monthly risk meetings and meetings with the Investment Committee.

Companies with low ESG scores (i.e., 2-rating or below or CCC MSCI ESG ratings) or violations to Global Norms (i.e., United Nations Global Compact principles, United Nations Guiding Principles for Business and Human Rights, International Labour Organization's fundamental principles) also fall in the ESG Restrictive List.

**Good governance**

Good governance practices are assessed as part of the Governance pillar in the ESG Scorecard. Stocks’ governance practices are assessed based on Corporate Governance and Business Ethics. Within Corporate Governance, stocks are assessed on their shareholder and ownership structure, board composition, remuneration, and accounting and audit. Within Business Ethics, stocks are assessed on their transparency, governance reliance, and business integrity.

**Proportion of investments**

At least 70% of the assets in the Sub-Fund are allocated to investments used to attain environmental and/or social characteristics promoted by the Sub-Fund.

**Monitoring of environmental or social characteristics**

The Shikhara ESG Scorecard is completed by analysts for all portfolio and conviction list stocks to compute ESG scores. The % distribution of the fund’s net assets to ESG scores is monitored by the Risk Management team each month.

Our ESG Restrictive List sets out exclusions applied to the fund (for business activities that Shikhara deems harmful to the environment and society) to promote minimum standards on environmental and social outcomes. SFDR Article 8 Funds’ exposure to exclusions within the ESG Restrictive List is monitored every month: temporary breaches will be treated in the same way as our current compliance procedure for passive breach violations; Portfolio Managers are required to rectify the position for the corresponding fund within 15 business days.

Companies with violations of the Global Norms (e.g. United Nations Global Compact principles) would also fall on the ESG Restrictive List. Should violations be identified, Portfolio Managers and relevant sector analysts are required to document remedial plans based on discussions with the company on a bi-annual basis. The Investment Committee will then decide whether to put a buy restriction on these companies.

**Methodologies**

Environmental and social characteristics are measured through the Shikhara ESG Scorecard, which assesses a company’s ESG performance using company data as well as external third-party data. The Scorecard comprises 13 ESG topics categorized under three pillars, as outlined in the following table:

Pillars	Topics
Environmental	Emissions Resource & Waste Management Climate Change Biodiversity Supply Chain Management (Environmental)
Social	Human Capital Management Health & Safety

	Data Security & Privacy Product Liability & Responsible Marketing Stakeholder Engagement Supply Chain Management (Social)
Governance	Corporate Governance Business Ethics

Qualitative and quantitative parameters: Companies are assessed quantitatively through data-driven scoring but also with a qualitative overlay supported by investment analysts’ understanding of the company’s business plans and industry landscape. The scoring is based on a 1 to 5 rating (1-rating indicating poor performance and 5-rating indicating excellent performance).

Due diligence: Shikhara’s ESG scores are internally audited against third-party ESG ratings, and when discrepancies are noted investment analysts are required to provide justification.

**Data sources and processing**

**Data sources**

The key data source is our proprietary ESG scorecard, which the Principal Investment Manager has developed to ensure ESG scores are tailored to the companies in the Sub-Fund’s portfolio based on the sectors and markets they operate in. Commonly disclosed ESG data are leveraged from data providers as inputs to the Scorecard, supplemented by proprietary research from our investment analysts. We also use external third-party ESG data to perform screening, based on company revenue exposure, to monitor our exclusions applied to the Sub-Fund.

**Data quality**

Our ESG scores are internally audited against and compared with external third-party ESG scores to guarantee quality and control, whilst ensuring scores are reflective of the company’s ESG performance based on our first-hand knowledge and expertise. Our in-house ESG Specialist is responsible for updating the scoring methodology and material topics underpinning the Scorecard on an annual basis to be on top of market trends and industry changes.

**Data processing**

Our investment analysts, who are highly knowledgeable about the respective industries they cover, are responsible for completing the Shikhara ESG Scorecard for all recommended stocks. Moreover, as the analysts are the key contact points with investee companies, they can act as effective enforcers of ESG engagement to influence companies to improve their ESG performance if required.

ESG scores for all active holdings are updated on an annual basis. Should there be material ESG controversies or events, the Principal Investment Manager is also responsible to update a stock’s ESG score within 3 months if required.

### Proportion of data that is estimated

Estimated data is only used in the absence of quality corporate disclosures for key inputs to the Scorecard, such as carbon emissions, and is based on the methodologies of external third-party ESG data providers.

### Limitations to methodologies and data

We understand the landscape of external third-party ESG ratings has the following limitations:

- Third-party ESG scores do not always cover all stocks in which the Sub-Fund may invest because parts of the portfolio may be invested in young, growth companies in emerging markets
- The Sub-Fund has a regional focus in the Asia market; therefore, the landscape and applicability of ESG topics and metrics may slightly differ from the broad and developed markets usually covered by external third-party ESG ratings
- As ESG is a rapidly evolving subject, there may be a lag in the update of external third-party rating methodology, whereas our proprietary ESG Scorecard can be updated in a timelier manner.

Due to the above reasons, we have chosen to rely on our proprietary ESG Scorecard to define the environmental and social characteristics of the Sub-Fund.

### Due diligence

The Risk team independently audits the ESG scores analysts provide against independent third-party ESG ratings. Alerts are set on low ESG scores, such that should there be material discrepancies with our internal score, the respective analyst will need to provide supplementary information as to where the divergence stems from. We work to strike a cordial balance between our sector analysts and external third-party ESG ratings on their assessment of various ESG-related issues to mitigate individual bias.

With regard to external third-party ESG data providers, we carry out due diligence on all potential data providers as part of our vendor selection process. We review potential data providers on their performance factors e.g. service quality and subject matter knowledge, and risk factors e.g. industry reputation and credibility.

### Engagement policies

Voting is the fundamental right of a shareholder, and we recognize that such rights are imperative for the improvement of an investee company's corporate governance. We actively vote on shareholdings we are responsible for across all markets. Our Investment Committee works with investment analysts and takes note of proxy voting recommendations from proxy voting advisory firms. Where applicable, Shikhara will consult recommendations from third-party proxy voting advisory firms. The proxy voting guideline we reference is the ISS Sustainability Voting Guidelines: <https://www.issgovernance.com/file/policy/active/specialty/Sustainability-International-Voting-Guidelines.pdf>

As active owners, our investment team members engage with companies regularly through various channels, including one-on-one meetings, group meetings, email correspondence, and site visits. These interactions allow us to gain a comprehensive understanding of the companies beyond what is available through sell-side research alone.

The Shikhara ESG Scorecard serves as an evaluation tool that provides a detailed overview of a company's strengths and highlights critical issues. We particularly target engaging companies that we view as risky (based on our ESG assessment) with the objective of discussing ways to improve their ESG scores.

### **Designated reference benchmark**

No ESG reference benchmark has been designated to determine whether this financial product is aligned with the environmental or social characteristics that it promotes.