

## SUSTAINABLE FINANCE DISCLOSURE REGULATION

### Alvarium Fund Managers (UK) Limited AIA Positive Engagement Fund

#### EU Regulation 2019/2088 of the European Parliament and of the Council of 27 November 2019 on sustainability-related disclosures in the financial services sector ("SFDR")

The following information relates to the AIA Positive Engagement Fund (the "**Sub-Fund**"), a sub-fund of the Alternative Investments Access ICAV ("**AIA ICAV**") and is made available pursuant to Article 10 SFDR, and in accordance with the requirements of Commission Delegated Regulation (EU) 2022/1288. Alvarium Fund Managers (UK) Limited ("**Alvarium**") acts as delegated investment manager to the AIA ICAV (the "**Investment Manager**").

#### (a) Summary

The Sub-Fund promotes environmental or social characteristics, but does not have as its objective sustainable investment.

The Sub-Fund promotes decarbonisation by investing in Sustainable-Focused Portfolio Funds which themselves invest in companies with low levels of carbon intensity and/or engage with companies to reduce their carbon intensity over time.

The Investment Manager, on behalf of the Sub-Fund, will seek to primarily invest in a portfolio of Sustainable-Focused Portfolio Funds. It is anticipated that the relevant Portfolio Fund Manager in respect of each Sustainable-Focused Portfolio Fund will be focused on actively engaging with the relevant Sustainable-Focused Portfolio Fund's underlying portfolio companies in order to seek to improve the sustainability credentials of, and/or the sustainability issues impacting, the relevant portfolio companies.

The Sub-Fund may also invest in Sustainable-Focused Portfolio Funds employing a public market or a hybrid public-private market strategy focused on providing capital to companies specifically aligned with one or more of the UN Sustainable Development Goals. In addition, to complement the Sub-Fund's investment program, the Investment Manager may, from time to time, invest a portion of the Sub-Fund's assets in ETFs which have strong ESG attributes relative to their benchmark. Where the Investment Manager invests in Sustainable-Focused Portfolio Funds focused on providing capital to companies specifically aligned with one or more of the UN Sustainable Development Goals, the Investment Manager will identify the specific UN Sustainable Development 'Goal, Target and Indicator' relevant for the strategy prior to investing. The Investment Manager will monitor the Sustainable-Focused Portfolio Fund's investments for revenue alignment with such 'Goals, Targets and Indicators' on an ongoing basis.

Noting that the Sub-Fund will primarily invest in Sustainable-Focused Portfolio Funds, and it is the Investment Manager's expectation that the majority if not all of the investments will be aligned with environmental and/or social characteristics, it is the Investment Manager's expectation that the minimum proportion of investments used to meet the environmental characteristics promoted by the Sub-Fund would be 80% of the Sub-Fund's portfolio. The Sub-Fund has not committed to making any sustainable investments.

The Investment Manager may invest in public equity or hybrid public-private equity strategies which are not aligned with decarbonisation/low carbon intensity in order to enhance return, enhance liquidity or mitigate risk in the portfolio. It is the intention of the Investment Manager that such

investments would align with other environmental or social goals, although such goals may vary over time.

The Investment Manager will also hold cash or cash-like assets in the portfolio for liquidity purposes but there are no minimum environmental or social safeguards associated with these investments/holdings.

The Investment Manager uses Scope 1 emissions (direct emissions from owned or controlled sources) data and Scope 2 emissions (including indirect emissions from the generation of purchased energy) data to measure carbon intensity relative to appropriate global benchmarks such as MSCI World or passive trackers of such an index. Sustainable-Focused Portfolio Funds' emissions are measured prior to addition to the Sub-Fund but also on a calendar quarter basis, reporting based on the most current available underlying portfolio exposures at that time.

The Investment Manager will seek to measure the carbon intensity of each Sustainable-Focused Portfolio Fund, using publicly disclosed data, and/or data that has been specifically sourced from the relevant Sustainable-Focused Portfolio Fund. Additional data sources may be included over time to enhance the accuracy and clarity of information reported.

The Investment Manager recognises that such data may not always be available in a consistent manner and as such, the Investment Manager will also rely on its qualitative analysis of the Sustainable-Focused Portfolio Fund's strategy, philosophy and thesis for investing in and holding underlying portfolio companies.

Prior to investing, the Investment Manager uses proprietary ESG integrated investment and operational due diligence questionnaires. These documents include questions, relating to the underlying Sustainable-Focused Portfolio Fund's integration of sustainability risks, within the context of a traditional investment process. These questionnaires also address governance issues within, and the governance practices of, the relevant Portfolio Fund Manager.

Engagement with the Sustainable-Focused Portfolio Funds is not part of the Investment Manager's strategy. However, as part of its ongoing due diligence of Sustainable-Focused Portfolio Funds, the Investment Manager does engage with various external asset managers on ESG issues (for example the Net Zero Asset Managers Initiative).

The Sub-Fund has not designated an index as reference benchmark to meet the environmental and/or social characteristics promoted by the Sub-Fund.

**(b) No sustainable investment objective**

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

**(c) Environmental or social characteristics of the financial product**

The Sub-Fund promotes decarbonisation by investing in Sustainable-Focused Portfolio Funds which themselves invest in companies with low levels of carbon intensity and/or engage with companies to reduce their carbon intensity over time. The Investment Manager measures decarbonisation promotion through carbon intensity, both at the Sub-Fund level and at the level of each Sustainable-Focused Portfolio Fund.

#### (d) Investment strategy

In order to achieve the Sub-Fund's investment objective, the Investment Manager, on behalf of the Sub-Fund, will seek to primarily invest in a portfolio of Sustainable-Focused Portfolio Funds. It is anticipated that the relevant Portfolio Fund Manager in respect of each Sustainable-Focused Portfolio Fund will be focused on actively engaging with the relevant Sustainable-Focused Portfolio Fund's underlying portfolio companies in order to seek to improve the sustainability credentials of, and/or the sustainability issues impacting, the relevant portfolio companies.

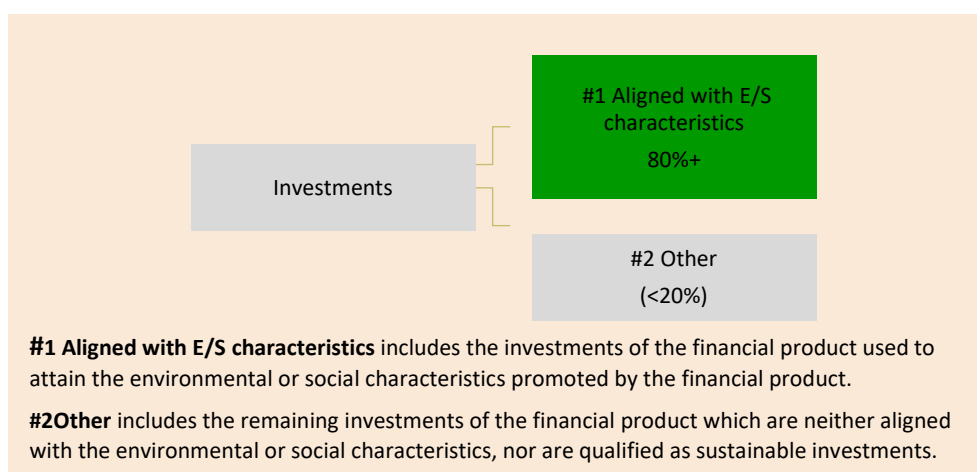
The Sub-Fund may also invest in Sustainable-Focused Portfolio Funds employing a public market or a hybrid public-private market strategy focused on providing capital to companies specifically aligned with one or more of the UN Sustainable Development Goals. In addition, to complement the Sub-Fund's investment program, the Investment Manager may, from time to time, invest a portion of the Sub-Fund's assets in ETFs which have strong ESG attributes relative to their benchmark. Where the Investment Manager invests in Sustainable-Focused Portfolio Funds focused on providing capital to companies specifically aligned with one or more of the UN Sustainable Development Goals, the Investment Manager will identify the specific UN Sustainable Development 'Goal, Target and Indicator' relevant for the strategy prior to investing. The Investment Manager will monitor the Sustainable-Focused Portfolio Fund's investments for revenue alignment with such 'Goals, Targets and Indicators' on an ongoing basis.

The Sub-Fund seeks to be a through-the-cycle strategy with a look-through allocation to a large, diverse number of listed equity holdings across market capitalisations, geographies and industry sectors where the Investment Manager is managing the varying liquidity profiles of the underlying Sustainable-Focused Portfolio Funds. The Investment Manager expects the majority of the underlying assets of the Sustainable-Focused Portfolio Funds to be listed on developed markets exchanges although the Sub-Fund can invest in Sustainable-Focused Portfolio Funds focused on emerging markets.

#### (e) Proportion of investments

Noting that the Sub-Fund will primarily invest in Sustainable-Focused Portfolio Funds, and it is the Investment Manager's expectation that the majority if not all of the investments will be aligned with environmental and/or social characteristics, it is the Investment Manager's expectation that the minimum proportion of investments used to meet the environmental characteristics promoted by the Sub-Fund would be 80% of the Sub-Fund's portfolio.

The Sub-Fund has not committed to making any sustainable investments.



The Investment Manager may invest in public equity or hybrid public-private equity strategies which are not aligned with decarbonisation/low carbon intensity in order to enhance return, enhance liquidity or mitigate risk in the portfolio. It is the intention of the Investment Manager that such investments would align with other environmental or social goals, although such goals may vary over time.

The Investment Manager will also hold cash or cash-like assets in the portfolio for liquidity purposes but there are no minimum environmental or social safeguards associated with these investments/holdings.

**(f) Monitoring of environmental or social characteristics**

The Investment Manager uses Scope 1 emissions (direct emissions from owned or controlled sources) data and Scope 2 emissions (including indirect emissions from the generation of purchased energy) data to measure carbon intensity. The Investment Manager will seek to measure the carbon intensity of each Sustainable-Focused Portfolio Fund, using publicly disclosed data, and/or data that has been specifically sourced from the relevant Sustainable-Focused Portfolio Fund, comparing this carbon intensity to relevant and appropriate, global benchmarks. Whilst it is the Investment Manager's expectation to invest primarily in Sustainable-Focused Portfolio Funds with relatively low carbon intensity, the Investment Manager may also invest in Sustainable-Focused Portfolio Funds that do not currently have a low carbon intensity.

**(g) Methodologies for environmental or social characteristics**

As detailed above, the Investment Manager will assess individual Sustainable-Focused Portfolio Funds and the aggregate Sub-Fund's Scope 1 and Scope 2 emissions to measure carbon intensity relative to appropriate global benchmarks such as MSCI World or passive trackers of such an index.

Sustainable-Focused Portfolio Funds' emissions are measured prior to addition to the Sub-Fund but also on a calendar quarter basis, reporting based on the most current available underlying portfolio exposures at that time.

**(h) Data sources and processing**

The Investment Manager will seek to measure the carbon intensity of each Sustainable-Focused Portfolio Fund, using publicly disclosed data, and/or data that has been specifically sourced from the relevant Sustainable-Focused Portfolio Fund. Additional data sources may be included over time to enhance the accuracy and clarity of information reported.

Such data sources are compared against each other and versus the Investment Manager's expectations and knowledge of the Sustainable-Focused Portfolio Funds' processes and policies. In addition, the Investment Manager will reference other Sustainable-Focused Portfolio Funds not held in the Sub-Fund in assessing both data sources and the specific data being reported.

Typically, such carbon reporting is undertaken by underlying companies annually, the proportion of such data that is estimated varies between reporting periods, but the Investment Manager would expect >66% data to be reported with the balance being estimated data subject to a small residual (expected to be <3%) of neither reported nor estimated data.

**(i) Limitations to methodologies and data**

The Investment Manager recognises that such data may not always be available in a consistent manner and as such, the Investment Manager will also rely on its qualitative analysis of the Sustainable-Focused Portfolio Fund's strategy, philosophy and thesis for investing in and holding underlying portfolio companies.

It is the Investment Manager's expectation that information for Scope 1 and Scope 2 emissions will be publicly available for a sufficiently large proportion of the Sub-Fund, that conclusions on the Sub-Fund's Environmental and Social characteristics will be clear and readily justifiable.

**(j) Due diligence**

Prior to investing, the Investment Manager uses proprietary ESG integrated investment and operational due diligence questionnaires. These documents include questions, relating to the underlying Sustainable-Focused Portfolio Fund's integration of sustainability risks, within the context of a traditional investment process. For example, within the 'Investment Research' section of the investment due diligence questionnaire, the Investment Manager asks how materiality of ESG is defined by underlying the Sustainable-Focused Portfolio Funds, or whether external ESG research is obtained on potential investments. These questionnaires also address governance issues within, and the governance practices of, the relevant Portfolio Fund Manager; such questions include diversity of board, staff turnover, pay-gaps, description of a firm's culture and attitude to social responsibility. A key focus of this operational due diligence is to assess and confirm that the Portfolio Fund Manager has strong governance structures, practices and principals, before investing in the relevant Sustainable-Focused Portfolio Fund.

The Investment Manager discusses these integrated investment and operational due diligence documents within its internal ESG Investment Committee, which includes individuals with experience and significant knowledge of sustainable and impact investing. The Investment Manager believes that making integrated decisions on risk-return and sustainability is critical to understanding the true strengths and weaknesses of different Sustainable-Focused Portfolio Funds; the Investment Manager further believes that such decisions should be made by an ESG Investment Committee comprising of diverse individuals with a range of geographies, backgrounds and experiences.

**(k) Engagement Policies**

Engagement with the Sustainable-Focused Portfolio Funds is not part of the Investment Manager's strategy. However, as part of its ongoing due diligence of Sustainable-Focused Portfolio Funds, the Investment Manager does engage with various external asset managers on ESG issues (for example the Net Zero Asset Managers Initiative).

The Sub-Fund intends to help investors access Portfolio Fund Managers who participate in positive engagement with the underlying portfolio companies of the Sustainable-Focused Portfolio Funds, primarily relating to sustainability and/or ESG issues; these Portfolio Fund Managers will seek to generate additional financial value and positive impact through such engagement activities.

**(l) Designated reference benchmark**

The Sub-Fund has not designated an index as reference benchmark to meet the environmental and/or social characteristics promoted by the Sub-Fund.