

**Financial Product Website Disclosure**

**Blackstone Low Carbon High Yield Corporate**

**Bond Fund (UCITS)**

**Summary**

**Transparency of the promotion of environmental and/or social characteristics**

*This document provides the investor with detailed information about the fund in relation to the Sustainable Finance Disclosure Regulation (“SFDR”). This is a regulatory document required under SFDR. The information contained in this document is to help the investor understand the sustainability characteristics and/or objectives and risks of this fund. This document should be read in conjunction with other relevant regulatory documentation so the investor can make an informed decision to invest.*

<b>Summary</b>	<p>The Fund invests in a portfolio of corporate bonds (primarily high yield bonds) and credit default swaps on the credit risk of companies that are issuers of corporate bonds by applying a quantitatively driven approach to asset selection and portfolio constitution. The investment strategy is expected to be net long credit risk of firms that have instruments traded on recognized exchanges worldwide. The Fund employs portfolio diversification controlled by active risk assessment and portfolio management.</p> <p>The Fund seeks to profit by holding long positions which have been identified as undervalued (i.e., the market price of credit risk, or “credit spread” is lower than the Investment Manager’s estimate of what is fair value) by the Investment Manager. Such positions will be identified by the Investment Manager’s proprietary analytics, which includes a default probability measurement and a quantitative analysis of the “fair value” of each exposure. The default probability measurement is based on a proprietary model that has been developed by the Investment Manager and which takes into account a firm’s asset value, liability structure, and volatility. The ‘fair value’ of the exposure is also based on proprietary analytics developed by the Investment Manager, and takes into account other characteristics of the exposure (e.g. rating, sector, and term). The long portfolio is invested in corporate bonds, primarily rated high yield, and CDS on the credit risk of issuers of corporate bonds.</p> <p>The investment objective of the Fund is to produce returns, net of fees and expenses above the performance of the BofA Merrill Lynch US High Yield Constrained Index to US Dollars (the “<b>Index</b>”). The Fund also seeks to achieve at least 50% lower weighted carbon intensity than the Index. The weighted average carbon intensity of the Fund is the exposure to carbon intensive companies. The carbon intensity of the Fund is determined by measuring direct CO<sub>2</sub> emissions from the individual corporate bond issuers in the Fund as well as emissions from purchased energy relative to their corporate revenues. The Investment Manager utilises a proprietary system to measure the carbon intensity of the individual investments. The Investment Manager relies on third-party data for carbon emissions and potential carbon emissions from fossil fuel reserves which are measured based on an issuer’s reported data from annual reports, corporate social responsibility reports, the CDP (carbon disclosure project), oil and gas industry bodies, and data derived from other relevant third-party sources. As part of the investment selection process, the Investment Manager systematically down-weights individual issuers with high carbon intensity but does not exclude any particular sector or industry solely based on carbon intensity.</p> <p>The Company, in consultation with the Investment Manager, has categorised the Fund as an Article 8 product for the purposes of the SFDR. The Investment Manager</p>
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	<p>integrates environmental and social characteristics into the investment process of the Fund by applying an exclusion screen to the selection of investments and (as of the date of this disclosure) seeks to avoid certain issuers from categories including but not limited to nuclear weapons, controversial munitions, opioid manufacturing, retail sold assault weapons, coal mining, private prisons, payday lending and the tobacco industry.</p>
<b>No sustainable investment objective</b>	<p>The Fund promotes environmental or social characteristics, but does not have as its objective a sustainable investment.</p>
<b>Environmental or social characteristics of the fund</b>	<p>The Investment Manager seeks to promote environmental or social characteristics by applying a number of exclusions from its investment universe. As of the date of this disclosure, the Investment Manager seeks to avoid certain issuers from categories including but not limited to nuclear weapons, controversial munitions, opioid manufacturing, retail sold assault weapons, coal mining, private prisons, payday lending and the tobacco industry.</p> <p>A current list of applicable exclusion categories is available upon request from the Investment Manager.</p> <p>A reference benchmark is not used for the purposes of attaining the environmental or social characteristics promoted by the Fund.</p>
<b>Investment strategy</b>	<p>The Fund invests in a portfolio of corporate bonds (primarily high yield bonds) and credit default swaps on the credit risk of companies that are issuers of corporate bonds by applying a quantitatively driven approach to asset selection and portfolio constitution. The investment strategy is expected to be net long credit risk of firms that have instruments traded on recognized exchanges worldwide. The Fund employs portfolio diversification controlled by active risk assessment and portfolio management.</p> <p>The Fund seeks to profit by holding long positions which have been identified as undervalued (i.e., the market price of credit risk, or “credit spread” is lower than the Investment Manager’s estimate of what is fair value) by the Investment Manager. Such positions will be identified by the Investment Manager’s proprietary analytics, which includes a default probability measurement and a quantitative analysis of the “fair value” of each exposure. The default probability measurement is based on a proprietary model that has been developed by the Investment Manager and which takes into account a firm’s asset value, liability structure, and volatility. The ‘fair value’ of the exposure is also based on proprietary analytics developed by the Investment Manager, and takes into account other characteristics of the exposure (e.g. rating, sector, and term). The long portfolio is invested in corporate bonds, primarily rated high yield, and CDS on the credit risk of issuers of corporate bonds.</p> <p>The investment objective of the Fund is to produce returns, net of fees and expenses above the performance of Index. The Fund also seeks to achieve at least 50% lower weighted carbon intensity than the Index. The weighted average carbon intensity of the Fund is the exposure to carbon intensive companies. The carbon intensity of the Fund is determined by measuring direct CO<sub>2</sub> emissions from the individual corporate bond issuers in the Fund as well as emissions from purchased energy relative to their corporate revenues. The Investment Manager utilises a proprietary system to measure the carbon intensity of the individual investments. The Investment Manager relies on third-party data for carbon emissions and potential carbon emissions from fossil fuel reserves which are measured based on an issuer’s reported data from annual reports, corporate social responsibility reports, the CDP (carbon disclosure project), oil and gas industry bodies, and data derived from other relevant third-party</p>

sources. As part of the investment selection process, the Investment Manager systematically down-weights individual issuers with high carbon intensity but does not exclude any particular sector or industry solely based on carbon intensity.

In order to meet the environmental and social characteristics promoted, Responsible Investment is integrated into the Investment Manager's investment process in accordance with three foundational pillars as follows:

- a) Application of a socially responsible investing ("SRI") exclusion screen in respect of the portfolio of the Fund.
- b) Conducting ongoing research into SRI (and ESG) factors.
- c) Reviewing, monitoring, and risk modelling the Fund's portfolio for emerging trends, threats, and developments, including those arising from SRI factors.

The Investment Manager integrates exclusion screening in respect of its investment selection process to account for additional risks that are inherent in socially and environmentally costly businesses. In this regard, it carries out a systematic approach of constructing a broad portfolio using fundamentally driven models, with holding periods typically measured in months. For example, the Investment Manager seeks to avoid certain issuers from categories including but not limited to, nuclear weapons, controversial munitions, opioid manufacturing, retail sold assault weapons, coal mining, private prisons, payday lending and the tobacco industry, or those investments that are considered to be poor SRI performers by the Investment Manager as further described below. While the Investment Manager does not pursue an activist investment strategy in respect of the Fund, it takes account of additional risks that are inherent in socially and environmentally costly businesses and when possible, will seek to avoid them. In this regard, the Investment Manager's policy aims to avoid providing implicit or explicit support for socially and environmentally irresponsible businesses. Whilst this analysis can be subjective, the Investment Manager will assess certain businesses where the social or environmental cost of the business creates negative externalities for society that are not fully captured by regulation, taxation or shareholder value. These risks typically manifest as low probability, but high cost, regulatory and legal exposures. Various factors are considered by the Investment Manager in the SRI screening process which are broadly categorised into: (i) ethical reasons; (ii) social responsibility and stewardship; and (iii) environmental responsibility and stewardship.

The Investment Manager considers the "good governance" practices of the investee company issuer (the "**Issuer**") in accordance with established governance requirements applicable to the securities (including liquid, public and secondary securities) (the "**Securities**") in which the Fund invests. This will include those good governance criteria established under the SFDR, specifically: sound management structures, employee remuneration, employee relations and tax compliance ("**Good Governance Criteria**").

The Investment Manager's assessment of "good governance practices" will consider a range of criteria, methodologies and assumptions as part of pre-investment and ongoing monitoring processes (including but not limited to factors such as the market, size, sector or geographic location of the Issuer). As a minimum, meeting the criteria for public listing on a main market, and continuing public listing eligibility of the Issuer (including the regulatory oversight of the same) is considered to set a presumption of good governance processes in the absence of evidence to the contrary. The Investment Manager's assessment will also involve a review of information in support of (or, alternatively, which disrupts) that presumption. This will be done via the use of quarterly ESG screening tools, such as ESG ratings and controversies screening tools or public searches carried out by the Investment Manager's Research Committee (the "**Research Committee**") or information

	<p>garnered by the same as part of the Investment Manager’s research-driven investment-process.</p> <p>Where there are material good governance disruptors which the Investment Manager considers to be a material breach of the Good Governance Criteria, absent immediate action taken by the Issuer to remediate such a breach, this would result in either an exclusion against investing in the relevant Securities or a divestment of the same within a reasonable time period. Examples of good governance disruptors include but are not limited to: (1) de-listing of the underlying issuer for breaches of applicable listing rules and/ or requirements relating to Good Governance Criteria; (2) quarterly screening undertaken by Research Committee (using ESG screening tools, such as ESG ratings) revealing material adverse results; and (3) any business found (by the Research Committee using controversies screening tools or public searches) to have been involved in controversies or material breaches (such as material and ongoing breaches of labour laws) that would suggest a material and ongoing failure of good governance at the issuer level, where in each case there is no evidence that the Issuer has taken steps to remediate, mitigate and manage the same.</p> <p>Note that no single good governance indicator or disruptor will be determinative on its own and some judgement will be required to consider these both in the round and in the wider context of the investment when making a determination as to good governance practices at the issuer level. This judgment will be exercised in good faith. Where any investment(s) are determined to not sufficiently meet the applicable Good Governance Criteria, a decision will be made not to invest in the securities of the Issuer or if securities of the Issuer are an existing investment to divest it within a reasonable period taking into consideration factors such as market liquidity.</p> <p>Note that the good governance assessment process described above is applicable to corporate credit investments only and is not applicable to any of the Fund’s investments in government bonds, other securities issue by sovereigns or supranational entities or derivatives such as interest rate futures.</p>
<p><b>Proportion of investments</b></p>	<p>The Fund intends to invest a minimum of 80% of the Fund’s assets in investments which attain the environmental and social characteristics promoted by the Fund. To achieve this, the Fund invests directly in a portfolio of high yield bonds and indirectly through credit default swaps on the credit risk of companies in order to gain exposure to such securities.</p> <p>The remaining percentage of the Fund’s investments will be in investments which seek to achieve the broader objectives of the Fund including instruments for the purposes of efficient portfolio management, hedging and liquidity management purposes.</p>
<p><b>Monitoring of environmental or social characteristics</b></p>	<p>The Investment Manager seeks to promote environmental or social characteristics by applying a number of exclusions from its investment universe. As of the date of this disclosure, the Investment Manager seeks to avoid certain issuers from categories including but not limited to nuclear weapons, controversial munitions, opioid manufacturing, retail sold assault weapons, coal mining, private prisons, payday lending and the tobacco industry.</p> <p>A current list of applicable exclusion categories is available upon request from the Investment Manager.</p>

	<p>The ESG-related exclusions referred to above apply at the time of acquisition of the relevant securities and in the event of any subsequent inadvertent holding of securities in breach of these principles or exclusions, the Investment Manager shall dispose of any such securities as soon as reasonably practicable having regard to the best interests of the Fund and its Shareholders.</p> <p>The Investment Manager maintains a robust process to ensure that the ESG-related exclusions referred to above are monitored and reviewed regularly. The Investment Manager has a pre trade and post trade monitoring built into proprietary systems to prevent and detect violations of ESG-related exclusions. Daily post-trade monitoring is performed by a compliance team independent from the investment and portfolio management. In addition to monitoring ESG related exclusions the WACI of the portfolio is also monitored in the same manner.</p>
<b>Methodologies</b>	<p>While the Investment Manager does not pursue an activist investment strategy in respect of the Fund, it takes account of additional risks that are inherent in socially and environmentally costly businesses and when possible, will seek to avoid them. In this regard, the Investment Manager's policy aims to avoid providing implicit or explicit support for socially and environmentally irresponsible businesses. Whilst this analysis can be subjective, the Investment Manager will assess certain businesses where the social or environmental cost of the business creates negative externalities for society that are not fully captured by regulation, taxation or shareholder value. These risks typically manifest as low probability, but high cost, regulatory and legal exposures. Various factors are considered by the Investment Manager in the SRI screening process which are broadly categorised into: (i) ethical reasons; (ii) social responsibility and stewardship; and (iii) environmental responsibility and stewardship. As of the date of this disclosure, the Investment Manager seeks to avoid certain issuers from categories including but not limited to nuclear weapons, controversial munitions, opioid manufacturing, retail sold assault weapons, coal mining, private prisons, payday lending and the tobacco industry. In this regard, the Investment Manager will exclude such businesses from the investment universe as detailed above. The Investment Manager reviews, affirms, and (if needed), modifies the specific exclusion list at least quarterly. Please see the "Monitoring of environmental or social characteristics " section above which outlines the process used to measure the promotion of environmental or social characteristics and also the sustainability indicators used to measure these.</p>
<b>Data sources &amp; processing</b>	<p>The investment process will identify three broad areas of concern about the inherent social costs in the business models of underlying issuers and securities. These areas are categorised according to the following classification:</p> <ul style="list-style-type: none"> <li>• ethical reasons</li> <li>• social responsibility and stewardship</li> <li>• environmental responsibility and stewardship</li> </ul> <p>Within the above broad categories the Investment Manager applies criterion based on businesses that the Investment Manager does not consider it appropriate to implicitly support. Such businesses are identified using top down and bottoms up research. The criteria are approved (at least) annually by the Investment Manager's research approval committee and reviewed (at least) quarterly.</p> <p>The potential list for exclusion is sourced from both the Investment Manager's own proprietary research analysis and externally from its' investment partners. The resulting exclusion list is maintained as part of the live portfolio construction process</p>

	<p>and is included in automatic compliance controls. An exclusion list is available for investors upon request from the Investment Manager.</p> <p>Weighted Average Carbon Intensity (“<b>WACI</b>”) is a measure of the portfolio’s exposure to carbon-intensive companies, based on a company’s Scope 1 and Scope 2 carbon emissions relative to its revenue. The Investment Manager uses TruCost carbon emissions data from S&amp;P Global for the WACI calculations which are in line with the Task Force on Climate-related Financial Disclosures recommendations for asset owners and asset managers. In seeking to achieve this objective, the Investment Manager relies on third-party data for both actual and potential carbon emissions from fossil fuel reserves for a particular issuer, sector or subsector. Achieving an accurate WACI will depend on third-party data providers ability to properly assess the carbon emissions of issuers. There can be no assurance that the strategy or techniques employed will be successful or that the information and data provided by the third-party data provider will be complete, accurate or provided in a timely manner. In addition, there are various providers of carbon emissions data and the measurement of carbon emissions may vary from provider to provider. As a result, the Investment Manager’s selection of any particular data provider may result in a different composition of the Fund and/or a different WACI measurement for the portfolio and/or Index. Investment Manager does not independently verify the third-party information used to derive the information and makes no representation or warranty as to the accuracy or completeness of such information. Please see <a href="https://ghgprotocol.org/corporate-standard">https://ghgprotocol.org/corporate-standard</a> for more information on the Greenhouse Gas Protocol Standard. Where carbon intensity is not available for an Index constituent the Investment Manager uses the subsector carbon intensity, which is the ratio of the total emissions of the subsector over the total revenue in the subsector as of that date. If there is an insufficient number of issuers with data in the relevant subsector, the Investment Manager uses the sector carbon intensity, which is the ratio of the total emissions of the sector over the total revenue in the sector as of that date. Accordingly, the weighted average carbon intensity data for the portfolios is not necessarily based on the emissions of the actual underlying investments held in the portfolios, but rather, in some instances, TruCost's emissions data for an investment's corresponding sub-sector or sector. Consequently, the weighted average carbon intensity data presented should not be viewed by investors as representative of the actual carbon exposure of the portfolio. Cash, cash equivalents, and derivatives are included in the denominator of the portfolios WACI calculation which implies no carbon emissions for those instruments.</p> <p>To ensure data quality, the Investment Manager carries out due diligence on any third party data provider, evaluates the methodology, carries out spot checks of data, and escalates data concerns to the data provider as needed.</p>
<p><b>Limitation to methodologies &amp; data</b></p>	<p>The data landscape for ESG analysis and reporting is rapidly developing and data quality and methodology currently face industry-wide challenges. Limitations on methodologies and ESG data include the lack of consistency, reliability, comparability, and quality of the data available. This is driven by issues including, but not limited to:</p> <ul style="list-style-type: none"> <li>• Lack of common methodology across providers of ESG ratings;</li> <li>• Lack of standardised reporting by companies;</li> <li>• Different models and analytical tools for unreported data; and</li> <li>• Backward looking information that fails to capture “direction of travel”.</li> </ul> <p>These limitations are addressed by:</p> <ul style="list-style-type: none"> <li>• Use of varied data sources; and</li> </ul>

	<ul style="list-style-type: none"> <li>• Reliance on internal research and analysis using third party data as complementary information.</li> </ul> <p>The Investment Manager utilises carbon intensity data that covers approximately 90% or more of the Net Asset Value of the Fund. This coverage rate excludes bonds and other debt securities issued by sovereign or quasi-sovereign issuers, cash or cash equivalent instruments held for ancillary purposes and any derivative instruments used to hedge currency or interest rate risk. The coverage rate for the carbon intensity data in respect of issuers within the Index can vary at any given time but as of September 30, 2021 is approximately 85%. Where carbon intensity is not available for an Index constituent the Investment Manager uses the subsector carbon intensity, which is the ratio of the total emissions of the subsector over the total revenue in the subsector as of that date. If there is an insufficient number of issuers with data in the relevant subsector, the Investment Manager uses the sector carbon intensity, which is the ratio of the total emissions of the sector over the total revenue in the sector as of that date.</p> <p>Please see the “Monitoring of environmental or social characteristics” section above.</p>
<b>Due diligence</b>	As the investment strategy of the financial product is systematic and rule based, the investment strategy implementation as well as the monitoring of investee companies on relevant matters, including a firm’s asset value, liability structure, volatility, social and environmental impact and corporate governance, are mainly based on quantitative measures.
<b>Engagement policies</b>	The Investment Manager does not engage directly with any of the investee companies as engagement is not part of the environmental or social investment strategy of the Fund. The systematic approach forms broad portfolios using fundamentally driven models, with holding periods measured in months. The Investment Manager does not interact with the executives in its investment portfolio, nor does the Investment Manager try to shape business strategy or policy, as the strategy is primarily engaged in liquid, public securities on the secondary market.
<b>Designated reference benchmark</b>	There is no designated reference benchmark for the Fund.

## Financial Product Website Disclosure

### Blackstone Market Neutral Systematic Credit Fund (ICAV)

#### Summary

#### Transparency of the promotion of environmental and/or social characteristics

*This document provides the investor with detailed information about the fund in relation to the Sustainable Finance Disclosure Regulation (“SFDR”). This is a regulatory document required under SFDR. The information contained in this document is to help the investor understand the sustainability characteristics and/or objectives and risks of this fund. This document should be read in conjunction with other relevant regulatory documentation so the investor can make an informed decision to invest.*

<b>Summary</b>	<p>The Fund invests in a portfolio of exposures to the credit risk of companies with equity listed on recognised exchanges, applying a quantitatively driven approach to asset selection and portfolio construction.</p> <p>This is achieved by holding “Long Positions” which have been identified as undervalued (i.e. the market price of credit risk, or “credit spread” is higher than the Investment Manager’s estimate of what is fair value) (hereinafter referred to as “Long Positions”) and holding “Short Positions” which have been identified as overvalued (i.e. the market price of Credit Risk, or “credit spread” is lower than the Investment Manager’s estimate of what is fair value) by the Investment Manager. (hereinafter referred to as “Short Positions”). Such Long Positions and Short Positions will be identified by the Investment Manager’s proprietary analytics, which includes a default probability measurement and a quantitative analysis of the “fair value” of each exposure. The Long portfolio uses credit default swaps (“CDS”) by selling protection. By selling protection through CDS, the Fund earns a premium and bears the risk that if the CDS reference entity defaults during the life of the CDS contract, the Fund may be obliged to make a payment to cash settle the CDS contract. The Short portfolio uses CDS by buying protection. By buying protection through CDS, the Fund pays a premium to the CDS contract seller. If the CDS reference entity defaults during the life of the CDS contract, the Fund may receive a payments from the seller of the protection to cash settle the CDS contract.</p> <p>The Company, in consultation with the Investment Manager, has categorised the Fund as an Article 8 product for the purposes of the SFDR. The Investment Manager integrates environmental and social characteristics into the investment process of the Fund by applying an exclusion screen to the selection of investments and (as of the date of this disclosure) seeks to avoid certain issuers from categories including but not limited to nuclear weapons, controversial munitions, opioid manufacturing, retail sold assault weapons, coal mining, private prisons and payday lending.</p>
<b>No sustainable investment objective</b>	<p>The Fund promotes environmental or social characteristics, but does not have as its objective a sustainable investment.</p>
<b>Environmental or social characteristics of the fund</b>	<p>The Investment Manager seeks to promote environmental or social characteristics by applying a number of exclusions from its investment universe. As of the date of this disclosure, the Investment Manager seeks to avoid certain issuers from categories including but not limited to nuclear weapons, controversial munitions, opioid manufacturing, retail sold assault weapons, coal mining, private prisons and payday lending.</p> <p>A current list of applicable exclusion categories is available upon request from the Investment Manager.</p>



	<p>A reference benchmark is not used for the purposes of attaining the environmental or social characteristics promoted by the Fund.</p>
<p><b>Investment strategy</b></p>	<p>The investment objective of the Fund is to produce returns, net of fees and expenses above the performance of the ICE BofAML 0-3 Month US Treasury Bill Index (the “<b>Index</b>”).</p> <p>The Fund invests in a portfolio of exposures to the credit risk of companies with equity listed on recognised exchanges, applying a quantitatively driven approach to asset selection and portfolio construction. The Investment Manager manages the Fund’s investments by creating long and short credit exposure as described in further detail below (short exposure will be obtained synthetically through the use of FDI).</p> <p>This is achieved by holding “Long Positions” which have been identified as undervalued (i.e. the market price of Credit Risk, or “credit spread” is higher than the Investment Manager’s estimate of what is fair value) (hereinafter referred to as “Long Positions”) and holding “Short Positions” which have been identified as overvalued (i.e. the market price of Credit Risk, or “credit spread” is lower than the Investment Manager’s estimate of what is fair value) by the Investment Manager. (hereinafter referred to as “Short Positions”) Such Long Positions and Short Positions will be identified by the Investment Manager’s proprietary analytics, which includes a default probability measurement and a quantitative analysis of the “fair value” of each exposure. The Long portfolio uses CDS by selling protection. By selling protection through CDS, the Fund earns a premium and bears the risk that if the CDS reference entity defaults during the life of the CDS contract, the Fund may be obliged to make a payment to cash settle the CDS contract. The Short portfolio uses CDS by buying protection. By buying protection through CDS the Fund pays a premium to the CDS contract seller. If the CDS reference entity defaults during the life of the CDS contract, the Fund may receive a payments from the seller of the protection to cash settle the CDS contract.</p> <p>In order to meet the environmental and social characteristics promoted, Responsible Investment is integrated into the Investment Manager’s investment process in accordance with three foundational pillars as follows:</p> <ol style="list-style-type: none"> <li>a) Application of a socially responsible investing (“<b>SRI</b>”) exclusion screen in respect of the portfolio of the Fund.</li> <li>b) Conducting ongoing research into SRI (and ESG) factors.</li> <li>c) Reviewing, monitoring, and risk modelling the Fund’s portfolio for emerging trends, threats, and developments, including those arising from SRI factors.</li> </ol> <p>The Investment Manager integrates exclusion screening in respect of its investment selection process to account for additional risks that are inherent in socially and environmentally costly businesses. In this regard, it carries out a systematic approach of constructing a broad portfolio using fundamentally driven models, with holding periods typically measured in months. For example, the Investment Manager seeks to avoid certain issuers from categories including but not limited to, nuclear weapons, controversial munitions, opioid manufacturing, retail sold assault weapons, coal mining, private prisons and payday lending, or those investments that are considered to be poor SRI performers by the Investment Manager as further described below. While the Investment Manager does not pursue an activist investment strategy in respect of the Fund, it takes account of additional risks that are inherent in socially and environmentally costly businesses and when possible, will seek to avoid them. In this regard, the Investment Manager’s policy aims to avoid providing implicit or explicit support for socially and environmentally irresponsible businesses. Whilst this analysis can be subjective, the Investment Manager will</p>

assess certain businesses where the social or environmental cost of the business creates negative externalities for society that are not fully captured by regulation, taxation or shareholder value. These risks typically manifest as low probability, but high cost, regulatory and legal exposures. Various factors are considered by the Investment Manager in the SRI screening process which are broadly categorised into: (i) ethical reasons; (ii) social responsibility and stewardship; and (iii) environmental responsibility and stewardship.

The Investment Manager considers the "good governance" practices of the investee company issuer (the "**Issuer**") in accordance with established governance requirements applicable to the securities (including liquid, public and secondary securities) (the "**Securities**") in which the Fund invests. This will include those good governance criteria established under the SFDR, specifically: sound management structures, employee remuneration, employee relations and tax compliance ("**Good Governance Criteria**").

The Investment Manager's assessment of "good governance practices" will consider a range of criteria, methodologies and assumptions as part of pre-investment and ongoing monitoring processes (including but not limited to factors such as the market, size, sector or geographic location of the Issuer). As a minimum, meeting the criteria for public listing on a main market, and continuing public listing eligibility of the Issuer (including the regulatory oversight of the same) is considered to set a presumption of good governance processes in the absence of evidence to the contrary. The Investment Manager's assessment will also involve a review of information in support of (or, alternatively, which disrupts) that presumption. This will be done via the use of quarterly ESG screening tools, such as ESG ratings and controversies screening tools or public searches carried out by the Investment Manager's Research Committee (the "**Research Committee**") or information garnered by the same as part of the Investment Manager's research-driven investment-process.

Where there are material good governance disruptors which the Investment Manager considers to be a material breach of the Good Governance Criteria, absent immediate action taken by the Issuer to remediate such a breach, this would result in either an exclusion against investing in the relevant Securities or a divestment of the same within a reasonable time period. Examples of good governance disruptors include but are not limited to: (1) de-listing of the underlying issuer for breaches of applicable listing rules and/ or requirements relating to Good Governance Criteria; (2) quarterly screening undertaken by Research Committee (using ESG screening tools, such as ESG ratings) revealing material adverse results; and (3) any business found (by the Research Committee using controversies screening tools or public searches) to have been involved in controversies or material breaches (such as material and ongoing breaches of labour laws) that would suggest a material and ongoing failure of good governance at the issuer level, where in each case there is no evidence that the Issuer has taken steps to remediate, mitigate and manage the same.

Note that no single good governance indicator or disruptor will be determinative on its own and some judgement will be required to consider these both in the round and in the wider context of the investment when making a determination as to good governance practices at the issuer level. This judgment will be exercised in good faith. Where any investment(s) are determined to not sufficiently meet the applicable Good Governance Criteria, a decision will be made not to invest in the securities of the Issuer or if securities of the Issuer are an existing investment to divest it within a reasonable period taking into consideration factors such as market liquidity.

	<p>Note that the good governance assessment process described above is applicable to corporate credit investments only and is not applicable to any of the Fund's investments in government bonds, other securities issue by sovereigns or supranational entities or derivatives such as interest rate futures.</p>
<p><b>Proportion of investments</b></p>	<p>The Fund intends to invest a minimum of 80% of the Fund's assets in investments which attain the environmental or social characteristics promoted by the Fund by gaining indirect exposure to the credit risk of companies worldwide. To achieve this, the Fund will buy and sell protection in credit default swaps and will also hold sovereign/agency bonds/notes in order to gain exposure to such securities.</p> <p>The remaining percentage of the Fund's investments will be in investments which seek to achieve the broader objectives of the Fund including instruments for the purposes of efficient portfolio management, hedging and liquidity management purposes.</p>
<p><b>Monitoring of environmental or social characteristics</b></p>	<p>The Investment Manager seeks to promote environmental or social characteristics by applying a number of exclusions from its investment universe. As of the date of this disclosure, the Investment Manager seeks to avoid certain issuers from categories including but not limited to nuclear weapons, controversial munitions, opioid manufacturing, retail sold assault weapons, coal mining, private prisons and payday lending.</p> <p>A current list of applicable exclusion categories is available upon request from the Investment Manager.</p> <p>The ESG-related exclusions referred to above apply at the time of acquisition of the relevant securities and in the event of any subsequent inadvertent holding of securities in breach of these principles or exclusions, the Investment Manager shall dispose of any such securities as soon as reasonably practicable having regard to the best interests of the Fund and its Shareholders.</p> <p>The Investment Manager maintains a robust process to ensure that the ESG-related exclusions referred to above are monitored and reviewed regularly. The Investment Manager has a pre trade and post trade monitoring built into proprietary systems to prevent and detect violations of ESG-related exclusions. Daily post-trade monitoring is performed by a compliance team independent from the investment and portfolio management.</p>
<p><b>Methodologies</b></p>	<p>While the Investment Manager does not pursue an activist investment strategy in respect of the Fund, it takes account of additional risks that are inherent in socially and environmentally costly businesses and when possible, will seek to avoid them. In this regard, the Investment Manager's policy aims to avoid providing implicit or explicit support for socially and environmentally irresponsible businesses. Whilst this analysis can be subjective, the Investment Manager will assess certain businesses where the social or environmental cost of the business creates negative externalities for society that are not fully captured by regulation, taxation or shareholder value. These risks typically manifest as low probability, but high cost, regulatory and legal exposures. Various factors are considered by the Investment Manager in the SRI screening process which are broadly categorised into: (i) ethical reasons; (ii) social responsibility and stewardship; and (iii) environmental responsibility and stewardship. As of the date of this disclosure, the Investment Manager seeks to avoid certain issuers from categories including but not limited to nuclear weapons,</p>

	<p>controversial munitions, opioid manufacturing, retail sold assault weapons, coal mining, private prisons and payday lending. In this regard, the Investment Manager will exclude such businesses from the investment universe as detailed above. The Investment Manager reviews, affirms, and (if needed), modifies the specific exclusion list at least quarterly. Please see the “Monitoring of environmental or social characteristics “ section above which outlines the process used to measure the promotion of environmental or social characteristics and also the sustainability indicators used to measure these.</p>
<p><b>Data sources &amp; processing</b></p>	<p>The investment process will identify three broad areas of concern about the inherent social costs in the business models of underlying issuers and securities. These areas are categorised according to the following classification:</p> <ul style="list-style-type: none"> <li>• ethical reasons</li> <li>• social responsibility and stewardship</li> <li>• environmental responsibility and stewardship</li> </ul> <p>Within the above broad categories the Investment Manager applies criterion based on businesses that the Investment Manager does not consider it appropriate to implicitly support. Such businesses are identified using top down and bottoms up research. The criteria are approved (at least) annually by the Investment Manager’s research approval committee and reviewed (at least) quarterly.</p> <p>The potential list for exclusion is sourced from both the Investment Manager’s own proprietary research analysis and externally from its’ investment partners. The resulting exclusion list is maintained as part of the live portfolio construction process and is included in automatic compliance controls. An exclusion list is available for investors upon request from the Investment Manager.</p> <p>To ensure data quality, the Investment Manager carries out due diligence on any third party data provider, evaluates the methodology, carries out spot checks of data, and escalates data concerns to the data provider as needed.</p>
<p><b>Limitation to methodologies &amp; data</b></p>	<p>The data landscape for ESG analysis and reporting is rapidly developing and data quality and methodology currently face industry-wide challenges. Limitations on methodologies and ESG data include the lack of consistency, reliability, comparability, and quality of the data available. This is driven by issues including, but not limited to:</p> <ul style="list-style-type: none"> <li>• Lack of common methodology across providers of ESG ratings;</li> <li>• Lack of standardised reporting by companies;</li> <li>• Different models and analytical tools for unreported data; and</li> <li>• Backward looking information that fails to capture “direction of travel”.</li> </ul> <p>These limitations are addressed by:</p> <ul style="list-style-type: none"> <li>• Use of varied data sources; and</li> <li>• Reliance on internal research and analysis using third party data as complementary information.</li> </ul> <p>Please see the “Monitoring of environmental or social characteristics” section above.</p>
<p><b>Due diligence</b></p>	<p>As the investment strategy of the financial product is systematic and rule based, the investment strategy implementation as well as the monitoring of investee companies on relevant matters, including a firm’s asset value, liability structure, volatility, social and environmental impact and corporate governance, are mainly based on quantitative measures.</p>

<b>Engagement policies</b>	The Investment Manager does not engage directly with any of the investee companies as engagement is not part of the environmental or social investment strategy of the Fund. The systematic approach forms broad portfolios using fundamentally driven models, with holding periods measured in months. The Investment Manager does not interact with the executives in its investment portfolio, nor does the Investment Manager try to shape business strategy or policy, as the strategy is primarily engaged in liquid, public securities on the secondary market.
<b>Designated reference benchmark</b>	There is no designated reference benchmark for the Fund.

**Financial Product Website Disclosure**

**Blackstone Emerging Market Systematic Corporate**

**Fund (UCITS)**

**Summary**

**Transparency of the promotion of environmental and/or social characteristics**

*This document provides the investor with detailed information about the fund in relation to the Sustainable Finance Disclosure Regulation (“SFDR”). This is a regulatory document required under SFDR. The information contained in this document is to help the investor understand the sustainability characteristics and/or objectives and risks of this fund. This document should be read in conjunction with other relevant regulatory documentation so the investor can make an informed decision to invest.*

<b>Summary</b>	<p>The Fund invests in a portfolio of corporate bonds (primarily investment grade) by applying a quantitatively driven approach to asset selection and portfolio constitution. The investment strategy is expected to be long credit risk of firms that have instruments traded on recognised exchanges worldwide. The Fund employs portfolio diversification controlled by active risk assessment and portfolio management.</p> <p>The Fund seeks to profit by holding positions which have been identified as undervalued (i.e., the market price of credit risk, or “credit spread” is lower than the Investment Manager’s estimate of what is fair value) by the Investment Manager. Such positions will be identified by the Investment Manager’s proprietary analytics, which includes a default probability measurement and a quantitative analysis of the “fair value” of each exposure. The default probability measurement is based on a proprietary model that has been developed by the Investment Manager and which takes into account a firm’s asset value, liability structure, and volatility. The ‘fair value’ of the exposure is also based on proprietary analytics developed by the Investment Manager, and takes into account other characteristics of the exposure (e.g. rating, sector, and term). The long portfolio is invested in corporate bonds without using any borrowing for leverage.</p> <p>The Company, in consultation with the Investment Manager, has categorised the Fund as an Article 8 product for the purposes of the SFDR. The Investment Manager integrates environmental and social characteristics into the investment process of the Fund by applying an exclusion screen to the selection of investments and (as of the date of this disclosure) seeks to avoid certain issuers from categories including but not limited to nuclear weapons, controversial munitions, opioid manufacturing, retail sold assault weapons, coal mining, private prisons and payday lending.</p>
<b>No sustainable investment objective</b>	<p>The Fund promotes environmental or social characteristics, but does not have as its objective a sustainable investment.</p>
<b>Environmental or social characteristics of the fund</b>	<p>The Investment Manager seeks to promote environmental or social characteristics by applying a number of exclusions from its investment universe. As of the date of this disclosure, the Investment Manager seeks to avoid certain issuers from categories including but not limited to nuclear weapons, controversial munitions, opioid manufacturing, retail sold assault weapons, coal mining, private prisons and payday lending.</p> <p>A current list of applicable exclusion categories is available upon request from the Investment Manager.</p>

	<p>A reference benchmark is not used for the purposes of attaining the environmental or social characteristics promoted by the Fund.</p>
<p><b>Investment strategy</b></p>	<p>The investment objective of the Fund is to produce returns, net of fees and expenses above the performance of the JP Morgan Corporate Emerging Markets Bond Index Broad Diversified (the “<b>Index</b>”).</p> <p>The Fund invests in a portfolio of corporate bonds (primarily investment grade) by applying a quantitatively driven approach to asset selection and portfolio constitution. The investment strategy is expected to be long credit risk of firms that have instruments traded on recognised exchanges worldwide. The Fund employs portfolio diversification controlled by active risk assessment and portfolio management.</p> <p>The Fund seeks to profit by holding positions which have been identified as undervalued (i.e., the market price of credit risk, or “credit spread” is lower than the Investment Manager’s estimate of what is fair value) by the Investment Manager. Such positions will be identified by the Investment Manager’s proprietary analytics, which includes a default probability measurement and a quantitative analysis of the “fair value” of each exposure. The default probability measurement is based on a proprietary model that has been developed by the Investment Manager and which takes into account a firm’s asset value, liability structure, and volatility. The ‘fair value’ of the exposure is also based on proprietary analytics developed by the Investment Manager, and takes into account other characteristics of the exposure (e.g. rating, sector, and term). The long portfolio is invested in corporate bonds without using any borrowing for leverage.</p> <p>In order to meet the environmental and social characteristics promoted, Responsible Investment is integrated into the Investment Manager’s investment process in accordance with three foundational pillars as follows:</p> <ol style="list-style-type: none"> <li>a) Application of a socially responsible investing (“<b>SRI</b>”) exclusion screen in respect of the portfolio of the Fund.</li> <li>b) Conducting ongoing research into SRI (and ESG) factors.</li> <li>c) Reviewing, monitoring, and risk modelling the Fund’s portfolio for emerging trends, threats, and developments, including those arising from SRI factors.</li> </ol> <p>The Investment Manager integrates exclusion screening in respect of its investment selection process to account for additional risks that are inherent in socially and environmentally costly businesses. In this regard, it carries out a systematic approach of constructing a broad portfolio using fundamentally driven models, with holding periods typically measured in months. For example, the Investment Manager seeks to avoid certain issuers from categories including but not limited to, nuclear weapons, controversial munitions, opioid manufacturing, retail sold assault weapons, coal mining, private prisons and payday lending, or those investments that are considered to be poor SRI performers by the Investment Manager as further described below. While the Investment Manager does not pursue an activist investment strategy in respect of the Fund, it takes account of additional risks that are inherent in socially and environmentally costly businesses and when possible, will seek to avoid them. In this regard, the Investment Manager’s policy aims to avoid providing implicit or explicit support for socially and environmentally irresponsible businesses. Whilst this analysis can be subjective, the Investment Manager will assess certain businesses where the social or environmental cost of the business creates negative externalities for society that are not fully captured by regulation, taxation or shareholder value. These risks typically manifest as low probability, but high cost, regulatory and legal exposures. Various factors are considered by the</p>

Investment Manager in the SRI screening process which are broadly categorised into: (i) ethical reasons; (ii) social responsibility and stewardship; and (iii) environmental responsibility and stewardship.

The Investment Manager considers the "good governance" practices of the investee company issuer (the "**Issuer**") in accordance with established governance requirements applicable to the securities (including liquid, public and secondary securities) (the "**Securities**") in which the Fund invests. This will include those good governance criteria established under the SFDR, specifically: sound management structures, employee remuneration, employee relations and tax compliance ("**Good Governance Criteria**").

The Investment Manager's assessment of "good governance practices" will consider a range of criteria, methodologies and assumptions as part of pre-investment and ongoing monitoring processes (including but not limited to factors such as the market, size, sector or geographic location of the Issuer). As a minimum, meeting the criteria for public listing on a main market, and continuing public listing eligibility of the Issuer (including the regulatory oversight of the same) is considered to set a presumption of good governance processes in the absence of evidence to the contrary. The Investment Manager's assessment will also involve a review of information in support of (or, alternatively, which disrupts) that presumption. This will be done via the use of quarterly ESG screening tools, such as ESG ratings and controversies screening tools or public searches carried out by the Investment Manager's Research Committee (the "**Research Committee**") or information garnered by the same as part of the Investment Manager's research-driven investment-process.

Where there are material good governance disruptors which the Investment Manager considers to be a material breach of the Good Governance Criteria, absent immediate action taken by the Issuer to remediate such a breach, this would result in either an exclusion against investing in the relevant Securities or a divestment of the same within a reasonable time period. Examples of good governance disruptors include but are not limited to: (1) de-listing of the underlying issuer for breaches of applicable listing rules and/ or requirements relating to Good Governance Criteria; (2) quarterly screening undertaken by Research Committee (using ESG screening tools, such as ESG ratings) revealing material adverse results; and (3) any business found (by the Research Committee using controversies screening tools or public searches) to have been involved in controversies or material breaches (such as material and ongoing breaches of labour laws) that would suggest a material and ongoing failure of good governance at the issuer level, where in each case there is no evidence that the Issuer has taken steps to remediate, mitigate and manage the same.

Note that no single good governance indicator or disruptor will be determinative on its own and some judgement will be required to consider these both in the round and in the wider context of the investment when making a determination as to good governance practices at the issuer level. This judgment will be exercised in good faith. Where any investment(s) are determined to not sufficiently meet the applicable Good Governance Criteria, a decision will be made not to invest in the securities of the Issuer or if securities of the Issuer are an existing investment to divest it within a reasonable period taking into consideration factors such as market liquidity.

Note that the good governance assessment process described above is applicable to corporate credit investments only and is not applicable to any of the Fund's investments in government bonds, other securities issue by sovereigns or supranational entities or derivatives such as interest rate futures.



<p><b>Proportion of investments</b></p>	<p>The Fund intends to invest a minimum of 80% of the Fund’s assets in investments which attain the environmental and social characteristics promoted by the Fund. To achieve this, the Fund invests in a portfolio of corporate bonds (fixed and floating rate) and credit default swaps on the credit risk of the issuers of such bonds in order to gain exposure to such securities.</p> <p>The remaining percentage of the Fund’s investments will be in investments which seek to achieve the broader objectives of the Fund including instruments for the purposes of efficient portfolio management, hedging and liquidity management purposes.</p>
<p><b>Monitoring of environmental or social characteristics</b></p>	<p>The Investment Manager seeks to promote environmental or social characteristics by applying a number of exclusions from its investment universe. As of the date of this disclosure, the Investment Manager seeks to avoid certain issuers from categories including but not limited to nuclear weapons, controversial munitions, opioid manufacturing, retail sold assault weapons, coal mining, private prisons, payday lending and the tobacco industry.</p> <p>A current list of applicable exclusion categories is available upon request from the Investment Manager.</p> <p>The ESG-related exclusions referred to above apply at the time of acquisition of the relevant securities and in the event of any subsequent inadvertent holding of securities in breach of these principles or exclusions, the Investment Manager shall dispose of any such securities as soon as reasonably practicable having regard to the best interests of the Fund and its Shareholders.</p> <p>The Investment Manager maintains a robust process to ensure that the ESG-related exclusions referred to above are monitored and reviewed regularly. The Investment Manager has a pre trade and post trade monitoring built into proprietary systems to prevent and detect violations of ESG-related exclusions. Daily post-trade monitoring is performed by a compliance team independent from the investment and portfolio management.</p>
<p><b>Methodologies</b></p>	<p>While the Investment Manager does not pursue an activist investment strategy in respect of the Fund, it takes account of additional risks that are inherent in socially and environmentally costly businesses and when possible, will seek to avoid them. In this regard, the Investment Manager's policy aims to avoid providing implicit or explicit support for socially and environmentally irresponsible businesses. Whilst this analysis can be subjective, the Investment Manager will assess certain businesses where the social or environmental cost of the business creates negative externalities for society that are not fully captured by regulation, taxation or shareholder value. These risks typically manifest as low probability, but high cost, regulatory and legal exposures. Various factors are considered by the Investment Manager in the SRI screening process which are broadly categorised into: (i) ethical reasons; (ii) social responsibility and stewardship; and (iii) environmental responsibility and stewardship. As of the date of this disclosure, the Investment Manager seeks to avoid certain issuers from categories including but not limited to nuclear weapons, controversial munitions, opioid manufacturing, retail sold assault weapons, coal mining, private prisons and payday lending. In this regard, the Investment Manager will exclude such businesses from the investment universe as detailed above. The Investment Manager reviews, affirms, and (if needed), modifies the specific</p>

	<p>exclusion list at least quarterly. Please see the “Monitoring of environmental or social characteristics “ section above which outlines the process used to measure the promotion of environmental or social characteristics and also the sustainability indicators used to measure these.</p>
<p><b>Data sources &amp; processing</b></p>	<p>The investment process will identify three broad areas of concern about the inherent social costs in the business models of underlying issuers and securities. These areas are categorised according to the following classification:</p> <ul style="list-style-type: none"> <li>• ethical reasons</li> <li>• social responsibility and stewardship</li> <li>• environmental responsibility and stewardship</li> </ul> <p>Within the above broad categories the Investment Manager applies criterion based on businesses that the Investment Manager does not consider it appropriate to implicitly support. Such businesses are identified using top down and bottoms up research. The criteria are approved (at least) annually by the Investment Manager’s research approval committee and reviewed (at least) quarterly.</p> <p>The potential list for exclusion is sourced from both the Investment Manager’s own proprietary research analysis and externally from its’ investment partners. The resulting exclusion list is maintained as part of the live portfolio construction process and is included in automatic compliance controls. An exclusion list is available for investors upon request from the Investment Manager.</p> <p>To ensure data quality, the Investment Manager carries out due diligence on any third party data provider, evaluates the methodology, carries out spot checks of data, and escalates data concerns to the data provider as needed.</p>
<p><b>Limitation to methodologies &amp; data</b></p>	<p>The data landscape for ESG analysis and reporting is rapidly developing and data quality and methodology currently face industry-wide challenges. Limitations on methodologies and ESG data include the lack of consistency, reliability, comparability, and quality of the data available. This is driven by issues including, but not limited to:</p> <ul style="list-style-type: none"> <li>• Lack of common methodology across providers of ESG ratings;</li> <li>• Lack of standardised reporting by companies;</li> <li>• Different models and analytical tools for unreported data; and</li> <li>• Backward looking information that fails to capture “direction of travel”.</li> </ul> <p>These limitations are addressed by:</p> <ul style="list-style-type: none"> <li>• Use of varied data sources; and</li> <li>• Reliance on internal research and analysis using third party data as complementary information.</li> </ul> <p>Please see the “Monitoring of environmental or social characteristics” section above.</p>
<p><b>Due diligence</b></p>	<p>As the investment strategy of the financial product is systematic and rule based, the investment strategy implementation as well as the monitoring of investee companies on relevant matters, including a firm’s asset value, liability structure, volatility, social and environmental impact and corporate governance, are mainly based on quantitative measures.</p>
<p><b>Engagement policies</b></p>	<p>The Investment Manager does not engage directly with any of the investee companies as engagement is not part of the environmental or social investment strategy of the Fund. The systematic approach forms broad portfolios using</p>

	fundamentally driven models, with holding periods measured in months. The Investment Manager does not interact with the executives in its investment portfolio, nor does the Investment Manager try to shape business strategy or policy, as the strategy is primarily engaged in liquid, public securities on the secondary market.
<b>Designated reference benchmark</b>	There is no designated reference benchmark for the Fund.

## Financial Product Website Disclosure

### Blackstone U.S. Systematic Corporate Fund (UCITS)

#### Summary

##### Transparency of the promotion of environmental and/or social characteristics

*This document provides the investor with detailed information about the fund in relation to the Sustainable Finance Disclosure Regulation (“SFDR”). This is a regulatory document required under SFDR. The information contained in this document is to help the investor understand the sustainability characteristics and/or objectives and risks of this fund. This document should be read in conjunction with other relevant regulatory documentation so the investor can make an informed decision to invest.*

<b>Summary</b>	<p>The Fund invests in a portfolio of corporate bonds (primarily investment grade) and also uses credit default swaps (“CDS”) by buying and selling protection, by applying a quantitatively driven approach to asset selection and portfolio constitution. The investment strategy is expected to be long credit risk of firms that have instruments traded on Recognised Exchanges worldwide. The Fund employs portfolio diversification controlled by active risk assessment and portfolio management.</p> <p>The Fund seeks to profit by holding positions which have been identified as undervalued (i.e., the market price of credit risk, or “credit spread” is lower than the Investment Manager’s estimate of what is fair value) by the Investment Manager in the context of sold CDS protection. Such positions will be identified by the Investment Manager’s proprietary analytics, which includes a default probability measurement and a quantitative analysis of the “fair value” of each exposure. The default probability measurement is based on a proprietary model that has been developed by the Investment Manager and which takes into account a firm’s asset value, liability structure, and volatility. The ‘fair value’ of the exposure is also based on proprietary analytics developed by the Investment Manager, and takes into account other characteristics of the exposure (e.g. rating, sector, and term). The portfolio is invested in corporate bonds, primarily rated Investment Grade and CDS on the credit risk of issuers of corporate bonds.</p> <p>The Company, in consultation with the Investment Manager, has categorised the Fund as an Article 8 product for the purposes of the SFDR. The Investment Manager integrates environmental and social characteristics into the investment process of the Fund by applying an exclusion screen to the selection of investments and (as of the date of this disclosure) seeks to avoid certain issuers from categories including but not limited to nuclear weapons, controversial munitions, opioid manufacturing, retail sold assault weapons, coal mining, private prisons and payday lending.</p>
<b>No sustainable investment objective</b>	<p>The Fund promotes environmental or social characteristics, but does not have as its objective a sustainable investment.</p>
<b>Environmental or social characteristics of the fund</b>	<p>The Investment Manager seeks to promote environmental or social characteristics by applying a number of exclusions from its investment universe. As of the date of this disclosure, the Investment Manager seeks to avoid certain issuers from categories including but not limited to nuclear weapons, controversial munitions, opioid manufacturing, retail sold assault weapons, coal mining, private prisons and payday lending.</p> <p>A current list of applicable exclusion categories is available upon request from the Investment Manager.</p>

	<p>A reference benchmark is not used for the purposes of attaining the environmental or social characteristics promoted by the Fund.</p>
<p><b>Investment strategy</b></p>	<p>The investment objective of the Fund is to produce returns, net of fees and expenses above the performance of the Bloomberg Barclays US Corporate Total Return Index (the "Index").</p> <p>The Fund invests in a portfolio of corporate bonds (primarily investment grade) and also uses credit default swaps ("CDS") by buying and selling protection, by applying a quantitatively driven approach to asset selection and portfolio constitution. The investment strategy is expected to be long credit risk of firms that have instruments traded on Recognised Exchanges worldwide. The Fund employs portfolio diversification controlled by active risk assessment and portfolio management.</p> <p>The Fund seeks to profit by holding positions which have been identified as undervalued (i.e., the market price of credit risk, or "credit spread" is lower than the Investment Manager's estimate of what is fair value) by the Investment Manager in the context of sold CDS protection. Such positions will be identified by the Investment Manager's proprietary analytics, which includes a default probability measurement and a quantitative analysis of the "fair value" of each exposure. The default probability measurement is based on a proprietary model that has been developed by the Investment Manager and which takes into account a firm's asset value, liability structure, and volatility. The 'fair value' of the exposure is also based on proprietary analytics developed by the Investment Manager, and takes into account other characteristics of the exposure (e.g. rating, sector, and term). The portfolio is invested in corporate bonds, primarily rated Investment Grade and CDS on the credit risk of issuers of corporate bonds.</p> <p>In order to meet the environmental and social characteristics promoted, Responsible Investment is integrated into the Investment Manager's investment process in accordance with three foundational pillars as follows:</p> <ul style="list-style-type: none"> <li>a) Application of a socially responsible investing ("SRI") exclusion screen in respect of the portfolio of the Fund.</li> <li>b) Conducting ongoing research into SRI (and ESG) factors.</li> <li>c) Reviewing, monitoring, and risk modelling the Fund's portfolio for emerging trends, threats, and developments, including those arising from SRI factors.</li> </ul> <p>The Investment Manager integrates exclusion screening in respect of its investment selection process to account for additional risks that are inherent in socially and environmentally costly businesses. In this regard, it carries out a systematic approach of constructing a broad portfolio using fundamentally driven models, with holding periods typically measured in months. For example, the Investment Manager seeks to avoid certain issuers from categories including but not limited to, nuclear weapons, controversial munitions, opioid manufacturing, retail sold assault weapons, coal mining, private prisons and payday lending, or those investments that are considered to be poor SRI performers by the Investment Manager as further described below. While the Investment Manager does not pursue an activist investment strategy in respect of the Fund, it takes account of additional risks that are inherent in socially and environmentally costly businesses and when possible, will seek to avoid them. In this regard, the Investment Manager's policy aims to avoid providing implicit or explicit support for socially and environmentally irresponsible businesses. Whilst this analysis can be subjective, the Investment Manager will assess certain businesses where the social or environmental cost of the business creates negative externalities for society that are not fully captured by regulation, taxation or shareholder value. These risks typically manifest as low probability, but high cost, regulatory and legal exposures. Various factors are considered by the</p>

Investment Manager in the SRI screening process which are broadly categorised into: (i) ethical reasons; (ii) social responsibility and stewardship; and (iii) environmental responsibility and stewardship.

The Investment Manager considers the "good governance" practices of the investee company issuer (the "**Issuer**") in accordance with established governance requirements applicable to the securities (including liquid, public and secondary securities) (the "**Securities**") in which the Fund invests. This will include those good governance criteria established under the SFDR, specifically: sound management structures, employee remuneration, employee relations and tax compliance ("**Good Governance Criteria**").

The Investment Manager's assessment of "good governance practices" will consider a range of criteria, methodologies and assumptions as part of pre-investment and ongoing monitoring processes (including but not limited to factors such as the market, size, sector or geographic location of the Issuer). As a minimum, meeting the criteria for public listing on a main market, and continuing public listing eligibility of the Issuer (including the regulatory oversight of the same) is considered to set a presumption of good governance processes in the absence of evidence to the contrary. The Investment Manager's assessment will also involve a review of information in support of (or, alternatively, which disrupts) that presumption. This will be done via the use of quarterly ESG screening tools, such as ESG ratings and controversies screening tools or public searches carried out by the Investment Manager's Research Committee (the "**Research Committee**") or information garnered by the same as part of the Investment Manager's research-driven investment-process.

Where there are material good governance disruptors which the Investment Manager considers to be a material breach of the Good Governance Criteria, absent immediate action taken by the Issuer to remediate such a breach, this would result in either an exclusion against investing in the relevant Securities or a divestment of the same within a reasonable time period. Examples of good governance disruptors include but are not limited to: (1) de-listing of the underlying issuer for breaches of applicable listing rules and/ or requirements relating to Good Governance Criteria; (2) quarterly screening undertaken by Research Committee (using ESG screening tools, such as ESG ratings) revealing material adverse results; and (3) any business found (by the Research Committee using controversies screening tools or public searches) to have been involved in controversies or material breaches (such as material and ongoing breaches of labour laws) that would suggest a material and ongoing failure of good governance at the issuer level, where in each case there is no evidence that the Issuer has taken steps to remediate, mitigate and manage the same.

Note that no single good governance indicator or disruptor will be determinative on its own and some judgement will be required to consider these both in the round and in the wider context of the investment when making a determination as to good governance practices at the issuer level. This judgment will be exercised in good faith. Where any investment(s) are determined to not sufficiently meet the applicable Good Governance Criteria, a decision will be made not to invest in the securities of the Issuer or if securities of the Issuer are an existing investment to divest it within a reasonable period taking into consideration factors such as market liquidity.

Note that the good governance assessment process described above is applicable to corporate credit investments only and is not applicable to any of the Fund's investments in government bonds, other securities issue by sovereigns or supranational entities or derivatives such as interest rate futures.

<p><b>Proportion of investments</b></p>	<p>The Fund intends to invest a minimum of 80% of the Fund’s assets in investments which attain the environmental and social characteristics promoted by the Fund. To achieve this, the Fund invests in a portfolio of corporate bonds (fixed and floating rate) and credit default swaps on the credit risk of the issuers of such bonds in order to gain exposure to such securities.</p> <p>The remaining percentage of the Fund’s investments will be in investments which seek to achieve the broader objectives of the Fund including instruments for the purposes of efficient portfolio management, hedging and liquidity management purposes.</p>
<p><b>Monitoring of environmental or social characteristics</b></p>	<p>The Investment Manager seeks to promote environmental or social characteristics by applying a number of exclusions from its investment universe. As of the date of this disclosure, the Investment Manager seeks to avoid certain issuers from categories including but not limited to nuclear weapons, controversial munitions, opioid manufacturing, retail sold assault weapons, coal mining, private prisons, payday lending and the tobacco industry.</p> <p>A current list of applicable exclusion categories is available upon request from the Investment Manager.</p> <p>The ESG-related exclusions referred to above apply at the time of acquisition of the relevant securities and in the event of any subsequent inadvertent holding of securities in breach of these principles or exclusions, the Investment Manager shall dispose of any such securities as soon as reasonably practicable having regard to the best interests of the Fund and its Shareholders.</p> <p>The Investment Manager maintains a robust process to ensure that the ESG-related exclusions referred to above are monitored and reviewed regularly. The Investment Manager has a pre trade and post trade monitoring built into proprietary systems to prevent and detect violations of ESG-related exclusions. Daily post-trade monitoring is performed by a compliance team independent from the investment and portfolio management.</p>
<p><b>Methodologies</b></p>	<p>While the Investment Manager does not pursue an activist investment strategy in respect of the Fund, it takes account of additional risks that are inherent in socially and environmentally costly businesses and when possible, will seek to avoid them. In this regard, the Investment Manager's policy aims to avoid providing implicit or explicit support for socially and environmentally irresponsible businesses. Whilst this analysis can be subjective, the Investment Manager will assess certain businesses where the social or environmental cost of the business creates negative externalities for society that are not fully captured by regulation, taxation or shareholder value. These risks typically manifest as low probability, but high cost, regulatory and legal exposures. Various factors are considered by the Investment Manager in the SRI screening process which are broadly categorised into: (i) ethical reasons; (ii) social responsibility and stewardship; and (iii) environmental responsibility and stewardship. As of the date of this disclosure, the Investment Manager seeks to avoid certain issuers from categories including but not limited to nuclear weapons, controversial munitions, opioid manufacturing, retail sold assault weapons, coal mining, private prisons and payday lending. In this regard, the Investment Manager will exclude such businesses from the investment universe as detailed above. The Investment Manager reviews, affirms, and (if needed), modifies the specific</p>

	<p>exclusion list at least quarterly. Please see the “Monitoring of environmental or social characteristics” section above which outlines the process used to measure the promotion of environmental or social characteristics and also the sustainability indicators used to measure these.</p>
<b>Data sources &amp; processing</b>	<p>The investment process will identify three broad areas of concern about the inherent social costs in the business models of underlying issuers and securities. These areas are categorised according to the following classification:</p> <ul style="list-style-type: none"> <li>• ethical reasons</li> <li>• social responsibility and stewardship</li> <li>• environmental responsibility and stewardship</li> </ul> <p>Within the above broad categories the Investment Manager applies criterion based on businesses that the Investment Manager does not consider it appropriate to implicitly support. Such businesses are identified using top down and bottoms up research. The criteria are approved (at least) annually by the Investment Manager’s research approval committee and reviewed (at least) quarterly.</p> <p>The potential list for exclusion is sourced from both the Investment Manager’s own proprietary research analysis and externally from its’ investment partners. The resulting exclusion list is maintained as part of the live portfolio construction process and is included in automatic compliance controls. An exclusion list is available for investors upon request from the Investment Manager.</p> <p>To ensure data quality, the Investment Manager carries out due diligence on any third party data provider, evaluates the methodology, carries out spot checks of data, and escalates data concerns to the data provider as needed.</p>
<b>Limitation to methodologies &amp; data</b>	<p>The data landscape for ESG analysis and reporting is rapidly developing and data quality and methodology currently face industry-wide challenges. Limitations on methodologies and ESG data include the lack of consistency, reliability, comparability, and quality of the data available. This is driven by issues including, but not limited to:</p> <ul style="list-style-type: none"> <li>• Lack of common methodology across providers of ESG ratings;</li> <li>• Lack of standardised reporting by companies;</li> <li>• Different models and analytical tools for unreported data; and</li> <li>• Backward looking information that fails to capture “direction of travel”.</li> </ul> <p>These limitations are addressed by:</p> <ul style="list-style-type: none"> <li>• Use of varied data sources; and</li> <li>• Reliance on internal research and analysis using third party data as complementary information.</li> </ul> <p>Please see the “Monitoring of environmental or social characteristics” section above.</p>
<b>Due diligence</b>	<p>As the investment strategy of the financial product is systematic and rule based, the investment strategy implementation as well as the monitoring of investee companies on relevant matters, including a firm’s asset value, liability structure, volatility, social and environmental impact and corporate governance, are mainly based on quantitative measures.</p>
<b>Engagement policies</b>	<p>The Investment Manager does not engage directly with any of the investee companies as engagement is not part of the environmental or social investment</p>



	strategy of the Fund. The systematic approach forms broad portfolios using fundamentally driven models, with holding periods measured in months. The Investment Manager does not interact with the executives in its investment portfolio, nor does the Investment Manager try to shape business strategy or policy, as the strategy is primarily engaged in liquid, public securities on the secondary market.
<b>Designated reference benchmark</b>	There is no designated reference benchmark for the Fund.

## Financial Product Website Disclosure

### Blackstone Absolute Return Systematic Credit Fund (UCITS)

#### Summary

#### Transparency of the promotion of environmental and/or social characteristics

*This document provides the investor with detailed information about the fund in relation to the Sustainable Finance Disclosure Regulation (“SFDR”). This is a regulatory document required under SFDR. The information contained in this document is to help the investor understand the sustainability characteristics and/or objectives and risks of this fund. This document should be read in conjunction with other relevant regulatory documentation so the investor can make an informed decision to invest.*

<b>Summary</b>	<p>The Fund invests in corporate bonds and credit default swaps on the credit risk of the issuers of such bonds and will also hold sovereign/agency bonds/notes. The underlying reference entities (i.e. companies) will be domiciled predominately in North America and Western Europe and there may be long or short exposure to any industry or sectors..</p> <p>To select investments, the Investment Manager applies a proprietary, quantitative credit model based on measuring default risk that assists it in identifying exposures that are overvalued (short positions) (i.e. the market price of credit risk or “credit spread” is higher than the Investment Manager’s estimate of what is fair value) or undervalued (long positions) (i.e. the market price of credit risk or “credit spread” is lower than the Investment Manager’s estimate of what is fair value).</p> <p>The Company, in consultation with the Investment Manager, has categorised the Fund as an Article 8 product for the purposes of the SFDR. The Investment Manager integrates environmental and social characteristics into the investment process of the Fund by applying an exclusion screen to the selection of investments and (as of the date of this disclosure) seeks to avoid certain issuers from categories including but not limited to nuclear weapons, controversial munitions, opioid manufacturing, retail sold assault weapons, coal mining, private prisons and payday lending.</p>
<b>No sustainable investment objective</b>	<p>The Fund promotes environmental or social characteristics, but does not have as its objective a sustainable investment.</p>
<b>Environmental or social characteristics of the fund</b>	<p>The Investment Manager seeks to promote environmental or social characteristics by applying a number of exclusions from its investment universe. As of the date of this disclosure, the Investment Manager seeks to avoid certain issuers from categories including but not limited to nuclear weapons, controversial munitions, opioid manufacturing, retail sold assault weapons, coal mining, private prisons and payday lending.</p> <p>A current list of applicable exclusion categories is available upon request from the Investment Manager.</p> <p>A reference benchmark is not used for the purposes of attaining the environmental or social characteristics promoted by the Fund.</p>
<b>Investment strategy</b>	<p>The Fund invests in corporate bonds and credit default swaps on the credit risk of the issuers of such bonds and will also hold sovereign/agency bonds/notes. The underlying reference entities (i.e. companies) will be domiciled predominately in</p>

North America and Western Europe and there may be long or short exposure to any industry or sectors.

To select investments, the Investment Manager applies a proprietary, quantitative credit model based on measuring default risk that assists it in identifying exposures that are overvalued (short positions) (i.e. the market price of credit risk or "credit spread" is higher than the Investment Manager's estimate of what is fair value) or undervalued (long positions) (i.e. the market price of credit risk or "credit spread" is lower than the Investment Manager's estimate of what is fair value).

The Fund is managed with the intention that the sensitivity of the long portfolio to market wide movements (i.e. credit market risk and volatility and interest rate movements) will be partially offset by the sensitivity of the short portfolio to market wide movements. The strategy aims to exploit potential market mis-pricing of the relative value of corporate credit assets and derivatives identified by the Investment Manager, applying a quantitatively driven approach to asset selection and portfolio constitution. Potential market mis-pricing will be identified by the Investment Manager's proprietary analytics, which includes, but is not limited to, a default probability measurement and a quantitative analysis of the "fair value" of each exposure. The default probability measurement is based on a proprietary model that has been developed by the Investment Manager and which takes into account a firm's asset value, liability structure, and volatility. The 'fair value' of the exposure is also based on proprietary analytics developed by the Investment Manager, and takes into account other characteristics of the exposure (e.g. rating, sector, and term).

The Investment Manager manages the credit strategy using corporate bonds and credit derivatives (FDI) to create "Long" and "Short" portfolios. The Long credit portfolio takes credit exposures by purchasing corporate bonds and by selling protection via credit default swaps ("CDS"). As a seller of protection, the Master Fund will receive payments under the CDS contract until the maturity date of the contract. In return, the Master Fund as seller agrees that in the event that the issuer (i.e. the underlying reference entity to the CDS) defaults or experiences a credit event, the Master Fund must make a cash settlement payment to the buyer in an amount determined via an ISDA sanctioned auction settlement determination for the referenced entities' securities. The Short portfolio is constructed through the use of FDI, buying protection via CDS contracts and, by taking short positions in CDS Indices (as described below) and by indirect investment in corporate bond indices through total return swaps. The Long and Short portfolios are constructed with the aim of having at least partially offsetting exposures to market wide credit spread movements. The CDS will have underlying exposure to the Credit Risk of companies worldwide.

In order to meet the environmental and social characteristics promoted, Responsible Investment is integrated into the Investment Manager's investment process in accordance with three foundational pillars as follows:

- a) Application of a socially responsible investing ("SRI") exclusion screen in respect of the portfolio of the Fund.
- b) Conducting ongoing research into SRI (and ESG) factors.
- c) Reviewing, monitoring, and risk modelling the Fund's portfolio for emerging trends, threats, and developments, including those arising from SRI factors.

The Investment Manager integrates exclusion screening in respect of its investment selection process to account for additional risks that are inherent in socially and environmentally costly businesses. In this regard, it carries out a systematic approach of constructing a broad portfolio using fundamentally driven models, with holding periods typically measured in months. For example, the Investment Manager seeks

to avoid certain issuers from categories including but not limited to, nuclear weapons, controversial munitions, opioid manufacturing, retail sold assault weapons, coal mining, private prisons and payday lending, or those investments that are considered to be poor SRI performers by the Investment Manager as further described below. While the Investment Manager does not pursue an activist investment strategy in respect of the Fund, it takes account of additional risks that are inherent in socially and environmentally costly businesses and when possible, will seek to avoid them. In this regard, the Investment Manager's policy aims to avoid providing implicit or explicit support for socially and environmentally irresponsible businesses. Whilst this analysis can be subjective, the Investment Manager will assess certain businesses where the social or environmental cost of the business creates negative externalities for society that are not fully captured by regulation, taxation or shareholder value. These risks typically manifest as low probability, but high cost, regulatory and legal exposures. Various factors are considered by the Investment Manager in the SRI screening process which are broadly categorised into: (i) ethical reasons; (ii) social responsibility and stewardship; and (iii) environmental responsibility and stewardship.

The Investment Manager considers the "good governance" practices of the investee company issuer (the "**Issuer**") in accordance with established governance requirements applicable to the securities (including liquid, public and secondary securities) (the "**Securities**") in which the Fund invests. This will include those good governance criteria established under the SFDR, specifically: sound management structures, employee remuneration, employee relations and tax compliance ("**Good Governance Criteria**").

The Investment Manager's assessment of "good governance practices" will consider a range of criteria, methodologies and assumptions as part of pre-investment and ongoing monitoring processes (including but not limited to factors such as the market, size, sector or geographic location of the Issuer). As a minimum, meeting the criteria for public listing on a main market, and continuing public listing eligibility of the Issuer (including the regulatory oversight of the same) is considered to set a presumption of good governance processes in the absence of evidence to the contrary. The Investment Manager's assessment will also involve a review of information in support of (or, alternatively, which disrupts) that presumption. This will be done via the use of quarterly ESG screening tools, such as ESG ratings and controversies screening tools or public searches carried out by the Investment Manager's Research Committee (the "**Research Committee**") or information garnered by the same as part of the Investment Manager's research-driven investment-process.

Where there are material good governance disruptors which the Investment Manager considers to be a material breach of the Good Governance Criteria, absent immediate action taken by the Issuer to remediate such a breach, this would result in either an exclusion against investing in the relevant Securities or a divestment of the same within a reasonable time period. Examples of good governance disruptors include but are not limited to: (1) de-listing of the underlying issuer for breaches of applicable listing rules and/ or requirements relating to Good Governance Criteria; (2) quarterly screening undertaken by Research Committee (using ESG screening tools, such as ESG ratings) revealing material adverse results; and (3) any business found (by the Research Committee using controversies screening tools or public searches) to have been involved in controversies or material breaches (such as material and ongoing breaches of labour laws) that would suggest a material and ongoing failure of good governance at the issuer level, where in each case there is no evidence that the Issuer has taken steps to remediate, mitigate and manage the same.

	<p>Note that no single good governance indicator or disruptor will be determinative on its own and some judgement will be required to consider these both in the round and in the wider context of the investment when making a determination as to good governance practices at the issuer level. This judgment will be exercised in good faith. Where any investment(s) are determined to not sufficiently meet the applicable Good Governance Criteria, a decision will be made not to invest in the securities of the Issuer or if securities of the Issuer are an existing investment to divest it within a reasonable period taking into consideration factors such as market liquidity.</p> <p>Note that the good governance assessment process described above is applicable to corporate credit investments only and is not applicable to any of the Fund's investments in government bonds, other securities issue by sovereigns or supranational entities or derivatives such as interest rate futures.</p>
<p><b>Proportion of investments</b></p>	<p>The Fund intends to invest a minimum of 80% of the Fund's assets in investments which attain the environmental or social characteristics promoted by the Fund by gaining indirect exposure to the credit risk of companies worldwide and direct exposure to corporate bonds. To achieve this, the Fund will buy and sell protection in credit default swaps and will also hold sovereign/agency bonds/notes and corporate bonds in order to gain exposure to such securities.</p> <p>The remaining percentage of the Fund's investments will be in investments which seek to achieve the broader objectives of the Fund including instruments for the purposes of efficient portfolio management, hedging and liquidity management purposes.</p>
<p><b>Monitoring of environmental or social characteristics</b></p>	<p>The Investment Manager seeks to promote environmental or social characteristics by applying a number of exclusions from its investment universe. As of the date of this disclosure, the Investment Manager seeks to avoid certain issuers from categories including but not limited to nuclear weapons, controversial munitions, opioid manufacturing, retail sold assault weapons, coal mining, private prisons, payday lending and the tobacco industry.</p> <p>A current list of applicable exclusion categories is available upon request from the Investment Manager.</p> <p>The ESG-related exclusions referred to above apply at the time of acquisition of the relevant securities and in the event of any subsequent inadvertent holding of securities in breach of these principles or exclusions, the Investment Manager shall dispose of any such securities as soon as reasonably practicable having regard to the best interests of the Fund and its Shareholders.</p> <p>The Investment Manager maintains a robust process to ensure that the ESG-related exclusions referred to above are monitored and reviewed regularly. The Investment Manager has a pre trade and post trade monitoring built into proprietary systems to prevent and detect violations of ESG-related exclusions. Daily post-trade monitoring is performed by a compliance team independent from the investment and portfolio management.</p>
<p><b>Methodologies</b></p>	<p>While the Investment Manager does not pursue an activist investment strategy in respect of the Fund, it takes account of additional risks that are inherent in socially</p>

	<p>and environmentally costly businesses and when possible, will seek to avoid them. In this regard, the Investment Manager's policy aims to avoid providing implicit or explicit support for socially and environmentally irresponsible businesses. Whilst this analysis can be subjective, the Investment Manager will assess certain businesses where the social or environmental cost of the business creates negative externalities for society that are not fully captured by regulation, taxation or shareholder value. These risks typically manifest as low probability, but high cost, regulatory and legal exposures. Various factors are considered by the Investment Manager in the SRI screening process which are broadly categorised into: (i) ethical reasons; (ii) social responsibility and stewardship; and (iii) environmental responsibility and stewardship. As of the date of this disclosure, the Investment Manager seeks to avoid certain issuers from categories including but not limited to nuclear weapons, controversial munitions, opioid manufacturing, retail sold assault weapons, coal mining, private prisons and payday lending. In this regard, the Investment Manager will exclude such businesses from the investment universe as detailed above. The Investment Manager reviews, affirms, and (if needed), modifies the specific exclusion list at least quarterly. Please see the "Monitoring of environmental or social characteristics " section above which outlines the process used to measure the promotion of environmental or social characteristics and also the sustainability indicators used to measure these.</p>
<p><b>Data sources &amp; processing</b></p>	<p>The investment process will identify three broad areas of concern about the inherent social costs in the business models of underlying issuers and securities. These areas are categorised according to the following classification:</p> <ul style="list-style-type: none"> <li>• ethical reasons</li> <li>• social responsibility and stewardship</li> <li>• environmental responsibility and stewardship</li> </ul> <p>Within the above broad categories the Investment Manager applies criterion based on businesses that the Investment Manager does not consider it appropriate to implicitly support. Such businesses are identified using top down and bottoms up research. The criteria are approved (at least) annually by the Investment Manager's research approval committee and reviewed (at least) quarterly.</p> <p>The potential list for exclusion is sourced from both the Investment Manager's own proprietary research analysis and externally from its' investment partners. The resulting exclusion list is maintained as part of the live portfolio construction process and is included in automatic compliance controls. An exclusion list is available for investors upon request from the Investment Manager.</p> <p>To ensure data quality, the Investment Manager carries out due diligence on any third party data provider, evaluates the methodology, carries out spot checks of data, and escalates data concerns to the data provider as needed.</p>
<p><b>Limitation to methodologies &amp; data</b></p>	<p>The data landscape for ESG analysis and reporting is rapidly developing and data quality and methodology currently face industry-wide challenges. Limitations on methodologies and ESG data include the lack of consistency, reliability, comparability, and quality of the data available. This is driven by issues including, but not limited to:</p> <ul style="list-style-type: none"> <li>• Lack of common methodology across providers of ESG ratings;</li> <li>• Lack of standardised reporting by companies;</li> <li>• Different models and analytical tools for unreported data; and</li> <li>• Backward looking information that fails to capture "direction of travel".</li> </ul>

	<p>These limitations are addressed by:</p> <ul style="list-style-type: none"> <li>• Use of varied data sources; and</li> <li>• Reliance on internal research and analysis using third party data as complementary information.</li> </ul> <p>Please see the “Monitoring of environmental or social characteristics” section above.</p>
<b>Due diligence</b>	<p>As the investment strategy of the financial product is systematic and rule based, the investment strategy implementation as well as the monitoring of investee companies on relevant matters, including a firm’s asset value, liability structure, volatility, social and environmental impact and corporate governance, are mainly based on quantitative measures.</p>
<b>Engagement policies</b>	<p>The Investment Manager does not engage directly with any of the investee companies as engagement is not part of the environmental or social investment strategy of the Fund. The systematic approach forms broad portfolios using fundamentally driven models, with holding periods measured in months. The Investment Manager does not interact with the executives in its investment portfolio, nor does the Investment Manager try to shape business strategy or policy, as the strategy is primarily engaged in liquid, public securities on the secondary market.</p>
<b>Designated reference benchmark</b>	<p>There is no designated reference benchmark for the Fund.</p>