

HuaAn Asset Management (Hong Kong) Limited
華安資產管理（香港）有限公司
Responsible Investment Statement
責任投資聲明

Chapter 1: General Provisions
第一章 總則

In order to integrate environmental, social and governance (ESG) factors into the entire investment process and investment decisions, to create long-term sustainable investment returns for our clients and to promote the long-term sustainable development of our society, this Responsible Investment Statement (the "Statement") is formulated in accordance with the Fund Manager Code of Conduct of the Securities and Futures Commission of Hong Kong and related regulations.

為了將環境、社會和治理因素納入整個投資流程和投資決策中，為客戶帶來長期可持續的投資回報，促進社會的長期可持續發展。根據香港證監會《基金經理操守準則》及有關規定制定本責任投資聲明。

1. Responsible Investment Philosophy
責任投資理念

Responsible Investment is a strategy and practice that incorporates environmental, social and governance factors into investment decisions and active ownership.

責任投資是將環境、社會和治理因素融入投資決策和積極所有權的一種策略和實踐。

We believe that companies that have good governance, promote social harmony and focus on environmental friendliness will be more sustainable and involve less investment risk. Investing in such companies and playing an active role as a shareholder or creditor will help generate long-term sustainable investment returns for our clients and contribute to the long-term sustainable development of our society.

我們相信，那些治理規範、促進社會和諧、注重環境友好的公司，會具備更好的可持續發展能力和較低的投資風險，投資於此類公司並積極發揮股東或債權人作用，有助於為客戶帶來長期可持續的投資回報，促進社會的長期可持續發展。

2. Sustainable Development Goals
可持續發展目標

Taking into account the urgency and universality of climate change issues and the urgent need to improve ESG information disclosure, our sustainable development goals for investment activities at this current stage are: (1) Improving climate change responsiveness: we encourage our investee companies to formulate strategies and plans to respond to climate change, as well as strengthen awareness in climate change mitigation, adaptation and impact reduction. We seek to inspire investee companies and their employees to make tangible and auditable improvement in their handling of these risks. (2) Improving ESG transparency: we encourage investee

companies to adopt sustainable practices, improve ESG management and disclose ESG information. During our investment process, relevant analysts and decision-makers consider the real world sustainable impact of each investee companies as well as their entire portfolio. Accordingly, we engage with each issuer, inspiring disclosure on positive and negative effects, while working with them as they demonstrate progress in the maximization of the positive and reduction of negative effects. This is a key part of our investment decision-making and post-investment management.

考慮到氣候變化問題的緊迫性和普適性，以及環境、社會和治理資訊披露水準亟待提升，公司投資活動在當前階段的可持續發展目標為：（一）提高應對氣候變化的能力：公司鼓勵被投資企業制定應對氣候變化的戰略和規劃，加強適應氣候變化，減少對氣候的不利影響。公司鼓勵被投資企業及其員工切實提高應對氣候相關風險的能力。（二）提升環境、社會和治理信息透明度：公司鼓勵被投資企業採用可持續的做法，提升環境、社會和治理管理實踐，並就環境、社會和治理資訊進行披露。在資產管理過程中，相關研究和投資決策人員應關注被投資企業及整個投資組合對現實世界的長期影響。據此，公司應與被投資企業進行互動，鼓勵其披露其對環境和社會的積極影響和消極影響，同時與被投資企業共同努力，促進其提高積極影響，減少消極影響。這是我們投資決策和投後管理的關鍵部分。

3. Scope of Application

適用範圍

This Statement applies to all asset classes, products and markets in which the Company invests.

本聲明適用於公司所投資的所有資產、產品和市場類別。

Chapter 2 - Structure for Implementing Responsible Investment

第二章 責任投資治理架構

Organizational Structure

組織架構

1. Board of Directors (the "Board")

董事會

The Board is responsible for overseeing the objectives, practices (including the integration of ESG considerations into investment management and risk management) and the progress of Responsible Investment implementation. The Board appoints the Investment Committee to manage the above-mentioned Responsible Investment implementation, and the Board shall review the Responsible Investment implementation report produced by the Investment Committee on an annual basis.

公司董事會負責監督責任投資的目標、實踐方法（包括環境、社會和治理納入投資管理和風險管理）及工作進度。董事會指定投資決策委員會履行上述各項責任投資的管理工作，並每年聽取投資決策委員會關於公司責任投資實踐情況的匯報。

2. Investment Committee

投資決策委員會

The Investment Committee Chaired by our CEO, our Investment Committee is primarily responsible for: (1) Establishment of our sustainable development goals, as well as formulation and review of our Responsible Investment and stewardship policy. (2) Guidance, supervision and implementation of our Responsible Investment measures, as well as review and approval of all relevant reports on related investments. (3) Decisions on major issues which may affect our Responsible Investment policies or measures.

公司設立投資決策委員會，由行政總裁擔任主席。投資決策委員會在責任投資方面的主要職責如下：1、確立公司的可持續發展目標，制定和審查公司責任投資政策、盡責管理政策等。2、指導和監督公司責任投資執行工作，審批公司責任投資相關成果報告。3、對公司責任投資重大事項進行決策。

3. Investment Department

投資部

- (1) The Chief Investment Officer is responsible for guiding, supervising and inspecting the responsible investment work of investment and research personnel, regularly reporting the implementation of Responsible Investment to the Investment Committee and regularly assessing the responsible investment capabilities as well as training needs of relevant personnel.

投資總監負責指導、督促和檢查投研人員的責任投資工作，定期向投資決策委員會報告責任投資實施情況，定期評估相關人員的責任投資能力和培訓需求。

- (2) Our research and investment personnel incorporate ESG factors into the investment research and decision-making process. Their remit includes ESG impact analysis, considering factors on investment risk and return, review and tracking ESG performance of each issuer. They also practice active ownership and feed the information learned from engagement into investment analysis. 投研人員在投資研究和決策過程中應納入環境、社會和治理因素，分析環境、社會和治理因素對投資風險和回報的影響，審查並跟蹤被投資企業的環境、社會和治理表現，參與積極所有權行動，並與投研團隊分享積極所有權過程中的見解。

4. Cross-department collaboration

其他部門協作

Relevant departments of the Company shall assume their corresponding Responsible Investment responsibilities which are as follows:

公司各相關部門依據本部門職能定位，承擔責任投資的相應職責：

- a. The Legal & Compliance Department is responsible for the continuous monitoring of ESG-related risks, preventing and managing related

conflicts of interest, providing compliance assessment recommendations, and regularly disclosing relevant ESG-related data to relevant parties such as clients and regulators;

法律合規部負責的環境、社會和治理相關風險進行持續監控，防範和管理相關利益衝突，提供合規評估建議，並向各投研部門、客戶與監管機構等相關方定期披露環境、社會和治理相關數據；

- b. The Marketing Department is responsible for introducing the Company's Responsible Investment practices to existing and potential clients; and 市場部門負責對現有客戶和潛在客戶介紹公司的責任投資的相關實踐；及
- c. The HR & Administration Department is responsible for establishing an assessment and evaluation mechanism that links the performance of the work related to the management of Responsible Investment with rewards and disciplinary measures.

人事行政部負責建立與責任投資管理相關的、將工作績效與獎懲掛鉤的考核評價機制。

Performance Assessment and Capacity Building 績效考核和能力建設

1. Performance Assessment

績效考核

The Investment Department is primarily responsible for the implementation of our Responsible Investment. It undertakes our work requirements as well as evaluation on Responsible Investment. Such as: (1) Strengthening the study of Responsible Investment theory and incorporate ESG factors into the investment research and decision-making process. (2) Summarizing our investment experience and insights, as well as sharing them with the investment and research team to discuss and improve the methods of Responsible Investment. (3) Improving the overall value of ESG investment to our clients and promoting the achievement of our sustainable development goals.

投資部是公司責任投資的主要實施主體，接受公司責任投資方面的工作要求和考核評價。1、加強責任投資理論學習，將環境、社會和治理因素納入投資研究和決策過程中。2、總結投資經驗和見解，並在投研團隊內分享，探討改進責任投資方法。3、提高環境、社會和治理投資對客戶的總體價值，促進實現公司可持續發展目標成果。

2. Capacity Building

能力建設

In order to improve our internal understanding of the Responsible Investment policy and commitments, we ensure that relevant personnel have the knowledge and ability to practice responsible investment. We also regularly hire professional institutions to carry out various Responsible Investment trainings for relevant personnel and arrange subject matter experts along with portfolio managers to conduct discussions to

improve our Responsible Investment strategies and methods. We will also obtain relevant ESG data, ratings and research reports from third-party professional organizations, in order to provide relevant personnel more content and tools to implement Responsible Investment.

為提高公司內部對責任投資政策和承諾的認識，公司確保相關人員具備踐行責任投資的知識和能力，同時也定期聘請專業機構對相關人員開展各種責任投資培訓，組織專家人員與公司基金經理進行研討，完善公司的責任投資策略和方法。公司也將從協力第三方專業機構獲取相關環境、社會和治理資料、評級、和研究報告等，給相關人員踐行責任投資提供更多的可用資訊和工具。

Chapter 3 - Implementation Strategy of Responsible Investment

第三章 責任投資的實施策略

ESG Incorporation

環境、社會和治理納入

1. ESG Issues

環境、社會和治理因素

The ESG issues that we will incorporate into the investment and research process involve environment, society, and governance these three dimensions. The factors involved in each dimension include but not limited to: Environment: climate change, biodiversity, energy management, water management, pollutant discharge, deforestation, waste management, environmental penalties, etc. Society: labor relations, occupational health and safety, employee diversity, customer relations, supply chain management, product responsibility, community relations, poverty alleviation and public welfare, etc. Governance: the independence, professionalism and conscientiousness of the board, the remuneration of directors and executives, shareholder rights, information disclosure, related party transactions, audit practices, business ethics, etc. We will dynamically evaluate and adjust the ESG factors considered and their importance based on clients' preferences, industry characteristics, market environment and ESG development trends.

公司在投研過程中會納入考慮的環境、社會和治理因素涉及環境、社會和治理三個維度，各維度涉及的主題包括但不限於：環境：氣候變化、生物多樣性、能源管理、水資源管理、污染物排放、森林砍伐、廢棄物處理、環保處罰等；社會：勞工關係、職業健康與安全、職工多元化、客戶關係、供應鏈管理、產品責任、社區關係、扶貧與公益等；治理：董事會獨立性、專業性及盡責性，董事高管薪酬、股東權利、資訊披露、關聯交易、審計實踐、商業道德等。公司將根據客戶要求、行業特點、市場環境和環境、社會和治理發展趨勢對所考慮的環境、社會和治理因素及其重要性進行動態評估和調整。

2. Methods of ESG Incorporation

環境、社會和治理納入方法

When incorporating ESG factors into investment research and portfolio construction, we may individually or simultaneously adopt the following ESG incorporation methods for responsible investment: (1) Screening: When establishing an investable

universe, strictly exclude targets that do not meet the requirements of the ESG standards set based on our investment philosophy. (2) Integration: Analysts and portfolio managers combine industry research and investee company research. We can also refer to external research reports to identify material ESG factors that have a significant impact on the financial performance of the investment targets, clearly and systematically incorporate the material ESG factors into investment analysis and portfolio construction. Analysts establish and maintain our investable universe based on ESG research and analysis, and determine the investable level of the corresponding targets. On this basis, portfolio managers construct investment portfolios and make daily adjustments to the portfolios according to the requirements of the fund contracts or entrusted investment contracts. Our portfolio managers also consider various asset allocation suggestions as well as analysts' ESG analysis and their own judgments on the industry and the investee companies.

在將環境、社會和治理因素納入投資研究和組合構建實踐時，公司可能單獨或同時採用以下環境、社會和治理納入方法進行責任投資：1、篩選法：在建立可投資池時，按照基於公司投資理念設定的環境、社會和治理標準，嚴格排除不符合要求的標的。2、整合法：研究員和基金經理結合行業研究和被投資企業研究，識別出對投資標的財務績效具有重大影響的實質性環境、社會和治理因素，也可同時參考外部研究報告，明確且系統性地將實質性環境、社會和治理因素納入投資分析和組合構建。研究員根據環境、社會和治理研究和分析，建立並維護公司可投資池，確定相應標的的可投資級別。基金經理在此基礎上，根據基金合同或委託投資合同的要求、公司各類資產配置建議，結合研究員及自身對行業和被投資企業的環境、社會和治理分析和判斷，構建投資組合，並對組合進行日常調整。

Equities investment - According to the expected impact of material ESG factors, we adjust financial forecasts, valuation model variables, valuation multiples, etc. to calculate the value of securities and determine whether the current price fully reflects the ESG factors' impact on the investee companies.

股票投資——針對實質性環境、社會和治理因素的預期影響，對財務預測、估值模型變數、估值倍數等進行調整，以計算證券的價值，並判斷當前價格是否充分反映了環境、社會和治理因素對被投資企業的影響。

Fixed income investment - We incorporate the issuer's material ESG factors that may affect downside risks into internal credit assessment, financial status and ratio forecasts, duration analysis, etc., to assess whether the market pricing of bonds has included all risk factors.

固定收益投資——將發行人可能影響下行風險的實質性環境、社會和治理因素納入內部信用評估、財務狀況和比率預測、久期分析等，評估債券的市場定價是否計入了所有風險因素。

Active Ownership

積極所有權

In the process of post investment, analysts and portfolio managers should actively track the

ESG performance of investee companies and understand the practices of investee companies in ESG risk and opportunity management. We will use the rights and status conferred by ownership to engage with the investee companies, actively exercising voting rights, to shape a positive impact on the activities or behavior of the investee companies, and will share the public information obtained with our entire research and investment team to further consider the investable universe and investment decision-making process. Our active ownership focus varies by asset classes.

在組合管理過程中，研究員和基金經理應當積極跟蹤被投資企業的環境、社會和治理表現，瞭解被投資企業在環境、社會和治理風險和機遇管理方面的實踐。公司將利用所有權賦予的權利和地位與被投資企業進行溝通，積極行使投票權，對被投資企業的活動或行為產生積極影響，並將履行積極所有權過程中獲取的公開信息與公司整個研究和投資團隊進行共用，進一步回饋到可投資池構建和投資決策流程中。積極所有權關注的具體角度可因資產類別而異。

1. Engagement

互動

We will not seek to participate in the specific operation and management of the investee companies at the micro level, but will engage with the investee companies on ESG risk and opportunity management, the overall business strategy and capital allocation. We encourage the investee companies to improve their ESG practice and information disclosure, promote the investee companies to take actions to mitigate the identified ESG risks and obtain long-term sustainable development. We will also combine our experience and insights accumulated in the process of asset management to engage with policy makers on public policies that may affect the sustainability and stability of financial markets as well as social, environmental and economic systems, while providing policy makers suggestions or feedback on our responsible investment positions.

公司不會尋求從微觀層面參與被投資企業的具體經營管理，但會與被投資企業就環境、社會和治理風險和機遇管理、整體商業戰略、資本配置等展開互動，以鼓勵被投資企業提升其環境、社會和治理實踐和資訊披露，推動被投資企業採取行動積極應對已識別的環境、社會和治理風險，促進企業獲得長期可持續發展。公司還將結合在資產管理過程中積攢的經驗和見解，與政策制定者就可能影響金融市場以及社會、環境和經濟系統的可持續和穩定性的公共政策進行互動，提供公司在責任投資立場上的建議或回饋。

2. Voting

投票

On the premise of complying with laws and regulations, all our products will actively exercise their voting rights as much as possible to promote the governance and corporate value of the investee companies, achieve better sustainability outcomes in the portfolios, and make reasonable voting decisions. All voting decisions will be made based on our research and analysis by our own research and investment team or a third-party professional organization(s). When exercising voting authority on behalf of clients, we will apply a sufficient duty of care and act in the best interests of

clients.

在符合法律法規的前提下，公司所有產品將盡可能積極行使其所享有的表決權，以促進被投資企業提高治理水準、提升企業價值及在投資組合中取得更好的可持續發展目標成果，作出合理的投票決策。所有投票決策均將基於公司投研團隊或協力第三方專業機構對該被投資企業的研究分析做出，在代表客戶行使表決權時，公司將履行充分的謹慎義務，以客戶的最佳利益行事。

Chapter 4 – Report

第四章 報告

The Marketing Department is responsible for taking the lead in preparing the ESG report. Our various departments shall collect and submit relevant materials as required, and assist in the preparation of the ESG report. The ESG report will be disclosed on our official website. If specific clients have other requirements for the disclosure of Responsible Investment activities related to their assets, we will also regularly report to them regarding the practices and results of Responsible Investment related to special accounts in accordance with the fund contracts or entrusted investment contracts.

市場部門負責牽頭編制環境、社會和治理報告，公司各部門按要求收集報送有關材料，協助編制環境、社會和治理報告。環境、社會和治理報告將在公司官網上披露。特定客戶就與其資產相關的責任投資活動披露另有要求的，公司亦將根據基金合同或委託投資合同約定，向其彙報相關專門帳戶在責任投資方面的實踐和成果。

Chapter 5 - Review and Revision

第五章 審查和修訂

This policy is formulated by our Investment Committee, which is responsible for reviewing and revising this policy on an annual basis along with our business development strategy, internal and external environment changes and ESG development trends.

本政策由投資決策委員會負責制定，並根據內外部環境變化、環境、社會和治理發展趨勢及公司業務發展需要，至少每年一次對本政策進行審查或修訂。

Important Information:**重要資訊:**

For information purposes only.

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