



Sustainability-related disclosures for abrdn Liquidity Fund (Lux) - US Dollar Fund

This document provides you with a summary of sustainability-related information available on our website about this financial product. It is prepared in relation to Article 10 of the Sustainable Finance Disclosure Regulation (EU) 2019/2088. The information disclosed is required by law to help you understand the sustainability characteristics and/or objectives and risks of this financial product.

Date of Publication: 2023-12-15

Legal entity identifier 549300F7O2ZU8OXB914

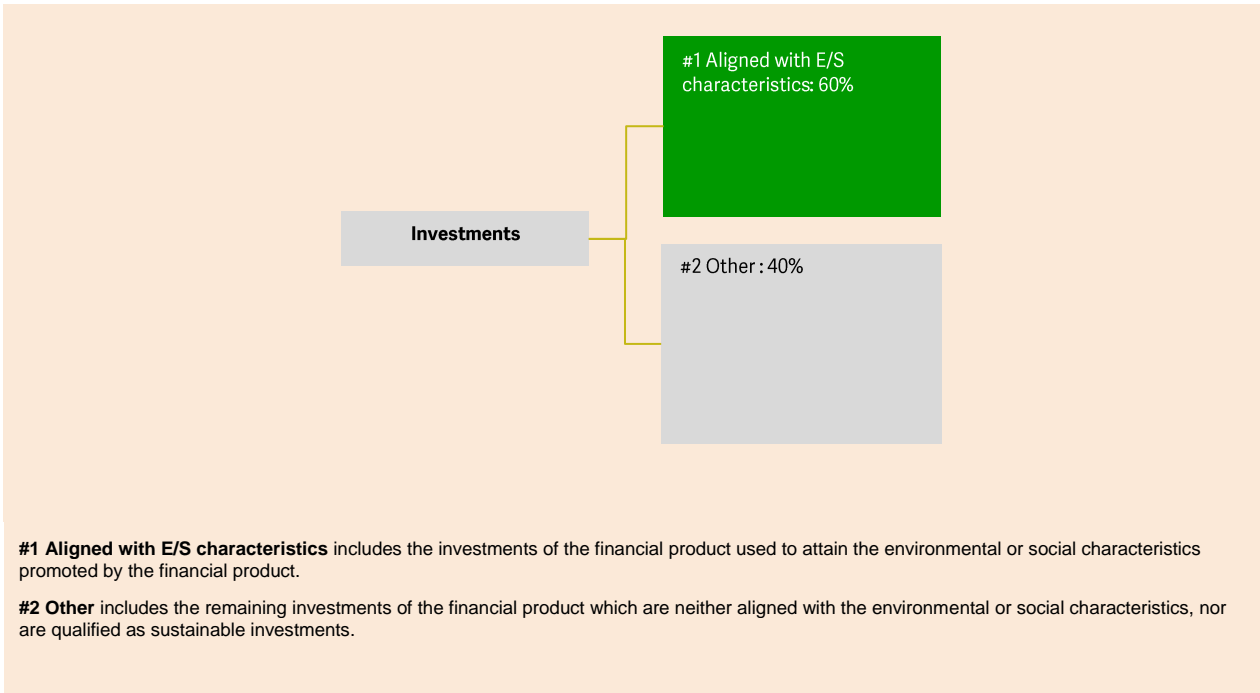
Summary	<p>The Fund is subject to article 8 of the European Union's (EU) 2019/2088 Sustainable Finance Disclosure Regulation ("SFDR") and thus it promotes environmental or social characteristics but does not have a sustainable investment objective.</p> <p>In line with the SFDR criteria for sustainable investments (positive contribution of the economic activity, no significant harm of the investment and good governance by the investee company) abrdn have developed an approach to identifying sustainable investments, the methodology of which is detailed in the Q&A below. This Fund does not make a commitment to a minimum proportion in Sustainable Investments.</p> <p>The Fund has not set a minimum proportion of investment in Taxonomy aligned economic activities, including Taxonomy-aligned fossil gas or nuclear energy related activities.</p> <p>The Fund aims to preserve capital and provide liquidity whilst aiming to provide a return in line with prevailing short term money market rates for which SOFR has been chosen as a benchmark.</p> <p>The Fund invests in high quality U.S. Dollar denominated money market instruments to generate a consistent return in line with the prevailing short term money market rates. Investment in the Fund's assets will follow the abrdn Liquidity U.S. Dollar Fund Investment Approach (the "Investment Approach") which is published at www.abrdn.com under Fund Centre.</p> <p>No benchmark is used for portfolio construction or as a basis for setting risk constraints in the management of the Fund.</p> <p>The portfolio is underpinned by our well-established active management approach of security selection tailored to the overall environment, which combines fundamental and Environmental, Social and Governance (ESG) considerations into our individual name, sector and top-down portfolio construction decisions. An assessment of a company's sustainability is supported by proprietary company rating models and a deeply embedded ESG framework utilising on-desk Fixed Income and central ESG resources.</p> <p>The Fund will:</p> <ul style="list-style-type: none">• Exclude issuers identified as not having ESG business practices. This is achieved through a set of exclusions, which identify controversial business activities and ESG laggards i.e. issuers rated poorly based on their management of ESG risks within their business.• Engage with companies to gather a forward-looking insight into management of ESG risks, opportunities and actively influence the management of these factors in line with best practice standards.• Target an MSCI ESG Fund Rating of at least AA. <p>The Fund seeks to:</p> <ul style="list-style-type: none">• Generate a consistent return in line with prevailing short term money market rates using our active management approach of stock selection tailored to the overall environment.• Benefit from our active engagement with companies, where we encourage positive changes in corporate behaviour.• Construct a portfolio that invests in companies with strong ESG practices.• Leverage the support and insights of our large, dedicated Fixed Income team and embedded ESG specialist resources. <p>Our credit analysts apply an ESG Risk Rating of Low, Medium, High (Low is better) to each issuer. This is credit profile-specific and represents how impactful we believe ESG risks are likely to be to the credit quality of the issuer now and in the future. The key area of focus is the materiality of the inherent Environmental and Social risks of the sector of operation (e.g. extraction, water usage, cyber security) and how specific companies manage these risks, combined with the quality and sustainability of its corporate governance. This materiality assessment is combined with a judgement on the timeframe over which these ESG risks may have an impact. Our analyst utilises an ESG Risk Rating Framework to support making these assessments. This is a proprietary tool designed to help focus the knowledge and expertise of credit analysts in a systematic way to substantiate the overall ESG Risk Rating (low/medium/high) assigned to debt issuers.</p> <p>To complement this, we also utilise our active stewardship and engagement activities. The binding elements of the strategy include:</p>
----------------	---



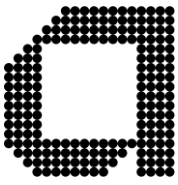
	<ol style="list-style-type: none"> 1. A commitment to hold a minimum of 60% of the assets aligned with E/S characteristics. 2. A commitment to achieve an MSCI ESG Fund rating of at least AA. 3. A commitment to apply binary exclusions to exclude the particular areas of investment related to the UN Global Compact, Controversial Weapons, Tobacco Manufacturing and Thermal Coal. 4. A commitment to exclude the bottom 10% of issuers with an MSCI Score that are in the money market investable universe. 5. A commitment to exclude any issuer with a High ESG Risk Rating using our proprietary Fixed Income ESG Risk Rating tool. <p>These elements apply in a binding manner and on an ongoing basis.</p> <p>Due diligence for each asset held is detailed in the Fund's Investment Approach document, published at www.abrdn.com, under Fund Centre.</p> <p>The Fund's ESG screening and binding commitments determine that Environmental or Social characteristics of holdings are met and are part of the overall portfolio construction. In addition, abrdn consider Principal Adverse Impact Indicators (PAIs) within our investment process for the Fund, which is detailed in the Q&A below.</p> <p>Monitoring of the Fund's environmental and social characteristics are carried out on desk by the fund managers, through systematic oversight and independently through abrdn's ESG Governance teams.</p> <p>abrdn have selected several internal and external data sources that serve an intended purpose to attain environmental and social characteristics. As part of the onboarding or review process, we have several controls in place to test quality, which includes, but not limited to, coverage, validity checks and consistency.</p> <p>For details on the Stewardship and Engagement policies, please see abrdn's Stewardship Report published on www.abrdn.com under Sustainable Investing, within the Governance and Active Ownership section.</p>
<p>No sustainable investment objective</p>	<p>This financial product promotes environmental or social characteristics, but does not have as its objective sustainable investment.</p>
<p>Environmental or social characteristics of the financial product</p>	<p>The Fund promotes environmental and social characteristics by aiming to invest in issuers that:</p> <ul style="list-style-type: none"> • Avoid severe, lasting or irremediable harm; and • Appropriately address adverse impacts on the environment and society; and • Support a decent standard of living for their stakeholders <p>The Fund aims to promote environmental and social characteristics holistically. In doing so, we do not consider all characteristics for all investments, but rather focus on the most relevant characteristics for each investment based on the nature of its activities, areas of operation, and products and services. However, using our proprietary research framework we aim to promote the below characteristics within this Fund, however a broader suite of characteristics may also be promoted on an investment by investment basis:</p> <p>Environment – promoting sound energy management and reducing greenhouse gas emissions, promoting good water, waste and raw materials management and addressing biodiversity/ecological impacts.</p> <p>Social – promoting good labour practices and relations, maximising employee health and safety, supporting diversity in the workforce, and healthy relationships with communities.</p> <p>No benchmark is used for portfolio construction or as a basis for setting risk constraints in the management of the Fund.</p>
<p>Investment strategy</p>	<p>The Fund seeks to:</p> <ul style="list-style-type: none"> • Generate a consistent return in line with prevailing short term money market rates using our active management approach of stock selection tailored to the overall environment. • Benefit from our active engagement with companies, where we encourage positive changes in corporate behaviour. • Construct a portfolio that invests in issuers with strong ESG practices. • Leverage the support and insights of our large, dedicated Fixed Income team and embedded ESG specialist resources. <p>For this Fund, the investee company needs to follow good governance practices in particular with respect to sound management structures, employee relations, remuneration of staff and tax compliance. This can be demonstrated by the monitoring of certain PAI indicators, for example corruption, tax compliance and diversity. In addition, by using abrdn's proprietary ESG scores within the investment process abrdn screen out any investments with low governance scores. Our governance scores assess a company's corporate governance and management structure (including remuneration of staff policies) and the quality and behaviour of its leadership and management. A low score will typically be given where there</p>



	<p>are concerns in relation to financially materially controversies, poor tax compliance or governance concerns, or poor treatment of employees or minority shareholders.</p> <p>The investment must further be aligned with OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human rights. Breaches and violations of these international norms are flagged by an event-driven controversy and are captured in the investment process.</p>
Proportion of investments	<p>A minimum of 60% of the Fund's assets are aligned with E/S characteristics. Environmental and social safeguards are met by applying certain PAI's, where relevant, to these underlying assets. The Fund invests a maximum of 40% of assets in the "Other" category, which may include government securities and derivatives.</p>



Monitoring of environmental or social characteristics	<p>First line Our investment teams have the primary responsibility for implementing the investment strategy.</p> <p>Our sustainable investing governance committees support investment desks with regards to the implementation of the framework as well as understanding the regulatory environment.</p> <p>Second line Investment Risk abrnd's Investment Risk Department carries out the analysis of risks and their overall contribution to the Fund's risk profile. The RAG status of funds as well as action taken to address moderate/high risks are reported to boards, and relevant committees as required, on a regular basis. The Investment Risk Department also undertakes an annual review of the fund risk profiles to determine the efficacy of the current limits and any potential forward looking trends.</p> <p>Compliance abrnd's Compliance function reviews a range of funds' legal and regulatory documents to ensure they comply with regulations. Compliance also reviews marketing communications, including fund and non-fund specific material, to ensure marketing material and ESG related statements are clear, fair and non-misleading.</p> <p>abrnd's EMEA Compliance function plays a key role in monitoring ESG related investment limits and adherence to the binding commitments of funds that have environmental or social characteristics (in line with SFDR Article 8) and funds that have sustainable investment objectives (in line with SFDR Article 9). Through the ESG Regulatory & Standards Taskforce, Compliance feeds all sustainability-related regulatory developments and new requirements to relevant first line stakeholders to ensure these are duly considered and integrated into abrnd's investment approach and adequately reflected in our disclosures. In this taskforce, Compliance teams from all jurisdictions in which abrnd operates are represented.</p> <p>Finally, a dedicated Monitoring & Oversight team operates a risk-based programme to provide assurance to senior management over the effectiveness of controls to ensure regulatory compliance. The outcome of the reviews is reported to the relevant entity boards and other governance forums, including the Risk and Capital Committee, Group Audit Committee and Executive Leadership Team Controls meeting. Assurance activities include both thematic reviews of risk or regulatory topics and focused reviews on specific regulatory or customer outcomes.</p>
--	---



	<p>Third line abrdrn's Internal Audit function conducts internal audits including of sustainability rule implementation as part of its internal audit agenda.</p>
<p>Methodologies</p>	<p>The Fund promotes environmental and social characteristics by aiming to invest in issuers that:</p> <ul style="list-style-type: none"> • Avoid severe, lasting or irremediable harm; and • Appropriately address adverse impacts on the environment and society; and • Support a decent standard of living for their stakeholders <p>The Fund aims to promote environmental and social characteristics holistically. In doing so, we do not consider all characteristics for all investments, but rather focus on the most relevant characteristics for each investment based on the nature of its activities, areas of operation, and products and services. However, using our proprietary research framework we aim to promote the below characteristics within this Fund, however a broader suite of characteristics may also be promoted on an investment by investment basis:</p> <p>Environment – promoting sound energy management and reducing greenhouse gas emissions, promoting good water, waste and raw materials management and addressing biodiversity/ecological impacts.</p> <p>Social – promoting good labour practices and relations, maximising employee health and safety, supporting diversity in the workforce, and healthy relationships with communities.</p> <p>No benchmark is used for portfolio construction or as a basis for setting risk constraints in the management of the Fund. this Fund considers Principal Adverse Impacts (PAI) on sustainability factors.</p> <p>Principal adverse impacts consideration Yes, the Fund commits to consider the following PAIs in its investment process, this means that there is pre- and post-trade monitoring is in place and that every investment for the Fund is assessed on these factors to determine its appropriateness for the Fund.</p> <ul style="list-style-type: none"> • PAI 1: GHG emissions (scope 1 and 2) • PAI 10: Violations of the UN Global Compact principles and Organisation for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises • PAI 14: Exposure to controversial weapons (anti-personnel mines, cluster munitions, chemical weapons and biological weapons) <p>Adverse impacts monitoring</p> <p>Pre investment, abrdrn applies a number of norms and activity-based screens related to the above PAIs, including but not limited to:</p> <ul style="list-style-type: none"> • <i>UNGC</i> : The Fund uses norms-based screens and controversy filters to exclude companies that may be in breach of international norms described in the OECD guidelines for multinational enterprises and the UN guiding principles on business and human rights, as well as state owned entities in countries which violate norms. • <i>Controversial Weapons</i>: The Fund excludes companies with business activities related to controversial weapons (cluster munitions, anti-personnel landmines, nuclear weapons, chemical and biological weapons, white phosphorus, non-detectable fragments, incendiary devices, depleted uranium ammunition or blinding lasers). • <i>Thermal Coal Extraction</i>: The Fund excludes companies with exposure to the fossil fuels sector based on percentage of revenue from thermal coal extraction. <p>abrdrn apply a fund specific set of company exclusions, more detail on these and the overall process is captured within the Investment Approach, which is published at www.abrdrn.com under "Fund Centre".</p> <p>Post-investment the above PAI indicators are monitored in the following way:</p> <ul style="list-style-type: none"> • company carbon intensity and GHG emissions is considered via our ESG integration risk analysis. • On an on-going basis the investment universe is scanned for companies that may be in breach of international norms described in the OECD guidelines for multinational enterprises and the UN guiding principles on business and human rights. <p>Post-investment we also undertake the following activities in relation to additional PAI's:</p> <ul style="list-style-type: none"> • Dependent on data availability, quality and relevance to the investments the consideration of additional PAI indicators will be on a case-by- case basis.



	<ul style="list-style-type: none"> • abrdn monitors PAI indicators via our ESG integration investment process using a combination of our proprietary house score and 3rd party data feeds. • Governance indicators are monitored via our proprietary governance scores and risk framework, including consideration of sound management structures, and remuneration. <p>Adverse impact mitigation</p> <ul style="list-style-type: none"> • PAI indicators that fail a defined pre-investment screen are excluded from the investment universe and cannot be held by the fund. • PAI indicators that are monitored post investment which fail a specific binary test or are considered above typical are flagged for review and may be selected for company engagement. These adverse indicators may be used as a tool for engagement, for example where there is no policy in place and this would be beneficial abrdn may engage with the issuer or company to develop one, or where carbon emissions are considered to be high, abrdn may engage to seek the creation of a long-term target and reduction plan.
<p>Data sources and processing</p>	<p>Data Sources</p> <p>We have selected several data sources which serve an intended purpose to attain environmental and social characteristics. abrdn uses a combination of the following approaches:</p> <ol style="list-style-type: none"> 1. a combination of publicly available data sources to identify companies that may fail to meet our screening requirements, our DNSH or PAI assessments. In addition, we use external data to identify green and/or social Bonds, plus to calculate environmental or social revenues through disclosed data or estimates; and 2. using our own insight we overlay the quantitative methodology with a number of internal data sources including proprietary on-desk ESG scoring frameworks, central proprietary ESG scores, economic contribution sector estimates or disclosed data through our own engagement activities or primary research. <p>The EU Regulatory Technical Standards calls on financial market participants to source sustainability data in various ways, including research providers, internal analysis, commissioned studies, publicly available information, and direct engagement with companies. The following sources are used by abrdn and our 3rd party data providers to collect company reported data:</p> <ul style="list-style-type: none"> • Company direct disclosure: sustainability reports, annual reports, regulatory filings, company websites and direct engagement with company representatives. • Company indirect disclosure: government agency published data, industry and trade associations, and financial data providers. • Direct communication with companies as described above in Company Communication. <p>Where company disclosure is unavailable, we may choose to leverage estimated metrics . These datasets are built based on proprietary methodologies and informed by data from companies, market and industry peers, media, NGOs, multilateral and other credible institutions. Our 3rd party providers use a wide range of information derived from various tools and sources, including:</p> <ul style="list-style-type: none"> • Company websites • Company annual reports and regulatory filings • Government financial agencies and disclosures • Financial data providers • Media and periodicals • Non-governmental organization (NGO) reports and websites <p>Data Quality assurance process</p> <p>Third Party Data Sources</p> <p>We ensure that our third party data sources follow a rigorous quality assurance process. Data accuracy and company profiles are peer-reviewed before final inclusion into datasets. Additionally, our third party data providers have an escalation method to allow for cases that require further interpretation or an update to the relevant methodology.</p> <p>As part of our onboarding or review process, we have several controls in place to test quality, which includes, but not limited to, coverage, validity checks and consistency. Our company's Data Governance Framework and Data Management operating models include the application of toolkits which profile data, capture full lineage and apply quality rules to monitor data that is critical to our investment processes. These services are further complimented by the existence of data owners and stewards across the business.</p> <p>For each external data source, we retain records of the proportion of data that are estimated (ie not available in company reports), and we seek to minimise this with disclosed data where possible.</p> <p>Qualitative Assessment Process</p> <p>In all cases where we apply a qualitative overlay or insight, this analysis is followed by a rigorous quality assurance and oversight process.</p> <p>Data Quality</p> <p>For both 3rd party and qualitative assessments, the percentage of disclosed data varies from holding to holding on a case by case basis depending on company size and the region it is located in. For</p>



	<p>example, a large European company will typically be required to disclose data due to regulation and there will be limited or zero estimates used in our methodology. However, where there is limited disclosed data for example within smaller companies, it is possible that the majority of the sustainable investment value is derived from estimates. In most cases, there is a blend of disclosed data and estimated data used in the methodology, typically with more disclosed data in relation to Environmental Characteristics, and more estimated data in relation to Social Characteristics. We use several data providers and the available actual and estimated data varies depending on the providers but the average estimated data is around 20%.</p>
<p>Limitations to methodologies and data</p>	<p>We recognise that relying solely on quantitative disclosed data can be a limitation due to the difficulties obtaining consistent data from companies, and also as in some regions there are no regulatory requirements to disclose such data. As such, we also leverage our investment research and insights to supplement our assessments, with estimated data or assessments. However, this may differ from data that is subsequently disclosed in company reports or via engagements.</p> <p>The EU Taxonomy focusses on the underlying economic activity that is aligned with an environmental (or in future social) objective. The EU taxonomy relies on demonstrable aligned revenue, opex or capex to demonstrate compliance. As a result, abrdn have aligned our method of calculating SFDR sustainable investments with this approach as we believe it is closer to the likely future direction of regulation.</p>
<p>Due diligence</p>	<p>Due diligence for each asset held is detailed in the Fund's Investment Approach document, published at www.abrdn.com, under Fund Centre.</p>
<p>Engagement policies</p>	<p>Active Ownership</p> <p>In our view, good governance and stewardship are vital to safeguard the way in which a company is managed and to ensure that it operates responsibly in relation to its customer, employees, shareholders, and the wider community. abrdn also believe that markets and companies which adopt best practices in corporate governance and risk management – including the management of environmental and social risks – are more likely to deliver sustainable, long-term investment performance.</p> <p>As owners of companies, the process of stewardship is a natural part of our investment approach as we seek to benefit from their long-term success on our clients' behalf. Our fund managers and analysts regularly meet with the management and non-executive directors of companies in which we invest.</p> <p>ESG Engagement</p> <p>Engagement with company management teams is key and a standard part of our equity investment process and ongoing stewardship programme. It provides us with a more holistic view of a company, including current and future ESG risks that the firm needs to manage and opportunities from which it may benefit. It also provides the opportunity for us to discuss areas of concern, share best practice and drive positive change. Priorities for engagement are established by:</p> <ul style="list-style-type: none"> • The use of the ESG House Score, in combination with • Bottom-up research insights from investment teams across asset classes, and • Areas of thematic focus from our company level stewardship activities. <p>Please also see our Stewardship Report published on www.abrdn.com under Sustainable Investing.</p>
<p>Designated reference benchmark</p>	<p>This Fund has a financial benchmark that is used for portfolio construction but does not incorporate any sustainable criteria and is not selected for the purpose of attaining these characteristics</p>