



## Sustainability-related disclosures for abrdn SICAV I - Climate Transition Bond 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.

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Summary	
	<p>The Fund is subject to article 9 of the European Union's (EU) 2019/2088 Sustainable Finance Disclosure Regulation ("SFDR") and has 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&amp;A below. The Fund has an expected minimum of 75% 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 achieve a combination of income and growth by investing at least 90% in bonds (loans to governments and companies) issued worldwide, including in Emerging Market countries. All bonds in the view of the Investment Manager, support the transition to a low carbon economy and society's adaptation to climate change.</p> <p>The Fund invests at least 90% in bonds, including corporate bonds and government bonds issued anywhere in the world, including sub-sovereigns, inflation-linked, convertible, asset backed and mortgage-backed bonds. The Fund invests at least 70% in corporate bonds issued anywhere in the world. The Fund may invest up to 40% in Sub-Investment Grade bonds. Non-Dollar denominated bonds will typically be hedged back to US Dollars. All bond holdings will be consistent with the Investment Manager's Climate Transition Bond Investment Approach.</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 the sustainable investment objective of the Fund. The benchmark is used as a comparator for performance.</p> <p>The Fund aims to achieve attractive long-term returns by investing at least 90% of the assets in fixed-income securities that support the transition to a low-carbon economy and society's adaptation to climate change. These securities include investment-grade and sub-investment-grade debt, as well as debt-related securities. abrdn make these investments worldwide, including in emerging markets.</p> <p>The Fund draws on abrdn's deep resources and understanding of climate and environmental issues to help our clients benefit from the long-term shift towards greater sustainability. We aim to achieve a combination of income and growth by investing in bonds issued by companies and countries that, in our view, are addressing the causes of climate change and adapting to its consequences.</p> <p>These are companies that are lowering green-house-gas (GHG) emissions of their operations or helping others to reduce their emissions, and companies and countries that are helping society adapt to the physical risks of climate change.</p> <p>The Fund uses three pillars to identify investments that are contributing to either climate change mitigation or climate change adaptation:</p> <ul style="list-style-type: none"><li>o Leaders – supporting the leading emission reducers in high emitting sectors. Companies with ambitious and credible decarbonisation targets.</li><li>o Adaptors – facilitating climate change adaptation. Companies and countries addressing the physical risks of climate change.</li><li>o Solutions – helping the wider economy decarbonise. Investing in the bonds of issuers whose products or services are helping the wider economy avoid emissions. This includes, but is not limited to, investments in the circular economy, energy efficiency, electrification, energy storage, renewable materials, smart buildings, renewable energy.</li></ul> <p>Bond issuers are selected through a multi-stage process which uses a proprietary screening tool with multiple external data providers, a qualitative research note completed by members of the investment team and a peer-review discussion to scrutinise each proposed bond issuer for the fund.</p> <p>The Fund seeks to achieve a minimum of 75% economic contribution to either climate change mitigation or adaptation. This is measured at the issuer level by the proportion of revenue, capital expenditure or operating expenditure allocated to these activities. As a result, the average (weighted by position size) economic contribution for each issuer to these sustainable objectives will be at least 75%.</p>



	<p>abrdn also apply a set of company exclusions, which are related to normative screening (UN Global Compact, ILO and OECD), State-Owned Enterprises, Tobacco, Alcohol, Gambling, Thermal Coal, Oil &amp; Gas, Adult Entertainment and Weapons. These screening criteria 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 <a href="http://www.abrdn.com">www.abrdn.com</a>, under <b>Fund Centre</b>.</p> <p>The Fund's ESG screening and binding commitments determine that sustainable objectives 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&amp;A below.</p> <p>Monitoring of the Fund's sustainable objectives 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 and monitor several internal and external data sources to attain sustainable objectives. As part of the onboarding and review processes, we have several controls in place to test quality, which include but are 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 <a href="http://www.abrdn.com">www.abrdn.com</a> under <b>Sustainable Investing</b>, within the <b>Governance and Active Ownership</b> section.</p>
<p><b>No significant harm to the sustainable investment objective</b></p>	<p>The Fund invests in three pillars which contribute to either climate change mitigation or adaptation:</p> <ul style="list-style-type: none"> <li>• Leaders (climate change mitigation: supporting the leading emission reducers)</li> <li>• Adaptors (climate change adaptation: facilitating climate change resilience)</li> <li>• Solutions (climate change mitigation: helping the economy decarbonise)</li> </ul> <p>Eligible issuers are assessed based on their economic contribution to each objective, measured via the proportion of revenue, capital expenditure or operating expenditure from these activities. Additional indicators are used to assess the contribution to sustainable objectives using a proprietary climate screening tool, which takes data from a range of external providers combined with a qualitative peer-reviewed assessment.</p> <p>The Fund also reduces the investment universe by a minimum of 20% through a combination of negative screening and strict climate criteria.</p> <p>As required by the SFDR Delegated Regulation, the investment does not cause Significant Harm ("Do No Significant Harm"/ "DNSH") to any of the sustainable investment objectives.</p> <p>abrdn have created a 3-step process to ensure consideration of DNSH:</p> <p>i. Sector Exclusions abrdn have identified a number of sectors which automatically do not qualify for inclusion as a Sustainable Investment as they are considered to be causing significant harm. These include but are not limited to: (1) Defence, (2) Coal, (3) Oil &amp; Gas Exploration, Production and associated activities, (4) tobacco, (5) gambling and (6) alcohol.</p> <p>ii. DNSH Binary Test The DNSH test, is a binary pass/fail test which signals if the company passes or fails criteria for the SFDR Article 2 (17) "do no significant harm". Pass indicates under abrdn's methodology the company has no ties to controversial weapons, less than 1% of revenue from thermal coal, less than 5% of revenue from tobacco related activities, is not a tobacco producer, and has no red/severe ESG Controversies. If the company fails this test, it cannot be considered a Sustainable Investment. Abrdn's approach is aligned with the SFDR PAIs included within tables 1, 2 &amp; 3 of the SFDR Delegated Regulation and is based on external data sources and abrdn internal insights.</p> <p>iii. DNSH Materiality Flag Using a number of additional screens and flags, abrdn consider the additional SFDR PAI's indicators as defined by the SFDR Delegated Regulation to identify areas for improvement or potential future concern. These indicators are not considered to cause significant harm and therefore a company with active DNSH materiality flags may still be considered to be a Sustainable Investment. abrdn aim to enhance the engagement activities to focus on these areas and seek to deliver better outcomes by resolving the issue.</p> <p>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.</p>
<p><b>Sustainable investment objective of the financial product</b></p>	<p>The Investment objective of the Fund aims to achieve a combination of income and growth by investing at least 90% in bonds (loans to governments and companies) issued worldwide, including in Emerging Market countries, which follow the Investment Manager's "Climate Transition Bond Investment Approach" (the "Investment Approach"). All bonds in the view of the Investment Manager, support the transition to a low carbon economy and society's adaptation to climate change.</p>



	<p>The Fund draws on abrdn’s deep resources and understanding of climate and environmental issues to help our clients benefit from the long-term shift towards greater sustainability. We aim to achieve a combination of income and growth by investing in bonds issued by companies and countries that, in our view, are addressing the causes of climate change and adapting to its consequences.</p> <p>These are companies that are lowering green-house-gas (GHG) emissions of their operations or helping others to reduce their emissions, and companies and countries that are helping society adapt to the physical risks of climate change.</p> <p>The Fund uses three pillars to identify investments that are contributing to either climate change mitigation or climate change adaptation:</p> <ul style="list-style-type: none"> <li>o Leaders – supporting the leading emission reducers in high emitting sectors. Companies with ambitious and credible decarbonisation targets.</li> <li>o Adaptors – facilitating climate change adaptation. Companies and countries addressing the physical risks of climate change.</li> <li>o Solutions – helping the economy decarbonize. Investing in the bonds of issuers whose products or services are helping the wider economy avoid emissions. This includes, but is not limited to, investments in the circular economy, energy efficiency, electrification, energy storage, renewable materials, smart buildings, renewable energy.</li> </ul> <p>This Fund does not refer to a benchmark index for portfolio construction.</p>
<p><b>Investment strategy</b></p>	<p>The Fund aims to achieve attractive long-term returns by investing at least 90% of the assets in fixed-income securities that support the transition to a low-carbon economy and society’s adaptation to climate change. These securities include investment-grade and sub-investment-grade debt, as well as debt-related securities. abrdn make these investments worldwide, including in emerging markets.</p> <p>The Fund draws on abrdn’s deep resources and understanding of climate and environmental issues to help our clients benefit from the long-term shift towards greater sustainability. We aim to achieve a combination of income and growth by investing in bonds issued by companies and countries that, in our view, are addressing the causes of climate change and adapting to its consequences.</p> <p>These are companies that are lowering green-house-gas (GHG) emissions of their operations or helping others to reduce their emissions, and companies and countries that are helping society adapt to the physical risks of climate change.</p> <p>The Fund uses three pillars to identify investments that are contributing to either climate change mitigation or climate change adaptation:</p> <ul style="list-style-type: none"> <li>o Leaders – supporting the leading emission reducers in high emitting sectors. Companies with ambitious and credible decarbonisation targets.</li> <li>o Adaptors – facilitating climate change adaptation. Companies and countries addressing the physical risks of climate change.</li> <li>o Solutions – helping the wider economy decarbonise. Investing in the bonds of issuers whose products or services are helping the wider economy avoid emissions. This includes, but is not limited to, investments in the circular economy, energy efficiency, electrification, energy storage, renewable materials, smart buildings, renewable energy.</li> </ul> <p>Bond issuers are selected through a multi-stage process which uses a proprietary screening tool with multiple external data providers, a qualitative research note completed by members of the investment team and a peer-review discussion to scrutinise each proposed bond issuer for the fund.</p> <p>abrdn also apply a set of company exclusions, which are related to normative screening (UN Global Compact, ILO and OECD), Tobacco, Alcohol, Gambling, Thermal Coal, Oil &amp; Gas, Adult Entertainment and Weapons. These screening criteria apply in a binding manner and on an ongoing basis.</p> <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 are concerns in relation to financially material 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> <p>abrdn also apply a set of company exclusions, which are related to normative screening (UN Global Compact, ILO and OECD), Tobacco, Alcohol, Gambling, Thermal Coal, Oil &amp; Gas, Adult Entertainment and Weapons. These screening criteria apply in a binding manner and on an ongoing basis.</p>
<p><b>Proportion of investments</b></p>	<p>The Fund commits to a minimum of 75% in Sustainable Investments with an environmental objective.</p>



The Fund invests a maximum of 25% of assets in the “Non Sustainable” category, which is mainly made up of cash, money market instruments and derivatives.



**Monitoring of sustainable investment objective**

**First line**

Our investment teams have the primary responsibility for implementing the investment strategy. Our sustainable investing governance committees support investment desks with regards to the implementation of the framework as well as understanding the regulatory environment.

**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.

**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.

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.

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.

**Third line**

abrnd’s Internal Audit function conducts internal audits including of sustainability rule implementation as part of its internal audit agenda.

**Methodologies**

The Investment objective of the Fund aims to achieve a combination of income and growth by investing at least 90% in bonds (loans to governments and companies) issued worldwide, including in Emerging Market countries, which follow the Investment Manager’s “Climate Transition Bond Investment Approach” (the “Investment Approach”). All bonds in the view of the Investment Manager, support the transition to a low carbon economy and society’s adaptation to climate change.



The Fund draws on abrdn’s deep resources and understanding of climate and environmental issues to help our clients benefit from the long-term shift towards greater sustainability. We aim to achieve a combination of income and growth by investing in bonds issued by companies and countries that, in our view, are addressing the causes of climate change and adapting to its consequences.

These are companies that are lowering green-house-gas (GHG) emissions of their operations or helping others to reduce their emissions, and companies and countries that are helping society adapt to the physical risks of climate change.

The Fund uses three pillars to identify investments that are contributing to either climate change mitigation or climate change adaptation:

- o Leaders – supporting the leading emission reducers in high emitting sectors. Companies with ambitious and credible decarbonisation targets.

- o Adaptors – facilitating climate change adaptation. Companies and countries addressing the physical risks of climate change.

- o Solutions – helping the economy decarbonize.

Investing in the bonds of issuers whose products or services are helping the wider economy avoid emissions. This includes, but is not limited to, investments in the circular economy, energy efficiency, electrification, energy storage, renewable materials, smart buildings, renewable energy.

This Fund does not refer to a benchmark index for portfolio construction. This Fund considers Principal Adverse Impacts (PAI) on sustainability factors.

Principal Adverse Impact Indicators are metrics that measure the negative effects on environmental and social matters. abrdn consider PAIs within the investment process for the Fund, this may include considering whether to make an investment, or they may be used as an engagement tool for example where there is no policy in place and this would be beneficial, or where carbon emissions are considered to be high, abrdn may engage to seek the creation of a long-term target and reduction plan. abrdn assess PAIs by using, amongst others, the PAI indicators referred to in the SFDR Delegated Regulation; however, dependent on data availability, quality and relevance to the investments not all SFDR PAI indicators may be considered. Where Funds consider PAIs, information on that consideration will be made available in annual reports.

**Data sources and processing**

**Data Sources**

We have selected several data sources which serve an intended purpose to attain the sustainable investment objective. abrdn uses a combination of the following approaches:

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.

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:

- 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.

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:

- 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

**Data Quality assurance process**

**Third Party Data Sources**

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>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><b>Qualitative Assessment Process</b> 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><b>Data Quality</b> 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 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><b>Limitations to methodologies and data</b></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><b>Due diligence</b></p>	<p>Due diligence for each asset held is detailed in the Fund's Investment Approach document, published at <a href="http://www.abrdn.com">www.abrdn.com</a>, under <b>Fund Centre</b>.</p>
<p><b>Engagement policies</b></p>	<p><b>Active Ownership</b> 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. 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><b>ESG Engagement</b> 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"> <li>• The use of the ESG House Score, in combination with</li> <li>• Bottom-up research insights from investment teams across asset classes, and</li> <li>• Areas of thematic focus from our company level stewardship activities.</li> </ul> <p>Please also see our Stewardship Report published on <a href="http://www.abrdn.com">www.abrdn.com</a> under <b>Sustainable Investing</b>.</p>
<p><b>Attainment of the sustainable investment objective</b></p>	<p>The sections above details how the Fund attains its sustainable investment. 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 the sustainable objectives</p>