# **Guinness Global Investors**

# Guinness Sustainable Energy UCITS ETF Exclusion Policy



# **Fund Description**

The Guinness Sustainable Energy UCITS ETF ("The Fund") invests in equity securities of globally based companies involved in sustainable energy or energy technology sectors. Sustainable energy includes but is not limited to energy derived from such sources as solar or wind power, hydroelectricity, tidal flow, wave movements, geothermal heat, biomass, or biofuels. Energy technology includes technologies that enable these sources to be trapped and also various manners of storage and transportation of energy, including hydrogen and other types of fuel cells, batteries, and flywheels, as well as technologies that conserve or enable more efficient use of energy.

## **Firm-Wide Exclusions**

#### Weapons

Guinness Global Investors commits to excluding active investments in companies that have been identified, by credible third parties, as being directly involved in the design, manufacture or sale of cluster munitions, landmines and biological and chemical weapons.

### **Thermal Coal**

We exclude companies that generate more than 30% of revenues via thermal coal extraction or thermal coal power generation.

## **Fund-Specific Exclusions**

Our Fund exclusion policy also focuses on:

#### (i) Extraction of oil or gas

The Fund excludes companies with over 5% revenue exposure to the exploration and production of oil or gas.

## (ii) Other

The Fund also adheres to the exclusion list of companies prepared by Norges Bank, which is guided by internationally recognized principles, including the UN Global Compact. The Norges Bank Exclusion list is based on recommendations from the Norwegian Council on Ethics (appointed by the Norwegian Ministry of Finance). Companies might be placed on the list as a result of serious violations of norms including serious or systematic human rights violations, such as murder, torture, deprivation of liberty, forced labour and the worst forms of child labour, severe environmental damage, gross corruption, or other particularly serious violations of fundamental ethical norms.

## (iii) EU Paris-aligned Benchmark ("PAB")

The fund also adheres to the EU Paris-Aligned Benchmark ("PAB") Exclusions. These Paris-aligned Benchmark exclusions are specified to exclude the following companies:

- (a) Companies involved in any activities related to controversial weapons.
- (b) Companies involved in the cultivation and production of tobacco.
- (c) Companies that benchmark administrators find in violation of the United Nations Global Compact principles or the OECD Guidelines for Multinational Enterprises.
- (d) Companies that derive 1% or more of their revenues from exploration, mining, extraction, distribution or refining of hard coal and lignite.
- (e) Companies that derive 10% or more of their revenues from the exploration, extraction, distribution or refining of oil fuels.
- (f) Companies that derive 50% or more of their revenues from the exploration, extraction, manufacturing or distribution of gaseous fuels.
- (g) Companies that derive 50% or more of their revenues from electricity generation with a GHG intensity of more than 100 g CO2 e/kWh.[1]

We monitor these PAB exclusions using various data sources, including our own estimates.

<sup>🗓</sup> Exclusions for EU Paris-aligned Benchmarks are contained in Article 12(1)(a) –(g) of Commission Delegated Regulation (EU) 2020/1818).

## **Policy implementation**

To implement our Exclusion Policy, we use exclusion lists of companies based on information provided by independent third-party sources. We update the exclusion lists annually on a best-efforts basis. The exclusion lists are distributed periodically across the firm.

We will not knowingly invest in any company that breaches our Exclusion Policy. In the event that we identify a company in our portfolios that does not comply with these policy requirements, we will contact the company directly for confirmation of their involvement in an excluded activity. Following confirmation of their involvement in this activity, we will divest any such holdings within 90 business days.

We monitor compliance in respect of this policy. However, due to the complexity of the issue and the evolution of company business models, there may be occasions when related securities appear in portfolios in error. If and when such instances are identified, we will seek to divest any such holdings within 90 business days.

## **Important Information**

This report is primarily designed to inform you about Guinness Sustainable Energy UCITS ETF. Any investment decision should take account of the subjectivity of the comments contained in the report.

This document is provided for information only and all the information contained in it is believed to be reliable but may be inaccurate or incomplete; any opinions stated are honestly held at the time of writing, but are not guaranteed. The contents of the document should not therefore be relied upon. It should not be taken as a recommendation to make an investment in the Fund or to buy or sell individual securities, nor does it constitute an offer for sale.

#### **Documentation**

The documentation needed to make an investment, including the Prospectus, Supplement, the Key Investor Information Document (KIID), Key Information Document (KID), is available in English from <a href="https://www.guinnessgi.com">www.guinnessgi.com</a> or the Manager <a href="https://www.hanetf.com">www.hanetf.com</a> or free of charge from:-

- The Administrator J.P Morgan Administration Services (Ireland) Limited, 200 Capital Dock, 79 Sir John Rogerson's Quay, Dublin 2 DO2 F 985, Ireland;
- Investment Manager: Guinness Asset Management Ltd, 18 Smith Square, London SW1P 3HZ.

#### Residency

In countries where the Fund is not registered for sale or in any other circumstances where its distribution is not authorised or is unlawful, the Fund should not be distributed to resident Retail Clients. THIS INVESTMENT IS NOT FOR SALE TO U.S. PERSONS.

### Structure & regulation

The Fund is a sub-fund of HANetf ICAV (the ICAV) an Irish collective Asset Management vehicle umbrella fund with segregated liability between sub-funds which is registered in Ireland by the Central Bank of Ireland (the Central Bank) and authorised under the UCITS Regulations.