

EU SFDR Annex II - Pre-contractual disclosure for the financial products referred to in Article 8, paragraphs 1, 2 and 2a, of Regulation (EU) 2019/2088 and Article 6, first paragraph, of Regulation (EU) 2020/852

Product name: Aviva High Yield Equity Fund

Fund Type: Equity, unit linked insurance fund ("Fund")

Product ID: 25000616

Underlying investment manager: Aviva Investors

Sustainable investment means an investment in an economic activity that contributes to an environmental or social objective, provided that the investment does not significantly harm any environmental or social objective and that the investee companies follow good governance practices.

The **EU Taxonomy** is a classification system laid down in Regulation (EU) 2020/852, establishing a list of **environmentally sustainable economic activities**. That Regulation does not lay down a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

Environmental and/or social characteristics

Does this financial product have a sustainable investment objective?

☒ ☐ **Yes**

☐ It will make a minimum of **sustainable investments with an environmental objective:** ____%

☐ in economic activities that qualify as environmentally sustainable under the EU Taxonomy

☐ in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy

☐ It will make a minimum of **sustainable investments with a social objective:** ____%

☒ ☐ **No**

☐ It **promotes Environmental/Social (E/S) characteristics** and while it does not have as its objective a sustainable investment, it will have a minimum proportion of ____% of sustainable investments

☐ with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy

☐ with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy

☐ with a social objective

☒ It promotes E/S characteristics, but **will not make any sustainable investments**



What environmental and/or social characteristics are promoted by this financial product?

Whilst the Fund may invest in underlying investments that contribute to climate change mitigation and/or climate change adaptation, the Fund does not make any minimum commitment to invest in one or more environmentally sustainable investments.

No reference benchmark has been designated for the purpose of attaining the environmental or social characteristics promoted by the Fund.

The below criteria are binding on the investment process to ensure underlying investments are inclusive of those securities promoting environmental or social characteristics:

The exclusions detailed below will be applied to this universe.

A. The Investment Manager's ESG Baseline Exclusions Policy which includes the following exclusions:

- Controversial weapons including nuclear weapons
- Civilian firearms
- Thermal Coal
- Non-conventional fossil fuels (arctic oil and tar sands)
- Breaches of principles of the UN Global Compact ("UNGC"); and
- Tobacco.
-

The exclusions are based on:

- a) A maximum acceptable percentage of estimated revenue derived from the specific activities; the maximum acceptable percentage of revenue thresholds are:
- Controversial weapons 0%, including nuclear weapons*
 - Civilian firearms 5%
 - Thermal Coal 5%**
 - Non-conventional fossil fuels (arctic oil and tar sands) at 10%**
 - Tobacco producers at 0% and tobacco distribution or sale at 25%

*The percentage of revenue threshold for nuclear weapons will be 0% for companies involved in, among others, development, production, use, maintenance, offering for sale, distribution, import or export, storage or transportation of nuclear weapons, where this supplies nuclear states outside of the UN Treaty on Non-Proliferation of Nuclear Weapons (1970).

** Companies that have an approved SBTi (Science Based Target) which has a classification of 1.5°C or Well Below 2°C are an exception to these thresholds.

- b) MSCI's controversy screening data to identify recent controversies to the Principles set out under the UN Global Compact. An Aviva Investors ESG Analyst qualitative assessment is additive to this process to confirm if the failings are irredeemable based on company behaviours since the controversy. If failings are considered to be redeemable, the Investment Manager will place the company into a structured and time bound engagement program.

Further details on the Investment Manager's ESG Baseline Exclusions Policy are available at <https://www.avivainvestors.com/en-gb/about/responsible-investment/policies-and-documents/>

- B. The Corporate Good Governance Qualitative Assessment criteria as outlined in the SFDR, is considered through the lenses outlined above. For corporates, the good governance principle introduced by SFDR will be met through a combination of the UNGC (as part of the Investment Manager's ESG Baseline Exclusions Policy noted above) and a qualitative assessment as part of the investment analyst research process. Good governance indicators form a substantial component of the Investment Manager's ESG scoring tools and ESG research.

Sustainability indicators measure how the environmental or social characteristics promoted by the financial product are attained.

- ***What sustainability indicators are used to measure the attainment of each of the environmental or social characteristics promoted by this financial product?***

It is anticipated that the sustainability indicators reported on for this Fund will include, but not be limited to:

1. Portfolio metric of any revenue derived from excluded activity (e.g. thermal coal)
2. UNGC 'severe' and 'very severe' incidents avoided and commentary on any exceptions
3. Additionally, the Fund will measure exposure to the Principle Adverse Impact indicators that the Investment Manager has committed to prioritizing in its Principle Adverse Impact Statement. For reference these include:
 - a) Indicators relating to Greenhouse Gas (GHG) Emissions
 - b) Indicators pertaining to activities negatively affecting biodiversity-sensitive areas
 - c) Indicators relating to Board Gender Diversity

- ***What are the objectives of the sustainable investments that the financial product partially intends to make and how does the sustainable investment contribute to such objectives?***

This does not apply

- ***How do the sustainable investments that the financial product partially intends to make, not cause significant harm to any environmental or social sustainable investment objective?***

This does not apply

Principal adverse impacts are the most significant negative impacts of investment decisions on sustainability factors relating to environmental, social and employee matters, respect for human rights, anti-corruption and anti-bribery matters.

- — *How have the indicators for adverse impacts on sustainability factors been taken into account?*

This does not apply

- — *How are the sustainable investments aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights? Details:*

This does not apply

The EU Taxonomy sets out a “do not significant harm” principle by which Taxonomy-aligned investments should not significantly harm EU Taxonomy objectives and is accompanied by specific EU criteria.

The “do no significant harm” principle applies only to those investments underlying the financial product that take into account the EU criteria for environmentally sustainable economic activities. The investments underlying the remaining portion of this financial product do not take into account the EU criteria for environmentally sustainable economic activities.

Any other sustainable investments must also not significantly harm any environmental or social objectives.



Does this financial product consider principal adverse impacts on sustainability factors?

☒ Yes

☐ No

The Fund does consider the following three principle adverse impacts indicators which are excluded in accordance with certain revenue thresholds (maximum estimated percentage of revenue), as detailed in the Investment Manager’s ESG Baseline Exclusions Policy and as captured below:

1. Controversial Weapons: revenue threshold 0%, including nuclear weapons*
2. Violations of UN Global Compact Principles and OECD Guidelines: revenue threshold n/a
3. Companies active in the Fossil Fuel sector: revenue threshold 5% for Thermal Coal and 10% for Non-conventional fossil fuels (arctic oil and tar sands)**

More broadly, PAIs are available in portfolio management systems, and the Investment Manager considers these indicators alongside all other relevant ESG and financial metrics that inform its assessment of sustainability risk. For more information on how Aviva Investors integrates PAIs, please consult Aviva Investors Liquid Markets – Principle Adverse Impact Statement which is available at – [EU Sustainable Finance Disclosure Regulation \(SFDR\) - Aviva Investors](#)

Information on how the Investment Manager considers PAIs will be available in the Fund’s annual report in a dedicated section.

*The percentage of revenue threshold for nuclear weapons will be 0% for companies involved in, among others, development, production, use, maintenance, offering for sale, distribution, import or

export, storage or transportation of nuclear weapons, where this supplies nuclear states outside of the UN Treaty on Non Proliferation of Nuclear Weapons (1970).

**Companies that have an approved SBTi (Science Based Target) which has a classification of 1.5°C or Well Below 2°C are an exception to these thresholds.



What investment strategy does this financial product follow?

The investment strategy guides investment decisions based on factors such as investment objectives and risk tolerance.

Objective: To grow the investment through a combination of income and capital growth over the long term, whilst aiming to deliver an income equivalent of at least 125% of that of the benchmark

Investments: The Fund will invest at least 80% in equities of global companies including up to 20% in emerging market companies. Specifically, the Fund invests at least 80% of total net assets (excluding ancillary liquid assets, eligible deposits, money market instruments and money market funds) in equities and equity-related securities of companies in any country across the globe, including emerging markets. Equity-related securities can include ADRs, GDRs, exchange-traded warrants and convertible securities, participation certificates and profit sharing certificates, among others. The Fund does not buy equity warrants but may hold any it receives in connection with equities it owns. The Fund may also invest in UCITS and/or other UCIs, preference shares and convertibles.

The Fund may invest in China A-Shares through Shanghai Hong Kong Stock Connect and through Shenzhen Hong Kong Stock Connect.

Strategy & Environmental, Social and Governance (ESG) criteria: The Fund is actively managed. The Investment Manager will adopt a high-conviction (strong belief) approach aiming to generate the Fund's target income. This will focus on opportunities across what the Investment Manager considers to be mature companies which potentially offer sustainably high dividends, or those which are felt able to steadily grow their dividends while showing financial strength and/or low levels of debt, with a strong management capability. The Fund will also take advantage of businesses in the early stages of development, where high cash generation is driving strong dividend growth. The Investment Manager will aim to invest in companies which have a diversified range of successful products, and which are active in a range of geographical markets.

Whilst ESG factors are integrated into the investment process, the Investment Manager retains discretion over investment selection. The Investment Manager actively engages with companies and uses voting rights with the aim of positively influencing company behavior and helping to create competitive returns. In addition, the Fund has exclusions based on the Investment Manager's ESG Baseline Exclusion Policy.

This Fund does not have a sustainable investment objective and the Investment Manager will consider the adverse impacts of an investment to the extent they are financially material. For further information please refer to the sustainability disclosures section of the prospectus and the website <https://www.avivabroker.ie/funds/avivas-sustainability-hub/>

- ***What are the binding elements of the investment strategy used to select the investments to attain each of the environmental or social characteristics promoted by this financial product?***

As noted previously, the criteria described in section “What environmental and/ or social characteristics are promoted by this financial product” above are binding on the investment process to ensure underlying investments are inclusive of those securities promoting environmental or social characteristics.

Aviva Investors considers climate change to be the greatest systemic challenge facing society, global economies, and companies. Failure to act will have catastrophic and pervasive consequences, including for capital markets and asset valuations.

- ***What is the committed minimum rate to reduce the scope of the investments considered prior to the application of that investment strategy?***

There is no commitment to a minimum rate target to reduce the scope of the investments considered prior to the application of the Investment Manager’s investment strategy. Issuers that meet the criteria of the Investment Manager’s ESG exclusion policy described above are excluded. The percentage of investments that are excluded from the Fund’s investment universe will vary over time and be minimal given the nature of the investment universe and the approved issuer process incorporating a strong ESG assessment.

- ***What is the policy to assess good governance practices of the investee companies?***

The Investment Manager’s policy considers global best practice guidelines such as the ICGN Global Corporate Governance Principles and the G20 / OECD Principles of Corporate Governance but are also informed by the Investment Manager’s investment philosophy and numerous years of stewardship and voting experience.

The Fund will only invest in securities from issuers that maintain governance practices in-line with national governance standards. The Fund will not invest in securities from issuers that are in violation of the international norms and conventions set out by the United Nations Global Compact Principles. Investment in securities from issuers that fail to protect the basic rights of investors through sound management practices and employees or that are involved in tax evasion, corruption, or other governance scandals, will be avoided, unless they have taken adequate remedial action.

The Good Governance criteria as outlined in the SFDR will be met through a combination of the UNGC (as part of the Investment Manager’s ESG Baseline Exclusions Policy noted above) and a qualitative assessment as part of the investment analyst research process. Good governance indicators form a substantial component of the Investment Manager’s ESG scoring tools and ESG research.

Aviva Investors’ ESG function, comprising governance and responsible investment specialists, provide analysis to support the Investment Manager’s investment teams and help them in building a robust assessment of good governance practices.

Good governance
practices include
sound management
structures, employee
relations,
remuneration of staff
and tax compliance.



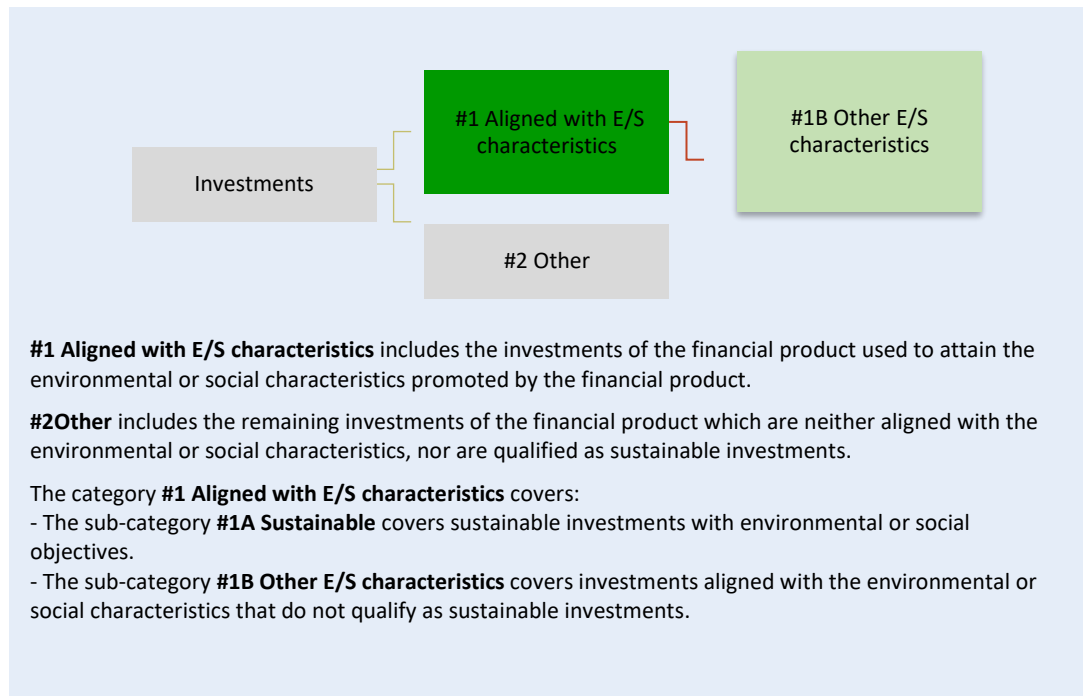
What is the asset allocation planned for this financial product?

Asset allocation describes the share of investments in specific assets.

Taxonomy-aligned activities are expressed as a share of:

- **turnover** reflecting the share of revenue from green activities of investee companies
- **capital expenditure** (CapEx) showing the green investments made by investee companies, e.g. for a transition to a green economy.
- **operational expenditure** (OpEx) reflecting green operational activities of investee companies.

It is expected that at least 80% of the investments will be aligned with the environmental/social characteristics of the Fund in **#1B Other E/S characteristics**. The Fund currently does not have any allocation to Sustainable Investments in category **#1A Sustainable**



It is expected that at least 80% of investments will be aligned with the environmental/social characteristics of the Fund in #1 where possible, however some assets will have no viable ESG data in instances where no viable quantitative data is available. The Fund may hold investments for liquidity purposes, such as ancillary liquid assets, eligible deposits, money market instruments or money market funds, which would fall under “#2 Other”.

The Fund may also hold investments in financial techniques and instruments and derivatives used for hedging and efficient portfolio management purposes, which would fall within “#2 Other”.

Amongst the investments aligned with the environmental/social characteristics of the Sub-Fund, there will be no sustainable investments, therefore all such investments will fall within the category #1B Other E/S characteristics.

● **How does the use of derivatives attain the environmental or social characteristics promoted by the financial product?**

This does not apply - Derivatives are used for hedging and efficient portfolio management and are not deemed to attain the environmental or social characteristics the Fund promotes.



To what minimum extent are sustainable investments with an environmental objective aligned with the EU Taxonomy?

There is no minimum proportion set, as per the graphs below 100% of the investments are not taxonomy aligned

Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy¹?

☐ Yes:

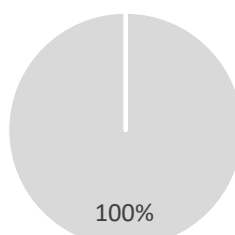
☐ In fossil gas ☐ In nuclear energy

☒ No

The two graphs below show in green the minimum percentage of investments that are aligned with the EU Taxonomy. As there is no appropriate methodology to determine the Taxonomy-alignment of sovereign bonds, the first graph shows the Taxonomy alignment in relation to all the investments of the financial product including sovereign bonds, while the second graph shows the Taxonomy alignment only in relation to the investments of the financial product other than sovereign bonds.*

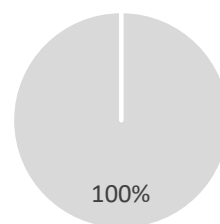
1. Taxonomy-alignment of investments including sovereign bonds*

- ☐ Taxonomy-aligned: Fossil gas
- ☐ Taxonomy-aligned: Nuclear
- ☐ Taxonomy-aligned (no fossil gas & nuclear)
- ☐ Non Taxonomy-aligned



2. Taxonomy-alignment of investments excluding sovereign bonds*

- ☐ Taxonomy-aligned: Fossil gas
- ☐ Taxonomy-aligned: Nuclear
- ☐ Taxonomy-aligned (no fossil gas & nuclear)
- ☐ Non Taxonomy-aligned



This graph represents 100% of the total investments.

* For the purpose of these graphs, 'sovereign bonds' consist of all sovereign exposures

The Fund does not make sustainable investments and the percentage of Taxonomy alignment of the Fund's portfolio is currently 0%.

¹ Fossil gas and/or nuclear related activities will only comply with the EU Taxonomy where they contribute to limiting climate change ("climate change mitigation") and do not significantly harm any EU Taxonomy objective – see explanatory note in the left hand margin. The full criteria for fossil gas and nuclear energy economic activities that comply with the EU Taxonomy are laid down in Commission Delegated Regulation (EU) 2022/1214.

- ***What is the minimum share of investments in transitional and enabling activities?***

The percentage of investments in transitional and enabling activities is currently 0%.



- ***What is the minimum share of sustainable investments with an environmental objective that are not aligned with the EU Taxonomy?***

This does not apply as the Fund does not make sustainable investments.



- ***What is the minimum share of socially sustainable investments?***

This does not apply as the Fund does not make sustainable investments.



- ***What investments are included under “#2 Other”, what is their purpose and are there any minimum environmental or social safeguards?***

There may on occasion be investments in financial techniques and instruments and derivatives used for hedging or efficient portfolio management purposes, or for liquidity holding purposes (such as ancillary liquid assets, eligible deposits, money market instruments, money market funds) which would fall within “#2 Other”. However, given the nature of the Fund “#2 Other” investments, it is not possible to apply environmental and/or social safeguard tests to such investments.

- ***Is a specific index designated as a reference benchmark to determine whether this financial product is aligned with the environmental and/or social characteristics that it promotes?***

No reference benchmark has been designated for the purpose of attaining the environmental or social characteristics promoted by the Fund

- ***How is the reference benchmark continuously aligned with each of the environmental or social characteristics promoted by the financial product?***

This does not apply

- ***How is the alignment of the investment strategy with the methodology of the index ensured on a continuous basis?***

This does not apply

- ***How does the designated index differ from a relevant broad market index?***

This does not apply



Reference benchmarks are indexes to measure whether the financial product attains the environmental or social characteristics that they promote.

- ***Where can the methodology used for the calculation of the designated index be found?***

This does not apply



Where can I find more product specific information online?

More product-specific information can be found on the website:

<https://www.avivabroker.ie/funds/avivas-sustainability-hub/>