

**Template 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**

**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 include a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

**Product name:** *GLOBALACCESS US SMALL & MID CAP EQUITY FUND*

**Legal entity identifier:** *213800HBTJADRZDQIC69*

## Environmental and/or social characteristics

### Does this financial product have a sustainable investment objective?

**Yes**

**No**

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:** \_\_\_%

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**



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

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

The Investment Manager does not select investments directly; instead, it selects and combines specialist Sub-Investment Managers to manage segments of the portfolios of the Fund. The Investment Manager relies on a third-party provider of ESG research in determining the individual companies to be excluded and Sub-Investment Managers are informed periodically of any new exclusions.

In selecting Sub-Investment Managers, the Investment Manager considers the Sub-Investment Manager's ability to implement any approved binding exclusions on all investments in the portfolio of the Fund. The Fund has a broad investable universe represented by an index and as such the level of exclusions that need to be applied will fluctuate depending on the components of the index at any given time and the degree of flexibility applied to invest outside that index.

It is expected that because of the application of the exclusions listed below, the investments of the Fund will contribute to the environmental objective of climate change mitigation.

The relevant Sub-Investment Manager (or its delegate) is required to consider good governance standards of companies in the selection of securities for investment. The Investment Manager uses third party data providers to identify companies that are deemed to be in breach of good governance principles. Only companies that meet good governance standards are eligible for investment by the Fund. For existing investee companies that display poor governance, an engagement and escalation framework is in place, seeking to remedy breaches within an acceptable timeframe.

The following binding exclusions are applicable to the Fund:

- Issuers which generate any revenue from controversial weapons (including cluster munitions, biological-chemical, landmine, depleted uranium, white phosphorous munitions)
- Issuers which generate greater than 10% of revenue from:
  - fossil fuels: thermal coal generation, extraction or sale; arctic oil and gas production; fracking or oil sands production
  - production of nuclear weapons or components exclusively manufactured for use in nuclear weapons
  - tobacco production, distribution, and/or retailing
  - gambling operations, gambling products or providing key products to gambling operations
  - adult entertainment production, distribution, and/or retailing.

The Fund has not designated a reference benchmark for the purpose of attaining the above environmental and social characteristics.

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

As part of the investment process and on an ongoing basis, the Investment Manager, relying on a third-party provider of ESG research, identifies and evaluates the following sustainability indicators in determining what binding exclusions to apply to the Fund:

- The percentage of revenue which issuers generate from controversial weapons (including cluster munitions, biological-chemical, landmine, depleted uranium, white phosphorous munitions)
- Issuers which generate greater than 10% of revenue from:
  - fossil fuels: thermal coal generation, extraction or sale; arctic oil and gas production; fracking or oil sands production
  - production of nuclear weapons or components exclusively manufactured for use in nuclear weapons
  - tobacco production, distribution, and/or retailing
  - gambling operations, gambling products or providing key products to gambling operations
  - adult entertainment production, distribution, and/or retailing.

● ***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?***

Not applicable.

● ***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?***

Not applicable.

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

Not applicable.

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

Not applicable.

**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.

*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

### **What investment strategy does this financial product follow?**

The Investment Manager does not select investments directly; instead, it selects and combines specialist Sub-Investment Managers to manage segments of the portfolio of the Fund. The Investment Manager relies on a third-party provider of ESG research in determining the individual companies to be excluded and Sub-Investment Managers are informed periodically of any new exclusions.

In selecting Sub-Investment Managers, the Investment Manager considers the Sub-Investment Manager’s ability to implement any approved binding exclusions on all investments in the portfolio of the Fund. The Fund has a broad investable universe represented by an index and as such the level of exclusions that need to be applied will fluctuate depending on the components of the index at any given time and the degree of flexibility applied to invest outside that index.

The relevant Sub-Investment Manager (or its delegate) is required to consider good governance standards of companies in the selection of securities for investment. The Investment Manager uses third party data providers to identify companies that are deemed to be in breach of good governance principles. Only companies that meet good governance standards are eligible for investment by the Fund. For existing investee companies that display poor governance, an engagement and escalation framework is in place, seeking to remedy breaches within an acceptable timeframe.

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



- **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?**

#### Good governance

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

#### Asset allocation

describes the share of investments in specific assets.

The following binding exclusions are applicable to the Fund:

- Issuers which generate any revenue from controversial weapons (including cluster munitions, biological-chemical, landmine, depleted uranium, white phosphorous munitions)
- Issuers which generate greater than 10% of revenue from:
  - fossil fuels: thermal coal generation, extraction or sale; arctic oil and gas production; fracking or oil sands production
  - production of nuclear weapons or components exclusively manufactured for use in nuclear weapons
  - tobacco production, distribution, and/or retailing
  - gambling operations, gambling products or providing key products to gambling operations
  - adult entertainment production, distribution, and/or retailing.

A third-party data provider is engaged to generate the issuer names captured by these binding exclusionary screens and these issuer names are then communicated to the external Sub-Investment Manager(s) with the clear instruction that those names cannot be purchased. The list of excluded companies is updated regularly. Should a new name be added to the screen by the data provider that is already held, it must be exited within a reasonable time and in an orderly manner by the relevant Sub-Investment Manager.



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.

- **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 committed minimum rate to reduce the scope of the investments considered prior to the application of that investment strategy, not applicable.

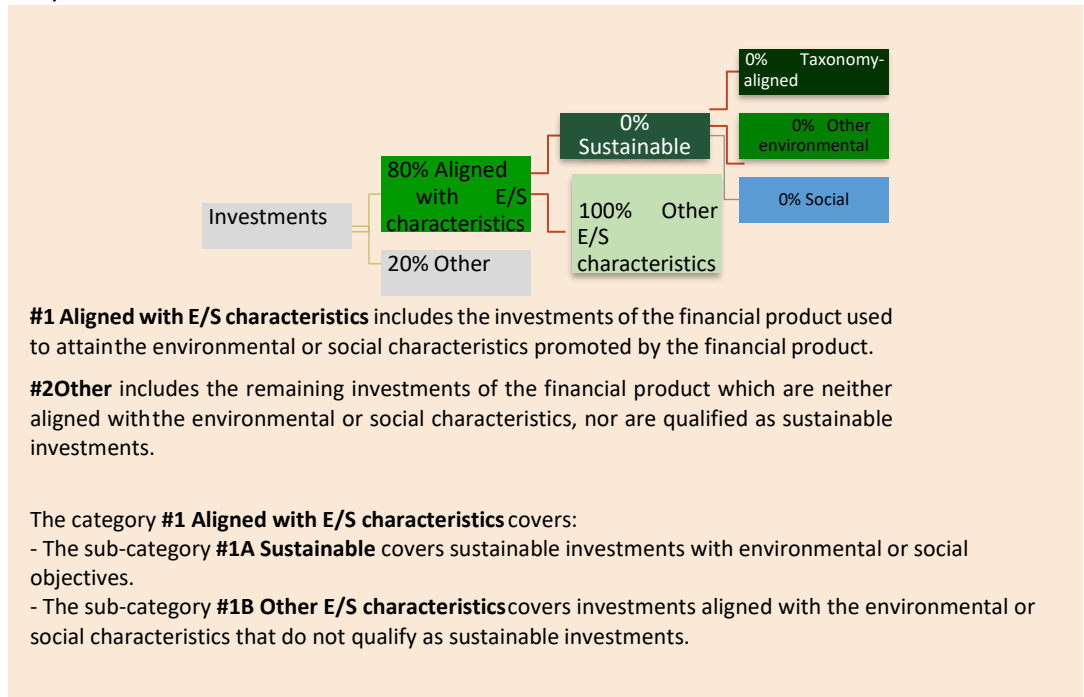
- **What is the policy to assess good governance practices of the investee companies?**

The relevant Sub-Investment Manager (or its delegate) is required to consider good governance standards of companies in the selection of securities for investment. The Investment Manager uses a third-party data provider to identify companies that are deemed to be in breach of good governance principles. Only companies that meet good governance standards are eligible for investment by the Fund. For existing investee companies that display poor governance, an engagement and escalation framework is in place, seeking to remedy breaches within an acceptable timeframe.

#### What is the asset allocation planned for this financial product?

The Fund seeks to achieve its environmental and social characteristics by applying the above binding exclusions on all the investments in the Fund's portfolio. A

minimum 80% of investments are therefore aligned with the Fund's environmental and/or social characteristics.



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

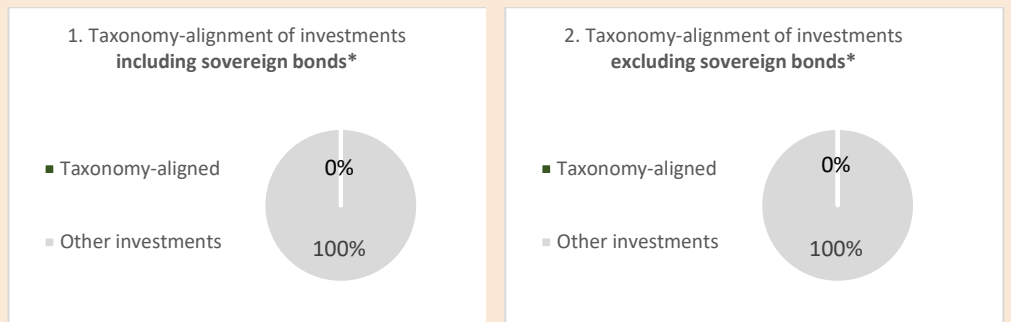
Not applicable.



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

Not applicable.

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.



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

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

The Fund has no taxonomy-aligned investments.



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

Not applicable



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

Not applicable



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

The Fund may, with the remaining portion of the assets (and on an ancillary basis), invest in Investment Grade government and corporate fixed income securities and convertible debt securities (listed or traded on a Regulated Market). The Fund may also invest up to 10% of its Net Asset Value in other collective investment undertakings.



**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 specific index is designated as a reference benchmark.

- ***How is the reference benchmark continuously aligned with each of the environmental or social characteristics promoted by the financial product? Not applicable.***
- ***How is the alignment of the investment strategy with the methodology of the index ensured on a continuous basis? Not applicable.***
- ***How does the designated index differ from a relevant broad market index? Not applicable.***
- ***Where can the methodology used for the calculation of the designated index be found? Not applicable.***



- **Where can I find more product specific information online?**

More product-specific information can be found at the document section of the Fund on the website: [www.barclaysinvestments.com](http://www.barclaysinvestments.com)

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