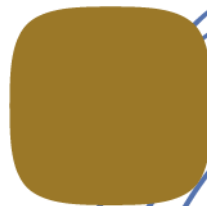


# SFDR Disclosure for Article 6 (Other Product)

## Japan Equity Mid-Small Cap Value Strategy

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## Disclosure for Article 6 (Other Product)

### Japan Equity Mid-Small Cap Value Strategy

<b>Strategy:</b>	Japan Equity Mid-Small Cap Value strategy
<b>Investment Objective</b>	The SMD-AM Japan Equity Mid-Small Cap Value UCITS Fund aims to deliver an attractive return versus the Benchmark (Russell/Nomura Mid-Small Cap Index (including dividends)) by investing in undervalued Japanese companies using a fundamental approach, while also aiming to improve corporate value through engagement with portfolio companies.
<b>Investment Universe</b>	Stocks listed on the Tokyo Stock Exchange (TSE), and regional stock exchanges in Japan, focussing on mainly small & mid-cap companies.
<b>SFDR Category: Article 6</b>	The strategy has neither a sustainable objective nor environmental or social characteristics.
<b>UCITS Fund Name:</b>	SMD-AM Japan Equity Mid-Small Cap Value (UCITS Fund)

#### Strategy overview:

The Japan Equity Mid-Small Cap Value strategy uses a fundamental approach, investing in undervalued stocks by narrowing down all listed companies based on financial criteria (PBR-ROE approach), while utilising AI to identify stocks in which we can expect medium-terms changes. Proactive recommendations to portfolio companies to address business issues with the aim of improving their corporate value.

#### Sustainability Risk Integration and Limitations of Sustainability Data:

**The investments underlying this financial product do not take into account the EU criteria for environmentally sustainable economic activities.**

However, the strategy and the UCITS fund aim to review sustainability factors alongside financial factors, treated holistically and managed from a risk-return perspective in the investment process as the Portfolio Manager considers that sustainability issues can influence investment risk and return.

The Portfolio Managers consider material sustainability risks in their investment decision-making processes in order to enhance their ability to manage risk more comprehensively and generate achievable, long-term returns for investors. Further details on our policies on the integration of sustainability risk into our investment decision-making process can be found in the links provided below.

Sustainability risks mean an environmental, social, or governance event or condition that, if it occurs, could potentially or actually cause a material negative impact on the value of a mandate's investment. Sustainability risks can either represent a risk of their own or have an impact on other risks and may contribute significantly to risks, such as market risks, operational risks, liquidity risks or counterparty risks.

Assessment of sustainability risks is complex and may be based on environmental, social, or governance data which is difficult to obtain and incomplete, estimated, out of date or otherwise materially inaccurate. Even when identified, there can be no guarantee that these data will be correctly assessed.

Sustainability risks may have a more material impact on the value of a mandate's investments in the medium-to-long term. SMDAM recognises that the impact of the consideration of sustainability risks

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JAPAN EQUITY MID-SMALL CAP VALUE STRATEGY

could be either positive or negative for the strategy's eventual performance. This impact is not quantifiable and will vary on a case by case basis; this is partly related to the known industry limitations of sustainability data.

As the strategy and the UCITS Fund do not promote environmental or social characteristics, no reference index is designated for the purpose of attaining such characteristics.

**Derivatives:**

As the strategy and the UCITS Fund do not promote environmental or social characteristics, derivatives used by them are not assessed against any environmental or social characteristics for SFDR purposes.

**Resources:**

You can find more SFDR information about the Sumitomo Mitsui DS Asset Management policies, strategies and Company Sustainability reports on our company website:

Sustainability Related Disclosures:

- SMDAM UK website:

<https://www.smd-am.co.uk/legal-and-compliance/sustainability-related-disclosures>

- SMDAM Tokyo website:

[https://www.smd-am.co.jp/english/corporate/responsible\\_investment/esg/](https://www.smd-am.co.jp/english/corporate/responsible_investment/esg/)

**Change Log**

Version	Date	Details of change
1.0	June 2025	Initial document
2.0	May 2026	Reviewed, no material change

## Disclaimer

Definitions referred to within this document are detailed below:

<p>“SMDAM” “Our” / “We” / “Group”</p> <p>“SMDAM Tokyo” / “SMDAM (Tokyo)”</p>	<p>These references relate to the entire “Sumitomo Mitsui DS Asset Management Company, Limited” organisation and will generally be used when referring to matters such as investment philosophy, style, company structure and other policies, which are consistent across the group.</p> <p>This refers to Sumitomo Mitsui DS Asset Management Company, Limited., the head office of the SMDAM group based in Tokyo, Japan. Our Japanese investment team is based in Tokyo and will perform day-to-day management of client portfolios.</p>
<p>“SMDAM UK” “SMDAM (UK)”</p>	<p>This refers to Sumitomo Mitsui DS Asset Management (UK) Limited, the UK-based subsidiary of SMDAM (Tokyo). SMDAM (UK) will typically be appointed as investment manager and will delegate day-to-day management of client portfolios to SMDAM (Tokyo), SMDAM (Hong Kong) and SMDAM (Singapore), but will retain responsibility for the management, control and servicing of the client portfolios and relationship. Some responses within this document will refer specifically to practices and procedures undertaken within the SMDAM (UK) office.</p>

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The disclosures in this document are designed to comply with Article 6 of the Sustainable Finance Disclosure Regulation ((EU) 2019/2088) (“SFDR”). The information disclosed is required by law to help you understand the integration of sustainability risks into our investment decisions.

The information in this document is not intended to be investment advice, tax, financial or any other type of advice, and is merely an overview of the sustainability-related aspects of the strategy. This document should not be construed as an offer or solicitation to purchase shares. It is correct to the best of our knowledge at the date of issue. This document may not be copied, redistributed or reproduced in whole or in part without prior written approval from Sumitomo Mitsui DS Asset Management (UK) Limited. The client’s legal agreement takes precedence over this document.