



Sumitomo Mitsui DS Asset Management

Review of Disclosures

SFDR Article 12

Change tracker for SFDR collateral and disclosures on the website

03 July 2023



## Review of Disclosures SFDR Article 12

Change tracker for SFDR collateral and disclosures on the website  
Date of tracker: **03 July 2023**

Name	Regulation	Link
Level 1 - SFDR	Regulation (EU) 2019/2088	<a href="https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:02019R2088-20200712">https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:02019R2088-20200712</a>
Level 2 - RTS (regulatory technical standards)	Supplements SFDR regulation	<a href="https://ec.europa.eu/finance/docs/level-2-measures/C_2022_1931_1_EN_ACT_part1_v6%20(1).pdf">https://ec.europa.eu/finance/docs/level-2-measures/C_2022_1931_1_EN_ACT_part1_v6%20(1).pdf</a>
Annexes	Annexes accompanying RTS	<a href="https://ec.europa.eu/info/business-economy-euro/banking-and-finance/sustainable-finance/sustainability-related-disclosure-financial-services-sector_en">https://ec.europa.eu/info/business-economy-euro/banking-and-finance/sustainable-finance/sustainability-related-disclosure-financial-services-sector_en</a>
Taxonomy	Regulation (EU) 2020/852	<a href="https://ec.europa.eu/finance/docs/level-2-measures/taxonomy-regulation-delegated-act-2021-2800_en.pdf">https://ec.europa.eu/finance/docs/level-2-measures/taxonomy-regulation-delegated-act-2021-2800_en.pdf</a>

What must the asset manager do?
Review all marketing communications The asset manager must review of all its marketing materials for all in-scope products and services, to ensure that those marketing documents do not contradict any information disclosed under the SFDR

Regulation Name	Regulation Reference	Article	Document Name	Available on website yes / no	Company / Fund related	Date of Version	Revision History	Date of Revised Version	Change made
SFDR	Regulation (EU) 2019/2088	Art.12	Review of disclosures - change tracker	Yes	All	March 2021	Document created	December 2022	Tracker updated
SFDR	Regulation (EU) 2019/2088	Art. 3.1	Policy - Sustainability Risk	No longer	Company	March 2021	Document created	December 2022	Document replaced with extended document 'Transparency of sustainability risks'
SFDR	Regulation (EU) 2019/2088	Art. 3	Transparency of sustainability risks	Yes	Company	December 2022	Document created	-	-
SFDR	Regulation (EU) 2019/2088	Art. 4.1	Policy - Adverse Sustainability (article 4.1)	No longer	Company	March 2021	Document created	December 2022	Document replaced with extended document 'Transparency of adverse sustainability impacts at entity level'
SFDR	Regulation (EU) 2019/2088	Art 4	Transparency of adverse sustainability impacts at entity level	Yes	Company	December 2022	Document created	-	-
SFDR	Regulation (EU) 2019/2088	Art 4 - Annex 1	Statement on Principal Adverse Impacts of Investment Decisions on Sustainability Factors SFDR Disclosure Statement Entity Level – Article 4, Annex 1	Yes	Company	June 2023	Document created	July 2023	Typo corrected
SFDR	Regulation (EU) 2019/2088	Art. 5.1	Policy - Remuneration (article 5.1)	Yes	Company	March 2021	Document created	December 2022	Annual review. Updates for any SFDR / RTS changes etc. change address from 5KWS to 100LS
SFDR	Regulation (EU) 2019/2088	Art 7.1a	Policy - Principle Adverse Impacts (article 7.1.a)	Yes	Company	March 2021	Document created	December 2022	Annual review. Updates for any SFDR / RTS changes etc. change address from 5KWS to 100LS
SFDR	Regulation (EU) 2019/2088	Art. 6.1	Disclosures (article 6) - Japan Equity Sustainable Dividend	Yes	Fund related	March 2021	Document created	December 2022	Annual review. Updates for any SFDR / RTS changes etc. change address from 5KWS to 100LS. Document name change.
SFDR	Regulation (EU) 2019/2088	Art. 6.1	Disclosures (article 6) - Japan Equity Small Cap Absolute Value	Yes	Fund related	March 2021	Document created	December 2022	Annual review. Updates for any SFDR / RTS changes etc. change address from 5KWS to 100LS. Document name change.
SFDR	Regulation (EU) 2019/2088	Art. 6.1	Disclosures (article 6) - APAC Real Estate Investment Trust	Yes	Fund related	March 2021	Document created	December 2022	Annual review. Updates for any SFDR / RTS changes etc. change address from 5KWS to 100LS. Document name change.
SFDR	Regulation (EU) 2019/2088	Art. 6.1	Disclosures (article 6) - Japan Equity Fundamental Active	Yes	Fund related	March 2021	Document created	December 2022	Annual review. Updates for any SFDR / RTS changes etc. change address from 5KWS to 100LS. Document name change.
SFDR	Regulation (EU) 2019/2088	Art. 6.1	Disclosures (article 6) - Japan Equity Value + Alpha	Yes	Fund related	March 2021	Document created	December 2022	Annual review. Updates for any SFDR / RTS changes etc. change address from 5KWS to 100LS. Document name change.
SFDR	Regulation (EU) 2019/2088	Art. 6.1	Disclosures (article 6) - China A Share Quality Growth	Yes	Fund related	March 2021	Document created	December 2022	Annual review. Updates for any SFDR / RTS changes etc. change address from 5KWS to 100LS
SFDR	Regulation (EU) 2019/2088	Art.13	Factsheet - UCITS fund - SUSDIV - (I) JPY	Yes	Fund related	November 2022	Monthly updates	Monthly updates	Annual review. Updates for any SFDR / RTS changes etc. change address from 5KWS to 100LS
SFDR	Regulation (EU) 2019/2088	Art.13	Factsheet - UCITS fund - SUSDIV - (P) EUR unhedged	No	Fund related	August 2022	Archived	-	Share class closed. Factsheet no longer required
SFDR	Regulation (EU) 2019/2088	Art.13	Factsheet - UCITS fund - SC AbVal - (P) JPY	Yes	Fund related	November 2022	Monthly updates	Monthly updates	Annual review. Updates for any SFDR / RTS changes etc. change address from 5KWS to 100LS
SFDR	Regulation (EU) 2019/2088	Art.13	Factsheet - UCITS fund - SC AbVal - (S) EUR unhedged	Yes	Fund related	November 2022	Monthly updates	Monthly updates	Annual review. Updates for any SFDR / RTS changes etc. change address from 5KWS to 100LS
SFDR	Regulation (EU) 2019/2088	Art.13	Factsheet - UCITS fund - SC AbVal - (S) Unhedged	Yes	Fund related	November 2022	Monthly updates	Monthly updates	Annual review. Updates for any SFDR / RTS changes etc. change address from 5KWS to 100LS
SFDR	Regulation (EU) 2019/2088	Art.13	Factsheet - UCITS fund - SC AbVal - (P) GBH unhedged	No	Fund related	June	Archived	-	Share class closed. Factsheet no longer required
SFDR	Regulation (EU) 2019/2088	Art.13	Factsheet - UCITS fund - SC AbVal - (S) EUR hedged	No	Fund related	August 2022	Archived	-	Share class closed. Factsheet no longer required
SFDR	Regulation (EU) 2019/2088	Art.13	Factsheet - UCITS fund - APAC REIT - (P) USD	Yes	Fund related	November 2022	Monthly updates	Monthly updates	Annual review. Updates for any SFDR / RTS changes etc. change address from 5KWS to 100LS
SFDR	Regulation (EU) 2019/2088	Art.13	Company Presentation - SMDAM	No	Company	November 2022	Monthly updates	Monthly updates	Annual review. Updates for any SFDR / RTS changes etc. change address from 5KWS to 100LS
SFDR	Regulation (EU) 2019/2088	Art.13	Product Presentation - JEFA	No	Strategy related	November 2022	Monthly updates	Monthly updates	Annual review. Updates for any SFDR / RTS changes etc. change address from 5KWS to 100LS
SFDR	Regulation (EU) 2019/2088	Art.13	Product Presentation - Susdiv	No	Strategy related	November 2022	Monthly updates	Monthly updates	Annual review. Updates for any SFDR / RTS changes etc. change address from 5KWS to 100LS
SFDR	Regulation (EU) 2019/2088	Art.13	Product Presentation - Value + Alpha	No	Strategy related	November 2022	Monthly updates	Monthly updates	Annual review. Updates for any SFDR / RTS changes etc. change address from 5KWS to 100LS
SFDR	Regulation (EU) 2019/2088	Art.13	Product Presentation - SC AbVal	No	Strategy related	November 2022	Monthly updates	Monthly updates	Annual review. Updates for any SFDR / RTS changes etc. change address from 5KWS to 100LS
SFDR	Regulation (EU) 2019/2088	Art.13	Product Presentation - APAC REIT	No	Strategy related	November 2022	Monthly updates	Monthly updates	Annual review. Updates for any SFDR / RTS changes etc. change address from 5KWS to 100LS
SFDR	Regulation (EU) 2019/2088	Art.13	Generic proposal - RIF - JEFA	No	Strategy related	November 2022	Monthly updates	Monthly updates	Annual review. Updates for any SFDR / RTS changes etc. change address from 5KWS to 100LS
SFDR	Regulation (EU) 2019/2088	Art.13	Generic proposal - RIF - Susdiv	No	Strategy related	November 2022	Monthly updates	Monthly updates	Annual review. Updates for any SFDR / RTS changes etc. change address from 5KWS to 100LS
SFDR	Regulation (EU) 2019/2088	Art.13	Generic proposal - RIF - Value + Alpha	No	Strategy related	November 2022	Monthly updates	Monthly updates	Annual review. Updates for any SFDR / RTS changes etc. change address from 5KWS to 100LS
SFDR	Regulation (EU) 2019/2088	Art.13	Generic proposal - RIF - SC AbVal	No	Strategy related	November 2022	Monthly updates	Monthly updates	Annual review. Updates for any SFDR / RTS changes etc. change address from 5KWS to 100LS
SFDR	Regulation (EU) 2019/2088	Art.13	Generic proposal - RIF - APAC REIT	No	Strategy related	November 2022	Monthly updates	Monthly updates	Annual review. Updates for any SFDR / RTS changes etc. change address from 5KWS to 100LS
SFDR	Regulation (EU) 2019/2088	Art.13	Generic proposal - RIF - China A Share	No	Strategy related	November 2022	Monthly updates	Monthly updates	Annual review. Updates for any SFDR / RTS changes etc. change address from 5KWS to 100LS

## Disclosures

On 1 October 2019, Sumitomo Mitsui Asset Management (London) Limited and Daiwa SB Investments (UK) Ltd. merged to form Sumitomo Mitsui DS Asset Management (UK) Limited.

**Definitions referred to within this document are detailed below:**

### Post 1 April 2019 merger

"Sumitomo Mitsui DS Asset Management Company, Limited"	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.
"SMDAM"	
"Our"	
"We"	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.
"Group"	
"SMDAM (UK)"	This refers to Sumitomo Mitsui DS Asset Management (UK) Limited, the UK-based subsidiary of SMDAM. SMDAM (UK) will typically be appointed as investment manager and will delegate day-to-day management of client portfolios to SMDAM, 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.

Issued by Sumitomo Mitsui DS Asset Management (UK) Limited Registered in England and Wales. Registered office 100 Liverpool Street, London, EC2M 2AT; registered number 1660184. Authorised and regulated by the Financial Conduct Authority.

The Information in this document is not intended to be investment advice and is merely a brief summary of the main aspects of the fund. This brochure is for information only and should not be construed as an offer to purchase shares of the fund. 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.

For detailed information about the Fund please refer to the sales prospectus and the key investor information document (KIID). Financial information about the fund is provided in the latest audited annual report or interim, whichever is newest. The KIID, the sales prospectus and the most recent annual report and the latest semi-annual report, if published thereafter, are the only binding basis for the purchase of shares and investment decisions should be based solely on this. Documents can be obtained free of charge at Sumitomo Mitsui DS Asset Management, and on [www.smd-am.co.uk](http://www.smd-am.co.uk)

Sumitomo Mitsui DS Asset Management recommends that you read the KIID, the sales prospectus and the last half / annual report and that you contact a professional adviser for personalised advice before deciding on any investment. Sumitomo Mitsui DS Asset Management assumes no responsibility for use of this document or its contents. This document does not contain any representation made by the management company of the fund. Opinions and data expressed herein are subject to change without notice.

The shares issued in the Fund may only be offered for sale or sold in jurisdictions where such offer or sale is permitted. Shares of the Fund are not available for purchase / sale in the U.S. or to U.S. persons residing outside the U.S., or the EEA or to any EEA domiciled persons. Any document regarding the Fund and / or the information may not be distributed in the U.S. or the EEA. Publication and distribution of this document and offer and sale of shares in the Fund may also be subject to special restrictions in other jurisdictions than the U.S. and the EEA.

To be compliant with the Swiss law please note that the representative in Switzerland is 1741 Fund Solutions Ltd, Burggraben 16, CH-9000 St. Gallen. Swiss Paying Agent in Switzerland is Telco Ltd, Bahnhofstrasse 4, 6430 Schwyz, Switzerland. Fund prospectus, the Key Investor Information Document, the articles of association as well as the annual and semi-annual reports may be obtained free of charge from the representative. In respect of the units distributed in and from Switzerland, the place of performance and jurisdiction is the registered office of the Representative.

**Risk warning: Investments in the Fund can both increase and decrease in value due to market fluctuations, the fund's risk and costs associated with subscription and redemption, administration, etc., and you can lose the entire amount invested. The Fund's historical development should not be considered a reliable indicator of future returns.**

**Risk warning: On 1 January 2021 the UK left the EU transitional arrangements and no longer benefits from passporting rights into EEA countries. This is a marketing communication. Please refer to the prospectus of the UCITS and to the KIID before making any final investment decisions.**