

PING AN OF CHINA ASSET MANAGEMENT (HONG KONG)  
COMPANY LIMITED

# Climate Risk Disclosure Statement 2024

22 November 2024



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## Introduction

Climate-related risks are considered by the Securities and Futures Commission ("SFC") as a source of financial risk which may pose potential impact to the value of assets and therefore an investor's investments in a fund. The Amendments to the Fund Manager Code of Conduct on the Management and Disclosure of Climate-related Risks as released in August 2021 requires fund managers to take climate-related risks into consideration in their investment and risk management processes to make appropriate disclosures to investors in funds. According to this requirement, Ping An of China Asset Management (Hong Kong) Company Limited ("**PAAMC HK**", "**Company**") is being classified as a Large Fund Manager and is required to conduct climate risk assessment on an annual basis.

PAAMC HK has now completed a climate-related risk relevancy analysis and materiality assessment of all currently managed funds under its SFC Type 9 License, and is hereby pleased to publish its Climate Risk Disclosure Statement. The purpose of this statement is to communicate to all PAAMC HK's stakeholders – clients, investors and peers on how PAAMC HK considers the climate across its business.

This statement summarizes PAAMC HK's key work to date for identifying, assessing, integrating and managing climate-related risks and opportunities in relation to PAAMC HK's investment. PAAMC HK is fully dedicated to promoting sustainable investment and responsible corporate governance practices in order to align with the goals and responsibilities of the Ping An Insurance (Group) Company of China, Ltd. (the "**Group**"). PAAMC HK believes that by contributing and playing an active role in the evolution of environmental, social and governance ("**ESG**") issues, PAAMC HK can create a positive feedback cycle and deliver higher investment returns for clients in the long-run.

**This statement is based on three pillars: (a) Governance, (b) Investment Management and Risk Management, and c) Portfolio Carbon Footprint Disclosure.**

**(a) Governance**

The Board of PAAMC HK provides ultimate oversight for climate-related issues of its funds. PAAMC HK has established an Investment Committee, which is made up of senior management including Chief Investment Officer, Head of Risk Management and Head of Compliance of the Company. The Board delegated authority to the Investment Committee regarding the status and progress of efforts to manage climate-related risks for the Company’s investments. The Investment Committee meets up monthly to oversee the management of climate-related issues.

PAAMC HK has also established an ESG Office to assist the Investment Committee in compliance with the ESG related policies and objectives as well as follow up the ESG requirements set by the Group, develop fund-level climate strategy, and help identify, assess and manage climate risks and opportunities.

The Investment Committee members and ESG Office members will attend PAAMC HK monthly Risk Management Committee meeting to give an update on the progress of the relevant ESG projects and keep PAAMC HK’s management informed of any material climate-related issues.

**Figure 1: Climate-related Governance Structure**



The governance structure described above is how PAAMC HK incorporates climate-related risks into the investment process. The steps taken to incorporate relevant and material climate-related risks into the investment management process and the processes for identifying and assessing, climate-related risks, including the key tools and metrics used, are described in the following Investment Management and Risk Management section.

**(b) Investment Management and Risk Management**

PAAMC HK has established policies to manage climate-related risks for its investment activities. For example, PAAMC HK includes climate-related risks in the investment philosophy and investment strategies, incorporates climate-related data and considerations into its investment research and analysis process, takes reasonable steps to assess the impact of these risks on the performance of underlying investments, and proactively engages with the investee companies and fund managers throughout the investment lifecycle.

### (b - i) Qualitative Climate Risk Assessment

PAAMC HK has performed a climate-related risk assessment, which consists of a relevancy analysis and a materiality assessment, for all funds in which it has discretionary management (“**Managed Funds**”). After the relevancy screening, PAAMC HK determined that roughly 57.00% of the Managed Funds have relevant climate-related risks.

During the materiality assessment, by referencing the Sustainability Accounting Standard Board’s sectoral materiality mapping and also a qualitative risk assessment based on the Network of Central Banks and Supervisors for Greening the Financial System scenarios, PAAMC HK has assessed the materiality of climate-related risks – transition risks and physical risks for each Managed Fund based on their corresponding investment strategies and horizons.

For transition risks, PAAMC HK has evaluated the degree of exposure in high carbon emission sectors and key markets, assessed the impact of these invested sectors due to potential change in climate policy and technology, provided a qualitative professional judgment on the level of transition risk, and calculated a transition risk score to determine the fund-specific transition risk level of each Managed Fund.

In addition, Notre Dame-Global Adaptation Index (ND-GAIN) Country Index<sup>1</sup> is adopted as a high-level reference for the physical climate risk associated with each Managed Fund. A fund-specific physical risk score is assigned to each Managed Fund by summing up the products of geographic ND-Gain Physical Risk Level and fund investment proportions. The results are then compared to the Fund-level Risk Score Ranges to determine the level of fund-specific physical risks.

According to the qualitative assessment conducted in October 2024, approximately 14.29% (2 funds) of the Managed Funds are deemed to have potential material climate-related risks (“**Material Climate-related Risks Managed Funds**”).

### (b - ii) Quantitative Climate Risk Assessment

To further evaluate the 2 Material Climate-related Risks Managed Funds, a quantitative risk assessment and portfolio carbon footprint calculation have been performed as part of the Enhanced Requirements for Large Fund Managers under the SFC’s requirements.

As the first step of PAAMC HK’s quantitative climate risk assessment, greenhouse gas (“**GHG**”) emission is selected as the key indicator of quantitative climate risk assessment to increase cross-industry comparability. A vulnerability scoring scheme is defined based on GHG intensity of each industry, weighted by the proportion of each industry of investment, and applied to assess fund-level vulnerability to change in carbon price.

Based on the quantitative assessment, one of the Material Climate-related Risks Managed Funds falls into the High risk and the other falls into the Medium risk. A portfolio-level climate risk assessment is then conducted based on the projection under current policies to further drill down and assess the potential impact of change in carbon price to all portfolio companies in vulnerable industries for all the Material Climate-related Risks Managed Funds. Of the 26 out of 82 underlying assets, accounting for 37.08% AUM of the two Managed Funds that are subject to medium to high risk, carbon price burden in 2025 and 2030 is projected respectively. PAAMC HK is well-informed about the possible impact. With PAAMC HK’s active risk management and engagement policy in place, the risk is deemed manageable by PAAMC HK.

PAAMC HK will closely monitor and review the risk level of each Material Climate-related Risks Managed Fund resulted from the quantitative climate risk assessment from time to time and seek engagement with portfolio companies where possible to facilitate their low carbon economy transition, and adjust PAAMC HK’s future investment strategy to reduce exposure to carbon cost.

### (b - iii) Scenario Analysis

In accordance with enhanced standards applicable to Large Fund Managers whose funds are assessed to be exposed to material climate-related risks, PAAMC HK hereby assesses the relevance and utility of scenario analysis.

Climate risks may cause more than unpredictable natural disasters and are complicated by uncertainty in policy and socio-economic factors. PAAMC HK recognizes that scenario analysis is an essential tool to assess the financial impact of uncertainty and inform risk management using “what-if” scenarios, and therefore the relevance and utility of scenario analysis are confirmed. Network of Central

<sup>1</sup> <https://gain.nd.edu/our-work/country-index/>

Banks and Supervisors for Greening the Financial System (“NGFS”) scenarios have been adopted in quantitative climate risk assessment to provide similar context to Banking Sector Climate Risk Stress Test as launched by Hong Kong Monetary Authority in 2021 and 2023.

PAAMC HK reviews the result of most current climate risk assessment and track updates on international climate policies and change in physical environment annually, e.g., global GHG emission level and temperature level, as well as climate-related performances in relevant industries and portfolio companies like industrial GHG intensity and GHG emissions from portfolio companies. Upon significant changes in the above-mentioned factors or a significant change in portfolio composition, PAAMC HK will evaluate whether there is a need to re-attempt quantitative risk assessment or conduct scenario analysis based on a new scenario to compare selected impact under different projection pathways embedded in different scenarios.

#### **(b - iv) Engagement Policy**

PAAMC HK views engagement as an essential way to express and pass on the commitment on ESG and green investments to portfolio companies during ownership. In the face of climate change, PAAMC HK believes that it can exert more impact on investee companies and fund managers it invests in as well as directing capital to drive decarbonization of the whole society.

To ensure its active and effective ownership position, PAAMC HK tailors the engagement approach and adapts to different natures of its diverse asset classes.

PAAMC HK prioritizes its engagement with investee companies based on 1) size of holdings, 2) duration of holding, and 3) sensitive industries/sectors to climate risks, and where feasible, with fund manager based on similar criteria.

PAAMC HK consistently monitors and assesses investee companies’ climate-related performance, including but not limited to energy use and GHG data tracking, climate-related information request and climate risk assessment, at post-investment stage to identify and manage potential risks.

PAAMC HK recognizes the power of voting rights and, where feasible and applicable, will file resolution to draw attention from investee companies on climate change subject matters. PAAMC HK also understands the power of education, and where appropriate, will provide trainings to help raise investee companies’ and fund managers’ awareness on climate changes and relevant mitigation measures.

#### **(c) 2024 Portfolio Carbon Footprint Disclosure**

Pursuant to enhanced standards in Consultation Conclusions on the Management and Disclosure of Climate-related Risks by Fund Managers set for Large Fund Managers, PAAMC HK calculates the portfolio carbon footprints of the Scope 1 and Scope 2 GHG emissions associated with the Material Climate-related Risks Managed Funds’ underlying investments at the fund level.

#### **(c - i) Methodology**

The portfolio carbon footprint is calculated in reference to The Global GHG Accounting and Reporting Standard for the Financial Industry published by Partnership for Carbon Accounting Financials (“PCAF”) and Appendix E of Consultation Conclusions on the Management and Disclosure of Climate-related Risks by Fund Managers published by SFC. The formula and methodology referenced are as follow:

Figure 2: Financed Emissions Calculation Methodology

For listed companies:

$$\text{Financed emissions} = \sum_c \frac{\text{Outstanding amount}_c}{\text{Enterprise Value Including Cash}_c} \times \text{Company emissions}_c$$

For bonds to private companies:

$$\text{Financed emissions} = \sum_c \frac{\text{Outstanding amount}_c}{\text{Total equity} + \text{debt}_c} \times \text{Company emissions}_c$$

$$\text{Attributed Emissions} = \frac{\text{Exposure to Sovereign Bond (USD)}}{\text{PPP-adjusted GDP (international USD)}} \times \text{Sovereign Emissions (tCO}_2\text{e)}$$

Source: PCAF, 2022, The Global GHG Accounting and Reporting Standard for the Financial Industry. Second Edition.

Figure 3: Portfolio Carbon Footprint Calculation Methodology

Portfolio carbon footprint	
Formula	$\sum_N^i \left( \frac{\text{Current value of investment}_i}{\text{Investee company's enterprise value}_i} \times \text{Investee company's Scope 1 and Scope 2 GHG emissions}_i^{\text{@}} \right)$ <p style="text-align: center;">Current portfolio value (\$ million)</p> <p><small>@ Fund managers are encouraged to include Scope 3 GHG emissions if data is available.</small></p>
Methodology	<p>Scope 1 and Scope 2 GHG emissions (and Scope 3 GHG emissions if available) from investments and debts are allocated to the reporting institution based on the proportional share of investment or debt in the investee company. For example, if an institution's investment represents 5% of a company's enterprise value, then that institution accounts for 5% of the company's GHG emissions.</p> <p>Enterprise value means the sum, at financial year end, of the market capitalisation of ordinary and preferred shares and the book value of total debt and non-controlling interests, without deducting cash or cash equivalents. For other asset classes, please make reference to the PCAF Standard in calculating the portfolio carbon footprint.</p> <p>The current portfolio value is used to normalise the data.</p>
Key points + / -	<ul style="list-style-type: none"> <li>+ May be used to compare portfolios to one another or to a benchmark.</li> <li>+ Uses portfolio market value to normalise data, which is fairly intuitive to investors.</li> <li>+ Allows for portfolio decomposition and attribution analysis.</li> <li>- Changes in the enterprise value of underlying companies can be misinterpreted.</li> </ul>

Source: SFC, 2021, Consultation Conclusions on the Management and Disclosure of Climate-related Risks by Fund Managers.

**(c - ii) Data Source**

An external GHG data vendor is tasked to provide investee company's Scope 1 and Scope 2 GHG emission data. There are three data sources, including: (1) disclosed 2023 GHG data from sustainability reports, CSR reports, CDP and other published company reports to obtain the necessary emissions data, (2) 2023 GHG data reported through third-party carbon disclosure database, and (3) where (1) and (2) are not available, carbon emission for such issuers is considered not available.

**(c - iii) Assumption**

Currently, PCAF lacks a methodology for calculating financed emissions related to cash holdings. As a result, we have excluded cash amounts from the scope of our financed emissions calculations.



(c - iv) Results

Among the Material Climate-related Risks Managed Funds, the table below summarizes the portfolio carbon footprint of the Scope 1 and Scope 2 GHG emissions associated with the funds' underlying investments for those are authorized by the SFC:

Table 1: Portfolio Carbon Footprint

Fund Names	Year-end Date <sup>1</sup>	Currency <sup>2</sup>	Covered Assets <sup>3</sup> (Millions in fund currency)	Total Net Assets <sup>4</sup> (Millions in fund currency)	Data Coverage <sup>5</sup>	Covered Financed Emissions <sup>6</sup> (t CO2e)	Portfolio Carbon Footprint <sup>7</sup> (t CO2e / USD Million)
Ping An of China Select Investment Fund Series - Ping An of China SIF - RMB Bond Fund (Fund F)	30-Jun-24	RMB	497.40	517.85	96.05%	15,688.22	229.17
Ping An of China Trust - Ping An of China CSI HK Dividend ETF 3070 (Fund J)	31-Dec-23	HKD	808.86	807.64	100%	44,982.33	434.30

The below two funds are not included in this year's assessment as they have been delisted in 2024. However, both funds were assessed to be material to climate risks according to 2023 annual assessment, their carbon footprint as of financial year end date on 31 Dec 2023 have been calculated for disclosure:

Ping An of China Asset Management Fund - Emerging Market Income Fund (Fund A)	31-Dec-23	USD	49.25	50.97	96.63%	3,752.85	76.20
Ping An of China Asset Management Fund Sub-fund 2 - China High Yield Private Strategy Bond Fund (Fund B)	31-Dec-23	USD	26.48	26.43	100.00%	3,601.53	136.02

Notes:

<sup>1</sup> A financial year end date signifies the completion of 12-month accounting period for a fund. Portfolio Carbon Footprint calculation for each of fund is aligned with the corresponding Year-end date, as appeared on corresponding annual financial statement.

<sup>2</sup> Currency indicates the presentation currency in which each fund presents its financial statements.

<sup>3</sup> Covered Assets indicates the amount of net assets with GHG data coverage, reported or estimated, and not excluded due to lack of recognized GHG accounting methodology.

<sup>4</sup> Total Net Assets is displayed as appeared on financial statement of corresponding fund by the indicated year-end date. In case where PAAMC HK is responsible for managing a portion of the fund, the values are adjusted to correctly reflect the total market value of the portion of assets under management of PAAMC HK.

<sup>5</sup> Data Coverage for a specific fund is calculated as the amount of covered assets, divided by the total net assets of that specific fund.

<sup>6</sup> Covered Financed Emissions are calculated as the Financed Emissions related to the Covered Assets, with reference to *Global GHG Accounting and Reporting Standard for the Financial Industry* published by PCAF.

<sup>7</sup> Portfolio Carbon Footprint is calculated as the financed emissions of the covered assets normalized by covered assets, rendering comparable results between different funds.

<sup>8</sup> Presentation currency of the fund is converted to USD using the exchange rate by corresponding Year-end Date.