

## Chapter 5

# Disclosure of sustainability-related information

**5.5 Sustainability product-level reporting**

**Form and content of Part A of a public product-level sustainability report**

- 5.5.1 **R** A manager must prepare Part A of a *public product-level sustainability report* in circumstances where a *sustainability product* does not have *pre-contractual materials* that relate to it.
- 5.5.2 **R** A manager must ensure that Part A of a *public product-level sustainability report*:
  - (1) contains the information set out in ■ ESG 5.3.3R and ■ ESG 5.3.6R; and
  - (2) is made available to *clients* before they invest in a *sustainability product*.
- 5.5.3 **R** A manager must publish Part A of a *public product-level sustainability report* on the *relevant digital medium* for the business of the *manager* in a prominent place on the specific webpage or page on a mobile application or other digital medium at which the *sustainability product* is offered.
- 5.5.4 **R** A manager must ensure that it keeps the information set out in Part A of a *public product-level sustainability report* under review in accordance with ■ ESG 5.1.2R.

**Form and content of Part B of a public product-level sustainability report**

- 5.5.5 **R**
  - (1) ■ ESG 2.3.1R to ■ ESG 2.3.4R apply for the purposes of a *manager* preparing Part B of a *public product-level sustainability report*, where the reference to '*public TCFD product report*' is substituted with the reference to '*public product-level sustainability report*'.
  - (2) A *manager* must:
    - (a) where a *manager* uses a *sustainability label* in relation to a *sustainability product*, include in Part B of its *public product-level sustainability report* the information set out under ■ ESG 5.5.6R; or
    - (b) where a *manager* does not use a *sustainability label* in relation to a *sustainability product* but uses one or more of the terms in ■ ESG 4.3.2R(2) in accordance with ■ ESG 4.3.2R(1), include in Part B of its *public product-level sustainability report* the information at:

- (i) ■ ESG 5.5.6R(3);
- (ii) ■ ESG 5.5.6R(5);
- (iii) ■ ESG 5.5.6R(8) (in relation to the *manager's* investment policy and strategy);
- (iv) ■ ESG 5.5.6R(9); and
- (v) ■ ESG 5.5.6R(10)

**5.5.6**

**R**

In addition to the requirements at ■ ESG 5.4.4R, a *manager* must include the following information in relation to a *sustainability product* in Part B of a *public product-level sustainability report*:

- (1) the *sustainability label* that the *manager* is using in relation to the *sustainability product*;
- (2) details of the product's *sustainability objective*;
- (3) the date of the report;
- (4) details as to the product's progress towards achieving its *sustainability objective*;
- (5) details as to how the product invests in accordance with the *manager's investment policy* and strategy for that product on an ongoing basis;
- (6) the proportion of assets (which may be expressed as an approximate figure or range) that are invested in accordance with the product's *sustainability objective*, as well as the types of assets that are not invested in accordance with that objective and the reason(s) for that;
- (7) details of the *sustainability product's* performance against the KPIs under ■ ESG 4.2.4R(3);
- (8) details of the relevant metrics (other than those set out in ■ ESG 5.5.6R(7)) that a *retail client* might reasonably find useful in understanding the product's *sustainability objective* and/or the *manager's* investment policy and strategy for that product;
- (9) details of the following information, where this is relevant to a *retail client's* understanding of the metrics set out at ■ ESG 5.5.6R(7) and ■ ESG 5.5.6R(8):
  - (a) relevant contextual information such as how the metrics should be interpreted and their associated limitations – for example, if particular assumptions or proxies have been used; and
  - (b) historical annual calculations of the metrics in ■ ESG 5.5.6R(7) and ■ ESG 5.5.6R(8) after the first year of preparing Part B of a *public product-level sustainability report* in relation to the product that enable *clients* to compare the product's sustainability performance year-on-year in a way that is easy to understand and is not misleading;
- (10) details (if any) of how the *manager's* approach in relation to the product deviates materially from the *manager's* overarching approach disclosed in the *manager's sustainability entity report*;

- (11) details of how the *manager's* investor stewardship strategy has been applied in relation to the *sustainability product*, including the activities undertaken and the outcomes the *manager* has achieved or expects to achieve; and
- (12) details of the matters escalated (if any) in accordance with the *manager's* escalation plan under ■ ESG 4.2.9R(6).

**5.5.7** **R** In addition to the information set out in ■ ESG 5.5.6R, where a *manager* uses the *sustainability label* 'sustainability impact', it must also include in Part B of a *public product-level sustainability report* details of the progress that the *sustainability product's* assets are making towards achieving a positive environmental and/or social impact, as measured in accordance with the method set out under ■ ESG 4.2.17R(2).

**5.5.8** **G** In relation to ■ ESG 5.5.5R(2)(b), a *manager* may choose to disclose any further information in ■ ESG 5.5.6R that it considers appropriate to include in Part B of a *public product-level sustainability report*.

**5.5.9** **G** To the extent that a *manager* discloses the information referred to at ■ ESG 5.5.6R(9):

- (1) the *manager* should clearly explain the methodology used in providing each relevant metric and ensure that the metrics calculated under ■ ESG 5.5.6R(7) and ■ ESG 5.5.6R(8) are at least as prominently presented; and
- (2) the metrics referred to in ■ ESG 5.5.6R(8) may include (for example) KPIs that are not linked specifically to the *sustainability objective* of the *sustainability product*, but which may be common metrics within a particular sector.

**5.5.10** **G** If a *manager* discloses material deviations under ■ ESG 5.5.6R(10), it may refer to the relevant sections of its *sustainability entity report*, and similarly its *sustainability entity report* may refer to these disclosures in Part B of its *public product-level sustainability report*.

**5.5.11** **G** A *manager* may, for the purposes of ■ ESG 5.5.6R(11), choose to cross-reference and include a hyperlink in its *public product-level sustainability report* to a report that it has published for the purposes of demonstrating its compliance with the UK Stewardship Code 2020, published by the Financial Reporting Council; if doing so, it should clearly signpost the information which is relevant to the *sustainability product*.

**Reviewing Part B of a public product-level sustainability report**

**5.5.12** **R** A *manager* must ensure that Part B of a *public product-level sustainability report* remains consistent with the *sustainability label* that is used in relation to a *sustainability product*, as well as the disclosures required under ■ ESG 5.2 and ■ ESG 5.3 in relation to that product.

**On-demand product-level sustainability information**

- 5.5.13 **R** (1) A *manager* must prepare and provide *on-demand sustainability information* to a *person* who requests it in order to satisfy sustainability-related disclosure obligations, whether under this chapter or as a result of other legal or regulatory requirements:
- (a) within a reasonable period of time; and
  - (b) in a format which the *manager*, acting reasonably, considers appropriate to meet the information needs of that *person*.
- (2) A *manager* that receives a request for *on-demand sustainability information* under **■ ESG 5.5.13R(1)** must provide the information under **■ ESG 5.4.4**, **■ ESG 5.5.1R** to **■ ESG 5.5.4** (as applicable) and **■ ESG 5.5.5R** to **■ ESG 5.5.7R**.
- 5.5.14 **R** (1) On receipt of a request from a *person* under **■ ESG 5.5.13R(1)**, a *manager* must provide *on-demand sustainability information* as at a calculation date determined in accordance with **■ ESG 5.4.8R** or at an alternative calculation date where this has been agreed between the *person* and the *manager*.
- (2) A *manager* is not required to comply with a request made under **■ ESG 5.5.13R(1)** before 2 December 2025.
- 5.5.15 **R** The entitlement in **■ ESG 5.5.13R(1)** is limited to one request for *on-demand product-level sustainability information* in respect of each *sustainability product* in each of the *manager's* 12-month reporting periods under **■ ESG 5.4.8R**.
- 5.5.16 **G** A *manager* is encouraged to consider, where practicable, making available to a *person* the information under **■ ESG 5.5.13R(2)** irrespective of the *person's* eligibility to request such information under **■ ESG 5.5.13R(1)**.