

European SRI Transparency Code



LIVING PLANET FUND

Statement of Commitment

Sustainable and Responsible Investing is an essential part of the strategic positioning and behaviour of the Living Planet Fund Management Company. We have been involved in SRI since 2003 and welcome the European SRI Transparency Code.

This is our third statement of commitment and covers the period November 1 2011 to October 31 2012. Our full response to the European SRI Transparency Code can be accessed below and is available on our web site.

Compliance with the Transparency Code

The Living Planet Fund Management Company is committed to transparency and we believe that we are as transparent as possible given the regulatory and competitive environments that exist in the countries in which we operate.

The Living Planet Fund Management Company meets the full recommendations of the European SRI Transparency Code with the exception of questions 5 and 6 as our fund size and therefore resources don't allow us yet to engage directly with companies we invest in. However, it is interesting to note that our mother company, WWF International has engaged discussion and partnership with many corporations around the world.

Once the Living Planet Fund will have gained in size, we will of course use our voting rights and engage more profoundly with the company we chose to invest in.

November 2011

Code Categories

1.1.1.1.1 Section 1. Basic Details	
1	Signatories should be clear about who they are and provide precise background information on the fund management company and the fund(s)
	The fund management company
1a	<p>Provide the name of the fund management company managing the fund(s) to which this code apply.</p> <p>Living Planet Fund Management Company S.A. c/o WWF International Av. du Mont-Blanc, 27 CH – 1196 Gland</p> <p>www.livingplanetfund.com</p> <p>Carole Mihilewicz cmihilewicz@wwfint.org +41 22 364 94 37</p> <p>More information on the company and the fund can be obtain on the following website : www.livingplanetfund.com</p>
1b	<p>Describe, in a general way, the SRI philosophy of the fund management company and the way it is implemented concretely.</p> <p>The aim of the Living Planet Fund Management Company is to offer institutional and retail investors the opportunity to align ethical convictions with investment goals. This is made through a range of quality SRI products that is managed by the company.</p>
	The SRI fund(s)
1c	<p>Provide the name of the fund(s) to which this code apply, and its (their) main characteristics.</p> <p>Living Planet Fund – Global Equity http://www.livingplanetfund.com/products/products/living_planet_fund_global_equity/ [Managed by Mr. Matthias Priebs (Bank Sarasin & Co.)] The Living Planet Fund – Global Equity is a global SRI equity fund combining different SRI approaches to build its portfolio - best in class, multi-thematic, exclusions and positive screening on top of a stringent financial analysis. It is invested worldwide in 50 to 70 companies that have a proactive commitment to environmental and social issues. The whole portfolio is listed at the bottom of the following page and is updated every month: http://www.livingplanetfund.com/products/products/living_planet_fund_global_equity/</p> <p>Living Planet Fund – Renewable Energy http://www.livingplanetfund.com/products/products/living_planet_fund_renewable_energy/ [Managed by Mr. Arthur Hoffmann (Bank Sarasin & Co.)] The Living Planet Fund – Renewable Energy is a thematic equity fund with a long term investment strategy. It constitutes its portfolio by selecting companies belonging to value chain of the energy sector: manufacturers, distributors or best practice consumers. It invests in different technologies: solar energy, geothermal, water, biomass and wind power. The whole portfolio is listed at the bottom of the following page and is updated every month:</p>

	http://www.livingplanetfund.com/products/products/living_planet_fund_renewable_energy/
1d	<p>Provide details on how to find further information regarding the funds.</p> <p>Please visit the documents and information page of our website (including fact sheet, annual reports, prospectuses, articles, etc): http://www.livingplanetfund.com/documents_information/</p>
1e	<p>Provide details of the content, frequency and means of communicating information to investors.</p> <p>Our investors get the updated fact sheet of the funds every month by e-mail. They can also visit www.livingplanetfund.com at anytime to collect further information on the products they are invested in.</p> <p>Fact sheets: http://www.livingplanetfund.com/documents_information/fact_sheets_private_shares/</p> <p>Annual reports: http://www.livingplanetfund.com/documents_information/annual_reports/</p> <p>Prospectuses: http://www.livingplanetfund.com/documents_information/prospectus/</p>

1.2 SECTION 2. ESG INVESTMENT CRITERIA IN SRI FUND	
2	Signatories should be clear about the fund(s) purpose and its (their) ESG investment criteria.
2a	<p>How does the fund define SRI?</p> <p>SRI covers environmental, social and governance fields. It aims to protect "human" values while investing in companies running its diverse activities in an ethical manner. Main criteria for the assessment of sustainability are the risks and opportunities linked with an investment. E.g. in the case of companies this is composed of the social acceptance and potential of conflict of products and production methods on the one hand and the opportunities arising out of environmentally friendly and/or socially favourable products and technologies on the other hand.</p> <p>We are combining different SRI approaches in order to build the fund's portfolios: best-in-class, multi-thematic, exclusions and positive screening on top of a stringent financial analysis. This ensures we only invest in companies proactively addressing environmental and social challenges.</p>
2b	<p>What are the ESG investment criteria of the fund?</p> <p>The sustainability rating of investments is each composed of two constituents. For companies, these are:</p> <ul style="list-style-type: none"> - the sector rating: Every sector is given a rating that shows its contribution to environmental and social risks. The main benchmark here is the industry's environmental relevance (for example: airlines consume a lot of energy, while financial service providers consume far less) and social relevance. The assessment is based on the environmental and social impact along the entire life cycle of products and services. The valuation criteria are: resource consumption, emissions, degree of centralisation as well as internal and external potential for conflicts. - the company rating: Here the effective performance of each company relative to its industry is analysed. This is based on the life cycle concept, where we examine the environmental aspects of pre-production sourcing, production processes, products and services, as well as the environmental strategy/policy and environmental management systems. This analysis focuses on seven key environmental criteria: energy intensity, material intensity, toxicity, revalorisation, use of renewables, durability and service intensity. Our assessment of the social rating is based on the stakeholder approach and examines the company's relationship with its suppliers, investors, the public sector, and its

	<p>employees, clients and competitors. The analysis examines four key aspects: public health, participation, distribution of wealth and know-how.</p> <p>The scales used for the evaluation of companies are part of sustainable development principles set by different international texts and organisms, such as:</p> <ul style="list-style-type: none"> - For environmental criteria: <ul style="list-style-type: none"> • WBCSD (World Business Council for Sustainable Development), • ISO 14001 - For social criteria: <ul style="list-style-type: none"> • WBCSD • OECD Guidelines for Multinational Enterprises • UN Global Compact • Declaration of Human Rights • ILO Standards • SA 8000 • European Foundation for Quality Management • Global Reporting Initiative <p>Moreover, companies are excluded if they are involved (a 10% cut off is applied) in the following areas of business:</p> <ul style="list-style-type: none"> - Arms industry and other military products, - Fossil fuel production, - Gambling, - Genetic engineering, - Nuclear, - Production and processing of tobacco and - Production of alcohol
2c	<p>How are the ESG criteria defined?</p> <p>The Living Planet Fund Management Company and WWF-International define the investment criteria which are then implemented by the asset manager which whom they have ongoing discussion as per mentioned below.</p> <p>To ensure coordination and accuracy there is an ongoing exchange between the asset manager's 33 SRI employees and WWF International's 14 Corporate Relation collaborators to discuss specific topics such as water, energy, etc. and share their views on sectors linked to these topics.</p>
2d	<p>How are criteria changes communicated to investors?</p> <p>Adjustments to individual assessment criteria that are made as part of the ongoing development process are not especially communicated to investors. In case of any substantial changes to the criteria (e.g. changes in the exclusion criteria) or their weighting these would be announced on the fund's website.</p>

1.2.1.1.1.1.1 Section 3. ESG Research Process

3	Signatories should provide clear information on the ESG research process of their investments.
3a	<p>Describe your ESG research methodology and process.</p> <p>The asset manager has a strict investment process that takes into account WWF's investment criteria. This process includes two types of analysis: Gathering information is the basis of every sustainability assessment. Bank Sarasin & Co. Ltd (www.sarasin.ch), the Fund's asset manager, uses the following sources, amongst others: - generally accessible company information</p>

	<ul style="list-style-type: none"> - daily monitoring of several hundred newspapers and periodicals through news services - specialised electronic media and the Internet - research reports - company visits and management contacts - contacts with non-governmental organisations - information from specialised Swiss and foreign research institutions <p>The analyst responsible interprets this information on the basis of a comprehensive list of criteria (s. 2b). The results for each criterion are converted into a value and (along with the documentation used) entered into a proprietary database (Sustainable Value Builder). The data are then assessed using a scoring system. The analyst conducts a plausibility check on the result. Finally there is a peer review.</p>
3b	<p>Does the fund manager use an in-house ESG research team and/or does he delegates this research to one or several external specialised providers?</p> <p>Sarasin Bank & Co. Ltd (www.sarasin.ch) has been appointed by The Living Planet Fund Management Company as asset manager. The Company chose Sarasin because of its long experience in the SRI field (since 1989) and the quality of work of the Sarasin Sustainable Team.</p> <p>The sustainability research is a team of 9 employees whose sole task is to rate companies, institutions and countries on the basis of environmental and social criteria. The results of this assessment (the ratings) form the basis for the fund managers' investment decisions. In order to simplify and improve the efficiency of the information gathering process Sarasin is using data provided by Asset4 (http://thomsonreuters.com/products_services/financial/content_update/content_overview/content_esg/)</p>
3c	<p>Is there an external control or external verification process in place for the ESG research process?</p> <p>Central task of the interdisciplinary Advisory Committee is the periodical re-assessment of the applied sustainability criteria, exclusion criteria and investment strategy from a sustainability perspective.</p> <p>The advisory committee is discussing different criteria throughout the year.</p>
3d	<p>Does the ESG research process include stakeholder consultation?</p> <p>Yes, the Living Planet Fund being a subsidiary of WWF-International, we make sure our asset managers are regularly in touch with the WWF's Corporate Relations department employees in order to ensure good coordination and proactive exchange of information.</p>
3e	<p>Do companies/issuers have the opportunity to see their profile or analysis?</p> <p>After every analysis has been completed, companies have the opportunity to look at the results (particularly comparisons with other companies in the same sector) and comment on them. Here companies are only entitled to correct inaccuracies or provide additional information. The rating method itself is not up for discussion.</p>
3f	<p>How frequently is the ESG research process reviewed?</p> <p>The research process is continuously reviewed and adapted if necessary. The process employed by Sarasin since 1998 still meets high quality standards and so far only minor details have been refined together with WWF.</p>
3g	<p>What research findings are disclosed to the public?</p> <p>To maintain its competitive edge in the market, Sarasin does not publish a full list of its research findings. But they do publish lots of reports on divers themes that can be found on their website: http://www.sarasin.ch/internet/iech/en/index_iech/sustainability_iech/sustainable_investments_iech/sustainability_publications_iech.htm</p>

1.2.1.1.1.2 Section 4. Evaluation and Implementation

4

Signatories should provide information on how the ESG research is used to build and maintain their portfolio.

How are the results of ESG research integrated into the investment process, including selection and approval of companies/issuers for investment?

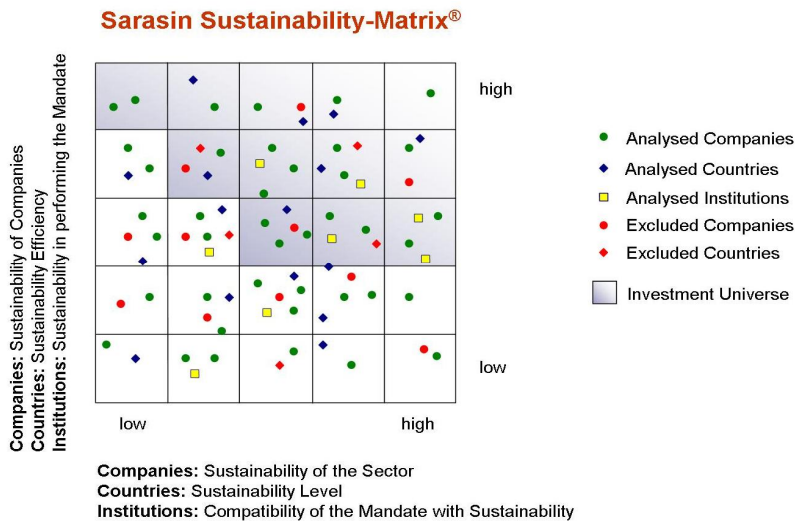
The results of sustainability research flow into the investment process in two ways:

Negative: Companies that are generating more than 5% of consolidated revenues with the following businesses are excluded from in the investment universe:

Nuclear power, armaments, chlorine and agrochemicals, tobacco, GMOs used in farming, pornography, fossil fuels, gambling, production of alcohol.

For the Living Planet Fund - Equity substantial infringements of ILO core conventions are an additional exclusion criterion.

Positive: Companies are plotted by the asset manager on the Sarasin Sustainability-Matrix on the basis of the research findings using the criteria specified in point 2b. The fund managers may only invest in companies if they are positioned in the blue shaded area of the matrix shown below.



4a

The theme funds Living Planet Fund – Equity and Living Planet Fund – Energy are investing in innovative, forward-looking companies with a long-term commitment to sustainability that is higher than the national and international norm and which also make a positive contribution to environmentally and socially responsible development. The core of each portfolio is built around investments in selected future-oriented themes, industries and activities.

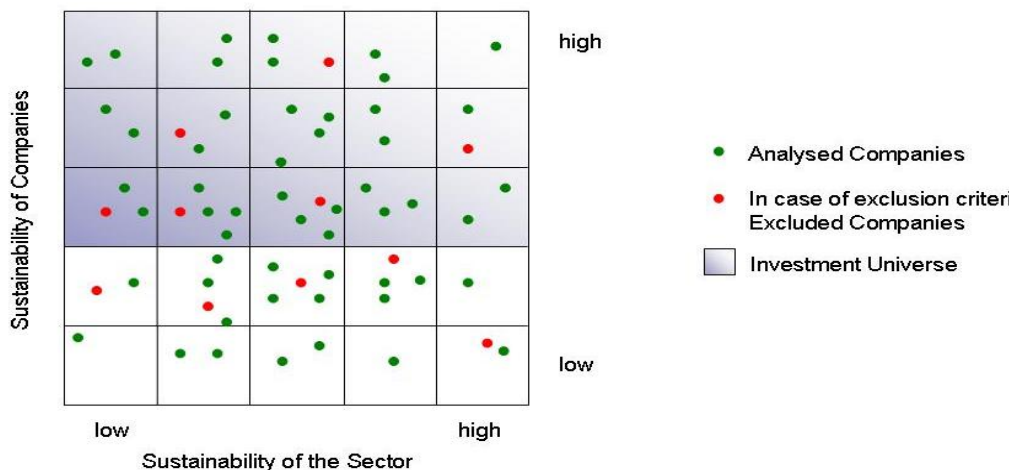
The investment themes of the Living Planet Fund- Equity are currently energy & climate, health, water, consumption, mobility, smart housing, financial services and knowledge society.

The Living Planet Fund – Energy pays special attention to companies active in renewable energies such as wind, water, biomass, solar and geothermal power. Living Planet Fund – Energy also invests in companies that offer innovative, environmentally friendly and socially responsible solutions using traditional sources of energy.

For the single theme fund (Living Planet Fund – Energy) the Sarasin Sustainability-Matrix is slightly modified due to the fact that the focus on companies with a high exposure to a

single sustainability theme is already a pre-selection. The fund management can therefore invest in all companies which are positioned in the shaded area of the Matrix below. Compared to the diagram above no distinction is made between industries. This leads to a slightly larger investment universe without compromising the sustainability approach by obeying the best-in-class principle.

Sarasin Sustainability-Matrix®



Selection Process

WWF, the Living Planet Fund Management Company and the Investment Committee of Sarasin Sustainable Investment are responsible for defining the investment policy. Sarasin Sustainable Investment is then responsible for constructing the model portfolios. It usually meets once a month, but may also be convened on an ad-hoc basis in response to special developments.

Taking into consideration the sustainability guidelines, SSI's Investment Committee takes over the core data for the entire Sarasin Group and traditional asset management (set by the Investment Policy Committee) as a connecting thread for the development of its own investment strategy, although it is free to make different suggestions and recommendations.

The members of the Sustainable Investment Committee include all the portfolio managers, the head of Sustainability Research, the head of Sarasin Sustainable Investment and a representative from Marketing Support. Representatives of client areas and other asset management units can attend meetings as observers.

4b	<p>What internal and/or external measures are in place to ensure portfolio holdings comply (or not comply) with ESG investment criteria?</p> <p>The head of Sustainability Research and the head of Sarasin Sustainable Investment are members of the Sustainable Investment Committee and make sure that buy recommendations are only made for stocks that feature in the investment universe.</p> <p>Additionally a department being organizationally independent from Sarasin Sustainable Investment controls if the investments in the portfolio show a sustainability rating in line with the investment guidelines.</p> <p>In addition the fund's Advisory Council may question any of the individual stock selections.</p>
4c	<p>What is the policy and procedure for divestments on ESG grounds?</p> <p>The policy is to sell, within one month at the latest, investments that no longer qualify for the investment universe following a reassessment by the asset manager, taking into account market conditions (i.e. safeguarding investors' interests).</p>

4d	What divestments occurred in the past year related to the SRI fund criteria? This information is available upon request.
4e	Are investors informed about divestments on ESG grounds? Only on request.
4f	Does the fund manager inform companies/issuers of portfolio movements due to non-compliance with its ESG policy and criteria? No. This is not necessary, because during the analysis process (see 3e) companies are able to comment on a potential downgrade of their sustainability rating by the responsible analyst and are made aware of the possible consequences.

N/A yet 1.2.1.1.1.2.1 Section 5. Engagement Approach

5	Signatories should explain their approach to engagement if the fund has such a policy.
5a	What are the aims of the engagement policy?
5b	How does the fund prioritise which companies/issuers it will engage with?
5c	Who undertakes engagement on behalf of the fund?
5d	What methods of engagement are employed?
5e	How is the effectiveness of engagement activity monitored/addressed?
5f	What further steps, if any, are taken if engagement is considered unsuccessful?
5g	How, and how frequently, are engagement activities communicated to investors and other stakeholders?
5h	What engagement activity has been carried out on behalf of the fund during the past year?

N/A yet 1.2.1.1.1.2.2 Section 6. Voting Policy

6	Signatories should make clear their policies on voting.
6a	Does the fund have a voting policy?
6b	Does the fund disclose its voting practices and reasoning for decisions?
6c	Does the fund sponsor/co-sponsor shareholder resolutions?
6d	What voting actions occurred that were related to the SRI fund ESG criteria?

Definitions of key terms used in the Code

Term	Definition
Divestments	Companies that are sold from the fund portfolio.
ESG	Environment, Social and Governance
Engagement	A long-term process of dialogue with companies by investors which seeks to positively influence company behaviour in relation to their

Term	Definition
	social, ethical, governance and environmental practices. This includes vote at AGM, filing or co-filing shareholder proposals, asking questions at AGM, collaborative engagement initiatives, individual company contact and dialogue with policy makers and industry organisations.
Exclusion	The exclusion of sectors or companies from a fund if involved in certain activities based on specific ESG criteria.
Fund manager	The entity responsible for overall management of the fund.
Fund(s)	A legal entity, the purpose of which is solely the acquisition of portfolio investments. This also includes compartments and sub-funds.
Fund Purpose	The spirit and overall focus of the fund, but not the investment criteria employed.
Holdings	Equities and/or bonds of companies that collectively comprise the fund portfolio.
Portfolio	A collection of investments managed by the fund manager.
Signatories	Fund(s) and/or fund manager that commits to disclose SRI information in line with the Code.
SRI	SRI, a generic term covering sustainable, responsible, ethical, environmental, social investments and any other investment process that integrates financial analysis with the influence of environmental, social and governance (ESG) issues. It includes an explicit written policy to make use of ESG criteria.
Voting Policy	Policy of a fund to exercise its voting rights as investors to influence company behaviour.

About Eurosif

EUROSIF, the European Sustainable Investment Forum, is the pan-European network whose mission is to address sustainability through the financial markets. Eurosif works as a partnership of the national Sustainable Investment Forums (SIFs) within the EU and with the support and involvement of Member Affiliates. Recognised as the premier European forum for sustainable investment, Eurosif's Member Affiliates are drawn from leading pension funds, asset managers, NGO's, trade unions, academic institutes and research providers, together representing assets totalling over €1 trillion. Eurosif's work includes a focus across asset classes - equity and fixed income markets, microfinance, renewable energy, property, private equity and hedge funds - all centred around the industry trends and future legislation affecting this space. The key benefits that Eurosif affiliate members receive include EU interfacing, SRI information and European wide initiatives that integrate Environmental, Social and Governance (ESG) issues into the financial services sector. For the full list of Eurosif Member Affiliates, please see www.eurosif.org.

National social/sustainable investment forum to date include:

- Belsif, Belgium
- Dansif, Denmark
- FNG – The German, Austrian and Swiss Sustainable Investment Forum
- Forum per la Finanza Sostenibile, Italy
- Forum pour l'Investissement Responsable, France
- Norsif, Norway
- Spainsif, Spain
- Swesif, Sweden
- UKSIF, UK
- VBDO (Vereniging van Beleggers voor Duurzame Ontwikkeling), The Netherlands

For further information contact Eurosif at +33 1 40 20 43 38 or by email at contact@eurosif.org. Additionally, feel free to see the most updated information on the Transparency Code at www.eurosif.org.

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