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Blackrock Global Equity Dynamic Opportunities Fund

Website Disclosure

1. NO SUSTAINABLE INVESTMENT OBJECTIVE

This financial product promotes environmental or social characteristics, but does not have as its objective sustainable investment.

The Sub-Fund will invest minimum of 70% of the Sub-Fund's total assets in investments with environmental and/or social characteristics. Of these investments, a minimum of 20% of the Sub-Fund's total assets will be invested in Sustainable Investments.

Sustainable Investments meet the DNSH requirements, as defined by applicable law and regulation. The Investment Manager has developed a set of criteria across all Sustainable Investments to assess whether an issuer or investment does significant harm. Investments considered to be causing significant harm do not qualify as Sustainable Investments.

The Investment Manager considers all mandatory principal adverse impacts listed in Annex I Table I of the SFDR-RTS (EU 2022/1288).

The indicators for PAIs are considered through the Investment Manager's DNSH standard for Sustainable Investments. The process specifically considers PAIs and assesses securities against those criteria. The Investment Manager makes use of internal analysis and third-party data sources to measure how issuers negatively impact sustainability factors and cause significant harm.

Sustainable Investments are assessed to consider any detrimental impacts and ensure compliance with international standards of the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights, including the principles and rights set out in the eight Sub-Fundamental conventions identified in the Declaration of the International Labour Organisation on Fundamental Principles and Rights at Work and the International Bill of Human Rights . Issuers deemed to have violated these conventions are not considered as Sustainable Investments.

2. THE ENVIRONMENTAL AND / OR SOCIAL CHARACTERISTICS PROMOTED BY THE FUND

The Sub-Fund promotes Environmental/Social (E/S) characteristics and aims to invest in sustainable investments, as well as achieve a reduction in carbon emissions intensity score relative to the MSCI World ACWI Index.

The Sub-Fund seeks to optimize an asset allocation within the Investment Manager's internal externalities framework. Under this framework, all securities are classified according to the externalities they produce and/or their ESG assessment.

The Investment Adviser will seek to enhance exposure to investments that are deemed to have associated positive externalities (e.g., lower carbon emitting issuers and issuers with positive ESG credentials) and seek to limit exposure to investments that are deemed to have associated negative externalities.

3. INVESTMENT STRATEGY

Investment strategy

The Sub-Fund adopts a flexible asset allocation policy and will invest in a diversified portfolio of assets. The asset allocation policy is consistent with the principles of environmental, social and governance ("ESG") focused investing. Although primarily an equity-oriented portfolio, individual investments may include bonds, distressed securities and contingent convertible bonds, as well as currencies and cash.

The Investment Manager will employ a proprietary methodology to assess investments based on the extent to which they are associated with positive or negative externalities, that is environmental and social benefits or costs relative to the holding's sector as defined by the Investment Manager. The Investment Manager will seek to restrict exposure to investments that are deemed to have associated negative externalities ("NEXT") while enhancing exposure (at least to a minimum of 50%) to investments that are deemed to have associated positive externalities ("PEXT"), compared to the Fund's investable universe. After applying exclusionary policies, the Investment Manager evaluates the risks and opportunities of the remaining issuers, combining ESG principles with top-down macro asset allocation and bottom-up security analysis.

The restriction/exclusion of investment in companies that have failed to meet minimum ESG standards are measured by eliminating from consideration the bottom 20% of all securities included with the sub-funds benchmark index (MSCI ACWI) according to MSCI rating.

Sustainability indicators are used to exclude or identify companies that would otherwise have been excluded by the exclusionary screens but that the Investment Adviser considers to be appropriate for investment on the basis that they are "in transition" and focused on meeting sustainability criteria over time.

Additionally, the Investment Manager will seek to limit and/or exclude direct investment (as applicable) in corporate issuers which, in the opinion of the Investment Manager, have exposure to, or ties with, certain sectors (in some cases subject to specific revenue thresholds) will furthermore seek to limit exposure to investments that are deemed to have associated negative externalities including but not limited to:

a. the production of certain types of controversial weapons
b. the distribution or production of firearms or small arms ammunition intended for retail civilians
c. the extraction of certain types of fossil fuel and/or the generation of power from them
d. the production of tobacco products or certain activities in relation to tobacco-related products; and
e. issuers which have been deemed to have failed to comply with United Nations Global Compact Principles
f. issuers involved in the ownership or operation of gambling related activities or facilities
g. production, supply and mining activities related to nuclear power
h. production of adult entertainment materials, and
i. companies that are on the People for the Ethical Treatment of Animals (PETA) list of facilities that manufacture animal-tested products, as well as brands that are owned by companies that have not yet adopted a permanent "no animal testing" policy.

Furthermore, the following exclusion criteria identifying Companies and/or Countries and/or underlying which should not be invested in or which should be invested in respecting predefined thresholds have been defined:

a. Companies that are involved in severe violations of the UN Global Compact
b. Companies manufacturing, maintaining, or trading controversial and/or morally unacceptable weapons, as identified through the international obligations, treaties and legislations.
c. Companies involved in thermal coal production and/or production of energy from thermal coal which derive from these businesses more than 10% of their consolidated revenues. It's also requested a mandatory phase out by 2028.
d. Companies involved in controversial fuel production and companies that extract hydrocarbons with controversial techniques or in areas with high environmental impact.

e. Companies involved in the tobacco production which derive from these businesses more than 5% of their consolidated revenues.
f. Companies involved in the nuclear energy production which derive from these businesses more than 15% of their consolidated revenues.
g. Companies involved in the weapons production which derive from these businesses more than 10% of their consolidated revenues.
h. Companies involved in the gambling business which derive from these businesses more than 15% of their consolidated revenues.
i. Companies involved in the adult entertainment business which derive from these businesses more than 15% of their consolidated revenues.

Good governance

The Investment Manager assesses good governance practices of the investee companies by combining proprietary insights and shareholder engagement by the Investment Adviser, with data from external ESG research providers. The Investment Manager uses data from external ESG research providers to initially identify issuers which may not have satisfactory governance practices in relation to key performance indicators (KPIs) related to sound management structure, employee relations, remuneration of staff and tax compliance.

Where issuers are identified as potentially having issues with regards to good governance, the issuers are reviewed to ensure that, where the Investment Adviser agrees with this external assessment, the Investment Adviser is satisfied that the issuer has either taken remediation actions or will take remedial actions within a reasonable time frame based on the Investment Adviser's direct engagement with the issuer. The Investment Adviser may also decide to reduce exposure to such issuers.

4. PROPORTION OF INVESTMENTS

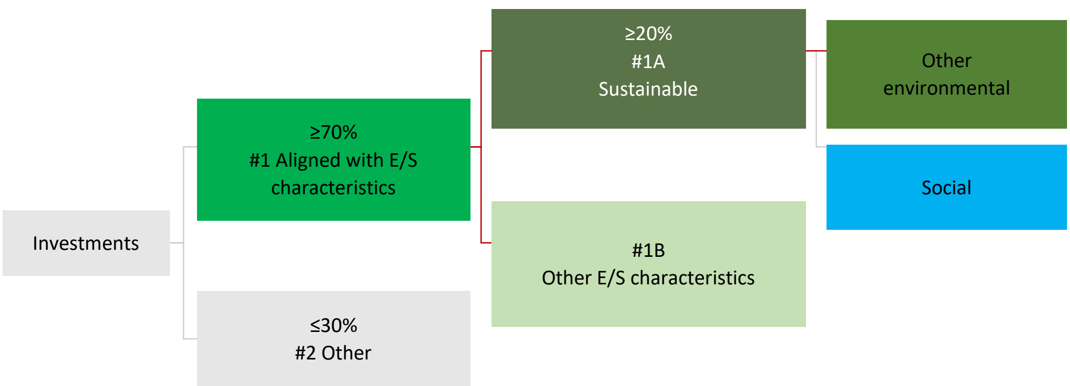
A minimum of 70% of the Sub-Fund's total assets will be invested in investments that are aligned with the environmental and/or social characteristics (#1 Aligned with E/S characteristics). Of these investments, a minimum of 20% of the Sub-Fund's total assets will be invested in Sustainable Investments (#1A Sustainable), and the remainder will be invested in investments aligned with other environmental and/or social characteristics described above (#1B Other E/S characteristics). The Sub-Fund may invest up to 30% of its total assets in other investments (#2 Other investments).

The Sub-Fund does not currently commit to investing more than 0% of its assets in Sustainable Investments with an environmental objective aligned with the EU Taxonomy, however, these investments may form part of the portfolio.

The majority of investments are aimed at gaining direct exposures to investee companies.

The Sub-Fund may invest up to 10% of its net assets in UCITS and UCIs eligible under article 41(1)e) of the 2010 Law.

Furthermore, the fund may gain indirect exposure to investee companies due to the use derivatives.



5. MONITORING OF ENVIRONMENTAL OR SOCIAL CHARACTERISTICS

Structured Invest (SI) monitors the handling and monitoring of sustainability risks. Among the different risks deriving from ESG matters the risks for a company which arise climate change poses a significant risk to the long-term financial sustainability of a company. Therefore, a better understanding of the potential impacts of sustainability risks is in the best interest of the investors.

6. METHODOLOGIES

To undertake this ESG criteria analysis and above binding exclusions, the Investment Manager will use data provided by external ESG research providers and data generated internally by the Investment Manager's proprietary research. In addition to the criteria outlined above, the Investment Manager categorises issuers by their "externalities". Externalities is defined as the cost (or benefit) to a third party from an action undertaken by a different party. In the Investment Manager's proprietary ESG framework, the party taking action are companies/issuers and the third party bearing the cost (or benefit) is the broader society and environment. The four categories of issuers by their "externalities" are as follows:

i. Issuers or securities associated with some positive environmental or social impact, highlighted as preferred holdings. Includes best-in-class companies, equity ESG leaders (top quartile) and those that have set science-based targets, companies rapidly decarbonizing, green/social bonds, Impact sectors and companies ("positive externalities" or "PEXT").
ii. Issuers that do not have any explicit positive impact characteristics but have no associated negative externalities either, are defined as neutral. Examples include equities that fall into the second quartile of ESG ratings relative to peers (ex-fossil fuels) and those that have committed science-based targets, US Treasuries, required for liquidity purposes/efficient portfolio management ("baseline externalities" or "BEXT").
iii. Where externalities of corporate issuers or securities are unclear (e.g. because of inadequate disclosures, as the company may be in the process of updating its global emissions targets, or the company's sustainability goals are unknown as the company may have only recently gone public), credit analysts, portfolio managers and the sustainability team will engage in an active discussion on "externalities" or "DEXT" with the goal of classifying the company into one of the other broad categories: PEXT, BEXT, or NEXT.
iv. Issuers associated with negative environmental or social impact that are consequently avoided for ESG portfolios, since exposure is not justified in a sustainable strategy. Those issuers are closely monitored and engaged to improve sustainability characteristics of 'worst' offenders and identify potential upgrades ("negative externalities" or "NEXT").

7. DATA SOURCES AND PROCESSING

Data sources

BlackRock Portfolio Managers have access to research, data, tools, and analytics to integrate ESG insights into their investment process. Aladdin is the operating system that connects the data, people, and technology necessary to manage portfolios in real time, as well as the engine behind BlackRock's ESG analytics and reporting capabilities. BlackRock's Portfolio Managers use Aladdin to make investment decisions, monitor portfolios and to access material ESG insights that can inform the investment process to attain ESG characteristics of the Portfolio.

ESG datasets are sourced from external third-party data providers, including but not limited to MSCI, Sustainalytics, Refinitiv, S&P and Clarity AI. These datasets may include headline ESG scores, carbon emissions data, business involvement metrics or controversies and have been incorporated into Aladdin tools that are available to Portfolio Managers and employed in BlackRock investment strategies. Such tools support the full investment process, from research, to portfolio construction and modelling, to reporting.

Measures taken to ensure data quality

BlackRock applies a comprehensive due diligence process to evaluate provider offerings with highly targeted methodology reviews and coverage assessments based on the sustainable investment strategy (and the environmental and social characteristics or sustainable objective) of the product. The process entails both qualitative and quantitative analysis to assess the suitability of data products in line with regulatory standards as applicable.

BlackRock assesses ESG providers and data across five core areas outlined below:

1. Data Collection: this includes but is not limited to assessing the data providers underlying data sources, technology used to capture data, process to identify misinformation and any use of machine learning or human data collection approaches. BlackRock will also consider planned improvements.
2. Data Coverage: the assessment includes but is not limited to the extent to which a data package provides coverage across our investible universe of issuers and asset classes. This will include consideration of the treatment of parent companies and their subsidiaries as well as use of estimated data or reported data.
3. Methodology: the assessment includes but is not limited consideration of the third-party providers methodologies employed, including considering the collection and calculation approaches, alignment to industry or regulatory standards or frameworks, materiality thresholds and their approach to data gaps.
4. Data Verification: the assessment will include but is not limited to the third-party providers approach to verification of data collected and quality assurance processes including their engagement with issuers.
5. Operations: BlackRock will assess a variety of aspects of a data vendors' operations, including but not limited to their policies and procedures (including consideration of any conflicts of interest) the size and experience of their data research teams, their training programs, and their use of third-party outsourcers.

Additionally, BlackRock, actively participates in relevant provider consultations regarding proposed changes to methodologies as they pertain to third party data sets or index methodologies and submits considered feedback and recommendations to data provider technical teams. BlackRock often has ongoing engagement with ESG data providers including index providers to keep abreast of industry developments.

Processing

At BlackRock, internal processes are focused on delivering high-quality standardized and consistent data to be used by investment professionals and for transparency and reporting purposes. Data, including ESG data, received through existing interfaces, and then processed through a series of quality control and completeness checks which seeks to ensure that data is of a high-quality before being made available for use downstream within BlackRock systems and applications, such as Aladdin. BlackRock's integrated technology enables the compilation of data about issuers and investments across a variety of environmental, social and governance metrics and a variety of data providers and make those available to investment teams and other support and control functions such as risk management.

Proportion of data that are estimated

BlackRock strives to capture as much reported data from companies via 3rd party data providers as practicable, however, industry standards around disclosure frameworks are still evolving, particularly with respect to forward looking indicators. As a result, in certain cases BlackRock relies on estimated or proxy measures from data providers to cover the broad investible universe of issuers. Due to current challenges in the data landscape, while BlackRock relies on material amount of estimated data across the investible universe, the levels of which may vary from data set to data set, BlackRock seeks to ensure that use of estimates is in line with regulatory guidance and that BlackRock has necessary documentation and transparency from data providers on their methodologies. BlackRock recognizes the importance in improving its data quality and data coverage and continues to evolve the data sets available to its investment professionals and other teams. Where required by local country-level regulations, funds may state explicit data coverage levels.

8. LIMITATIONS TO METHODOLOGIES AND DATA

There is a lack of standardised taxonomy of ESG evaluation methodology, as there are not yet commonly agreed principles and metrics for assessing the sustainable characteristics of investments. In evaluating a security based on sustainable characteristics, the Investment Manager is dependent upon information and data sources provided by internal research teams and complemented by external ESG rating providers, which may be incomplete, inaccurate or unavailable. Nevertheless, companies are regularly monitored and assessed.

9. DUE DILIGENCE

The Methodology uses quantitative and qualitative inputs generated by the Investment Manager, its affiliates and/or one or more external research providers. Where a company is identified by the Investment Manager as meeting the criteria in the Methodology for investment and is approved in accordance with the Methodology, it is eligible to be held by the Fund. Such companies are regularly reviewed. In the event that the Investment Manager determines that a company fails the criteria in the Methodology (in whole or in part and at any time) or it is not engaging with the Investment Manager on a satisfactory basis, it will be considered for divestment.

Additionally, the Management Company cooperates with a partner to assesses external data sources to calculate the overall sustainability (risk) exposure of a fund portfolio based on the defined sustainability factors. The results of the assessment are compiled and constantly monitored by the internal Risk Management function against the limits set in the (sub-) fund risk profile.

Furthermore, the Management Company monitors the handling of sustainability risks and adherence to the defined asset proportions. Among the different risks deriving from ESG matters the risks for a company which arise climate change poses a significant risk to the long-term financial sustainability of a company. Therefore, a better understanding of the potential impacts of sustainability risks is in the best interest of the investors.

10. ENGAGEMENT POLICIES

Maintain an ongoing dialogue with companies, for example in order to influence the investee company to improve its corporate governance practices, to ensure long-term value creation in the investee company, to promote disclosure standards or any other identified area of concern. Such dialogues can be held directly, e.g. by initiating meetings with the company management, or indirectly, e.g. through the exercise of voting rights.

11. DESIGNATED REFERENCE BENCHMARK

No benchmark has been designated for the purpose of attaining the environmental or social characteristics.