

FOREWORD

It is nearly impossible to read the news or scroll through social media feeds these days without seeing something on the topic of ESG. And sitting at the epicentre of the global ESG agenda are asset managers, who play a pivotal role with respect to regulatory advocacy, capital allocation decisions, and delivering on evolving public expectations.

While ESG adoption in Asia Pacific lags that of Europe by a considerable margin, a growing number of Asian regulators are localising ESG-related requirements in their home markets – in short, ESG is no longer a "nice to have". It is a "must". In addition, regional managers are becoming increasingly aware of the consequences of non-compliance (including the risk of reputational damage and capital outflows), as well as the benefits of getting ESG right (including potential valuation uplifts, the ability to charge higher management fees and enhanced access to offshore capital).

Despite the benefits that ESG integration can bring to regional managers, the ESG transformation journey is fraught with challenges, especially given the heterogenous nature of Asia Pacific – including fragmented rules, products, data, and cultures. As such, a robust ESG strategy and operating model is needed for regional managers who are looking to capitalise on the ESG opportunity beyond mere "box ticking".

KPMG and Quinlan & Associates have co-authored this paper to provide regional asset managers with a fresh perspective on how to make ESG work for you; not just in terms of ensuring compliance with evolving regulatory norms in the region, but in delivering real economic value to your organisation.



Chee Hoong Tong
Partner, Asset Management,
Hong Kong SAR, KPMG China



Wei Lin
Head of Environmental, Social
and Governance, KPMG China



Dr. Christoph ZinkePartner, KPMG China
Head of Global Strategy Group, ASPAC



Benjamin Quinlan
CEO & Managing Partner
Quinlan & Associates

EXECUTIVE SUMMARY (1/2)

THE STATUS QUO

- Asset managers sit at the heart of the global ESG ecosystem, playing a pivotal role with respect to regulatory advocacy, capital allocation decisions, and meeting rapidly evolving public expectations regarding sustainable business practices
- Asia Pacific (APAC) lags significantly behind global standards when it comes to implementing sustainable practices across key environmental, social, and governance pillars

APAC ASSET MANAGERS AT RISK

- Leveraging frameworks established by inter-governmental organisations (IGOs), a growing number of **APAC regulators** are **actively establishing ESG-related regulations** in their home markets
- In addition, **end-investors** in APAC, including pension funds, sovereign wealth funds, and high net worth individuals (HNWIs), are **increasingly taking ESG considerations into account** when selecting their asset managers
- As such, we believe **non-adherence** to rapidly evolving ESG standards will leave regional asset managers open to **sizeable reputational risks**, and create **challenges with respect to capital raising**, especially from offshore investors
- Given growing regulatory and investor pressure, we expect **stronger allocations** by regional managers **to ESG-friendly assets** in the coming years, offering a USD 1.8 billion revenue opportunity by 2025
- Despite the significant potential of ESG investing, most asset managers in the APAC region lag considerably behind their global competitors when it comes to **integrating ESG considerations into their operational / investment processes**, putting them at risk of losing market share to international managers who are currently operating in the region
- While most APAC managers can be considered "Starters" or "Fast Followers" in the ESG space, we see considerable
 potential for firms with a willingness to evolve to become true "Market Leaders", attracting significant ESG-related
 inflows

EXECUTIVE SUMMARY (2/2)

THE ESG TRANSFORMATION JOURNEY

- Asset managers need to evaluate a holistic range of strategic and operational considerations when embarking on their ESG transformation journey
 - Stakeholder Review: as a first priority, managers should comprehend the different ESG needs and levels-of-influence of their key stakeholder groups, following which they can develop a fit-for-purpose ESG proposition
 - **Proposition Development:** managers should apply qualitative and/or data-driven quantitative screening methodologies, with a view to developing ESG funds that: (1) increase transparency; (2) prevent greenwashing; (3) redirect capital correctly; and (4) appeal to key target client segments
 - Stakeholder Engagement: managers may either outsource their shareholder activism activity to specialists or look to build their own internal expertise, which can serve as a source of competitive advantage
 - Reporting: in line with international standards and/or frameworks, managers should not only disclose their
 financial performance, but also their product-level ESG investment themes, strategies, stewardship approaches,
 and ESG-specific metrics at the fund and enterprise-level
 - **Data:** data solutions for ESG-related analytics and applications should be adopted across: (1) sales and marketing; (2) investment; and (3) investee engagement
 - **Corporate Structure:** a fit-for-purpose corporate structure should be established to mitigate risks and separate operational processes, via "green" or "brown" spin-offs or hybrid models
 - **Governance:** a decentralised governance structure should be crafted, with responsibilities distributed across the asset management firm
 - **Talent & Incentives:** managers should identify gaps and develop appropriate talent acquisition, development, compensation, and retention plans
 - Measurement System: while embarking on this transformation journey, a measurement system can help benchmark asset managers' progress against industry best practices / market-leading peers, allowing improved identification of what is still left to be achieved
 - Change Management: the concept of ESG as a whole should be well-integrated across the organisation and embedded into its DNA, both in terms of its culture and operations

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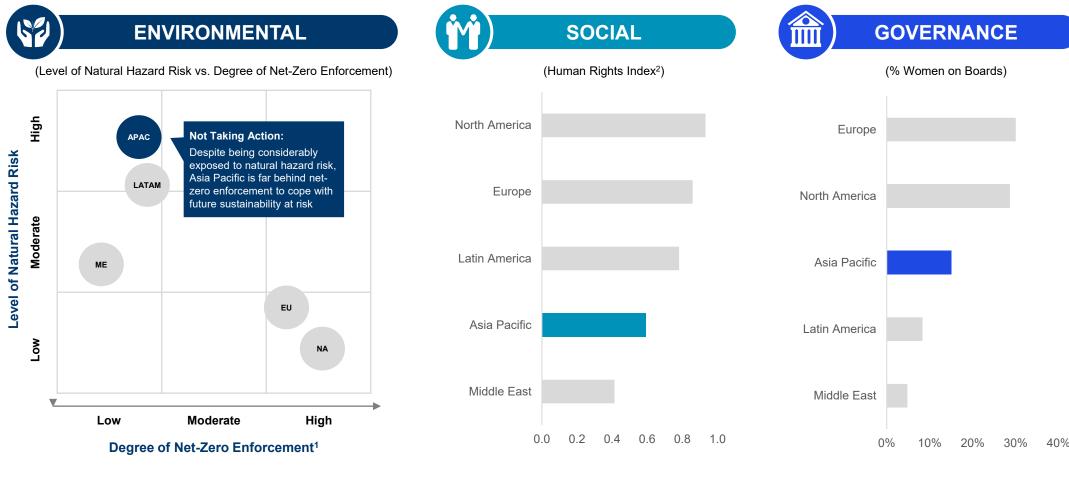
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ASIA PACIFIC ESG SNAPSHOT

Asia Pacific lags significantly behind global standards with respect to the adoption of sustainable practices across key environmental, social, and governance factors



Source: Swiss Re Institute, Visual Capitalist, KPMG / Quinlan & Associates analysis

Source: One World in Data

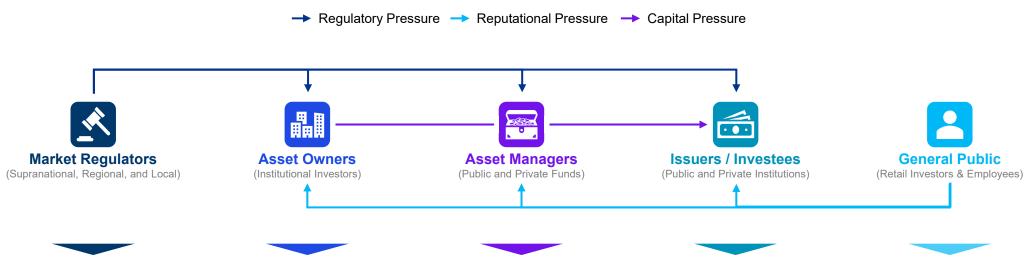
Source: UNGC

Notes: 1. Degree of enforcement is based on the proportion of jurisdictions that is enforcing net-zero targets through the adoption of policy or law, 2. The Human Rights Index measures the extent of the availability of human rights (e.g. people's freedoms of movement, property rights, religious expression etc.) Variables range from 0 to 1 (most human rights).



THE IMPORTANCE OF ASSET MANAGERS

Asset managers sit at the epicentre of the ESG ecosystem, playing a pivotal role in regulatory advocacy, capital allocation decisions, and delivering on evolving public expectations



Global regulators set ESG mission, objectives, and guidelines, while regional and local authorities establish and execute regulations

Key asset owners (i.e. institutional investors) inject capital into ESGcompliant industries / companies directly or via professional asset managers Asset managers make ESG investment decisions based on the expectations of regulators, investors, employees, and the general public

Industries / companies within the capital market ecosystem integrate ESG considerations into their business and operating models

Employees, as well as the general public, expect asset managers to integrate ESG factors in their investment process to drive positive impacts



REGULATORY PRESSURE

Regulators in Asia are actively establishing and executing ESG-related regulations by leveraging frameworks and guidance set forth by inter-governmental organisations

	2019	2020	2021	2022
Singapore (MAS)	Implemented the Green Finance Action Plan (GFAP)¹	 Issued Guidelines on Environmental Risk Management and the Green and Sustainability- Linked Loan Grant Scheme (GSLS) for sustainability-linked loans² 	 Published its first Sustainability Report³ and set up a Sustainability Group to coordinate MAS's green finance and sustainability agenda⁴ 	 Co-led the supervision workstream, which has published the Principles for the Effective Management and Supervision of Climate-related Financial Risks¹
Chinese Mainland (PBOC, CBIRC, NDRC, CSRC)	 Issued guidelines on high-quality development of banking and insurance industry, to strengthen ESG information disclosure⁵ 	Issued a pilot guideline to financial institutions in 2020 on environmental information disclosure ⁶	 Jointly announced launch of China Green Bond Catalog and updated it subsequently to govern Chinese green bond market and consolidate it for the investors⁷ 	 Issued Guidelines for Green Finance in the Banking and Insurance Industry, requiring banking and insurance institutions to promote green finance⁸
Hong Kong SAR (SFC)	 Issued first circular in 2019 setting out the SFC's expectations on disclosures regarding ESG funds⁹ 	 Initiated the establishment of the Cross-Agency Steering Group (CASG) in May 2020⁹ to accelerate the growth of green finance 	 Amended its Fund Manager Code of Conduct (FMCC) to require fund managers to take climate-related risks into consideration, to make appropriate disclosures, and to combat greenwashing¹⁰ 	 Maintained a central database of all SFC-authorised ESG funds and included the key features of these funds to enhance their transparency¹⁰
Japan (FSA)	 Appointed first Chief Sustainable Finance Officer to plan and coordinate the promotion of sustainable finance internally and globally¹¹ 	Revised the latest version of Japan's Stewardship Code to call for institutional investors to consider medium- to long-term sustainability, including ESG factors, in their investment strategies ¹²	 Included climate disclosures into Japan's corporate governance code on a "comply-or-explain" basis in the Guidelines for Investor and Company Engagement¹³ 	 Implemented the ESG-related disclosure requirements for companies listed in prime markets in accordance with the Climate- related Financial Disclosures (TCFD) framework¹⁴

Source: KPMG / Quinlan & Associates analysis

Note: 1-14. Please refer to REFERENCES for more details.



REPUTATIONAL PRESSURE

Non-compliance with ESG standards and / or the opportunistic adoption of ESG practices can expose asset managers to considerable reputational damage

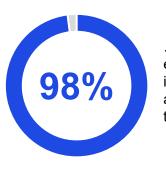
Cost of Greenwashing

Stock Price of a Major European Asset Manager vs. SDAX Index, July 2021 - October 2022

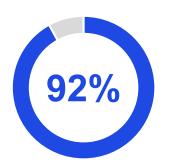
August 2021 U.S. Securities and Exchange May 2022 Commission began investigating the Prosecutors, along with police and asset manager over its sustainable other officials, raid the asset manager, investing practices1 following up on news reports and the 1.2 whistleblower's claims1 1.1 SDAX Index Asset Manager 0.9 0.8 0.7 Sep-Dec 2021 0.6 The asset manager's supervisory board creates a subcommittee to deal with the allegations1 0.5

Job Selection Priorities

Asia Talent Market



...of talent in Asia expects their position in a company to have a positive impact in the world



...of youngergeneration talent in Asia agreed that ESG aligns with their values to life

Source: HR Magazine

Note: 1. Please refer to REFERENCES for more details.

Source: Yahoo Finance



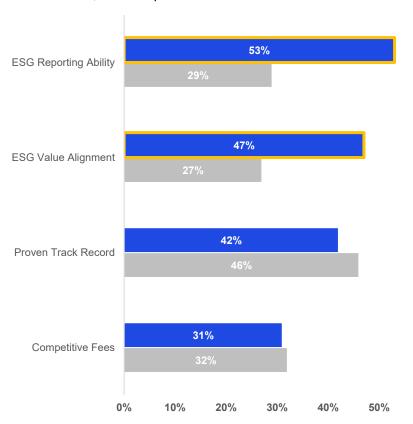
CAPITAL PRESSURE (1/2) – ASSET MANAGER SELECTION

Asset-owners in Asia Pacific have already started to include ESG considerations when selecting their asset managers...

Highlight

Investors' Selection Criteria for Asset Managers

2019 vs. 2021, % of Respondents



Source: BNP Paribas, KPMG / Quinlan & Associates analysis

ESG Expectation Enforcement

Asset Owners, Case Studies



Government Pension Fund in Japan

- · Signed the UN PRI, published own ESG investment principles
- Revised manager evaluation criteria, with significantly higher scores for good ESG-related activities
- Requires all EAMs in Japan to consider ESG as a fundamental measure of investment



HNWIs in Hong Kong SAR

- Growing investment priorities in sustainable investment (ESG) amidst macroeconomic uncertainty
- In 2020, only 8% of HNWIs stated that sustainable investment (ESG) was core to their investment focus.¹ By 2022, this number had tripled to 25%²



Sovereign Wealth Fund in Singapore

- Established a dedicated ESG function as a centre of knowledge for ESG research, data, and expertise
- Provides regular ESG training to investment teams, raising awareness of key sustainability themes
- Continues to monitor ESG trends and review ESG statements

Source: KPMG / Quinlan & Associates analysis

Note: 1-2. Please refer to REFERENCES for more details.



CAPITAL PRESSURE (2/2) – LIMITED CAPITAL ACCESS

...driving greater allocations to ESG-related assets

Asset Mangers

(With ESG Offerings)

ESG Compliant

Issuers

Virtuous Cycle ESG Driver Capital Flow (+) Capital Flow (-) Capital Flow (-) Investors & AUM Asset Owners Global ESG AUM Investors Investors Issuers

Asset Mangers

(Without ESG Offerings)

ESG Non-compliant

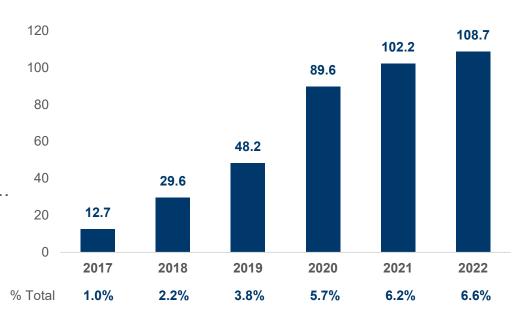
Issuers

ESG Allocations

Allocation to ESG-Related Assets, USD billion, 2017-2022

Government Pension Fund in Japan

- Allocating a sizable portion of its investment portfolio to ESG-related assets after its first investment in 2017.
- ESG allocations have risen 9x between 2017 and 2022, growing at a CAGR of 53.6% over the period.



Source: KPMG / Quinlan & Associates analysis

Asset managers with limited ESG adoption /

offerings are expected

to face major difficulties

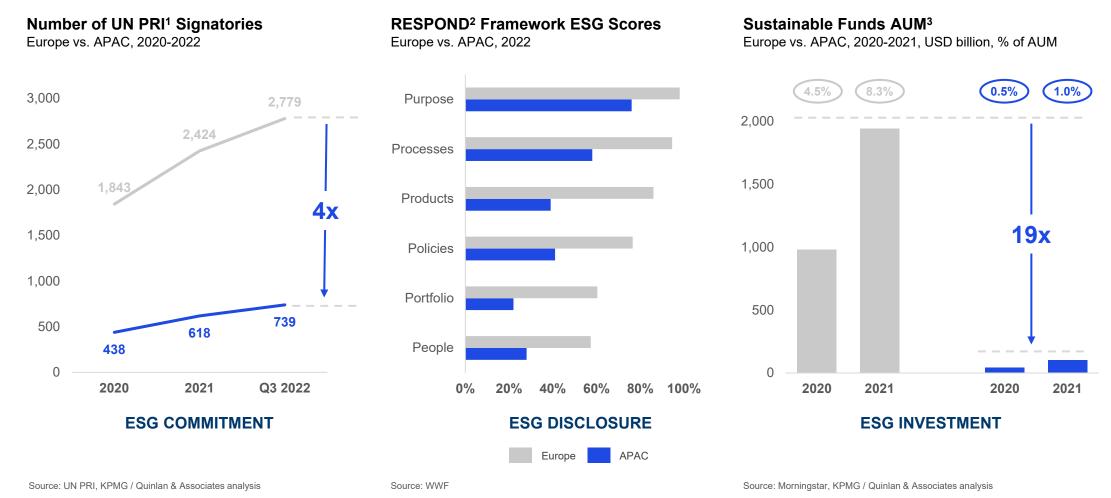
in accessing capital in

coming years



FAR BEHIND THE CURVE

Despite fast-growing stakeholder interest in ESG, Asian asset managers trail far behind their Western rivals with respect to integrating ESG factors into their operational and investment practices



Notes: 1. The United Nations Principle for Responsible Investing, 2. Resilient and Sustainable Portfolios that Protect Nature and Drive Decarbonisation (RESPOND) is a framework developed by WWF that assesses ESG-related disclosures made by asset managers, 3. Open-ended funds only.



OPPORTUNITIES AHEAD (1/2)

With significant net inflows into ESG-related investments, coupled with more attractive margins on thematic fund products...

Net Flows into Thematic Funds

2016-2020, % of AUM

ENVIRONMENT JPMorgan Climate Change Solutions ETF¹

Seeks to achieve long-term capital appreciation by investing in companies that the adviser believes are developing solutions to address climate change.²

SOCIAL

Impact Shares Affordable Housing MBS ETF1

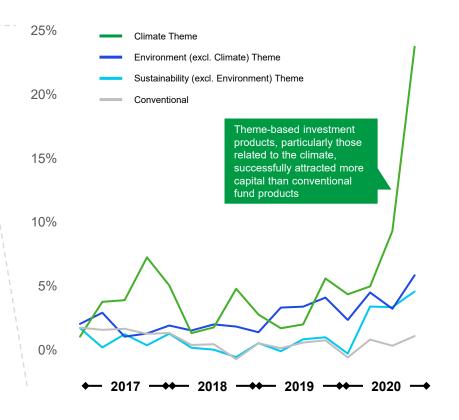
Aims to invest at least 80% of its net assets in mortgage-backed securities backed by pools of mortgage loans that the fund's Sub-Adviser believes were made to minority families, low-income families, and/or families that live in persistent poverty areas.³

GOVERNANCE

SPDR® SSGA Gender Diversity Index ETF1

Seeks to provide exposure to US companies that demonstrate greater gender diversity within senior leadership than other firms in their sector.⁴

Notes: 1. Products are mentioned for illustrative purposes only and do not represent KPMG / Quinlan & Associates recommendations. 2-4. Please refer to REFERENCES for more details.



Average Fee

Thematic vs. Non-Thematic Fund Products



Source: Morningstar, KPMG / Quinlan & Associates analysis



OPPORTUNITIES AHEAD (2/2)

... ESG-friendly asset managers in APAC will be able to tap into USD 1.82 billion in revenues by 2025, while potentially benefitting from more favourable valuations

Revenue Potential

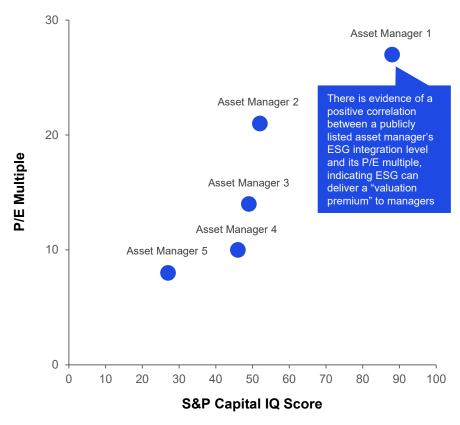
Sustainable Fund Revenues in APAC, 2021-2025F, USD billion



Source: Morningstar, KPMG / Quinlan & Associates analysis

Valuation Potential

P/E multiple, S&P Capital IQ ESG Score (by Asset Manager)



Source: Bloomberg, S&P Capital IQ, KPMG / Quinlan & Associates analysis



ESG TRANSFORMATION FRAMEWORK

Asset managers need to evaluate a holistic range of ESG considerations – and respective initiatives – when preparing for their ESG transformation journey

STRATEGIC CONSIDERATAIONS: WHERE TO PLAY



STAKEHOLDER REVIEW

Who are your key stakeholders, what are their ESG preferences and how do you plan to address them?



Click Here



What is your ESG vision and ambition and how does this align with your core capabilities and stakeholder priorities?



Click Here



PROPOSITION DEVELOPMENT

What different ranges of ESG products do you wish to structure and market to your target segment?



Click Here



INVESTMENT **PROCESS**

How should you seamlessly integrate ESG into existing or new investment processes in a fully compliant manner?



Click Here



How should you engage with portfolio companies to maximise the ESG impact that is expected from both clients and shareholders?



STAKEHOLDER COMMUNICATION

How should you communicate with internal and external stakeholders on your expected ESG deliverables?



What kind of corporate structure should you setup to effectively

CORPORATE

STRUCTURE

incorporate ESG propositions in a sustainable manner?



Click Here

TRANSFORMATION JOURNEY

OPERATIONAL CONSIDERATIONS: HOW TO WIN



DATA & **TECHNOLOGY**

What are the different data and technology solutions you should consider adopting to enable your ESG transformation?



Click Here



GOVERNANCE STRUCTURE

How do you plan to delegate supervision responsibilities across your organisation with regards to adopting ESG?



Click Here



TALENT & INCENTIVES

What are the ESG skills and competencies you should source and develop, and how do you motivate them?



Click Here



MEASUREMENT SYSTEM

What measurements / KPIs should you use to assess your ESG maturity status and track your transformation efforts?



CHANGE MANAGEMENT

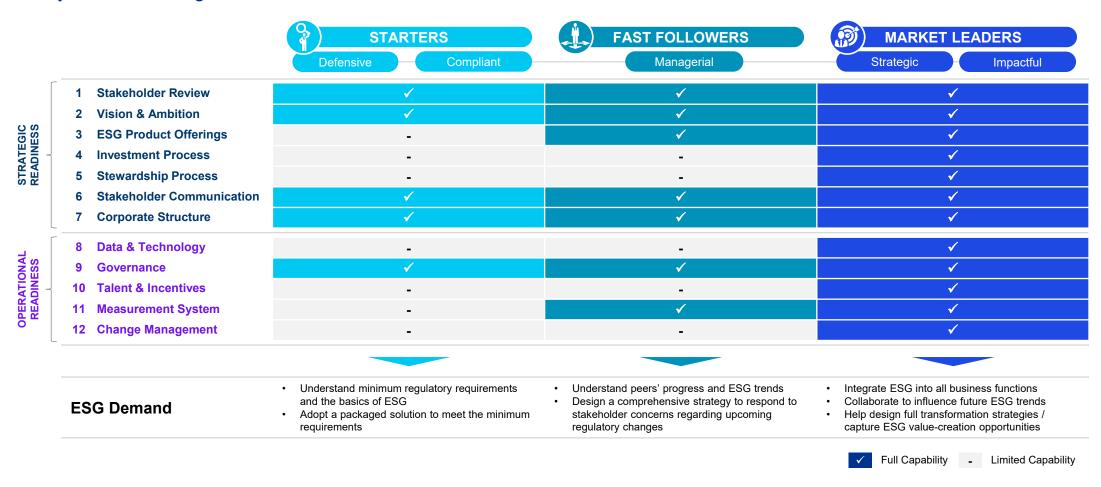
How do you make these changes across your organisation and make them stick?

Click Here



DIFFERENT STARTING POINTS

While most asset managers in APAC can be considered "Starters" or "Fast Followers", we see considerable potential for many firms in the region to become ESG "Market Leaders"



2.1. STAKEHOLDER REVIEW





ESG PRIORITIES

Building a compelling ESG proposition begins with understanding the different ESG needs and expectations of key stakeholders, including the level of influence each stakeholder has on the asset manager's business

ESG stakeholders...

Market Regulators

Global regulators set ESG mission, objectives and guidelines, while regional and local authorities establish and execute regulations

Issuers / Investees

Industries / companies within the capital market ecosystem integrate ESG considerations into their business models and operating processes

Asset Owners

Asset owners (e.g. institutional investors) inject capital into ESGcompliant industries / companies directly or via professional asset managers

General Public

Employees, as well as the general public, expect asset managers to integrate ESG into their investment process to make positive impacts

...have different ESG agendas...

Climate Change

Impact on climate change that the portfolio company's production / operational processes may have



Resource Depletion

Consumption of renewable and non-renewable resources during the portfolio company's production / operational processes



Waste & Pollution

Level of waste and pollution (e.g. carbon dioxide emission) from the portfolio company's production / operational processes



Human Rights

Whether international human rights standards (e.g. industrial accidents, antidiscrimination) are incorporated across company frameworks



Working Conditions

Working time, remuneration, as well as the physical conditions and mental demands that exist in the workplace



Employee Relations

The effort of a company to create and maintain a positive relationship between employers and employees



Bribery & Corruption

Whether the risks of bribery and corruption are managed by relevant antibribery policies



Board Diversity & Structure

Number or percentage of diverse board directors in terms of gender, ethnicity and expertise in the board structure of an asset manager



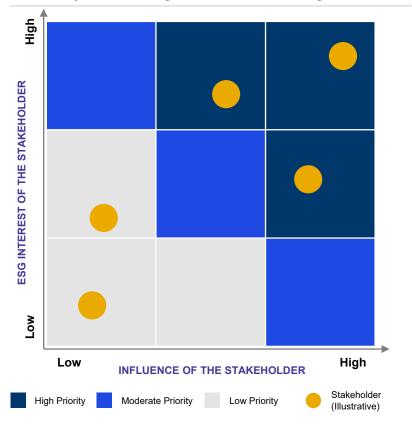
Whether polices (e.g. those that regulate tax and procurement regimes) are established and comprehensive







...that carry different weight for each asset manager



REGULATORY EXPECTATIONS – THE "PUSH"

As regulators have introduced different ESG-related standards, asset managers in Asia Pacific must understand the regulatory nuances in their key operating markets before formulating their short-to-long-term ESG strategy

Investment Disclosure Metrics

Notable Regulatory Requirements, by Market

ESG-	related Metrics	Description	European Union Sustainable Finance Disclosure Regulation ¹	United Kingdom Sustainability Disclosure Requirements ²	United States Investment Advisers Act; Investment Company Act ³	Singapore Guidelines on Environmental Risk Mgmt ⁴	Hong Kong SAR Fund Manager Code of Conduct⁵
	ESG Risk Management	The risk management processes and policies surrounding ESG-specific risks	4 4	*	-	✓ Environmental risks focused	✓ Climate-related risks focused
	Adverse Impact Analysis	Principal adverse impacts on sustainability of investment decisions	11	-	-	-	-
6	ESG KPIs and Targets	Expected ESG targets and KPIs, as well as the measurement of progress	✓ Proposed in SFDR Level 2	11	-	-	-
*	ESG Investment Strategy	Overview of the fund's ESG investment strategy	-	-	11	-	-
	ESG Performance Assessment	ESG metrics and data generated at the entity-level and fund / product level	11	11	-	✓ Environmental risks focused	Climate-related risks focused, for certain fund managers only
ļī.	Active Engagement	Engagement with investee companies, including approach and voting results	-	-	11	✓ Environmental risks focused	Climate-related risks focused, for certain fund mangers only
					✓✓ Fully App	olicable Partially appli	icable - Unspecified

Source: KPMG / Quinlan & Associates analysis

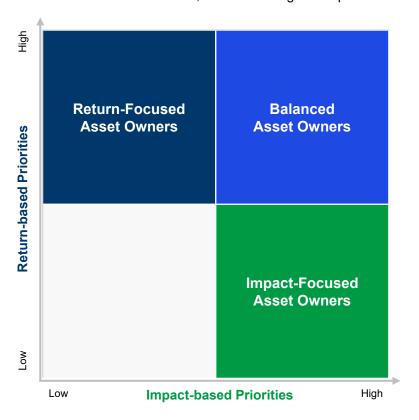
Note: 1-5. Please refer to REFERENCES for more details.

CLIENT EXPECTATIONS – THE "PULL"

Just as critical is the need for asset managers to understand the priorities of both their "current" and "prospective" clients (i.e. asset owners)

Asset Owner Universe

Based on Investment Mandate, Across Existing & Prospective Investors





Assets Under Management

Value of assets that are managed by the fund, which is an indication of the level of trust that investors have



Absolute Financial Return

Investment return that is attributable to investors, which indicates the financial performance of the ESG fund



Relative Financial Return

A benchmark measure against similar funds to identify underperformance or outperformance of the ESG fund



Carbon Emission Rate

Level of carbon dioxide emissions from the portfolio company's production / operational processes



Diversity and Inclusion Rate

Measure of diverse individuals working in a company and degree to which employees feel valued and respected



Compensation Gap

Level of differences in pay between two different groups of people (e.g. male / female, with / without disabilities)



Incorporation of ESG Standards

Level of ESG implementation towards daily practices (e.g. paperless client onboarding, hiring diverse employees)



Portfolio Company Engagement

Level of engagement with the portfolio company towards improving ESG efforts and / or financial performance



Disclosure

Extent of disclosure on material ESG factors and risks to the public, which is a measure of transparency



Return-based



Impact-based

PRIORITISATION BASED ON DOUBLE MATERIALITY

Both financial and impact materiality must be considered when developing and prioritising ESG initiatives to meet different stakeholder expectations

IDENTIFICATION OF ESG ISSUES

STAKEHOLDER ENGAGEMENT

ASSESSMENT & PRIORITISATION

Identify ESG issues to be measured per peer review, research ESG megatrends and international ESG frameworks / standards (e.g. SASB)

Collect internal and external stakeholder views on which ESG issues to focus on

Analyse insights gathered from stakeholders and prioritise the ESG issues

Material ESG issues vary by investor objectives, investment style, industry, and macro conditions.



It is important to understand stakeholders' ESG preferences.

External stakeholders

- HNWIs
- Insurance Companies
- Pensions
- Sovereign Wealth Funds
- Endowments
- Talent
- Public

Internal stakeholders

- Board of Directors
- Investment team
- Risk team
- Employees

When prioritising ESG issues, it is highly recommended to consider ESG issues that are:

- Material to the market, the environment, and people (impact materiality); and
- Financially material in influencing business value (financial materiality).



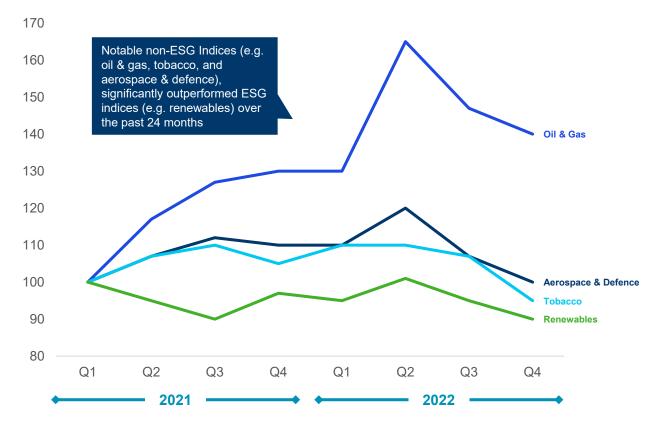
Impact on Environment and Society

COST OF EXPECTATION MISALIGNMENT

Pushing ESG agendas without fully comprehending the priorities of different stakeholders may lead to conflicts that could pose a threat to both current and future fund operations

Stock Market Performance

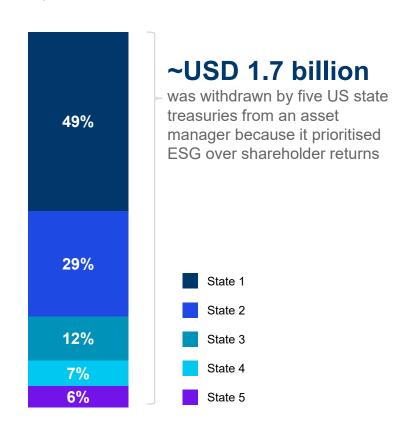
All World Sector Indices (rebased), January 2021 – November 2022



Source: Refinitiv, KPMG / Quinlan & Associates analysis

Cost of Expectation Misalignment

Capital Withdrawals



2.2. VISION & AMBITION





ESG PROPOSITION

After understanding and evaluating the needs and expectations of different stakeholders, asset managers should look to develop an ESG proposition that is best aligned to the assessment

ESG Proposition

Expected Alignment with Global Standards vs. Purpose of ESG Integration



Risk Management

Purpose of ESG Integration

Source: KPMG / Quinlan & Associates analysis

Core Value Proposition

ESG represents the core DNA of the asset manager from both a compliance and revenue-generating perspective

Strategic Proposition Managers operate with ESG compliance requirements and provide ESG products to address investor demand

Best-Practice Compliance

Asset managers deliver global best-practice ESG compliance, but have yet to offer a full suite of ESG products

Moderate Compliance Managers comply with regional regulatory requirements, but have not yet capitalised on ESG investment opportunities

Minimum Compliance

Managers only comply with minimum requirements and have not yet capitalised on ESG investment opportunities



ESG VISION & AMBITION

In developing an ESG vision & ambition, asset managers should have a deep understanding of the status quo and point of arrival (i.e. risk, opportunity, and internal capability assessment) to determine a suitable ESG proposition

ESG VISION & AMBITION

ESG Proposition, Vision & Ambition, and Tactical Initiatives



...will help you determine a fit-for-purpose...



...to develop your...



Environment Vision & Ambition

...supported by...

Environment Tactical Initiatives



Social **Vision & Ambition**

...supported by ...

Social **Tactical Initiatives**

Governance **Tactical Initiatives** Source: KPMG / Quinlan & Associates analysis

Governance

Vision & Ambition

...supported by ...

SMART Framework

Developing ESG Vision & Ambition

Specific to ESG pillars

covering ESG proposition for both internal and external stakeholders

Measurable Results

based on international standards / initiatives / principles

Actionable Initiatives

based on current and planned strategic and operational capabilities

Sealistic Execution

without going against core needs and demands of key business stakeholders

set on tactical initiatives across ESG goals to ensure they are achieved as promised

CASE STUDY: ASSET MANAGER BASED IN EU

Building on a strong foundation in environmentally and socially responsible investment, the company aims to become a shaper of sustainable investing solutions across public and private markets - leading clients and companies on an inclusive transition pathway to a better future

ENVIRONMENT VISION & AMBITION

- Working towards sourcing 100% renewable electricity for our operations by 2023
- Reducing greenhouse gas (GHG) emissions by 38% per employee by 2025

SOCIAL VISION & AMBITION

- Listed equity and corporate bonds 25% GHG reduction, Scope 1 and 2, by the end of 2024 (baseline: 2019)
- Infrastructure equity 28% GHG reduction, Scope 1 and 2, by the end of **2025** (baseline: 2020)

GOVERNANCE VISION & AMBITION

- Women at group executive committee level targeting 30% by 2025
- 27% female representation among senior management by 2025

2.3. PROPOSITION DEVELOPMENT

Back to ESG Transformation Framework



ESG PROPOSITION TAXONOMY (1/2) – KEY QUESTIONS

There are five key questions that asset managers should ask when categorising their ESG-related investment products

5-Key Criteria Differentiating ESG Products

ESG Product Taxonomy

FUND PROPOSITION INVESTMENT PROCESS ACTIVE STEWARDSHIP Is ESG the primary Is a qualitative Is a quantitative **Are ESG factors** Is active objective of the considered in screening screening stewardship product/mandate? assessing the riskmethodology exercised? methodology adjusted return of applied? applied? the asset?

ESG PROPOSITION TAXONOMY (2/2) - PRODUCT UNIVERSE

KPMG and Quinlan & Associates see four broad ESG products that can be differentiated from traditional investment fund products

ESG PRODUCT TAXONOMY	Primary Fund Objective (ESG Impact vs. Financial Return)	Fund's Investment Mandate Inclusion of ESG objective	Investment Process Adoption of ESG factors for investment decisions	Active Stewardship Exertion of ESG-specific influence
1. Impact Fund Fund products that fully incorporate expected ESG practices and prioritise ESG impact over financial returns	ESG Impact	✓	✓	✓
2. Sustainability Fund Fund products that fully incorporate expected ESG practices, but prioritise financial return over impact	Financial Return	✓	✓	✓
3. ESG Investment Fund Fund products that help investors get access to a portfolio of companies that are ESG compliant	Financial Return	✓	✓	*
4. ESG Influence Fund Fund products that help investors to influence various issuers that are yet to be ESG compliant	Financial Return	✓	*	✓
Traditional Fund Widely available fund products that do not incorporate ESG expectations on fund operations	Financial Return	×	*	*



ESG PRODUCT COMPONENTS

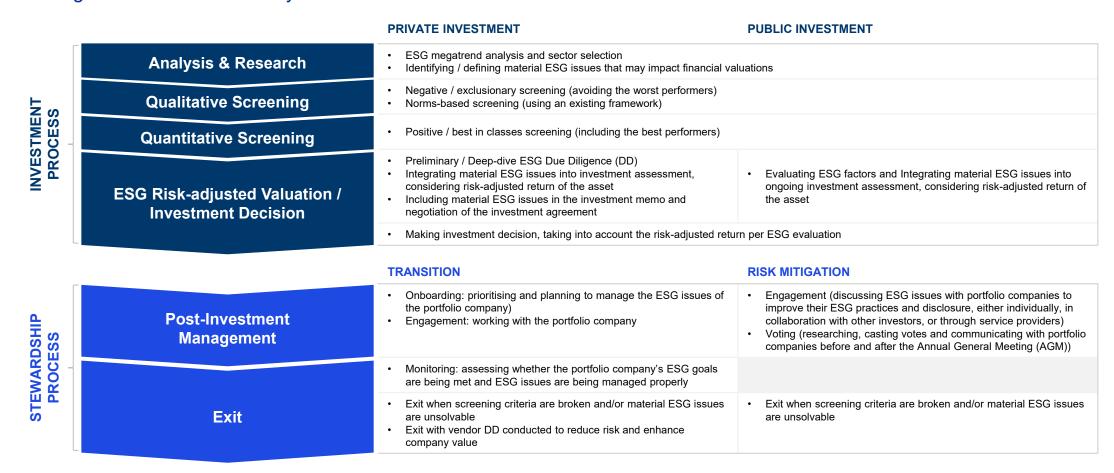
ESG fund products should broadly incorporate the following product components to: (1) increase transparency; (2) prevent greenwashing; and (3) redirect capital correctly

	Components	Description		
OBJECTIVE	Strategy	Explain the strategy implemented in the investment process on a continuous basis		INCREASE TRANSPARENCY
OBJE	Governance	State the policy to assess good governance practices at the investee companies	1	Product-level compliance increases the transparency around the
	Indicators	Identify indicators to measure the environmental or social characteristics that the product promotes	_	sustainability of ESG products
EN	Benchmarks	State the designated reference benchmark and whether it is aligned with sustainable objectives		
ASSESSMENT	Sustainability	Describe how sustainable investments contribute to the objectives of the product	2	PREVENT GREENWASHING Clear ESG criteria and disclosure
AS	(mpacts)	Disclose how principal adverse impacts are taken into consideration in sustainability factors		requirements can help prevent potential greenwashing
	Emissions	Indicate whether the product aims to reduce carbon emissions		
ENT	☑ Criteria	Explain the criteria used to select the investments to attain sustainable investment objectives	9	REDIRECT CAPITAL Regulations help investors
NVESTM	Allocation	Disclose the planned proportion of asset allocation that is not aligned with sustainable objectives	- 5	understand / compare when redirecting capital to sustainable
N	Derivatives	Explain how derivatives are used in portfolios to attain sustainable investment objectives		products



ESG INVESTMENT CYCLE

Prior to a new ESG product launch, asset managers should ensure ESG practices are systematically incorporated throughout their investment cycle



2.4. INVESTMENT PROCESS

Back to ESG Transformation Framework



QUALITATIVE & QUANTITATIVE SCREENING

Asset managers must apply qualitative and / or ESG data-driven quantitative screening methodologies when building their portfolios; however, there is currently no "golden source of truth" when it comes to ESG market data

Qualitative and Quantitative Screening

Norm-Based Screening, Negative Screening and Positive Screening

Definition¹ Notable example **Norm-Based Screening** Standards: Screening of investments against UN Treaties minimum standards of business practices **OECD Guidelines** QUALITATIVE based on international norms Human Rights Declaration **Negative Screening** Industries: The exclusion from a fund or portfolio of Tobacco certain sectors, companies, or practices Gambling based on specific ESG criteria Fossil Fuels **QUANTITATIVE Positive Screening ESG Data Coverage** The active inclusion of companies with Environment positive ESG performance relative to

Social

Governance

Challenges in Filtering the Best-In-Class Companies

Lack of standardisation in third-party ESG data

	Data Provider #1	Data Provider #2	Data Provider #3
Main Data Source	 3,000+ alternative media sources Company disclosures 	Corporate filingsCompany websitesNews sources	Corporate filingsCompany websitesNews sources
Indicators	250+	500+	600+
ESG Data Coverage			
Environmental			
Damage	✓	✓	✓
Resource Usage	✓	✓	✓
Future Planning	✓	✓	-
Social			
Supply Chain	✓	-	-
Human Resources	✓	-	✓
External Efforts	-	-	✓
Governance			
Company	✓	-	-
Risks	✓	-	-
Executive Rights	✓	✓	✓

Source: KPMG / Quinlan & Associates analysis

industry peers

Note: 1. Please refer to REFERENCES for more details.



RISK-ADJUSTED VALUATION

ESG factors are increasingly being incorporated into valuation models to support investment decisions

Approaches of Incorporating ESG Factors by Investment Strategy¹

	Actively vs. passively managed products	Non-ESG elements in valuation	Valuation process of integrating ESG factors
Fundamental Strategies	Active	Forecasted financials Revenue Operating cost Asset book value Capital expenditure	Adjust the impact of ESG factors into the forecasted financials and via valuation models Dividend discount model Discounted cash flow model Adjusted present value model
Quantitative Strategies	Active	Value sizeSizeMomentumGrowthVolatility	Construct models integrating ESG factors alongside non-ESG factors
Smart Beta Strategies	Active	Financial weight	Use ESG factors and scores as a weight in portfolio construction to create excess risk-adjusted returns, reduce downside risk and/or enhance portfolios' ESG risk profile
Passive & Enhanced Passive Strategies	Passive	Non-ESG stock index	Apply adjustment for the index constituent weights by taking ESG risk profiles into consideration

Case study on Passive & Enhanced Passive Strategies

A stock index is established based on the mainstream index in the Eurozone. All components of the parent index are included in this stock index but are over- and underweighted according to sector-based proprietary ESG KPI integration scores, which reduces the large-cap bias associated with mainstream indices and other ESG indices.

Integration Score	Component Weights
0-20	Under-weighted 50%
20.01-40	Under-weighted 25%
40.01-60	No change
60.01-80	Over-weighted 25%
80.01-100	Over-weighted 50%

Source: KPMG / Quinlan & Associates analysis

Note: 1. Please refer to REFERENCES for more details.

2.5. STEWARDSHIP PROCESS

Back to ESG Transformation Framework





ACTIVE STEWARDSHIP

Shareholder activism is an important part of ESG investing (including engagement and voting processes), which may be outsourced to specialist providers

ESG Engagement

Asset Managers

		Current-state Stewardship	Mature Active Stewardship
Z	APPROACH	Compliant	Activist
PROPOSITION	STEWARDSHIP GOAL	Selective E/S/G issues meeting regulatory expectations	Tied to key sustainable development goals or issues and connected to firm's ESG vision & ambition
PRC	IMPLEMENTATION COORDINATION	Lightly-staffed stewardship team	Expertise across sectors, regions and themes
	MONITORING	High-level ESG evaluation process	Specific, tailored KPIs tied to deepen sustainability research
PROCESS	ENGAGEMENT	Solely relying on risk-and-return driven engagement	Set clear framework to define: Engagement channels Point of contact Timelines
	ESCALATION	No escalation communication implemented	Develop clear communication in the event of unsuccessful engagement to public
	DISCLOSURE	Focus on activity reporting	Transparent and outcome-based reporting to clients

Source: KPMG / Quinlan & Associates analysis

Example: Voting Processes & Result

Process



Issue Prioritisation

State how asset managers prioritise certain issues that they choose to vote on (or not)



Decision Making

Describe the process to inform voting decisions, including proxy voting advisors and internal research



Record Transparency

Explain how asset managers keep a record of votes cast and relevant results to report transparently

Outsource Active Ownership

- Some asset managers choose to outsource active ownership activities to external third-party specialist service providers
- Asset managers need to identify key ESG voting and engagement frameworks that they want third parties to follow
- · Managers also need to report to clients periodically



BEST PRACTICE

Some ESG-focused active managers have built up specialist expertise to engage investee companies on specific ESG issues, which can be a source of competitive advantage

UK Stewardship Code¹ 2020

	REPORTING ITEMS	EXAMPLES FROM A SIGNATORY ASSET MANAGER
	1 PURPOSE & STRATEGY	Outline that their stewardship purpose is to work together to build better financial futures
	2 RESOURCES & INCENTIVES	Establish a committee which has oversight of all sustainable investments
GOVERNANCE	3 CONFLICT MANAGEMENT	Issue global conflicts of interest policy document
	4 RISK MANAGEMENT	Enhance internal processes to identify and respond to market-wide and systemic risks
	5 POLICIES	Review ESG-related policies annually
	6 COMMUNICATION	Offer a range of different ESG and stewardship reports on their website
INVESTMENT	7 INTEGRATION	Tailor to the different ownership rights inherent in each asset class
	8 MONITORING	Utilise a variety of service providers to monitor ESG stewardship
	9 ENHANCEMENT	Maintain an ongoing dialogue with investee companies through formal meetings and other events
ENGAGEMENT	10 PARTICIPATION	Join collaboration programmes to develop engagement and monitor progress
	11 ESCALATION	Determine response case-by case and escalate issues with a formal escalation process
EXERCISING	12 IMPLEMENTATION	Vote according to stewardship policies and disclose voting results on their website

Source: KPMG / Quinlan & Associates analysis

Note: 1. Please refer to REFERENCES for more details.

2.6. STAKEHOLDER COMMUNICATION







WITH REGULATORS: PRODUCT DISCLOSURE

Beyond compliance requirements on ESG-related fund classifications, asset managers should provide ESG reporting to showcase product-level ESG investment themes, strategies, stewardship approaches, and ESG performance

Communication

Product Level

METRIC 1 ESG Investment Methodology

In addition to the fund classification per compliance requirements (if any), the product's ESG focus / theme, ESG investment strategy and stewardship approaches should be reported

METRIC 2 Portfolio Holdings

The composition of underlying assets in the portfolios held by the product should be reported

METRIC 3 Portfolio ESG Performance and Impacts

The ESG performance and potential ESG impacts that the portfolio holdings may have should be reported

Examples:

- ESG Investment Theme
 - Climate Change
 - Alternative Energy
 - etc.
- · ESG Investment Strategy
 - · Screening Methodology
 - etc.
- · Stewardship and Engagement Approach

Examples:

- % of Positive Impact Assets
 - % of Alternative Energy Companies
 - % of Green Buildings
 - etc.
- % of Negative Impact Assets
 - % of Tobacco Industries
 - · % of Gambling Industries
 - etc.

Examples:

- Carbon Footprint
- ESG Risk Exposures and Controversies
 - Environmental Risks
 - · Water Pollution Exposure, etc.
 - Social Risks
 - Human Rights Violations, etc.
 - · Governance Risks
 - · Corruption Risks, etc.

How will the product achieve its ESG proposition?

What kind of underlying assets does the product invest in?

What are the ESG impacts of investing in the product?

WITH INVESTORS: CLIENT REPORTING

In addition to their financial performance, asset managers should disclose the overall ESG performance of their clients' investment portfolios, including product-level ESG information on portfolio holdings



Sample

Corporate	Portfolio	Benchmark	
Sustainability Score	27	23.2	
Sovereign	Portfolio	Benchmark	
Sustainability Score	42	33.5	
Carbon	Portfolio	Benchmark	
Risk Score	23	30	
Sustainable Fund Portion by EU Regulations			

	Sustainable Attributes (Yes) Sustainable Attributes (No)		60%
			30%
	Not Analy	zed	10%
Carbon Footprint (emissions of CO2 in millions metric tons)	Portfolio		10%
(emissions of CO2 in			

Portfolio Holdings

Fund Holdings	Asset %	Sustainability Rating	Sustainability Risk	Carbon Risk	Overall Sustainable?
Fund A	35.00	4	Medium	Low	Yes
Fund B	22.00	4	Medium	High	Yes
Fund C	19.00	3	Low	Low	Yes
Fund D	13.00	2	Severe	Low	No
Fund E	11.00	2	Severe	High	No

Asset Holdings	Asset %	Sustainability Rating	ESG Risk Rating	Highest Controversy Level	Carbon Intensity
Asset A	5.00	4	Low	Low	18.9
Asset B	5.00	3	Medium	Moderate	29.1
Asset C	5.00	2	Low	Low	34.2
Asset D	5.00	2	Medium	Low	50.8
Asset E	5.00	1	Low	High	98.4

WITH SHAREHOLDERS: CORPORATE SUSTAINABILITY REPORT

Asset managers should also look to disclose ESG information at the enterprise level to all stakeholders, in line with international ESG standards and / or frameworks

A good Asset Management Company (AMC) sustainability report should include:

ESG Definition, Vision and Objectives

- ESG vision, ambition, and objectives
- Definition of responsible / ESG investment
- How the fund's portfolios are broken down on an ESG-basis

ESG Governance,Policies and Guidelines

- ESG governance structure with well-defined delegation and escalation processes
- ESG-related policies that are material to the fund's daily operations
- Responsible / ESG investment policies and management procedures

ESG Integration and Stewardship Approach

- Overview of ESG integration approach into investing processes
- How its ESG priorities in investing are given
- · Overview of its ESG engagements
- How the company's strategy is implemented to fulfil its fiduciary duty to its clients
- How the company leverages its resources to achieve its ESG goals

ESG Performance and Impact Disclosure

- Investment strategy's positive impact with quantified impact metrics and / or case studies
- ESG performance report with ESG key performance indicators (KPIs)

2.7. CORPORATE STRUCTURE

Back to ESG Transformation Framework



RESTRUCTURING OPTIONS

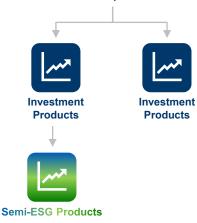
Finally, consideration should be given to setting-up a fit-for-purpose corporate structure that can best deliver on an asset manager's ESG proposition, including the potential for "brown" and / or "green" spin-offs

Corporate Structure

Integration & Spin-off Approaches



PARTIAL CONVERSION Integrating ESG considerations into the investment process of select products



Source: KPMG / Quinlan & Associates analysis

FULL-SCALE CONVERSION

Integrating ESG considerations into the investment process of all products in the entire portfolio



Semi-ESG Products Semi-ESG Products

NEW PRODUCT LAUNCH

Launching new ESG-focused investment products to provide ESG investment channels



ESG Investment Products

ESG FOCUSED SUBSIDIARY

Launching a "green" subsidiary that provides ESG-focused products only



Subsidiary



ESG Investment Products

NON-ESG FOCUSED SUBSIDIARY

Launching a "brown" subsidiary for non-ESG funds that may be subject to controversy



Non-ESG Focused Subsidiary



Non-ESG Investment Products

RESTRUCTURING BENEFITS

Adapting a fund manager's corporate structure can not only help to mitigate ESG-related risks, but can also help it to optimise its fund operations processes

Benefits

Integration & Spin-off Approaches





2.8. DATA & TECHNOLOGY

Back to ESG Transformation Framework





ESG DATA

With ESG data aggregators adopting different data collection and analysis methodologies, asset managers should carefully consider different data solutions and craft ESG data strategies that allow them to stay ahead of the competition

ESG Data Strategies

Investment Management



In-House Proprietary Data

Collect, process, and analyse ESG data fully in house, with proprietary ESG evaluation metrics and benchmarks

2



Partnerships with Data Aggregators

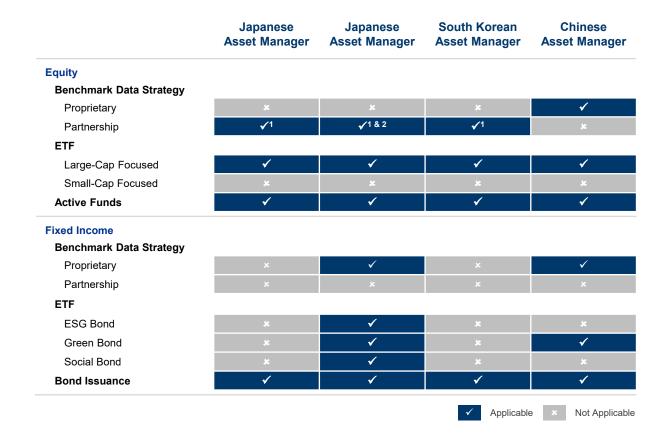
Partner with data aggregators which collect and distribute ESG data, and provide ESG ratings and indices for asset managers

3



Partnerships with Alt. Data Providers

Partner with alternative ESG data providers, which generate ESG data from alternative sources (e.g. social media) by using AI



Source: KPMG / Quinlan & Associates analysis

Note: The superscripts represents the partnership with the following companies: 1. MSCI, 2. S&P



ESG TECHNOLOGY

Successful ESG transformation needs to be enabled by adoption of analytics and applications across key processes – including sales and marketing, investment, and engagement with client / investee companies



2.9. GOVERNANCE STRUCTURE

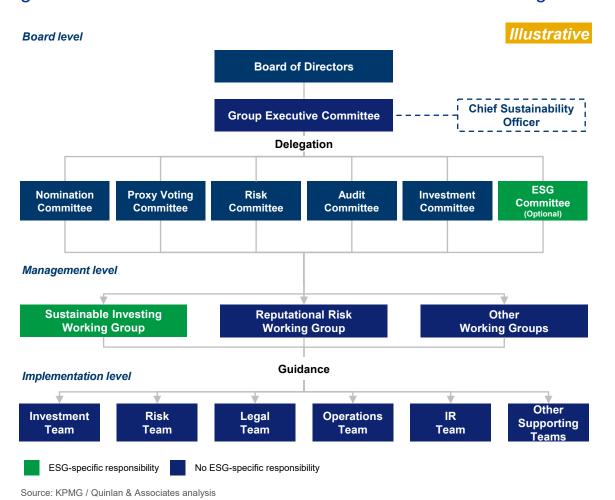






CENTRALISED STRUCTURE

Considering ESG integration is a collective effort across multiple departments – the traditional, centralised ESG governance structure is not an ideal model for asset managers to consider



CENTRALISED ESG GOVERNANCE

- 1. Centralise ESG governance responsibilities within the Board, or
- 2. Form a separate centralised ESG Committee reporting to the Board
 - · Review the progress of ESG activities
 - Revise and approve the ESG policies, active ownership activities, external development opportunities (e.g. thirdparty data partnership)
 - · Propose ESG strategies to the board

LIMITATIONS WITH CENTRALISED ESG GOVERNANCE

Sub-Optimal Execution Result

Without proper delegation of ESG responsibilities at the implementation level, specific ESG strategies and commitments made by the Board and committees will not materialise in the company, both in its day-to-day operations and in the fund's investments.

Concentrated Responsibility for Collective Efforts

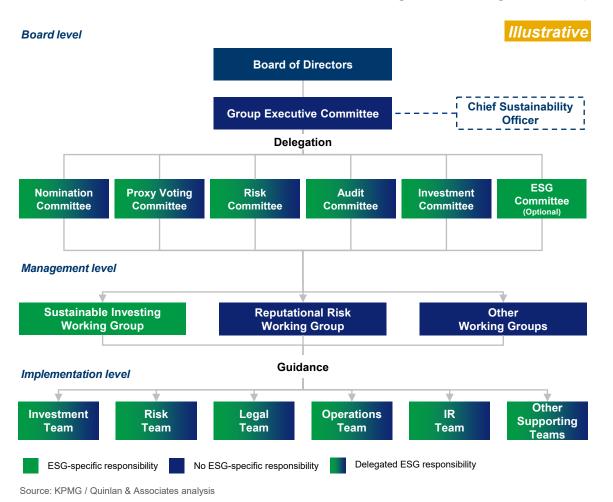
ESG responsibilities assigned to other committees will not be thoroughly implemented due to the lack of accountability towards ESG-related matters.

High Maintenance Cost

Asset managers with centralised ESG governance models require more oversight in their ESG implementation, thereby incurring additional costs to the organisation.

DECENTRALISED STRUCTURE

Asset managers should consider adopting a decentralised governance structure, where ESG responsibilities are evenly distributed across the firm, with active delegation and guidance provided by the executive team



DECENTRALISED ESG GOVERNANCE

A decentralised ESG governance structure engages employees across the fund to monitor and implement ESG responsibility in their day-to-day operations and fiduciary duty. As opposed to traditional ESG governance, ESG ownership and responsibility are spread across the organisation, allowing for a more agile and thorough execution of ESG responsibility and values.

SUGGESTED APPROACH FOR A SHIFT

Delegate specific ESG responsibilities across the organisation

ESG ownership in committees and at the working level allows for a thorough implementation of ESG values throughout the fund. Each team should bear responsibility for implementing ESG and should be able to provide the board with the relevant ESG metrics when required to supplement the board's decision making.

Establish a proper ESG reporting structure

A proper organisation reporting structure for all ESG-related matters should be established within the firm for both committees and working-level teams. A proper chain of command will help raise accountability across teams throughout the firm. Additionally, employees should be able to escalate ESG-related concerns to the relevant parties to prevent misconduct such as greenwashing.

Establish proper communication pipeline

The board should be able to effectively communicate the fund's ESG strategic directory across teams through established communication pipelines. This helps prevent a disconnect between the board's strategic vision and the fund's implementation of ESG. Inversely, employees should also be given the opportunity to voice their ESG priorities and concerns to the board.

2.10. TALENT & INCENTIVES

Back to ESG Transformation Framework



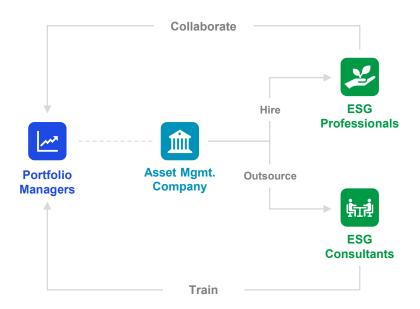


TALENT

Given the considerable demand for ESG expertise in the market, asset managers must identify potential talent gaps and develop appropriate talent acquisition, development and retention strategies

Talent Model

Illustrative



Suggested Talent Model

- 1. Build: Recruit ESG talent for in-house capabilities
- 2. Partner: Outsource ESG matters to external consultants
- 3. Hybrid: Develop in-house capabilities and external partnerships

Source: KPMG / Quinlan & Associates analysis

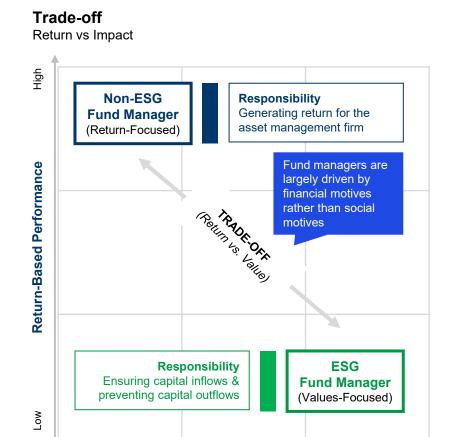
Relevant Expertise by Function

Examples

FUNCTION	RELEVANT EXPERTISE	
Board and Committee (e.g. ESG Committee, etc.)	 Overseeing abilities to manage the company's ESG vision & ambition Define and implement suitable ESG management approaches and strategies to evaluate and prioritise ESG-related issues and risks Progress reviewing capabilities towards ESG-related goals and targets Structuring ability to adjust the company hierarchy to incorporate ESG 	
Front Office (e.g. Portfolio Managers, Sales, etc.)	 Able to integrate ESG as part of their investment processes Great communication skills to understand ESG needs of different clients and promotion skills to recommend suitable ESG funds Ability to interpret ESG data and evaluate how it impacts the investment decisions labour 	
Middle Office (e.g. Risk Team, Product Team, etc.)	 Ample knowledge regarding ESG regulations of different jurisdictions and standards of different initiatives Ability to design ESG fund taxonomy and conduct cost-benefits analysis Good understanding of different ESG data and their vendors Capabilities to collect and analyse internal and external ESG data and convert these data into reporting metrics in an industry consistent manner Generate client reports according to ESG standards' requirements 	
Back Office (e.g. HR team, IT team, etc.)	 Ability to establish ESG-related KPIs scheme and create compensation policy to encourage people to reach it Build up a mature ESG technology architecture to smooth the internal communication channel and ESG data flow Understand the needed ESG expertise of different positions within company and can develop related ESG training materials Great network to external ESG talent pool 	

COMPENSATION & INCENTIVE STRUCTURE

Considering both ESG- and non-ESG -focused fund managers play pivotal roles in running the overall business, albeit with different objectives, a carefully calibrated compensation strategy should be considered



Values-Based Performance

Potential Solution

Illustrative

RESTRUCTURED COMPENSATION MODEL

creating balanced compensation system for fair distribution of return for both ESG and non-ESG managers

KEY ENABLERS

Corporate Governance

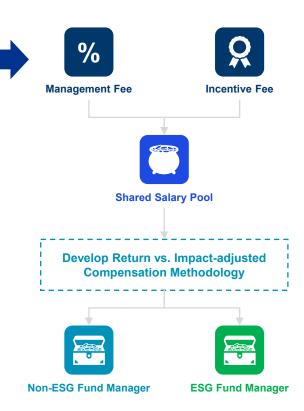
...elevating the importance of ESG practices setting the tone from board-level

Internal Communication

...converging with internal stakeholders on roles of ESG fund managers

ADOPTION CHALLENGE

There could be an initial outflow of talent, which is a natural resistance stage for any transformation. When ESG becomes the norm in the industry, then such a compensation practice will likely be more accepted. It is a long-term educational process



Source: KPMG / Quinlan & Associates analysis

Low

High

2.11. MEASUREMENT SYSTEM

Back to ESG Transformation Framework



MEASUREMENT SYSTEM

To drive ESG transformation, a measurement system should be set up to assess the manager's current state of maturity vs. leading practices and to identify what is needed to achieve the desired state over time



MEASUREMENTS

referenced within PRI framework

sitting on the Board

conversion rate

 Greenwashing litigation rate

impact funds

Transparency rate of client report

data / digital tools over time

ROI on ESG data



Talent and Incentives

The promotion of a culture of diversity, equity and inclusion throughout the organisation and to what extent the company values

The frequency of ESG trainings provided to employees to raise their understanding of ESG, including the quality of the training provided

The existence of incentive plans to promote fund-level ESG performance and the range of employees such incentives cover

 Training and qualification rate

 Gender diversity across ranks / departments

Source: KPMG / Quinlan & Associates analysis

Note: 1. Please refer to REFERENCES for more details.

2.12. CHANGE MANAGEMENT

Back to ESG Transformation Framework





CHANGE MANAGEMENT

The "Make-It" approach simplifies the ESG transformation for asset managers with engaging phases and activities

The "Make-It" Approach





TRANSFORMING INSIDE-OUT

ESG is not just integral to investment, but should be integrated across the asset manager's culture and operations

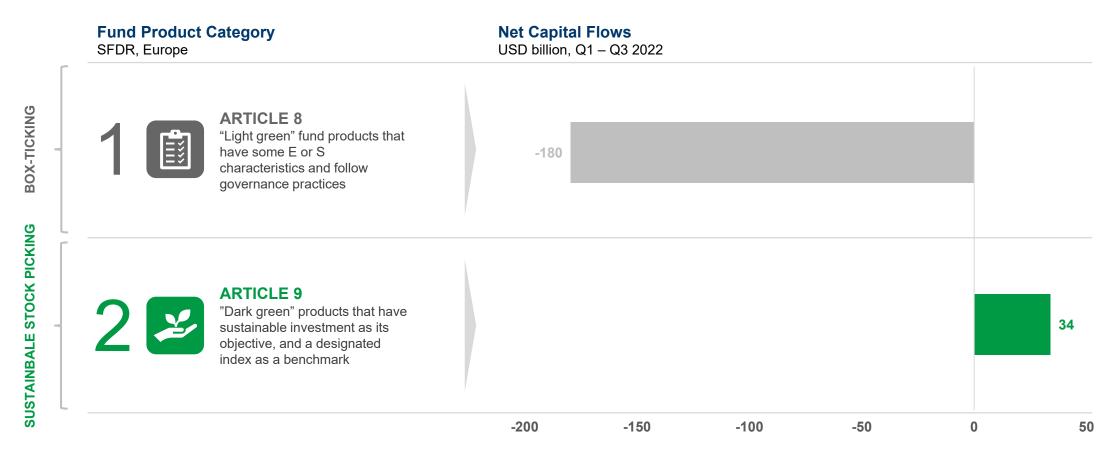
Changing Mindsets and Behaviours...





BUSINESS AT RISK

Although many asset managers see ESG as a "box ticking" exercise, it is becoming clear that merely complying with ESG requirements is not enough; a clear ESG strategy and operating model are needed to drive real outcomes

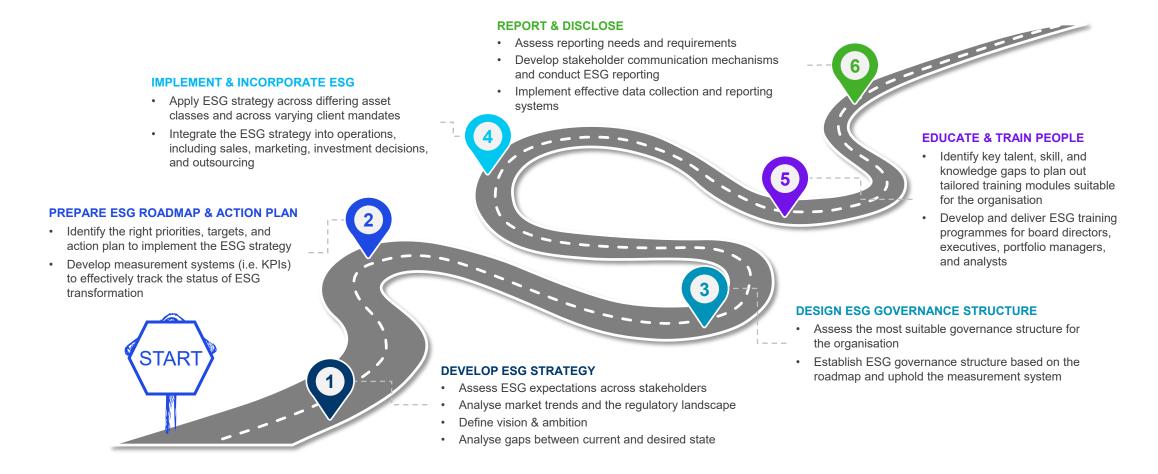


Source: Refinitiv, KPMG / Quinlan & Associates analysis



ESG TRANSFORMATION – ROADMAP (SIMPLIFIED OVERVIEW)

KPMG and Quinlan & Associates can help you on your end-to-end ESG journey – from developing your ESG strategy to adapting and implementing your target operating model, ensuring a successful transformation





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Key Contacts

Andrew Weir

Senior Partner, Hong Kong SAR, Vice Chairman, KPMG China and Global Head of Asset Management KPMG International

T: +852 2826 7243

E: andrew.weir@kpmg.com

Chee Hoong Tong

Partner, Asset Management Hong Kong SAR KPMG China

T: +852 3927 4609

E: cheehoong.tong@kpmg.com

Bonn Liu

Partner, Head of Financial Services, Banking and Capital Markets, Hong Kong SAR, KPMG China and Head of Asset Management ASPAC region

T: +852 2826 7241

E: bonn.liu@kpmg.com

Angus Choi

Partner, Climate and Sustainability Hong Kong SAR KPMG China T: +852 2847 5160

E: angus.choi@kpmg.com

Wei Lin

Partner, Head of Environmental, Social and Governance KPMG China

T: +86 2122 123508 E: wei.lin@kpmg.com

Jianing Song

Partner, Head of Advisory, Hong Kong SAR KPMG China T: +852 2978 8101

E: jianing.n.song@kpmg.com

Dr Christoph Zinke

Partner, Head of Global Strategy Group, ASPAC

KPMG China

T: +852 2140 2808

E: christoph.zinke@kpmg.com

Vivian Chui

Head of Securities & Asset Management, Hong Kong SAR KPMG China

T: +852 2978 8128

E: vivian.chui@kpmg.com

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Key Contacts

Benjamin Quinlan

CEO & Managing Partner Quinlan & Associates

T: +852 2618 5000

E: <u>bquinlan@quinlanandassociates.com</u>

Yvette Kwan

COO & Partner Quinlan & Associates

T: +852 2618 5000

E: ykwan@quinlanandassociates.com

Michael Campion

Partner Quinlan & Associates

T: +852 2618 5000

E: mcampion@quinlanandassociates.com

Justin Chung

Senior Associate

Quinlan & Associates

T: +852 2618 5000

E: jchung@quinlanandassociates.com

Alison Hu

Consultant
Quinlan & Associates

T: +852 2618 5000

E: ahu@quinlanandassociates.com

Acknowledgement: Project team: Benjamin Quinlan, Justin Chung, Alison Hu





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