



Article 10 (SFDR) Website disclosure for an Article 8 fund

AQR Apex UCITS Fund (the “Fund”)

Date: 9 July 2024

Version: 2



Product name: AQR Apex UCITS Fund
Legal entity identifier: 222100PVIRZ09WEVM247

Does this financial product have a sustainable investment objective?

<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
<input type="checkbox"/> It will make a minimum of sustainable investments with an environmental objective: __% <ul style="list-style-type: none"> <input type="checkbox"/> in economic activities that qualify as environmentally sustainable under the EU Taxonomy <input type="checkbox"/> in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy 	<input type="checkbox"/> It promotes Environmental/Social (E/S) characteristics and while it does not have as its objective a sustainable investment, it had a proportion of __% of sustainable investments <ul style="list-style-type: none"> <input type="checkbox"/> with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy <input type="checkbox"/> with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy <input type="checkbox"/> with a social objective
<input type="checkbox"/> It will make a minimum of sustainable investments with a social objective: __%	<input checked="" type="checkbox"/> It promotes E/S characteristics, but will not make any sustainable investments



A. Summary

The Fund has been classified as an Article 8 fund under Regulation (EU) 2019/2088 on sustainability-related disclosures in the financial services sector (“SFDR”). Terms used but not defined herein shall have the respective meanings given to them in the prospectus of the Fund.

No sustainable investment objective

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

Environmental or social characteristics of the product

Through the stock selection portion of the portfolio, the Fund promotes environmental or social characteristics by utilising *inter alia* negative screens, exclusions, positive tilts and managing carbon emissions.

Investment strategy

The Investment Manager, AQR Capital Management, LLC (“AQR”) offers dedicated environmental, social and governance (“ESG”) solutions including ESG investing strategies that focus on broad ESG implications (incorporating negative screens and positive tilts), low-carbon portfolios, or portfolios customized for other client-specific ESG priorities.

The Fund implements the following ESG characteristics and indicators into its investment policy. In this context the Fund’s objective would in particular be to better manage risk, generate sustainable, long-term returns and promote environmental or social characteristics. For further details investors should refer to the Fund’s prospectus.



Exclusions					ESG Characteristics	Good Governance	
Static screen: excluding tobacco	Static screen: excluding controversial weapons	Static screen: excluding fossil-fuels related stock	Dynamic screen: excluding issuers with weakest ESG scores	Managing carbon emissions footprint	Active tilt towards securities with superior ESG characteristics	Good governance signals	Excluding issuers with inferior governance
✓	✓	✓	✓	✓	✓	✓	

Proportion of investments

The Fund plans to use 10% of its investments to attain the environmental or social characteristics promoted, while the remaining investments of the Fund which are neither aligned with the environmental or social characteristics, nor are qualified as sustainable investments are planned to be 90%.

Monitoring of environmental or social characteristics

A number of sustainability indicators are coded directly into the portfolio optimization process. Adherence to the ESG characteristics and indicators is monitored on a regular basis as part of the investment process.

Methodologies

A separate methodology is associated with each of the sustainability indicators, which facilitates codification of the indicators into the portfolio construction process. Reporting is provided to clients consistent with the methodologies, and the portfolio management team is able to monitor the same data.

Data sources and processing

The Investment Manager makes use of a variety of data sources. Specific to ESG-related data, this Fund’s portfolio construction process deploys a combination of proprietary models and a variety of third-party data sources in its portfolio construction process, such as raw data which is processed into proprietary ESG investment signals; MSCI ESG ratings data; and carbon-related data.

Limitations to methodologies and data

Data for ESG can face comparatively short time periods and sparse or inconsistent coverage. In addition, there is an ongoing due diligence of the 3rd party data solutions utilized, and proactive due diligence of new data solutions. Such due diligence involves an economic analysis to help validate whether the data actually captures the dimensions of ESG that it is designed to capture.

Due diligence

Third-party and internal ESG data monitors assets in our investment universe, and any changes with such data are dynamically reflected in our models’ views. AQR also utilizes an ESG company monitor that identifies problematic exposures. AQR also hosts several exclusion lists, and portfolios are continuously monitored to ensure compliance with the precise exclusion criteria.

Engagement policies

AQR undertakes direct engagement with companies based on ESG concerns, and to improve companies’ environmental-related data disclosures. AQR’s Stewardship Committee is responsible



for monitoring and tracking its engagement activities. Each engagement has a defined objective, and failure to attain this objective over a given time horizon can trigger our escalation process.

Designated reference benchmark

No reference benchmark has been designated for the purpose of attaining these characteristics promoted by the financial product.



B. No sustainable investment objective

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



C. Environmental or social characteristics of the financial product

What are the environmental or social characteristics promoted by this financial product?

This Fund is a multi-strategy portfolio comprised of systematic stock selection, arbitrage, and directional and relative value macro strategies. Through the systematic stock selection and merger arbitrage and convertible arbitrage strategies of the portfolio, the Fund promotes environmental and/or social characteristics by utilizing (i) negative screens aiming at excluding issuers with weakest ESG scores, (ii) principles-based exclusion framework, (iii) positive tilts towards securities with superior ESG characteristics, as well as (iv) managing carbon emissions (only in systematic stock selection), as defined below.

As further described below, the environmental and/or social characteristics promoted by the Fund shall be determined by ESG ratings data (selected at the Investment Manager's discretion) with the aim of identifying the extent to which each company in the universe is exposed to, and how well it manages, a range of Environmental, Social, and Governance factors.

ESG factors taken into account with respect to this approach include amongst others:

- **Environmental:** gas emissions, resource depletion, waste and pollution, deforestation, carbon footprint;
- **Social:** working conditions, relation to the local communities, health and safety, employee relations, diversity considerations;
- **Governance:** executive pay, bribery and corruption, political lobbying and donations, tax strategy.

The Fund will also invest in issuers which follow good governance practices, as further described below.

No reference benchmark has been designated for the purpose of attaining the promoted environmental and social characteristics.



D. Investment strategy

What investment strategy does this financial product follow and how is the strategy implemented in the investment process on a continuous basis?

With respect to systematic stock selection, the Investment Manager will not purchase, at the time of rebalance of the Fund's portfolio (the "time of rebalance"), long positions in UN Global Compact violators, fossil-fuels, tobacco, controversial weapons, adult entertainment, alcohol, cannabis, and gambling related securities as well as any company which appears as excluded on the Norges Bank Investment Management exclusion list ("NBIM List"). Additionally, the Investment manager will not purchase long positions in issuers with the weakest 5-12% (but targeting an exclusion rate of 10%) of ESG scores.

Moreover, for systematic stock selection, the Investment Manager will explicitly manage the portfolio's carbon intensity, which is measured for the securities the Investment Manager holds on the long side of the portfolio (treating long positions as a standalone portfolio) and is managed to be lower than the equivalent measure computed for the short side of the portfolio, at the time of rebalance.

For merger arbitrage and convertible arbitrage, the Investment Manager will not purchase at the time of rebalance long positions in UN Global Compact violators, fossil-fuels, tobacco, controversial weapons, adult entertainment, alcohol, cannabis, and gambling related securities as well as any company which appears as excluded on the NBIM List. In addition, the Investment Manager will not purchase deals involving issuers that the Investment Manager identifies as having ESG scores in the lowest 10% of issuers in the Russell 3000 Index, at the time of rebalance.

In addition to good governance signals and the exclusion prerequisites, the Investment Manager's stock selection process will actively tilt toward securities with superior ESG characteristics. Within systematic stock selection, the portfolio-weighted ESG score for the issuers the Investment Manager holds on the long side of the portfolio (treating long positions as a standalone portfolio) is managed so as to exceed the equivalent measure computed for the short side of the portfolio, at the time of rebalance. For convertible and merger arbitrage, the Investment Manager will allocate relatively more capital to those corporate deals that are undertaken by issuers with relatively more attractive ESG scores, compared to the capital allocated to otherwise similar deals undertaken by other issuers, when such opportunities are available. The issuers with relatively more attractive ESG scores is the best 10% of issuers in the Russell 3000 Index.

ESG characteristics shall be determined by ESG ratings data (selected at the Investment Manager's discretion) with the aim of identifying the extent to which each company in the universe is exposed to, and how well it manages, a range of Environmental, Social, and Governance factors.

ESG factors taken into account with respect to this approach include amongst others:

- **Environmental:** gas emissions, resource depletion, waste and pollution, deforestation, carbon footprint;
- **Social:** working conditions, relation to the local communities, health and safety, employee relations, diversity considerations;
- **Governance:** executive pay, bribery and corruption, political lobbying and donations, tax strategy.



The ESG characteristics are generated using a combination of the Investment Manager's proprietary models, as well as third party models and data. Investors should note that assessment criteria may change over time or vary depending on the sector or industry in which the relevant issuer operates.

Note that ESG-related data received from third parties may be incomplete, inaccurate or unavailable from time to time. As a result, there is a risk that the Investment Manager may incorrectly assess a security or issuer, resulting in the incorrect direct or indirect inclusion or exclusion of a security in the portfolio of the Fund. Additionally, securities or issuers without ESG-related data may be included in the portfolio of the Fund.

Applying ESG criteria to the investment process may lead the Investment Manager to invest in or exclude securities for non-financial reasons, irrespective of market opportunities, in order to achieve the ESG characteristics promoted by the Fund following the approach described above.

In addition to the preliminary assessment of investment opportunities against the ESG characteristics described herein, the Investment Manager will monitor the invested positions on an ongoing basis. Should an invested security not fulfil or meet the ESG criteria, the Investment Manager will take appropriate actions deemed necessary (including but not limited to portfolio rebalancing), within a reasonable timeframe and in such manner that is line with the interest of the Fund.

What are the binding elements of the investment strategy used to select the investments to attain each of the environmental or social characteristics promoted by this financial product?

For the avoidance of doubt, all binding elements and restrictions are considered, applied and measured at the time of rebalance.

With respect to systematic stock selection, the Investment Manager will not purchase long positions in UN Global Compact violators, fossil-fuels related issuers, tobacco, controversial weapons, adult entertainment, alcohol, cannabis, and gambling related securities, as well as companies excluded on the NBIM List, and will not purchase 5-12% (but targeting 10%) of long positions in issuers with the weakest ESG scores. Where applicable, these securities may be shorted. The exclusion rate depends on the universe and may vary over time based on the following criteria, but is typically around 10%.

For merger arbitrage and convertible arbitrage, the Investment Manager will not purchase long positions in UN Global Compact violators, fossil-fuels related issuers, tobacco, controversial weapons, adult entertainment, alcohol, cannabis, and gambling related securities as well as companies excluded on the NBIM List. In addition, the Investment Manager will not purchase deals involving issuers that the Investment Manager identifies as having ESG scores in the lowest 10% of issuers in the Russell 3000 Index.

- A company is deemed to be a fossil-fuel related company if it owns any fossil fuel reserves, has 10,000MW or more installed capacity for thermal coal, derives more than 0% revenue from mining of thermal coal, derives 5% or more revenue from thermal coal based power generation, or derives 5% or more revenue from oil sands extraction.
- A company is deemed to be a tobacco-related company if it owns a company involved in tobacco related business activities or derives more than 0% revenue from manufacture of tobacco products.
- A company is deemed to be a controversial weapons related company if it is involved in or owns a company involved in the manufacturing of cluster munitions, anti-personnel landmines, depleted uranium, biological and chemical weapons, blinding lasers, incendiary weapons, non-detectable fragments, or companies that manufacture nuclear weapons,



manufacture or assemble nuclear delivery platforms, manufacture components for nuclear delivery platforms, or companies involved in the production and/or storage of fissile materials used in/for nuclear weapons, or provide auxiliary services related to nuclear weapons.

- A company is deemed to be an adult entertainment related company if it owns a company involved in or derives 5% or more revenue from adult entertainment related business activities.
- A company is deemed to be an alcohol related company if it owns a company involved in alcohol related business activities or derives 5% or more revenue from manufacture of alcoholic products.
- A company is deemed to be a cannabis related company if it produces and/or retails cannabis for recreational use or derives more than 0% revenue from cannabis related business activities.
- A company is deemed to be a gambling related company if it owns a company involved in or derives 5% or more revenue from gambling related business activities.
- A company which appears as excluded on the NBIM List.
- A company in violation of the UN Global Compact principles.

Within systematic stock selection, the Investment Manager will explicitly manage the portfolio's carbon intensity, which is measured for the securities the Investment Manager holds on the long side of the portfolio (treating long positions as a standalone portfolio) and is managed to be lower than the equivalent measure computed for the short side of the portfolio, at the time of rebalance.

The Investment Manager's security selection process will actively tilt toward issuers with superior ESG characteristics. The portfolio weighted ESG scores for the securities the Investment Manager holds on the long side of systematic stock selection of the portfolio is managed so as to exceed the equivalent measure computed for the short side of the portfolio. For convertible and merger arbitrage, the Investment Manager will allocate relatively more capital to those corporate deals that are undertaken by issuers with relatively more attractive ESG scores, compared to the capital allocated to otherwise similar deals undertaken by other issuers, when such opportunities are available. The issuers with relatively more attractive ESG scores is the best 10% of issuers in the Russell 3000 Index.

What is the policy to assess good governance practices of the investee companies?

Systematic stock selection integrates one or more governance-related signals into its investment view. Such signals are designed to capture various dimensions of target companies' governance in order to assess that the companies in which the investments are made follow good governance practices (e.g. measures of conservative accounting practices). Convertible arbitrage and merger arbitrage provide for a minimum standard of good governance by excluding the lowest 5% of companies in the Russell 3000 Index by governance practices score.

Is there a commitment to reduce by a minimum rate the scope of investments considered prior to the application of the strategy? (Including an indication of the rate)

Yes. With respect to systematic stock selection, convertible arbitrage, and merger arbitrage, on the long side, the Investment Manager will not purchase issuers with the weakest ESG scores in the given universe, in addition to restricting all issuers with adult entertainment, alcohol, cannabis, gambling, tobacco, fossil fuel, and controversial weapons involvement, UN Global Compact



violators, or excluded on the NBIM list. These exclusions typically exceed 5% of stocks in a given investment universe.

Does this financial product consider principal adverse impacts on sustainability factors?

- Yes
- No

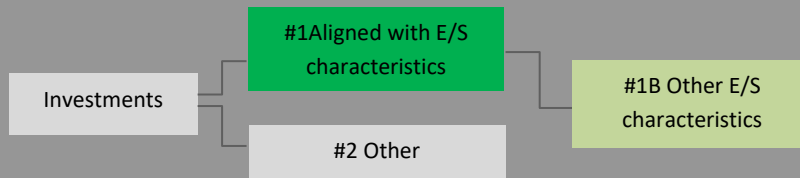


E. Proportion of investments

What is the planned asset allocation for this financial product?

The Fund plans to use **10%** of its investments to attain the environmental or social characteristics promoted (#1 Aligned with E/S characteristics).

The remaining investments of the Fund which are not aligned with the environmental or social characteristics are planned to be **90%** (#2 Other). The Fund does not target a sustainable investment objective.



#1 Aligned with E/S characteristics includes the investments of the financial product used to attain the environmental or social characteristics promoted by the financial product.

#2 Other includes the remaining investments of the financial product which are neither aligned with the environmental or social characteristics, nor are qualified as sustainable investments.

How does the use of derivatives attain the environmental or social characteristics promoted by the financial product?

The Fund promotes environmental and/or social characteristics and ensures that the investee issuers follow good governance principles within systematic stock selection, convertible arbitrage, and merger arbitrage, as described throughout this document. Based on the nature of these strategies, in particular the fact that shorting is inherent to their implementation, the Investment Manager expects to use derivatives to achieve the promotion of E/S characteristics, in particular via



exposure to single name swaps or TRS. The Investment Manager screens single-name positions, whether held in cash or in single-name swaps (such as TRS) and assesses their ESG characteristics.

What investments are included under “#2 Other”, what is their purpose and are there any minimum environmental or social safeguards?

Certain assets are excluded, namely instruments held for cash management purposes which are not subject to minimum environmental or social safeguards due to the nature of the holding of such instruments. Additionally, instruments in Special Purpose Acquisition Corporations or other instruments salient to the event-driven strategy within the arbitrage strategies are not subject to minimum environmental or social safeguards. Macro assets like sovereign bonds and commodities are also not covered by environmental or social safeguards.



F. Monitoring of environmental or social characteristics

What sustainability indicators are used to measure the attainment of the environmental or social characteristics promoted by this financial product?

For systematic stock selection, merger arbitrage and convertible arbitrage, the indicators used are:

- ESG score of portfolio long leg;
- ESG score of portfolio short leg; and
- Percentage of investments in issuers that do not comply with the exclusion criteria.

For systematic stock selection, the following additional indicators are used:

- Carbon intensity of portfolio long leg; and
- Carbon intensity of portfolio short leg.

How are the environmental or social characteristics and the sustainability indicators monitored throughout the lifecycle of the financial product and the related internal/external control mechanism?

ESG-related investment guidelines and constraints, namely the sustainability indicators just noted, are coded directly into the portfolio optimization process. Adherence to the ESG characteristics and indicators is monitored on a regular basis as part of the investment process and compliance controls of the Sub-Fund. Reporting is provided to Fund clients relating to the sustainability indicators noted.



G. Methodologies

What is the methodology to measure the attainment of the environmental or social characteristics promoted by the financial product using the sustainability indicators?

The Investment Manager has a methodology associated with each of the sustainability indicators above, for example an ESG score threshold determined from third-party ESG ratings data or a carbon intensity formula consistent with industry frameworks. This facilitates codification of the indicators



into the portfolio construction process. Reporting is provided to clients consistent with the methodologies, and the portfolio management team is able to monitor the same data.



H. Data sources and processing

What are the data sources used to attain each of the environmental or social characteristics including the measures taken to ensure data quality, how data is processed and the proportion of data that is estimated?

The Investment Manager is quantitatively-oriented and makes use of a variety of data sources. Specific to ESG-related data, this Fund’s portfolio construction process deploys a combination of proprietary models and a variety of third-party data sources in its portfolio construction process. Data sources include:

- Raw data which we process into proprietary ESG investment signals;
- MSCI ESG ratings data;
- Carbon-related data (e.g., emissions, reserves, etc.) from Trucost and MSCI; as a CDP signatory, we also have access to their climate-related data; and
- Screening lists based on industry codes, restricted activities, etc.

Data integrity has been a well-known historic research issue for ESG, and we carefully analyze the quality and scope of third-party ESG data we consume. The Investment Manager maintains a regular dialogue with its data providers, and is vigilant in pointing out any issues in the data for resolution.

Data is never taken in “as is”, but rather is subject to coverage checks and the Investment Manager imputing gaps where possible. This may include estimating carbon emissions for companies in the investment universe that are not yet covered by providers. Estimations vary by data provider and investment universe, although for the sustainability indicators noted above, the Investment Manager finds existing coverage suitable and observes improving trends.

In addition to checks to promote data integrity, the Investment Manager seeks to proactively identify and address omissions or errors in individual data points provided by vendors, enriching the data set for all consumers.

Moreover, the Investment Manager participates in broad consultations with data providers to improve the usefulness of their current and future offerings as the ESG landscape evolves and matures.



I. Limitations to methodologies and data

What are the limitations to the methodologies and data sources? (Including how such limitations do not affect the attainment of the environmental or social characteristics and the actions taken to address such limitations)

Data for ESG has its limitations, with, for example, comparatively short time periods and sparse or inconsistent coverage. We view handling potentially incomplete and noisy data as one of our competitive advantages, further described in our response to point H above.



In addition, we have ongoing due diligence of the 3rd party data solutions we utilize, and proactive due diligence of new data solutions that may further strengthen our process. This due diligence involves an economic analysis to help validate whether the data actually captures the dimensions of ESG that it is designed to capture. We believe this economic analysis is not always undertaken by data providers, but we consider it critical to inform us about the potential usefulness of the data. Examples of the types of analyses we undertake can be found in our public whitepapers, for example “Supply Chain Climate Exposure” or “Assessing Risk through Environmental, Social and Governance Exposures.”

Note that ESG-related data received from third parties may be incomplete, inaccurate or unavailable from time to time. As a result, there is a risk that the Investment Manager may incorrectly assess a security or issuer, resulting in the incorrect direct or indirect inclusion or exclusion of a security in the portfolio of the Fund. Additionally, securities or issuers without ESG-related data may be included in the portfolio of the Fund.

Applying ESG criteria to the investment process may lead the Investment Manager to invest in or exclude securities for non-financial reasons, irrespective of market opportunities, in order to achieve the ESG characteristics promoted by the Fund following the approach described above.

In addition to the preliminary assessment of investment opportunities against the ESG characteristics described herein, the Investment Manager will monitor the invested positions on an ongoing basis. Should an invested security not fulfil or meet the ESG criteria, the Investment Manager will take appropriate actions deemed necessary (including but not limited to portfolio rebalancing), within a reasonable timeframe and in such manner that is line with the interest of the Fund.



J. Due diligence

What is the due diligence carried out on the underlying assets and what are the internal and external controls in place?

Third-party and internal ESG data monitors assets in our investment universe, and any changes with such data are dynamically reflected in our models’ views. AQR also utilizes an ESG company monitor that identifies problematic exposures, and for the largest positions we engage the company to better understand the risks and improve transparency. AQR also hosts several exclusion lists, e.g., for controversial weapons, that can be applied to portfolios; such companies are identified using, for instance, MSCI’s controversial weapons flag, and portfolios are continuously monitored to ensure compliance with the precise exclusion criteria.



K. Engagement policies

Is engagement part of the environmental or social investment strategy?

Yes

No



If so, what are the engagement policies? (Including any management procedures applicable to sustainability-related controversies in investee companies)

The Investment Manager's engagement policy can be found on AQR's [ESG webpage](#).

AQR's engagements are conducted at the firm level, not specific to individual portfolios, and are focused on transparency and relevant holdings are considered within the overall assessment for engaging with a company.

AQR undertakes direct engagement with companies based on ESG and to improve companies' environmental-related data disclosures. AQR's Stewardship Committee is responsible for monitoring and tracking its engagement activities. Each engagement has a defined objective, and failure to attain this objective over a given time horizon can trigger our escalation process.



L. Reference benchmark

Has a reference benchmark been designated for the purpose of attaining these characteristics promoted by the financial product?

Yes

No