



PUBLIC TRANSPARENCY REPORT

2023

Columbia Threadneedle Investments

Generated 15-12-2023

About this report

PRI reporting is the largest global reporting project on responsible investment. It was developed with investors, for investors.

PRI signatories are required to report publicly on their responsible investment activities each year. In turn, they receive a number of outputs, including a public and private Transparency Report.

The public Transparency Reports, which are produced using signatories' reported information, provide accountability and support signatories to have internal discussions about their practices and to discuss these with their clients, beneficiaries, and other stakeholders.

This public Transparency Report is an export of the signatory's responses to the PRI Reporting Framework during the 2023 reporting period. It includes the signatory's responses to core indicators, as well as responses to plus indicators that the signatory has agreed to make public.

In response to signatory feedback, the PRI has not summarised signatories' responses – the information in this document is presented exactly as it was reported.

For each of the indicators in this document, all options selected by the signatory are presented, including links and qualitative responses. In some indicators, all applicable options are included for additional context.

Disclaimers

Responsible investment definitions

Within the PRI Reporting Framework Glossary, we provide definitions for key terms to guide reporting on responsible investment practices in the Reporting Framework. These definitions may differ from those used or proposed by other authorities and regulatory bodies due to evolving industry perspectives and changing legislative landscapes. Users of this report should be aware of these variations, as they may impact interpretations of the information provided.

Data accuracy

This document presents information reported directly by signatories in the 2023 reporting cycle. This information has not been audited by the PRI or any other party acting on its behalf. While this information is believed to be reliable, no representations or warranties are made as to the accuracy of the information presented.

The PRI has taken reasonable action to ensure that data submitted by signatories in the reporting tool is reflected in their official PRI reports accurately. However, it is possible that small data inaccuracies and/or gaps remain, and the PRI shall not be responsible or liable for such inaccuracies and gaps.

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SENIOR LEADERSHIP STATEMENT (SLS)

SENIOR LEADERSHIP STATEMENT

SENIOR LEADERSHIP STATEMENT

| Indicator | Type of indicator | Dependent on | Gateway to | Disclosure | Subsection | PRI Principle |
|-----------|-------------------|--------------|------------|------------|-----------------------------|---------------|
| SLS 1 | CORE | N/A | N/A | PUBLIC | Senior Leadership Statement | GENERAL |

Section 1. Our commitment

- Why does your organisation engage in responsible investment?
- What is your organisation's overall approach to responsible investment, and what major responsible investment commitment(s) have you made?

At Columbia Threadneedle Investments, we strive to be a trusted partner to our clients and responsible stewards of their assets, allocating capital within a framework of robust research and good governance. Our overarching purpose is to deliver better investment outcomes for our clients that enable them to meet their investment objectives.

Responsible investment (RI), a key priority for our firm, is central to how we will achieve these goals. We engage in RI for four primary reasons:

- To enhance our research intensity: We believe the integration of financially material environmental, social and governance (ESG) factors with our traditional fundamental analysis, provides a more comprehensive understanding of the risks and long-term opportunities of the investments we make on behalf of our clients, enhancing our ability to deliver the investment outcomes they expect. We have developed sophisticated ESG tools and analytics to support investment teams when considering ESG factors and with portfolio monitoring.
- To serve our clients: Our approach to RI – like our clients and many of the ESG issues that confront them – is truly global. We have the flexibility to tailor products and strategies to meet the different needs and investment goals of our investors and the regulatory environments in which we and they operate.
- To fulfil our role as active stewards of capital: we believe well managed companies are better positioned to manage the risks and challenges inherent in business and capture opportunities that foster sustainability and long-term value creation.
- In our role as a responsible business: we aim to deliver positive outcomes that meet the needs of our stakeholders. That includes how we operate, serve our clients, support our employees, and advance our philanthropic priorities and community support.

We have a large Responsible Investment team with over 40 specialists supporting our clients, our investment professionals, and our wider business.

By combining deep insights, alongside diversity of expertise within our team, we've created a powerful RI capability to support the decisions we make and products we develop to meet a range of client demands across asset classes. We believe that investing responsibly is fundamental to long-term wealth creation: it can enhance how we find value and mitigate risks.

Active ownership is a central pillar of what we do: we use considered engagement and thoughtful proxy voting to understand financially material risks with issuers, and better understand and influence corporate behaviour, which we believe helps to enhance long-term investment performance. Investors rely on us to invest prudently for their financial future, and in addition, some investors look for us to be proactive for them in creating a more sustainable one.

Section 2. Annual overview

- Discuss your organisation's progress during the reporting year on the responsible investment issue you consider most relevant or material to your organisation or its assets.
- Reflect on your performance with respect to your organisation's responsible investment objectives and targets during the reporting year. Details might include, for example, outlining your single most important achievement or describing your general progress on topics such as the following (where applicable):
 - refinement of ESG analysis and incorporation
 - stewardship activities with investees and/or with policymakers
 - collaborative engagements
 - attainment of responsible investment certifications and/or awards

Since our acquisition of BMO GAM (EMEA) from BMO Financial Group in 2021, we have made meaningful progress on responsible investment integration into our organisation. This acquisition enabled us to combine complementary strengths to create a responsible investment capability based on creating value through research intensity, driving real-world change through active ownership with the aim of enhancing shareholder value, and partnering with clients to deliver innovative RI solutions. Integration continues to be a priority and will remain as such going into 2024.

Examples include:

- The consolidation of RI leadership into one global role, with Claudia Wearmouth appointed as our Global Head of Responsible Investment reporting to Global Chief Investment Officer, William Davies.

In addition, we appointed a Head of RI Implementation to support our strategic ambition to further enhance our RI capability across the firm. Within our RI team, more than 40 specialist analysts work to support our clients, investment professionals and our wider business through their expertise in ESG thematic research, ESG integration, engagement and voting, ESG policy, product development, client reporting and thought leadership.

- Our successful submission to achieve signatory status of the UK Stewardship Code, the Japan Stewardship Code and the Taiwan Stewardship Code.

Our 2022 Stewardship Report demonstrates Columbia Threadneedle Investments' commitment to these codes. Specifically, we describe how we have approached and carried out our duty as responsible stewards of client capital during a year that has seen much market volatility and geopolitical risk.

- The integration of our engagement and voting activities, resulting in a single, harmonised, global active ownership approach – including an integrated proxy voting policy. The launch of our global active ownership policy in January 2023 means that we can now engage and vote with a unified voice when this aligns with our clients' best interests.

- The development of our global ESG product offering in line with varying client demands and industry and regulatory standards. We developed new frameworks to help us fulfil European regulatory requirements relating, for example, to the Principle Adverse Impacts of our investment decisions on sustainability factors, assessing investee companies for good governance, and developing an operational definition of sustainable investments.

- Continued investment in technology to support our research and inform our active ownership activities.

For example, we extended functionality within our portfolio management system to enable portfolio managers and analysts, where applicable, to monitor and consider data covering investment restrictions resulting from adherence with EU Sustainable Finance Disclosure Regulation (SFDR) requirements and transition to net zero by investee companies. This is further supported by an internal cloud-based dashboard, which enables stock-level research through various ESG factor lenses.

- The roll-out of our net zero methodology in key asset classes, as part of our commitment under the Net Zero Asset Managers Initiative (NZAM), where clients have directed us to align their portfolios with our net zero approach (currently only portfolios in EMEA). We also published our first global TCFD report, showing our commitment to transparency on the topic of climate change in line with the requirements of the UK FCA's ESG Sourcebook.

- The delivery of training sessions to our investment, distribution and control function teams, to ensure our RI approach is understood and can be embedded across business functions.

- Formalised the incorporation of RI into investment leaders' global priorities. This will help us as we continue to embed our RI approach across our core asset classes.

- Embedded RI in our existing global governance structure, reflecting its importance across business channels. We developed a dedicated RI Council to enable strategic decisions to be made in a robust operating environment. We are committed to further investing in our ability to serve a range of evolving client expectations in our role as responsible stewards of capital.

During 2022, our business was in the process of effectively managing the integration. Thus, we have submitted this report using the most suitable response for our combined firm, where possible.

Section 3. Next steps

■ What specific steps has your organisation outlined to advance your commitment to responsible investment in the next two years?

Responsible Investment is a key priority of our global business, and we are investing meaningfully across business functions to ensure it is enabled within our operations. Some of the steps we will take to continue the momentum in progress include:

- Continuing to develop our client reporting capability to enable increased transparency with our clients. Reporting is an evolving area, shaped by increasing client expectations and the developing regulatory landscape. During 2022, work began to integrate and enhance our RI reporting strategy.

This has continued into 2023 and will remain a priority for the organisation into 2024 and beyond.

- We continue to roll out our net zero methodology across our portfolios, working in partnership with our clients (currently EMEA only), and plan to expand methodologies into asset classes not currently covered, such as sovereign bonds.

- Our investment into tools and data to enable ESG integration continues.

For example, we are currently piloting a deforestation and biodiversity tool, which will enable us to systematically analyze companies' risk management and adaptation practices around these themes.

- Finally, we continue to launch new strategies that leverage (as applicable) our expertise in responsible investment across traditional and alternative asset classes. Our product pipeline reflects the variety of priorities and differing needs of our global client base.

Section 4. Endorsement

'The Senior Leadership Statement has been prepared and/or reviewed by the undersigned and reflects our organisation-wide commitment and approach to responsible investment'.

Name

William F. Truscott

Position

Chief Executive Officer

Organisation's Name

Columbia Threadneedle Investments

☒ A

'This endorsement applies only to the Senior Leadership Statement and should not be considered an endorsement of the information reported by the above-mentioned organisation in the various modules of the Reporting Framework. The Senior Leadership Statement serves as a general overview of the above-mentioned organisation's responsible investment approach. The Senior Leadership Statement does not constitute advice and should not be relied upon as such. Further, it is not a substitute for the skill, judgement and experience of any third parties, their management, employees, advisors and/or clients when making investment and other business decisions'.

☐ B

ORGANISATIONAL OVERVIEW (OO)

ORGANISATIONAL INFORMATION

REPORTING YEAR

| Indicator | Type of indicator | Dependent on | Gateway to | Disclosure | Subsection | PRI Principle |
|-----------|-------------------|--------------|------------|------------|----------------|---------------|
| OO 1 | CORE | N/A | N/A | PUBLIC | Reporting year | GENERAL |

What is the year-end date of the 12-month period you have chosen to report for PRI reporting purposes?

| | Date | Month | Year |
|--|------|-------|------|
| Year-end date of the 12-month period for PRI reporting purposes: | 31 | 12 | 2022 |

SUBSIDIARY INFORMATION

| Indicator | Type of indicator | Dependent on | Gateway to | Disclosure | Subsection | PRI Principle |
|-----------|-------------------|--------------|------------|------------|------------------------|---------------|
| OO 2 | CORE | N/A | OO 2.1 | PUBLIC | Subsidiary information | GENERAL |

Does your organisation have subsidiaries?

- ☒ (A) Yes
☐ (B) No

| Indicator | Type of indicator | Dependent on | Gateway to | Disclosure | Subsection | PRI Principle |
|-----------|-------------------|--------------|------------|------------|------------------------|---------------|
| OO 2.1 | CORE | OO 2 | OO 2.2 | PUBLIC | Subsidiary information | GENERAL |

Are any of your organisation's subsidiaries PRI signatories in their own right?

- ☒ (A) Yes
☐ (B) No

| Indicator | Type of indicator | Dependent on | Gateway to | Disclosure | Subsection | PRI Principle |
|-----------|-------------------|--------------|------------|------------|------------------------|---------------|
| OO 2.2 | CORE | OO 2.1 | N/A | PUBLIC | Subsidiary information | GENERAL |

How many subsidiaries of your organisation are PRI signatories in their own rights?

- ☒ 1
☐ 2
☐ 3
☐ 4
☐ 5
☐ 6
☐ 7
☐ 8
☐ 9
☐ 10

List any subsidiaries of your organisation that are PRI signatories in their own right and indicate if the responsible investment activities of the listed subsidiaries will be reported in this submission.

(1) Yes, the responsible investment activities of this subsidiary will be included in this report

(2) No, the responsible investment activities of this subsidiary will be included in their separate report

(A) Signatory name: Pyrford International Limited

☐

☒

ASSETS UNDER MANAGEMENT

ALL ASSET CLASSES

| Indicator | Type of indicator | Dependent on | Gateway to | Disclosure | Subsection | PRI Principle |
|-----------|-------------------|--------------|------------|------------|-------------------|---------------|
| OO 4 | CORE | OO 3 | N/A | PUBLIC | All asset classes | GENERAL |

What are your total assets under management (AUM) at the end of the reporting year, as indicated in [OO 1]?

USD

(A) AUM of your organisation, including subsidiaries, and excluding the AUM subject to execution, advisory, custody, or research advisory only

US\$ 584,028,729,185.00

(B) AUM of subsidiaries that are PRI signatories in their own right and excluded from this submission, as indicated in [OO 2.2]

US\$ 6,487,024,238.00

(C) AUM subject to execution, advisory, custody, or research advisory only

US\$ 0.00

ASSET BREAKDOWN

| Indicator | Type of indicator | Dependent on | Gateway to | Disclosure | Subsection | PRI Principle |
|-----------|-------------------|--------------|---------------------|------------|-----------------|---------------|
| OO 5 | CORE | OO 3 | Multiple indicators | PUBLIC | Asset breakdown | GENERAL |

Provide a percentage breakdown of your total AUM at the end of the reporting year as indicated in [OO 1].

| | (1) Percentage of Internally managed AUM | (2) Percentage of Externally managed AUM |
|-----------------------|--|--|
| (A) Listed equity | >10-50% | >0-10% |
| (B) Fixed income | >10-50% | >0-10% |
| (C) Private equity | >0-10% | 0% |
| (D) Real estate | >0-10% | 0% |
| (E) Infrastructure | >0-10% | 0% |
| (F) Hedge funds | >0-10% | 0% |
| (G) Forestry | 0% | 0% |
| (H) Farmland | 0% | 0% |
| (I) Other | >0-10% | 0% |
| (J) Off-balance sheet | 0% | 0% |

(I) Other - (1) Percentage of Internally managed AUM - Specify:

Other Alternative asset classes, Variable and Managed strategies.

ASSET BREAKDOWN: EXTERNALLY MANAGED ASSETS

| Indicator | Type of indicator | Dependent on | Gateway to | Disclosure | Subsection | PRI Principle |
|-----------|-------------------|--------------|------------|------------|---|---------------|
| OO 5.1 | CORE | OO 5 | Multiple | PUBLIC | Asset breakdown: Externally managed assets | GENERAL |

Provide a further breakdown of your organisation's externally managed listed equity and/or fixed income AUM.

| | (1) Listed equity | (2) Fixed income - SSA | (3) Fixed income - corporate | (4) Fixed income - securitised | (5) Fixed income - private debt |
|-------------|-------------------|------------------------|------------------------------|--------------------------------|---------------------------------|
| (A) Active | >75% | >10-50% | >10-50% | >50-75% | >0-10% |
| (B) Passive | >0-10% | 0% | 0% | | |

| Indicator | Type of indicator | Dependent on | Gateway to | Disclosure | Subsection | PRI Principle |
|-----------|-------------------|--------------|-----------------|------------|---|---------------|
| OO 5.2 | CORE | OO 5, OO 5.1 | SAM 3, SAM 8 | PUBLIC | Asset breakdown: Externally managed assets | GENERAL |

Provide a breakdown of your organisation's externally managed AUM between segregated mandates and pooled funds or investments.

| | (1) Segregated mandate(s) | (2) Pooled fund(s) or pooled investment(s) |
|-----------------------------|---------------------------|--|
| (A) Listed equity - active | >75% | >0-10% |
| (B) Listed equity - passive | 0% | >75% |
| (C) Fixed income - active | >75% | >0-10% |

ASSET BREAKDOWN: INTERNALLY MANAGED LISTED EQUITY

| Indicator | Type of indicator | Dependent on | Gateway to | Disclosure | Subsection | PRI Principle |
|-----------|-------------------|--------------|------------|------------|---|---------------|
| OO 5.3 LE | CORE | OO 5 | Multiple | PUBLIC | Asset breakdown: Internally managed listed equity | GENERAL |

Provide a further breakdown of your internally managed listed equity AUM.

(A) Passive equity >0-10%

(B) Active – quantitative >0-10%

(C) Active – fundamental >75%

(D) Other strategies 0%

ASSET BREAKDOWN: INTERNALLY MANAGED FIXED INCOME

| Indicator | Type of indicator | Dependent on | Gateway to | Disclosure | Subsection | PRI Principle |
|-----------|-------------------|--------------|------------|------------|--|---------------|
| OO 5.3 FI | CORE | OO 5 | Multiple | PUBLIC | Asset breakdown: Internally managed fixed income | GENERAL |

Provide a further breakdown of your internally managed fixed income AUM.

(A) Passive – SSA >0-10%

(B) Passive – corporate >0-10%

(C) Active – SSA >10-50%

(D) Active – corporate >50-75%

(E) Securitised >10-50%

(F) Private debt 0%

ASSET BREAKDOWN: INTERNALLY MANAGED PRIVATE EQUITY

| Indicator | Type of indicator | Dependent on | Gateway to | Disclosure | Subsection | PRI Principle |
|-----------|-------------------|--------------|------------|------------|--|---------------|
| OO 5.3 PE | CORE | OO 5 | N/A | PUBLIC | Asset breakdown: Internally managed private equity | GENERAL |

Provide a further breakdown of your internally managed private equity AUM.

(A) Venture capital >0-10%

(B) Growth capital >10-50%

(C) (Leveraged) buy-out >75%

(D) Distressed, turnaround or
special situations 0%

(E) Secondaries >0-10%

(F) Other 0%

ASSET BREAKDOWN: INTERNALLY MANAGED REAL ESTATE

| Indicator | Type of indicator | Dependent on | Gateway to | Disclosure | Subsection | PRI Principle |
|-----------|-------------------|--------------|------------|------------|---|---------------|
| OO 5.3 RE | CORE | OO 5 | N/A | PUBLIC | Asset breakdown: Internally managed real estate | GENERAL |

Provide a further breakdown of your internally managed real estate AUM.

(A) Retail >10-50%

(B) Office >10-50%

(C) Industrial >10-50%

| | |
|-------------------------------------|---------|
| (D) Residential | >0-10% |
| (E) Hotel | 0% |
| (F) Lodging, leisure and recreation | 0% |
| (G) Education | 0% |
| (H) Technology or science | 0% |
| (I) Healthcare | 0% |
| (J) Mixed use | >10-50% |
| (K) Other | >0-10% |

(K) Other - Specify:

Car park and Agricultural

ASSET BREAKDOWN: INTERNALLY MANAGED INFRASTRUCTURE

| Indicator | Type of indicator | Dependent on | Gateway to | Disclosure | Subsection | PRI Principle |
|------------|-------------------|--------------|------------|------------|--|---------------|
| OO 5.3 INF | CORE | OO 5 | N/A | PUBLIC | Asset breakdown: Internally managed infrastructure | GENERAL |

Provide a further breakdown of your internally managed infrastructure AUM.

| | |
|--------------------------------|---------|
| (A) Data infrastructure | >10-50% |
| (B) Diversified | 0% |
| (C) Energy and water resources | 0% |
| (D) Environmental services | 0% |
| (E) Network utilities | 0% |

| | |
|---|---------|
| (F) Power generation (excl. renewables) | 0% |
| (G) Renewable power | >10-50% |
| (H) Social infrastructure | 0% |
| (I) Transport | >10-50% |
| (J) Other | 0% |

ASSET BREAKDOWN: INTERNALLY MANAGED HEDGE FUND

| Indicator | Type of indicator | Dependent on | Gateway to | Disclosure | Subsection | PRI Principle |
|-----------|-------------------|--------------|------------|------------|--|---------------|
| OO 5.3 HF | CORE | OO 5 | OO 11 | PUBLIC | Asset breakdown: Internally managed hedge fund | GENERAL |

Provide a further breakdown of your internally managed hedge fund assets.

| | |
|---|------|
| (A) Multi-strategy | >75% |
| (B) Long/short equity | 0% |
| (C) Long/short credit | 0% |
| (D) Distressed, special situations and event-driven fundamental | 0% |
| (E) Structured credit | 0% |
| (F) Global macro | 0% |
| (G) Commodity trading advisor | 0% |
| (H) Other strategies | 0% |

MANAGEMENT BY PRI SIGNATORIES

| Indicator | Type of indicator | Dependent on | Gateway to | Disclosure | Subsection | PRI Principle |
|-----------|-------------------|--------------|------------|------------|-------------------------------|---------------|
| OO 6 | CORE | OO 5 | N/A | PUBLIC | Management by PRI signatories | GENERAL |

What percentage of your organisation's externally managed assets are managed by PRI signatories?

>75%

GEOGRAPHICAL BREAKDOWN

| Indicator | Type of indicator | Dependent on | Gateway to | Disclosure | Subsection | PRI Principle |
|-----------|-------------------|------------------------|------------|------------|------------------------|---------------|
| OO 7 | CORE | Multiple, see guidance | N/A | PUBLIC | Geographical breakdown | GENERAL |

How much of your AUM in each asset class is invested in emerging markets and developing economies?

AUM in Emerging Markets and Developing Economies

| | |
|---------------------------------|---------------|
| (A) Listed equity | (2) >0 to 10% |
| (B) Fixed income – SSA | (2) >0 to 10% |
| (C) Fixed income – corporate | (2) >0 to 10% |
| (D) Fixed income – securitised | (2) >0 to 10% |
| (E) Fixed income – private debt | (2) >0 to 10% |
| (F) Private equity | (1) 0% |
| (G) Real estate | (1) 0% |
| (H) Infrastructure | (1) 0% |

STEWARDSHIP

STEWARDSHIP

| Indicator | Type of indicator | Dependent on | Gateway to | Disclosure | Subsection | PRI Principle |
|-----------|-------------------|------------------------|---------------------|------------|-------------|---------------|
| OO 8 | CORE | Multiple, see guidance | Multiple indicators | PUBLIC | Stewardship | GENERAL |

Does your organisation conduct stewardship activities, excluding (proxy) voting, for any of your assets?

| | (1) Listed equity - active | (2) Listed equity - passive | (3) Fixed income - active | (4) Fixed income - passive | (5) Private equity |
|------------------------------------|-------------------------------------|-------------------------------------|-------------------------------------|-------------------------------------|-------------------------------------|
| (A) Yes, through internal staff | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| (B) Yes, through service providers | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| (C) Yes, through external managers | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| (D) We do not conduct stewardship | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |

| | (6) Real estate | (7) Infrastructure | (8) Hedge funds | (11) Other |
|------------------------------------|-------------------------------------|-------------------------------------|-------------------------------------|-------------------------------------|
| (A) Yes, through internal staff | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| (B) Yes, through service providers | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| (C) Yes, through external managers | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| (D) We do not conduct stewardship | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |

STEWARDSHIP: (PROXY) VOTING

| Indicator | Type of indicator | Dependent on | Gateway to | Disclosure | Subsection | PRI Principle |
|-----------|-------------------|--------------|------------|------------|-----------------------------|---------------|
| OO 9 HF | CORE | OO 5 | OO 9 | PUBLIC | Stewardship: (Proxy) voting | GENERAL |

Does your organisation have direct investments in listed equity across your hedge fund strategies?

- ☒ (A) Yes
☐ (B) No

| Indicator | Type of indicator | Dependent on | Gateway to | Disclosure | Subsection | PRI Principle |
|-----------|-------------------|------------------------|---------------------|------------|-----------------------------|---------------|
| OO 9 | CORE | Multiple, see guidance | Multiple indicators | PUBLIC | Stewardship: (Proxy) voting | GENERAL |

Does your organisation conduct (proxy) voting activities for any of your listed equity holdings?

| | (1) Listed equity - active | (2) Listed equity - passive | (3) Hedge funds |
|--------------------------------------|-------------------------------------|-------------------------------------|-------------------------------------|
| (A) Yes, through internal staff | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| (B) Yes, through service providers | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| (C) Yes, through external managers | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| (D) We do not conduct (proxy) voting | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |

| Indicator | Type of indicator | Dependent on | Gateway to | Disclosure | Subsection | PRI Principle |
|-----------|-------------------|--------------|---------------------|------------|--------------------------------|---------------|
| OO 9.1 | CORE | OO 9 | PGS 10.1, PGS 31 | PUBLIC | Stewardship: (Proxy) voting | GENERAL |

For each asset class, on what percentage of your listed equity holdings do you have the discretion to vote?

Percentage of your listed equity holdings over which you have the discretion to vote

| | |
|-----------------------------|-------------------|
| (A) Listed equity – active | (11) >90 to <100% |
| (B) Listed equity - passive | (11) >90 to <100% |
| (C) Hedge funds | (11) >90 to <100% |

ESG INCORPORATION

INTERNALLY MANAGED ASSETS

| Indicator | Type of indicator | Dependent on | Gateway to | Disclosure | Subsection | PRI Principle |
|-----------|-------------------|------------------------|---------------------|------------|---------------------------|---------------|
| OO 11 | CORE | Multiple, see guidance | Multiple indicators | PUBLIC | Internally managed assets | 1 |

For each internally managed asset class, does your organisation incorporate ESG factors into your investment decisions?

| | (1) Yes, we incorporate ESG factors into our investment decisions | (2) No, we do not incorporate ESG factors into our investment decisions |
|--|---|---|
| (A) Listed equity - passive | <input checked="" type="radio"/> | <input type="radio"/> |
| (B) Listed equity - active - quantitative | <input checked="" type="radio"/> | <input type="radio"/> |
| (C) Listed equity - active - fundamental | <input checked="" type="radio"/> | <input type="radio"/> |
| (E) Fixed income - SSA | <input checked="" type="radio"/> | <input type="radio"/> |
| (F) Fixed income - corporate | <input checked="" type="radio"/> | <input type="radio"/> |
| (G) Fixed income - securitised | <input checked="" type="radio"/> | <input type="radio"/> |
| (I) Private equity | <input checked="" type="radio"/> | <input type="radio"/> |
| (J) Real estate | <input checked="" type="radio"/> | <input type="radio"/> |
| (K) Infrastructure | <input checked="" type="radio"/> | <input type="radio"/> |
| (L) Hedge funds - Multi-strategy | <input type="radio"/> | <input checked="" type="radio"/> |
| (V) Other: Other Alternative asset classes, Variable and Managed strategies. | <input checked="" type="radio"/> | <input type="radio"/> |

EXTERNAL MANAGER SELECTION

| Indicator | Type of indicator | Dependent on | Gateway to | Disclosure | Subsection | PRI Principle |
|-----------|-------------------|--------------|---------------------|------------|----------------------------|---------------|
| OO 12 | CORE | OO 5, OO 5.1 | Multiple indicators | PUBLIC | External manager selection | 1 |

For each externally managed asset class, does your organisation incorporate ESG factors when selecting external investment managers?

| | (1) Yes, we incorporate ESG factors when selecting external investment managers | (2) No, we do not incorporate ESG factors when selecting external investment managers |
|-----------------------------|---|---|
| (A) Listed equity - active | <input checked="" type="radio"/> | <input type="radio"/> |
| (B) Listed equity - passive | <input checked="" type="radio"/> | <input type="radio"/> |
| (C) Fixed income - active | <input checked="" type="radio"/> | <input type="radio"/> |

EXTERNAL MANAGER APPOINTMENT

| Indicator | Type of indicator | Dependent on | Gateway to | Disclosure | Subsection | PRI Principle |
|-----------|-------------------|--------------|---------------------|------------|------------------------------|---------------|
| OO 13 | CORE | OO 5, OO 5.1 | Multiple indicators | PUBLIC | External manager appointment | 1 |

For each externally managed asset class, does your organisation incorporate ESG factors when appointing external investment managers?

| | (1) Yes, we incorporate ESG factors when appointing external investment managers | (2) No, we do not incorporate ESG factors when appointing external investment managers |
|-----------------------------|--|--|
| (A) Listed equity - active | <input checked="" type="radio"/> | <input type="radio"/> |
| (B) Listed equity - passive | <input checked="" type="radio"/> | <input type="radio"/> |
| (C) Fixed income - active | <input checked="" type="radio"/> | <input type="radio"/> |

EXTERNAL MANAGER MONITORING

| Indicator | Type of indicator | Dependent on | Gateway to | Disclosure | Subsection | PRI Principle |
|-----------|-------------------|--------------|---------------------|------------|-----------------------------|---------------|
| OO 14 | CORE | OO 5, OO 5.1 | Multiple indicators | PUBLIC | External manager monitoring | 1 |

For each externally managed asset class, does your organisation incorporate ESG factors when monitoring external investment managers?

| | (1) Yes, we incorporate ESG factors when monitoring external investment managers | (2) No, we do not incorporate ESG factors when monitoring external investment managers |
|-----------------------------|--|--|
| (A) Listed equity - active | <input checked="" type="radio"/> | <input type="radio"/> |
| (B) Listed equity - passive | <input checked="" type="radio"/> | <input type="radio"/> |
| (C) Fixed income - active | <input checked="" type="radio"/> | <input type="radio"/> |

ESG IN OTHER ASSET CLASSES

| Indicator | Type of indicator | Dependent on | Gateway to | Disclosure | Subsection | PRI Principle |
|-----------|-------------------|-----------------|------------|------------|----------------------------|---------------|
| OO 15 | CORE | OO 11, OO 12–14 | N/A | PUBLIC | ESG in other asset classes | 1 |

Describe how your organisation incorporates ESG factors into the following asset classes.

Internally managed
(C) Other

For certain investments, consideration of ESG factors may be incorporated into our investment decision making where research, data coverage and relevant information is readily available and where we believe such factors are material. Our assessment of materiality may vary depending on the nature of the particular investment, asset class, and investment time horizon.

ESG NOT INCORPORATED

| Indicator | Type of indicator | Dependent on | Gateway to | Disclosure | Subsection | PRI Principle |
|-----------|-------------------|-----------------|------------|------------|----------------------|---------------|
| OO 16 | CORE | OO 11, OO 12–14 | N/A | PUBLIC | ESG not incorporated | 1 |

Describe why your organisation does not currently incorporate ESG factors into your investment decisions.

Internally managed
(L) Hedge funds

Consideration of governance factors where financially material form part of our investment decision making process for our hedge funds. However, overall integration of ESG factors is not a primary focus of this process given the nature of the asset class (shorter term investment time horizons and long/short positions) and the economic interests of our investors in these funds.

ESG STRATEGIES

LISTED EQUITY

| Indicator | Type of indicator | Dependent on | Gateway to | Disclosure | Subsection | PRI Principle |
|-----------|-------------------|--------------|-------------------|------------|---------------|---------------|
| OO 17 LE | CORE | OO 11 | OO 17.1 LE, LE 12 | PUBLIC | Listed equity | 1 |

Which ESG incorporation approach and/or combination of approaches does your organisation apply to your internally managed active listed equity?

Percentage out of total internally managed active listed equity

| | |
|-------------------------------|--------|
| (A) Screening alone | 0% |
| (B) Thematic alone | 0% |
| (C) Integration alone | >75% |
| (D) Screening and integration | >0-10% |
| (E) Thematic and integration | 0% |
| (F) Screening and thematic | 0% |

(G) All three approaches combined >0-10%

(H) None 0%

| Indicator | Type of indicator | Dependent on | Gateway to | Disclosure | Subsection | PRI Principle |
|------------|-------------------|--------------|------------|------------|---------------|---------------|
| OO 17.1 LE | CORE | OO 17 LE | LE 9 | PUBLIC | Listed equity | 1 |

What type of screening does your organisation use for your internally managed active listed equity assets where a screening approach is applied?

Percentage coverage out of your total listed equity assets where a screening approach is applied

(A) Positive/best-in-class screening only

0%

(B) Negative screening only

>75%

(C) A combination of screening approaches

>0-10%

FIXED INCOME

| Indicator | Type of indicator | Dependent on | Gateway to | Disclosure | Subsection | PRI Principle |
|-----------|-------------------|------------------|------------------------|------------|--------------|---------------|
| OO 17 FI | CORE | OO 5.3 FI, OO 11 | Multiple, see guidance | PUBLIC | Fixed income | 1 |

Which ESG incorporation approach and/or combination of approaches does your organisation apply to your internally managed active fixed income?

(1) Fixed income - SSA

(2) Fixed income - corporate

(3) Fixed income - securitised

(A) Screening alone

0%

0%

0%

(B) Thematic alone

0%

0%

0%

| | | | |
|-----------------------------------|---------|---------|--------|
| (C) Integration alone | >10-50% | >75% | >0-10% |
| (D) Screening and integration | >0-10% | >10-50% | 0% |
| (E) Thematic and integration | 0% | 0% | 0% |
| (F) Screening and thematic | 0% | 0% | 0% |
| (G) All three approaches combined | >0-10% | >0-10% | 0% |
| (H) None | >50-75% | >0-10% | >75% |

| Indicator | Type of indicator | Dependent on | Gateway to | Disclosure | Subsection | PRI Principle |
|------------|-------------------|--------------|------------|------------|--------------|---------------|
| OO 17.1 FI | CORE | OO 17 FI | N/A | PUBLIC | Fixed income | 1 |

What type of screening does your organisation use for your internally managed active fixed income where a screening approach is applied?

| | (1) Fixed income - SSA | (2) Fixed income - corporate |
|---|------------------------|------------------------------|
| (A) Positive/best-in-class screening only | 0% | 0% |
| (B) Negative screening only | >75% | >50-75% |
| (C) A combination of screening approaches | 0% | >10-50% |

ESG/SUSTAINABILITY FUNDS AND PRODUCTS

LABELLING AND MARKETING

| Indicator | Type of indicator | Dependent on | Gateway to | Disclosure | Subsection | PRI Principle |
|-----------|-------------------|--------------|------------|------------|-------------------------|---------------|
| OO 18 | CORE | OO 11–14 | OO 18.1 | PUBLIC | Labelling and marketing | 1 |

Do you explicitly market any of your products and/or funds as ESG and/or sustainable?

● **(A) Yes, we market products and/or funds as ESG and/or sustainable**

Provide the percentage of AUM that your ESG and/or sustainability-marketed products or funds represent:

>0-10%

- (B) No, we do not offer products or funds explicitly marketed as ESG and/or sustainable
- (C) Not applicable; we do not offer products or funds

Additional information: (Voluntary)

Further information on our funds, including Key Investor Information Documents, is available at columbiathreadneedle.com

| Indicator | Type of indicator | Dependent on | Gateway to | Disclosure | Subsection | PRI Principle |
|-----------|-------------------|--------------|------------|------------|-------------------------|---------------|
| OO 18.1 | CORE | OO 18 | OO 18.2 | PUBLIC | Labelling and marketing | 1 |

Do any of your ESG and/or sustainability-marketed products and/or funds hold formal ESG and/or RI certification(s) or label(s) awarded by a third party?

● **(A) Yes, our ESG and/or sustainability-marketed products and/or funds hold formal labels or certifications**

Provide the percentage of AUM that your labelled and/or certified products and/or funds represent:

>0-10%

- (B) No, our ESG and/or sustainability-marketed products and/or funds do not hold formal labels or certifications

| Indicator | Type of indicator | Dependent on | Gateway to | Disclosure | Subsection | PRI Principle |
|-----------|-------------------|--------------|------------|------------|-------------------------|---------------|
| OO 18.2 | CORE | OO 18.1 | N/A | PUBLIC | Labelling and marketing | 1 |

Which ESG/RI certifications or labels do you hold?

- ☐ (A) Commodity type label (e.g. BCI)
- ☒ **(B) GRESB**
- ☒ **(C) Austrian Ecolabel (UZ49)**
- ☐ (D) B Corporation
- ☒ **(E) BREEAM**
- ☐ (F) CBI Climate Bonds Standard
- ☐ (G) DDV-Nachhaltigkeitskodex-ESG-Strategie
- ☐ (H) DDV-Nachhaltigkeitskodex-ESG-Impact
- ☐ (I) EU Ecolabel
- ☐ (J) EU Green Bond Standard
- ☒ **(K) Febelfin label (Belgium)**
- ☐ (L) Finansol
- ☒ **(M) FNG-Siegel Ecolabel (Germany, Austria and Switzerland)**
- ☐ (N) Greenfin label (France)
- ☐ (O) Grüner Pfandbrief
- ☐ (P) ICMA Green Bond Principles
- ☐ (Q) ICMA Social Bonds Principles
- ☐ (R) ICMA Sustainability Bonds Principles
- ☐ (S) ICMA Sustainability-linked Bonds Principles
- ☐ (T) Kein Verstoß gegen Atomwaffensperrvertrag
- ☐ (U) Le label ISR (French government SRI label)
- ☐ (V) Luxflag Climate Finance
- ☐ (W) Luxflag Environment
- ☒ **(X) Luxflag ESG**
- ☐ (Y) Luxflag Green Bond
- ☐ (Z) Luxflag Microfinance
- ☐ (AA) Luxflag Sustainable Insurance Products
- ☒ **(AB) National stewardship code**

Specify:

UK, Japan, Taiwan

- ☐ (AC) Nordic Swan Ecolabel
- ☐ (AD) Other SRI label based on EUROSIF SRI Transparency Code (e.g. Novethic)
- ☐ (AE) People's Bank of China green bond guidelines
- ☐ (AF) RIAA (Australia)
- ☒ **(AG) Towards Sustainability label (Belgium)**
- ☐ (AH) Other

PASSIVE INVESTMENTS

| Indicator | Type of indicator | Dependent on | Gateway to | Disclosure | Subsection | PRI Principle |
|-----------|-------------------|------------------|-------------|------------|---------------------|---------------|
| OO 19 | CORE | OO 5.3 FI, OO 11 | LE 8, FI 10 | PUBLIC | Passive investments | 1 |

What percentage of your total internally managed passive listed equity and/or fixed income passive AUM utilise an ESG index or benchmark?

Percentage of AUM that utilise an ESG index or benchmark

| | |
|-----------------------------|----|
| (A) Listed equity - passive | 0% |
| (B) Fixed income - passive | 0% |

THEMATIC BONDS

| Indicator | Type of indicator | Dependent on | Gateway to | Disclosure | Subsection | PRI Principle |
|-----------|-------------------|--------------|--------------|------------|----------------|---------------|
| OO 20 | CORE | OO 17 FI | FI 15, FI 17 | PUBLIC | Thematic bonds | 1 |

What percentage of your total environmental and/or social thematic bonds are labelled by the issuers in accordance with industry-recognised standards?

Percentage of your total environmental and/or social thematic bonds labelled by the issuers

| | |
|---------------------------------|---------|
| (A) Green or climate bonds | >10-50% |
| (B) Social bonds | >10-50% |
| (C) Sustainability bonds | >10-50% |
| (D) Sustainability-linked bonds | >0-10% |
| (E) SDG or SDG-linked bonds | 0% |
| (F) Other | 0% |

(G) Bonds not labelled by the issuer 0%

SUMMARY OF REPORTING REQUIREMENTS

SUMMARY OF REPORTING REQUIREMENTS

| Indicator | Type of indicator | Dependent on | Gateway to | Disclosure | Subsection | PRI Principle |
|-----------|-------------------|---------------------|---------------------|------------|-----------------------------------|---------------|
| OO 21 | CORE | Multiple indicators | Multiple indicators | PUBLIC | Summary of reporting requirements | GENERAL |

The following table shows which modules are mandatory or voluntary to report on in the separate PRI asset class modules. Where a module is voluntary, indicate if you wish to report on it.

| Applicable modules | (1) Mandatory to report (pre-filled based on previous responses) | (2.1) Voluntary to report. Yes, I want to opt-in to reporting on the module | (2.2) Voluntary to report. No, I want to opt-out of reporting on the module |
|--|--|---|---|
| Policy, Governance and Strategy | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Confidence Building Measures | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| (A) Listed equity – passive | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| (B) Listed equity – active – quantitative | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| (C) Listed equity – active – fundamental | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| (E) Fixed income – SSA | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| (F) Fixed income – corporate | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| (G) Fixed income – securitised | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| (I) Private equity | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> |

| | | | |
|--|----------------------------------|----------------------------------|-----------------------|
| (J) Real estate | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| (K) Infrastructure | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> |
| (T) External manager selection, appointment and monitoring (SAM) – listed equity - active | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| (U) External manager selection, appointment and monitoring (SAM) – listed equity - passive | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| (V) External manager selection, appointment and monitoring (SAM) – fixed income - active | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> |

OTHER ASSET BREAKDOWNS

PRIVATE EQUITY: SECTORS

| Indicator | Type of indicator | Dependent on | Gateway to | Disclosure | Subsection | PRI Principle |
|-----------|-------------------|--------------|------------|------------|----------------------------|---------------|
| OO 22 | CORE | OO 21 | N/A | PUBLIC | Private equity: Sectors | GENERAL |

In which sector(s) are your internally managed private equity assets invested?

- ☒ (A) Energy
- ☒ (B) Materials
- ☒ (C) Industrials
- ☒ (D) Consumer discretionary
- ☒ (E) Consumer staples
- ☒ (F) Healthcare
- ☒ (G) Financials
- ☒ (H) Information technology
- ☒ (I) Communication services
- ☒ (J) Utilities
- ☒ (K) Real estate

PRIVATE EQUITY: OWNERSHIP LEVEL

| Indicator | Type of indicator | Dependent on | Gateway to | Disclosure | Subsection | PRI Principle |
|-----------|-------------------|--------------|------------|------------|------------------------------------|---------------|
| OO 23 | CORE | OO 21 | N/A | PUBLIC | Private equity: Ownership level | GENERAL |

What is the percentage breakdown of your internally managed private equity investments by the level of ownership?

- ☐ (A) A majority stake (more than 50%)
- ☐ (B) A significant minority stake (between 10–50%)
- ☒ (C) A limited minority stake (less than 10%)
 - Select from the list:
 - ☐ (1) >0 to 10%
 - ☐ (2) >10 to 50%
 - ☐ (3) >50 to 75%
 - ☒ (4) >75%

REAL ESTATE: BUILDING TYPE

| Indicator | Type of indicator | Dependent on | Gateway to | Disclosure | Subsection | PRI Principle |
|-----------|-------------------|--------------|--------------------|------------|-------------------------------|---------------|
| OO 24 | CORE | OO 21 | RE 1, RE 9 - 10 | PUBLIC | Real estate: Building type | GENERAL |

What is the building type of your physical real estate assets?

- ☒ (A) Standing investments
- ☒ (B) New construction
- ☒ (C) Major renovation

REAL ESTATE: OWNERSHIP LEVEL

| Indicator | Type of indicator | Dependent on | Gateway to | Disclosure | Subsection | PRI Principle |
|-----------|-------------------|--------------|------------|------------|------------------------------|---------------|
| OO 25 | CORE | OO 21 | N/A | PUBLIC | Real estate: Ownership level | GENERAL |

What is the percentage breakdown of your physical real estate assets by the level of ownership?

☒ (A) A majority stake (more than 50%)

Select from the list:

- ☐ (1) >0 to 10%
- ☐ (2) >10 to 50%
- ☐ (3) >50 to 75%

☒ (4) >75%

☐ (B) A significant minority stake (between 10–50%)

☐ (C) A limited minority stake (less than 10%)

REAL ESTATE: MANAGEMENT TYPE

| Indicator | Type of indicator | Dependent on | Gateway to | Disclosure | Subsection | PRI Principle |
|-----------|-------------------|--------------|---------------------|------------|------------------------------|---------------|
| OO 26 | CORE | OO 21 | RE 1, RE 6–8, RE 13 | PUBLIC | Real estate: Management type | GENERAL |

Who manages your physical real estate assets?

- ☒ (A) Direct management by our organisation
- ☒ (B) Third-party property managers that our organisation appoints
- ☒ (C) Other investors or their third-party property managers
- ☒ (D) Tenant(s) with operational control

INFRASTRUCTURE: OWNERSHIP LEVEL

| Indicator | Type of indicator | Dependent on | Gateway to | Disclosure | Subsection | PRI Principle |
|-----------|-------------------|--------------|------------|------------|---------------------------------|---------------|
| OO 27 | CORE | OO 21 | N/A | PUBLIC | Infrastructure: Ownership level | GENERAL |

What is the percentage breakdown of your organisation's infrastructure assets by the level of ownership?

☒ (A) A majority stake (more than 50%)

Select from the list:

- ☐ (1) >0 to 10%
- ☐ (2) >10 to 50%
- ☐ (3) >50 to 75%

☒ (4) >75%

☐ (B) A significant minority stake (between 10–50%)

☐ (C) A limited minority stake (less than 10%)

INFRASTRUCTURE: STRATEGY

| Indicator | Type of indicator | Dependent on | Gateway to | Disclosure | Subsection | PRI Principle |
|-----------|-------------------|--------------|------------|------------|--------------------------|---------------|
| OO 28 | CORE | OO 21 | N/A | PUBLIC | Infrastructure: Strategy | GENERAL |

What is the investment strategy for your infrastructure assets?

☒ (A) Core

☐ (B) Value added

☐ (C) Opportunistic

☐ (D) Other

INFRASTRUCTURE: TYPE OF ASSET

| Indicator | Type of indicator | Dependent on | Gateway to | Disclosure | Subsection | PRI Principle |
|-----------|-------------------|--------------|------------|------------|-------------------------------|---------------|
| OO 29 | CORE | OO 21 | INF 1 | PUBLIC | Infrastructure: Type of asset | GENERAL |

What is the asset type of your infrastructure?

- ☐ (A) Greenfield
☒ (B) Brownfield

INFRASTRUCTURE: MANAGEMENT TYPE

| Indicator | Type of indicator | Dependent on | Gateway to | Disclosure | Subsection | PRI Principle |
|-----------|-------------------|--------------|------------------------|------------|---------------------------------|---------------|
| OO 30 | CORE | OO 21 | Multiple, see guidance | PUBLIC | Infrastructure: Management type | GENERAL |

Who manages your infrastructure assets?

- ☒ (A) Direct management by our organisation
☒ (B) Third-party infrastructure operators that our organisation appoints
☐ (C) Other investors, infrastructure companies or their third-party operators
☐ (D) Public or government entities or their third-party operators

SUBMISSION INFORMATION

REPORT DISCLOSURE

| Indicator | Type of indicator | Dependent on | Gateway to | Disclosure | Subsection | PRI Principle |
|-----------|-------------------|------------------|------------|------------|-------------------|---------------|
| OO 31 | CORE | Reporting status | N/A | PUBLIC | Report disclosure | GENERAL |

Your organisation is in its voluntary reporting period; do you wish to make your responses available to the public?

- ☒ (A) Yes, publish all responses to Core indicators and any Plus indicators that are indicated for publication
☐ (B) No, keep all our responses private for this year

| Indicator | Type of indicator | Dependent on | Gateway to | Disclosure | Subsection | PRI Principle |
|-----------|-------------------|--------------|------------|------------|-------------------|---------------|
| OO 32 | CORE | OO 3, OO 31 | N/A | PUBLIC | Report disclosure | GENERAL |

How would you like to disclose the detailed percentage figures you reported throughout the Reporting Framework?

- ☐ (A) Publish as absolute numbers
- ☒ (B) Publish as ranges

POLICY, GOVERNANCE AND STRATEGY (PGS)

POLICY

RESPONSIBLE INVESTMENT POLICY ELEMENTS

| Indicator | Type of indicator | Dependent on | Gateway to | Disclosure | Subsection | PRI Principle |
|-----------|-------------------|--------------|---------------------|------------|--|---------------|
| PGS 1 | CORE | OO 8, OO 9 | Multiple indicators | PUBLIC | Responsible investment policy elements | 1, 2 |

Which elements are covered in your formal responsible investment policy(ies)?

- ☒ (A) Overall approach to responsible investment
- ☒ (B) Guidelines on environmental factors
- ☒ (C) Guidelines on social factors
- ☒ (D) Guidelines on governance factors
- ☒ (E) Guidelines on sustainability outcomes
- ☒ (F) Guidelines tailored to the specific asset class(es) we hold
- ☒ (G) Guidelines on exclusions
- ☒ (H) Guidelines on managing conflicts of interest related to responsible investment
- ☒ (I) Stewardship: Guidelines on engagement with investees
- ☒ (J) Stewardship: Guidelines on overall political engagement
- ☒ (K) Stewardship: Guidelines on engagement with other key stakeholders
- ☒ (L) Stewardship: Guidelines on (proxy) voting
- ☐ (M) Other responsible investment elements not listed here
- ☐ (N) Our organisation does not have a formal responsible investment policy and/or our policy(ies) do not cover any responsible investment elements

| Indicator | Type of indicator | Dependent on | Gateway to | Disclosure | Subsection | PRI Principle |
|-----------|-------------------|--------------|------------------------|------------|--|---------------|
| PGS 2 | CORE | PGS 1 | Multiple, see guidance | PUBLIC | Responsible investment policy elements | 1 |

Does your formal responsible investment policy(ies) include specific guidelines on systematic sustainability issues?

- ☒ (A) Specific guidelines on climate change (may be part of guidelines on environmental factors)
- ☒ (B) Specific guidelines on human rights (may be part of guidelines on social factors)
- ☐ (C) Specific guidelines on other systematic sustainability issues
- ☐ (D) Our formal responsible investment policy(ies) does not include guidelines on systematic sustainability issues

| Indicator | Type of indicator | Dependent on | Gateway to | Disclosure | Subsection | PRI Principle |
|-----------|-------------------|--------------|------------|------------|--|---------------|
| PGS 3 | CORE | PGS 1, PGS 2 | N/A | PUBLIC | Responsible investment policy elements | 6 |

Which elements of your formal responsible investment policy(ies) are publicly available?

- ☒ (A) Overall approach to responsible investment

Add link:

https://docs.columbiathreadneedle.com/documents/en_responsible_investment_policy.pdf?inline=true

- ☒ (B) Guidelines on environmental factors

Add link:

<https://www.columbiathreadneedleus.com/binaries/content/assets/cti/public/8.-environmental-and-social-practices-statement.pdf>

- ☒ (C) Guidelines on social factors

Add link:

<https://www.columbiathreadneedleus.com/binaries/content/assets/cti/public/8.-environmental-and-social-practices-statement.pdf>

- ☒ (D) Guidelines on governance factors

Add link:

<https://www.columbiathreadneedleus.com/binaries/content/assets/cti/public/7.-corporate-governance-guidelines.pdf>

- ☒ (E) Guidelines on sustainability outcomes

Add link:

<https://www.columbiathreadneedleus.com/binaries/content/assets/cti/public/9.-stewardship-report.pdf>

- ☒ (F) Specific guidelines on climate change (may be part of guidelines on environmental factors)

Add link:

<https://www.columbiathreadneedleus.com/binaries/content/assets/cti/public/climate-change-managing-risks-and-opportunities---taskforce-on-climate-related-financial-disclosures-tcfd.pdf>

☒ **(G) Specific guidelines on human rights (may be part of guidelines on social factors)**

Add link:

<https://www.columbiathreadneedleus.com/binaries/content/assets/cti/public/8.-environmental-and-social-practices-statement.pdf>

☒ **(I) Guidelines tailored to the specific asset class(es) we hold**

Add link:

<https://docs.columbiathreadneedle.com/documents/Columbia%20Threadneedle%20Investments%20-%20Stewardship%20Report.pdf?inline=true>

☒ **(J) Guidelines on exclusions**

Add link:

<https://docs.columbiathreadneedle.com/documents/Columbia%20Threadneedle%20Investments%20-%20Stewardship%20Report.pdf?inline=true>

☒ **(K) Guidelines on managing conflicts of interest related to responsible investment**

Add link:

<https://www.columbiathreadneedleus.com/binaries/content/assets/cti/public/4.-engagement-policy--conflicts-of-interest.pdf>

☒ **(L) Stewardship: Guidelines on engagement with investees**

Add link:

<https://www.columbiathreadneedleus.com/binaries/content/assets/cti/public/5.-engagement-policy.pdf>

☒ **(M) Stewardship: Guidelines on overall political engagement**

Add link:

<https://www.columbiathreadneedleus.com/binaries/content/assets/cti/public/5.-engagement-policy.pdf>

☒ **(N) Stewardship: Guidelines on engagement with other key stakeholders**

Add link:

<https://www.columbiathreadneedleus.com/binaries/content/assets/cti/public/5.-engagement-policy.pdf>

☒ **(O) Stewardship: Guidelines on (proxy) voting**

Add link:

<https://www.columbiathreadneedleus.com/binaries/content/assets/cti/public/1.-proxy-voting-policy.pdf>

- (Q) No elements of our formal responsible investment policy(ies) are publicly available

| Indicator | Type of indicator | Dependent on | Gateway to | Disclosure | Subsection | PRI Principle |
|-----------|-------------------|--------------|------------|------------|--|---------------|
| PGS 5 | CORE | PGS 1 | N/A | PUBLIC | Responsible investment policy elements | 2 |

Which elements are covered in your organisation's policy(ies) or guidelines on stewardship?

☒ **(A) Overall stewardship objectives**

☒ **(B) Prioritisation of specific ESG factors to be advanced via stewardship activities**

- ☒ (C) Criteria used by our organisation to prioritise the investees, policy makers, key stakeholders, or other entities on which to focus our stewardship efforts
- ☒ (D) How different stewardship tools and activities are used across the organisation
- ☒ (E) Approach to escalation in stewardship
- ☒ (F) Approach to collaboration in stewardship
- ☒ (G) Conflicts of interest related to stewardship
- ☒ (H) How stewardship efforts and results are communicated across the organisation to feed into investment decision-making and vice versa
- ☐ (I) Other
- ☐ (J) None of the above elements is captured in our policy(ies) or guidelines on stewardship

| Indicator | Type of indicator | Dependent on | Gateway to | Disclosure | Subsection | PRI Principle |
|-----------|-------------------|--------------|------------|------------|--|---------------|
| PGS 6 | CORE | PGS 1 | N/A | PUBLIC | Responsible investment policy elements | 2 |

Does your policy on (proxy) voting include voting principles and/or guidelines on specific ESG factors?

- ☒ (A) Yes, it includes voting principles and/or guidelines on specific environmental factors
- ☒ (B) Yes, it includes voting principles and/or guidelines on specific social factors
- ☒ (C) Yes, it includes voting principles and/or guidelines on specific governance factors
- ☐ (D) Our policy on (proxy) voting does not include voting principles or guidelines on specific ESG factors

| Indicator | Type of indicator | Dependent on | Gateway to | Disclosure | Subsection | PRI Principle |
|-----------|-------------------|--------------|------------|------------|--|---------------|
| PGS 7 | CORE | OO 9 | N/A | PUBLIC | Responsible investment policy elements | 2 |

Does your organisation have a policy that states how (proxy) voting is addressed in your securities lending programme?

- ☒ (A) We have a publicly available policy to address (proxy) voting in our securities lending programme

Add link(s):

<https://www.columbiathreadneedle.co.uk/document-library/services/documents/retrieveDocument/?token=088c999b-44eb-4774-893f-8a7e4942de6f&clientCode=a5fa720c45c5bf709d70b7d7ae64d4f7d14ae162&filename=Responsible%20Investment%20-%20Corporate%20Governance%20G>

- ☐ (B) We have a policy to address (proxy) voting in our securities lending programme, but it is not publicly available
- ☐ (C) We rely on the policy of our external service provider(s)
- ☐ (D) We do not have a policy to address (proxy) voting in our securities lending programme
- ☐ (E) Not applicable; we do not have a securities lending programme

RESPONSIBLE INVESTMENT POLICY COVERAGE

| Indicator | Type of indicator | Dependent on | Gateway to | Disclosure | Subsection | PRI Principle |
|-----------|-------------------|--------------|------------|------------|--|---------------|
| PGS 8 | CORE | PGS 1 | N/A | PUBLIC | Responsible investment policy coverage | 1 |

What percentage of your total AUM is covered by the below elements of your responsible investment policy(ies)?

Combined AUM coverage of all policy elements

(A) Overall approach to responsible investment

(B) Guidelines on environmental factors

(C) Guidelines on social factors

(D) Guidelines on governance factors

(6) >90% to <100%

| Indicator | Type of indicator | Dependent on | Gateway to | Disclosure | Subsection | PRI Principle |
|-----------|-------------------|--------------|------------|------------|--|---------------|
| PGS 9 | CORE | PGS 2 | N/A | PUBLIC | Responsible investment policy coverage | 1 |

What proportion of your AUM is covered by your formal policies or guidelines on climate change, human rights, or other systematic sustainability issues?

AUM coverage

(A) Specific guidelines on climate change

(2) for a majority of our AUM

(B) Specific guidelines on human rights

(2) for a majority of our AUM

| Indicator | Type of indicator | Dependent on | Gateway to | Disclosure | Subsection | PRI Principle |
|-----------|-------------------|----------------------|------------|------------|--|---------------|
| PGS 10 | CORE | OO 8, OO 9, PGS 1 | N/A | PUBLIC | Responsible investment policy coverage | 2 |

Per asset class, what percentage of your AUM is covered by your policy(ies) or guidelines on stewardship with investees?

☒ **(A) Listed equity**

(1) Percentage of AUM covered

- (1) >0% to 10%
- (2) >10% to 20%
- (3) >20% to 30%
- (4) >30% to 40%
- (5) >40% to 50%
- (6) >50% to 60%
- (7) >60% to 70%
- (8) >70% to 80%
- (9) >80% to 90%
- **(10) >90% to <100%**
- (11) 100%

(2) If your AUM coverage is below 100%, explain why: (Voluntary)

☒ **(B) Fixed income**

(1) Percentage of AUM covered

- (1) >0% to 10%
- (2) >10% to 20%
- (3) >20% to 30%
- (4) >30% to 40%
- (5) >40% to 50%
- (6) >50% to 60%
- (7) >60% to 70%
- (8) >70% to 80%
- (9) >80% to 90%
- **(10) >90% to <100%**
- (11) 100%

(2) If your AUM coverage is below 100%, explain why: (Voluntary)

☒ **(C) Private equity**

(1) Percentage of AUM covered

- (1) >0% to 10%
- (2) >10% to 20%
- (3) >20% to 30%
- (4) >30% to 40%
- (5) >40% to 50%
- (6) >50% to 60%
- (7) >60% to 70%
- (8) >70% to 80%
- (9) >80% to 90%
- **(10) >90% to <100%**
- (11) 100%

(2) If your AUM coverage is below 100%, explain why: (Voluntary)

☒ **(D) Real estate**

(1) Percentage of AUM covered

- (1) >0% to 10%
- (2) >10% to 20%
- (3) >20% to 30%
- (4) >30% to 40%
- (5) >40% to 50%
- (6) >50% to 60%
- (7) >60% to 70%
- (8) >70% to 80%
- (9) >80% to 90%
- **(10) >90% to <100%**
- (11) 100%

(2) If your AUM coverage is below 100%, explain why: (Voluntary)

☒ **(E) Infrastructure**

(1) Percentage of AUM covered

- (1) >0% to 10%
- (2) >10% to 20%
- (3) >20% to 30%
- (4) >30% to 40%
- (5) >40% to 50%
- (6) >50% to 60%
- (7) >60% to 70%
- (8) >70% to 80%
- (9) >80% to 90%
- **(10) >90% to <100%**
- (11) 100%

(2) If your AUM coverage is below 100%, explain why: (Voluntary)

☐ (F) Hedge funds

☐ (I) Other

| Indicator | Type of indicator | Dependent on | Gateway to | Disclosure | Subsection | PRI Principle |
|-----------|-------------------|---------------|------------|------------|--|---------------|
| PGS 10.1 | CORE | OO 9.1, PGS 1 | N/A | PUBLIC | Responsible investment policy coverage | 2 |

What percentage of your listed equity holdings is covered by your guidelines on (proxy) voting?

☒ **(A) Actively managed listed equity**

(1) Percentage of your listed equity holdings over which you have the discretion to vote

- (1) >0% to 10%
- (2) >10% to 20%
- (3) >20% to 30%
- (4) >30% to 40%
- (5) >40% to 50%
- (6) >50% to 60%
- (7) >60% to 70%
- (8) >70% to 80%
- (9) >80% to 90%
- **(10) >90% to <100%**
- (11) 100%

(2) If your AUM coverage is below 100%, explain why: (Voluntary)

☒ **(B) Passively managed listed equity**

(1) Percentage of your listed equity holdings over which you have the discretion to vote

- ☐ (1) >0% to 10%
- ☐ (2) >10% to 20%
- ☐ (3) >20% to 30%
- ☐ (4) >30% to 40%
- ☐ (5) >40% to 50%
- ☐ (6) >50% to 60%
- ☐ (7) >60% to 70%
- ☐ (8) >70% to 80%
- ☐ (9) >80% to 90%
- ☒ **(10) >90% to <100%**
- ☐ (11) 100%

(2) If your AUM coverage is below 100%, explain why: (Voluntary)

☐ (C) Direct listed equity holdings in hedge fund portfolios

GOVERNANCE

ROLES AND RESPONSIBILITIES

| Indicator | Type of indicator | Dependent on | Gateway to | Disclosure | Subsection | PRI Principle |
|-----------|-------------------|--------------|---------------------|------------|----------------------------|---------------|
| PGS 11 | CORE | N/A | Multiple indicators | PUBLIC | Roles and responsibilities | 1 |

Which senior level body(ies) or role(s) in your organisation have formal oversight over and accountability for responsible investment?

☒ **(A) Board members, trustees, or equivalent**

☒ **(B) Senior executive-level staff, or equivalent**

Specify:

Chief Executive Officer

☒ **(C) Investment committee, or equivalent**

Specify:

Investment Oversight Committee (US), Investment Management Committee (EMEA)

☒ **(D) Head of department, or equivalent**

Specify department:

Global Chief Investment Officer

☐ (E) None of the above bodies and roles have oversight over and accountability for responsible investment

| Indicator | Type of indicator | Dependent on | Gateway to | Disclosure | Subsection | PRI Principle |
|-----------|-------------------|----------------------|------------|------------|----------------------------|---------------|
| PGS 11.1 | CORE | PGS 1, PGS 2, PGS 11 | N/A | PUBLIC | Roles and responsibilities | 1, 2 |

Does your organisation's senior level body(ies) or role(s) have formal oversight over and accountability for the elements covered in your responsible investment policy(ies)?

| | (1) Board members, trustees, or equivalent | (2) Senior executive-level staff, investment committee, head of department, or equivalent |
|--|--|---|
| (A) Overall approach to responsible investment | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| (B) Guidelines on environmental, social and/or governance factors | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| (C) Guidelines on sustainability outcomes | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| (D) Specific guidelines on climate change (may be part of guidelines on environmental factors) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| (E) Specific guidelines on human rights (may be part of guidelines on social factors) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| (G) Guidelines tailored to the specific asset class(es) we hold | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| (H) Guidelines on exclusions | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| (I) Guidelines on managing conflicts of interest related to responsible investment | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| (J) Stewardship: Guidelines on engagement with investees | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

| | | |
|---|--------------------------|-------------------------------------|
| (K) Stewardship: Guidelines on overall political engagement | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| (L) Stewardship: Guidelines on engagement with other key stakeholders | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| (M) Stewardship: Guidelines on (proxy) voting | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| (N) This role has no formal oversight over and accountability for any of the above elements covered in our responsible investment policy(ies) | <input type="radio"/> | <input type="radio"/> |

| Indicator | Type of indicator | Dependent on | Gateway to | Disclosure | Subsection | PRI Principle |
|-----------|-------------------|--------------|------------|------------|----------------------------|---------------|
| PGS 11.2 | CORE | N/A | N/A | PUBLIC | Roles and responsibilities | 1 – 6 |

Does your organisation have governance processes or structures to ensure that your overall political engagement is aligned with your commitment to the principles of PRI, including any political engagement conducted by third parties on your behalf?

● (A) Yes

Describe how you do this:

We aspire to play an active role in public policy development through thoughtful engagement with policymakers and regulators. We seek to bring a constructive investor voice to standard settings, and we believe that policy and regulatory change is often the catalyst for improved corporate behaviour. The Head of Active Ownership manages the approval process for public policy engagement. Requests are raised by Responsible Investment professionals and the approval process is managed by the Head of Active Ownership. For the approval process to begin, there must be thematic alignment between relevant portfolio managers or analysts. Once aligned, requests are reviewed by Legal and Compliance Communications within both Columbia Threadneedle and our parent organisation Ameriprise Financial, Inc. Requests are then reviewed at monthly meetings involving the Global Heads of Responsible Investment, Research, Equities and Fixed Income, as well as the Ameriprise Corporate Social Responsibility Working Group Chair. Final sign-off is obtained from the global or regional CEO, depending on the nature of the request. Any approval process participant can ask for further escalation/additional approval participants/steps beyond the described process.

- (B) No
- (C) Not applicable, our organisation does not conduct any form of political engagement directly or through any third parties

| Indicator | Type of indicator | Dependent on | Gateway to | Disclosure | Subsection | PRI Principle |
|-----------|-------------------|--------------|------------|------------|----------------------------|---------------|
| PGS 12 | CORE | N/A | N/A | PUBLIC | Roles and responsibilities | 1 |

In your organisation, which internal or external roles are responsible for implementing your approach to responsible investment?

☒ **(A) Internal role(s)**

Specify:

The following internal roles are all responsible for implementing our approach to RI: Regional and global CEOs; Chief Investment Officer; Investment Oversight Committee, Investment Management Committee; Global Head of Responsible Investment; Global Head of Research; Portfolio managers and fundamental analysts; and our dedicated Responsible Investment capability that comprises over 40 responsible investment professionals.

☐ (B) External investment managers, service providers, or other external partners or suppliers

☐ (C) We do not have any internal or external roles with responsibility for implementing responsible investment

| Indicator | Type of indicator | Dependent on | Gateway to | Disclosure | Subsection | PRI Principle |
|-----------|-------------------|--------------|------------|------------|----------------------------|---------------|
| PGS 13 | CORE | PGS 11 | N/A | PUBLIC | Roles and responsibilities | 1 |

Does your organisation use responsible investment KPIs to evaluate the performance of your board members, trustees, or equivalent?

☐ (A) Yes, we use responsible investment KPIs to evaluate the performance of our board members, trustees, or equivalent

☒ **(B) No, we do not use responsible investment KPIs to evaluate the performance of our board members, trustees, or equivalent**

Explain why: (Voluntary)

| Indicator | Type of indicator | Dependent on | Gateway to | Disclosure | Subsection | PRI Principle |
|-----------|-------------------|--------------|------------|------------|----------------------------|---------------|
| PGS 14 | CORE | PGS 11 | N/A | PUBLIC | Roles and responsibilities | 1 |

Does your organisation use responsible investment KPIs to evaluate the performance of your senior executive-level staff (or equivalent), and are these KPIs linked to compensation?

● (A) Yes, we use responsible investment KPIs to evaluate the performance of our senior executive-level staff (or equivalent)

Indicate whether these responsible investment KPIs are linked to compensation

- (1) KPIs are linked to compensation
- (2) KPIs are not linked to compensation as these roles do not have variable compensation

● (3) KPIs are not linked to compensation even though these roles have variable compensation

Describe: (Voluntary)

Appropriate consideration of ESG issues and active engagement activity is reflected in all investment professionals' investment performance goals and incentives. For RI professionals, remuneration is linked to delivering high-quality active ownership analysis and activities, such as engagement and voting in line with our global RI policies, contributing to building Columbia Threadneedle's RI profile, ESG integration, and enhanced ESG disclosure.

- (B) No, we do not use responsible investment KPIs to evaluate the performance of our senior executive-level staff (or equivalent)

EXTERNAL REPORTING AND DISCLOSURES

| Indicator | Type of indicator | Dependent on | Gateway to | Disclosure | Subsection | PRI Principle |
|-----------|-------------------|--------------|------------|------------|------------------------------------|---------------|
| PGS 16 | CORE | N/A | N/A | PUBLIC | External reporting and disclosures | 6 |

What elements are included in your regular reporting to clients and/or beneficiaries for the majority of your AUM?

- ☒ (A) Any changes in policies related to responsible investment
- ☒ (B) Any changes in governance or oversight related to responsible investment
- ☒ (C) Stewardship-related commitments
- ☒ (D) Progress towards stewardship-related commitments
- ☒ (E) Climate-related commitments
- ☒ (F) Progress towards climate-related commitments
- ☒ (G) Human rights-related commitments
- ☒ (H) Progress towards human rights-related commitments
- ☒ (I) Commitments to other systematic sustainability issues
- ☒ (J) Progress towards commitments on other systematic sustainability issues
- (K) We do not include any of these elements in our regular reporting to clients and/or beneficiaries for the majority of our AUM

| Indicator | Type of indicator | Dependent on | Gateway to | Disclosure | Subsection | PRI Principle |
|-----------|-------------------|--------------|------------|------------|------------------------------------|---------------|
| PGS 17 | CORE | N/A | N/A | PUBLIC | External reporting and disclosures | 6 |

During the reporting year, did your organisation publicly disclose climate-related information in line with the Task Force on Climate-Related Financial Disclosures' (TCFD) recommendations?

- ☒ (A) Yes, including all governance-related recommended disclosures
- ☒ (B) Yes, including all strategy-related recommended disclosures
- ☒ (C) Yes, including all risk management-related recommended disclosures
- ☒ (D) Yes, including all applicable metrics and targets-related recommended disclosures
- (E) None of the above

Add link(s):

https://docs.columbiathreadneedle.com/documents/Climate%20Change%20Report_TCFD.pdf?inline=true

| Indicator | Type of indicator | Dependent on | Gateway to | Disclosure | Subsection | PRI Principle |
|-----------|-------------------|--------------|------------|------------|------------------------------------|---------------|
| PGS 19 | CORE | N/A | N/A | PUBLIC | External reporting and disclosures | 6 |

During the reporting year, did your organisation publicly disclose its membership in and support for trade associations, think tanks or similar bodies that conduct any form of political engagement?

☒ (A) Yes, we publicly disclosed our membership in and support for trade associations, think tanks, or similar bodies that conduct any form of political engagement

Add link(s):

<https://docs.columbiathreadneedle.com/documents/Columbia Threadneedle Investments - Stewardship Report.pdf?inline=true>

- (B) No, we did not publicly disclose our membership in and support for trade associations, think tanks, or similar bodies that conduct any form of political engagement
- (C) Not applicable, we were not members in or supporters of any trade associations, think tanks, or similar bodies that conduct any form of political engagement during the reporting year

STRATEGY

CAPITAL ALLOCATION

| Indicator | Type of indicator | Dependent on | Gateway to | Disclosure | Subsection | PRI Principle |
|-----------|-------------------|--------------|------------|------------|--------------------|---------------|
| PGS 20 | CORE | N/A | N/A | PUBLIC | Capital allocation | 1 |

Which elements do your organisation-level exclusions cover?

- ☐ (A) Exclusions based on our organisation's values or beliefs regarding particular sectors, products or services
- ☐ (B) Exclusions based on our organisation's values or beliefs regarding particular regions or countries
- ☐ (C) Exclusions based on minimum standards of business practice aligned with international norms such as the OECD Guidelines for Multinational Enterprises, the International Bill of Human Rights, UN Security Council sanctions or the UN Global Compact
- ☐ (D) Exclusions based on our organisation's climate change commitments

☒ (E) Other elements

Specify:

Columbia Threadneedle Investments has a regional controversial weapons policy. Details found here:

<https://docs.columbiathreadneedle.com/documents/Responsible%20Investment%20-%20Controversial%20Weapons%20Policy.pdf?inline=true>

- (F) Not applicable; our organisation does not have any organisation-level exclusions

| Indicator | Type of indicator | Dependent on | Gateway to | Disclosure | Subsection | PRI Principle |
|-----------|-------------------|--------------|------------|------------|--------------------|---------------|
| PGS 21 | CORE | N/A | N/A | PUBLIC | Capital allocation | 1 |

How does your responsible investment approach influence your strategic asset allocation process?

☒ **(A) We incorporate ESG factors into our assessment of expected asset class risks and returns**

Select from dropdown list:

- (1) for all of our AUM subject to strategic asset allocation
- (2) for a majority of our AUM subject to strategic asset allocation
- **(3) for a minority of our AUM subject to strategic asset allocation**

☒ **(B) We incorporate climate change–related risks and opportunities into our assessment of expected asset class risks and returns**

Select from dropdown list:

- (1) for all of our AUM subject to strategic asset allocation
- (2) for a majority of our AUM subject to strategic asset allocation
- **(3) for a minority of our AUM subject to strategic asset allocation**

☒ **(C) We incorporate human rights–related risks and opportunities into our assessment of expected asset class risks and returns**

Select from dropdown list:

- (1) for all of our AUM subject to strategic asset allocation
- (2) for a majority of our AUM subject to strategic asset allocation
- **(3) for a minority of our AUM subject to strategic asset allocation**

☒ **(D) We incorporate risks and opportunities related to other systematic sustainability issues into our assessment of expected asset class risks and returns**

Select from dropdown list:

- (1) for all of our AUM subject to strategic asset allocation
- (2) for a majority of our AUM subject to strategic asset allocation
- **(3) for a minority of our AUM subject to strategic asset allocation**

Specify: (Voluntary)

- (E) We do not incorporate ESG factors, climate change, human rights or other systematic sustainability issues into our assessment of expected asset class risks and returns
- (F) Not applicable; we do not have a strategic asset allocation process

STEWARDSHIP: OVERALL STEWARDSHIP STRATEGY

| Indicator | Type of indicator | Dependent on | Gateway to | Disclosure | Subsection | PRI Principle |
|-----------|-------------------|--------------|------------|------------|---|---------------|
| PGS 22 | CORE | OO 8, OO 9 | N/A | PUBLIC | Stewardship: Overall stewardship strategy | 2 |

For the majority of AUM within each asset class, which of the following best describes your primary stewardship objective?

| | (1) Listed equity | (2) Fixed income | (3) Private equity | (4) Real estate | (5) Infrastructure | (6) Hedge funds |
|---|----------------------------------|----------------------------------|----------------------------------|----------------------------------|----------------------------------|----------------------------------|
| (A) Maximise our portfolio-level risk-adjusted returns. In doing so, we seek to address any risks to overall portfolio performance caused by individual investees' contribution to systematic sustainability issues. | <input checked="" type="radio"/> | <input checked="" type="radio"/> | <input checked="" type="radio"/> | <input checked="" type="radio"/> | <input checked="" type="radio"/> | <input checked="" type="radio"/> |
| (B) Maximise our individual investments' risk-adjusted returns. In doing so, we do not seek to address any risks to overall portfolio performance caused by individual investees' contribution to systematic sustainability issues. | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |

| Indicator | Type of indicator | Dependent on | Gateway to | Disclosure | Subsection | PRI Principle |
|-----------|-------------------|------------------|------------|------------|---|---------------|
| PGS 23 | PLUS | OO 5, OO 8, OO 9 | N/A | PUBLIC | Stewardship: Overall stewardship strategy | 2 |

How does your organisation, or the external service providers or external managers acting on your behalf, prioritise the investees or other entities on which to focus its stewardship efforts?

The Active Ownership team at Columbia Threadneedle Investments uses a pronged prioritization process to determine focus of its stewardship efforts:

- (1) Bottom-up: priority issuers We identify and prioritize issuers for engagement based on the following:
 - Assessment of impact of ESG risk and opportunity factors now and in the future, including financial materiality of risk issues in accordance with SASB Standards
 - Investment teams' and Fundamental Analysts' judgement and expertise,
 - Previous engagement track record
 - The significance, probability of occurrence, and severity of adverse sustainability impacts, including their potentially irremediable character, scale (gravity), scope and character (noting whether remedial action is possible);
 - Assessment of likelihood of success for engagement;
 - Level of exposure, typically based on size of holding across both managed client assets and reo® client assets; and
 - Overall preferences of managed clients or reo® clients as may be provided to us.

Additional considerations may be brought in depending on the issue under engagement, such as specialist data sources to identify issuers subject to a specific risk we are focusing on. This includes engagement projects (see below), and our net zero climate change engagement, which is prioritized according to a set of factors including financed emissions intensity and the quality of issuers' climate strategy. We set specific engagement objectives and track progress against these to assess achievements ("Milestones") and determine next steps. When we open discussions with individual issuers, we aim to clearly communicate our engagement objectives – including timelines, and desired outcomes.

- (2) Top-down: engagement projects on an annual basis, The Active Ownership team conducts a high-level assessment of a wide range of current and emerging ESG issues and their potential impacts on long-term investment returns, the economy, environment, and society. The results of this assessment determine the specific ESG issues on which we will focus our engagement activities going forward. Project-based engagements on specific issues normally run for two to three years and are concluded by a final assessment of progress.

- (3) Event-driven engagement Part of our engagement happens in reaction to scheduled events such as annual general meetings, where we would outline shareholder expectations, and encourage appropriate changes to an issuer's operations, governance structure or strategic approaches. Engagement activity may also occur in response to unscheduled and controversial events, such as scandals or major environmental disasters linked to corporate operations. Our event driven engagement also happens in reaction to potential issuer breaches of global standards, such as the OECD guidelines for multinational enterprises or the UN Global Compact.

- (4) Engagement for specific mandates, fund strategy, or regulatory requirements Individual client mandates, fund strategies or jurisdictional regulatory requirements may require a dedicated approach to engagement that is different to the approach outlined above. This will be outlined in client mandate documentation and/or fund/strategy-specific investment policies.

| Indicator | Type of indicator | Dependent on | Gateway to | Disclosure | Subsection | PRI Principle |
|-----------|-------------------|--------------|------------|------------|---|---------------|
| PGS 24 | CORE | OO 8, OO 9 | N/A | PUBLIC | Stewardship: Overall stewardship strategy | 2 |

Which of the following best describes your organisation's default position, or the position of the external service providers or external managers acting on your behalf, concerning collaborative stewardship efforts?

- (A) We recognise the value of collective action, and as a result, we prioritise collaborative stewardship efforts wherever possible
- (B) We collaborate on a case-by-case basis
- (C) Other
- (D) We do not join collaborative stewardship efforts

| Indicator | Type of indicator | Dependent on | Gateway to | Disclosure | Subsection | PRI Principle |
|-----------|-------------------|------------------|------------|------------|---|---------------|
| PGS 25 | PLUS | OO 5, OO 8, OO 9 | N/A | PUBLIC | Stewardship: Overall stewardship strategy | 2 |

Rank the channels that are most important for your organisation in achieving its stewardship objectives.

- ☒ (A) Internal resources, e.g. stewardship team, investment team, ESG team, or staff
Select from the list:
● 1
- ☒ (B) External investment managers, third-party operators and/or external property managers, if applicable
Select from the list:
● 4
- ☒ (C) External paid specialist stewardship services (e.g. engagement overlay services or, in private markets, sustainability consultants) excluding investment managers, real assets third-party operators, or external property managers
Select from the list:
● 5
- ☒ (D) Informal or unstructured collaborations with investors or other entities
Select from the list:
● 3
- ☒ (E) Formal collaborative engagements, e.g. PRI-coordinated collaborative engagements, Climate Action 100+, or similar
Select from the list:
● 2
- (F) We do not use any of these channels

| Indicator | Type of indicator | Dependent on | Gateway to | Disclosure | Subsection | PRI Principle |
|-----------|-------------------|--------------|------------|------------|---|---------------|
| PGS 27 | PLUS | OO 8, OO 9 | N/A | PUBLIC | Stewardship: Overall stewardship strategy | 2 |

How are your organisation's stewardship activities linked to your investment decision making, and vice versa?

| Indicator | Type of indicator | Dependent on | Gateway to | Disclosure | Subsection | PRI Principle |
|-----------|-------------------|--------------|------------|------------|---|---------------|
| PGS 28 | PLUS | OO 8, OO 9 | N/A | PUBLIC | Stewardship: Overall stewardship strategy | 2 |

8a7e4942de6f&clientCode=f2b75c00241240c1e554d2cdcb6c44e09bdf13&filename=Responsible%20Investment%20%E2%80%93%20Engagement%20policy%20addendum%20%E2%80%93%20Conflicts%20of%20interest.pdf

| Indicator | Type of indicator | Dependent on | Gateway to | Disclosure | Subsection | PRI Principle |
|-----------|-------------------|--------------|------------|------------|-----------------------------|---------------|
| PGS 29 | CORE | OO 9, PGS 1 | N/A | PUBLIC | Stewardship: (Proxy) voting | 2 |

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| Indicator | Type of indicator | Dependent on | Gateway to | Disclosure | Subsection | PRI Principle |
|-----------|-------------------|--------------|------------|------------|-----------------------------|---------------|
| PGS 30 | CORE | OO 9 | N/A | PUBLIC | Stewardship: (Proxy) voting | 2 |

How is voting addressed in your securities lending programme?

- (A) We recall all securities for voting on all ballot items
- (B) When a vote is deemed important according to pre-established criteria (e.g. high stake in the company), we recall all our securities for voting

● **(C) Other**

Specify:

If the term of the instrument coincides with an annual or extraordinary general meeting, the transfer of the voting right impairs the ability of the underlying shareowner to exercise their voting rights. We consider the balance struck between stock lending and voting to be a matter for individual decision-making by clients and execute voting where/if possible and as mandated by clients.

- (D) We do not recall our securities for voting purposes
- (E) Not applicable; we do not have a securities lending programme

| Indicator | Type of indicator | Dependent on | Gateway to | Disclosure | Subsection | PRI Principle |
|-----------|-------------------|--------------|------------|------------|-----------------------------|---------------|
| PGS 31 | CORE | OO 9.1 | N/A | PUBLIC | Stewardship: (Proxy) voting | 2 |

For the majority of votes cast over which you have discretion to vote, which of the following best describes your decision making approach regarding shareholder resolutions (or that of your external service provider(s) if decision making is delegated to them)?

● **(A) We vote in favour of resolutions expected to advance progress on our stewardship priorities, including affirming a company's good practice or prior commitment**

- (B) We vote in favour of resolutions expected to advance progress on our stewardship priorities, but only if the investee company has not already publicly committed to the action(s) requested in the proposal
- (C) We vote in favour of shareholder resolutions only as an escalation measure
- (D) We vote in favour of the investee company management's recommendations by default
- (E) Not applicable; we do not vote on shareholder resolutions

| Indicator | Type of indicator | Dependent on | Gateway to | Disclosure | Subsection | PRI Principle |
|-----------|-------------------|--------------|------------|------------|-----------------------------|---------------|
| PGS 32 | CORE | OO 9 | N/A | PUBLIC | Stewardship: (Proxy) voting | 2 |

During the reporting year, how did your organisation, or your external service provider(s), pre-declare voting intentions prior to voting in annual general meetings (AGMs) or extraordinary general meetings (EGMs)?

- ☐ (A) We pre-declared our voting intentions publicly through the PRI's vote declaration system on the Resolution Database
- ☐ (B) We pre-declared our voting intentions publicly by other means, e.g. through our website
- ☒ **(C) We privately communicated our voting decision to investee companies prior to the AGM/EGM**
- ☐ (D) We did not privately or publicly communicate our voting intentions prior to the AGM/EGM
- ☐ (E) Not applicable; we did not cast any (proxy) votes during the reporting year

| Indicator | Type of indicator | Dependent on | Gateway to | Disclosure | Subsection | PRI Principle |
|-----------|-------------------|--------------|------------|------------|-----------------------------|---------------|
| PGS 33 | CORE | OO 9 | PGS 33.1 | PUBLIC | Stewardship: (Proxy) voting | 2 |

After voting has taken place, do you publicly disclose your (proxy) voting decisions or those made on your behalf by your external service provider(s), company by company and in a central source?

● **(A) Yes, for all (proxy) votes**

Add link(s):

<https://vds.issgovernance.com/vds/#!/MzY2MA==>
<https://vds.issgovernance.com/vds/#!/Mjc3NQ==/>
<https://www.columbiathreadneedleus.com/investor/disclosures/proxy-voting-report>
<https://vds.issgovernance.com/vds/#!/MTAzNDcx>

- ☐ (B) Yes, for the majority of (proxy) votes
- ☐ (C) Yes, for a minority of (proxy) votes
- ☐ (D) No, we do not publicly report our (proxy) voting decisions company-by-company and in a central source

| Indicator | Type of indicator | Dependent on | Gateway to | Disclosure | Subsection | PRI Principle |
|-----------|-------------------|--------------|------------|------------|-----------------------------|---------------|
| PGS 33.1 | CORE | PGS 33 | N/A | PUBLIC | Stewardship: (Proxy) voting | 2 |

In the majority of cases, how soon after an investee's annual general meeting (AGM) or extraordinary general meeting (EGM) do you publish your voting decisions?

- ☒ (A) Within one month of the AGM/EGM
- ☐ (B) Within three months of the AGM/EGM
- ☐ (C) Within six months of the AGM/EGM
- ☐ (D) Within one year of the AGM/EGM
- ☐ (E) More than one year after the AGM/EGM

| Indicator | Type of indicator | Dependent on | Gateway to | Disclosure | Subsection | PRI Principle |
|-----------|-------------------|--------------|------------|------------|-----------------------------|---------------|
| PGS 34 | CORE | OO 9 | N/A | PUBLIC | Stewardship: (Proxy) voting | 2 |

After voting has taken place, did your organisation, and/or the external service provider(s) acting on your behalf, communicate the rationale for your voting decisions during the reporting year?

| | (1) In cases where we abstained or voted against management recommendations | (2) In cases where we voted against an ESG-related shareholder resolution |
|--|---|---|
| (A) Yes, we publicly disclosed the rationale | (1) for all votes | (1) for all votes |
| (B) Yes, we privately communicated the rationale to the company | | |
| (C) We did not publicly or privately communicate the rationale, or we did not track this information | ○ | ○ |

(D) Not applicable; we did not abstain or vote against management recommendations or ESG-related shareholder resolutions during the reporting year

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(A) Yes, we publicly disclosed the rationale - Add link(s):

<https://vds.issgovernance.com/vds/#/MzY2MA==>
<https://vds.issgovernance.com/vds/#/Mjc3NQ==/>
<https://www.columbiathreadneedleus.com/investor/disclosures/proxy-voting-report>
<https://vds.issgovernance.com/vds/#/MTAzNDcx>

| Indicator | Type of indicator | Dependent on | Gateway to | Disclosure | Subsection | PRI Principle |
|-----------|-------------------|--------------|------------|------------|-----------------------------|---------------|
| PGS 35 | PLUS | OO 9 | N/A | PUBLIC | Stewardship: (Proxy) voting | 2 |

How does your organisation ensure vote confirmation, i.e. that your votes have been cast and counted correctly?

The Active Ownership team is responsible for the execution of voting. We have a number of established controls to ensure voting is conducted in a timely and accurate manner. This includes the daily review of the voting queue and a 4 eye check which ensures execution is being done correctly in advance of all vote deadlines. Another control, looks at a daily report which identifies votes that are not consistent with the established policy and a review is conducted to ensure the correct analysis has been completed.

While the Active Ownership team is responsible for the submission of voting activities, it is the Proxy Team who conduct those voting controls to ensure the process and policies are followed routinely. Exceptions in voting are escalated to the Proxy team and then a review is conducted by a working group/committee which considers those situations where policy exceptions are being sought. When exceptions are approved to vote outside of the established policy the votes are then completed by the Proxy team and a final communication is sent out to the Proxy Working Group, along with the investment professionals who would be involved in the particular voting situation.

There are routine reports which are generated by the proxy voting execution service which are reviewed by the Proxy team to monitor votes are being counted and successfully submitted.

STEWARDSHIP: ESCALATION

| Indicator | Type of indicator | Dependent on | Gateway to | Disclosure | Subsection | PRI Principle |
|-----------|-------------------|--------------|------------|------------|-------------------------|---------------|
| PGS 36 | CORE | OO 8, OO 9 | N/A | PUBLIC | Stewardship: Escalation | 2 |

For your listed equity holdings, what escalation measures did your organisation, or the external investment managers or service providers acting on your behalf, use in the past three years?

| | (1) Listed equity | (2) Direct listed equity holdings in hedge fund portfolios |
|---|-------------------------------------|--|
| (A) Joining or broadening an existing collaborative engagement or creating a new one | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| (B) Filing, co-filing, and/or submitting a shareholder resolution or proposal | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| (C) Publicly engaging the entity, e.g. signing an open letter | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| (D) Voting against the re-election of one or more board directors | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| (E) Voting against the chair of the board of directors, or equivalent, e.g. lead independent director | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| (F) Divesting | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| (G) Litigation | <input type="checkbox"/> | <input type="checkbox"/> |
| (H) Other | <input type="checkbox"/> | <input type="checkbox"/> |

(I) In the past three years, we did not use any of the above escalation measures for our listed equity holdings

○

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| Indicator | Type of indicator | Dependent on | Gateway to | Disclosure | Subsection | PRI Principle |
|-----------|-------------------|------------------------|------------|------------|-------------------------|---------------|
| PGS 37 | CORE | Multiple, see guidance | N/A | PUBLIC | Stewardship: Escalation | 2 |

For your corporate fixed income assets, what escalation measures did your organisation, or the external investment managers or service providers acting on your behalf, use in the past three years?

- ☒ (A) Joining or broadening an existing collaborative engagement or creating a new one
- ☒ (B) Publicly engaging the entity, e.g. signing an open letter
- ☒ (C) Not investing
- ☒ (D) Reducing exposure to the investee entity
- ☒ (E) Divesting
- ☐ (F) Litigation
- ☐ (G) Other
- (H) In the past three years, we did not use any of the above escalation measures for our corporate fixed income assets

STEWARDSHIP: ENGAGEMENT WITH POLICY MAKERS

| Indicator | Type of indicator | Dependent on | Gateway to | Disclosure | Subsection | PRI Principle |
|-----------|-------------------|--------------|--------------------|------------|--|---------------|
| PGS 39 | CORE | OO 8, OO 9 | PGS 39.1, PGS 39.2 | PUBLIC | Stewardship: Engagement with policy makers | 2 |

Did your organisation, or the external investment managers or service providers acting on your behalf, engage with policy makers as part of your responsible investment approach during the reporting year?

- ☒ (A) Yes, we engaged with policy makers directly
- ☒ (B) Yes, we engaged with policy makers through the leadership of or active participation in working groups or collaborative initiatives, including via the PRI
- ☒ (C) Yes, we were members of, supported, or were in another way affiliated with third party organisations, including trade associations and non-profit organisations, that engage with policy makers, excluding the PRI
- (D) We did not engage with policy makers directly or indirectly during the reporting year beyond our membership in the PRI

| Indicator | Type of indicator | Dependent on | Gateway to | Disclosure | Subsection | PRI Principle |
|-----------|-------------------|--------------|------------|------------|--|---------------|
| PGS 39.1 | CORE | PGS 39 | N/A | PUBLIC | Stewardship: Engagement with policy makers | 2 |

During the reporting year, what methods did you, or the external investment managers or service providers acting on your behalf, use to engage with policy makers as part of your responsible investment approach?

- ☒ (A) We participated in 'sign-on' letters
- ☒ (B) We responded to policy consultations
- ☐ (C) We provided technical input via government- or regulator-backed working groups
- ☐ (D) We engaged policy makers on our own initiative
- ☒ (E) Other methods

Describe:

For all our public policy engagement see our Stewardship Report for 2022.

| Indicator | Type of indicator | Dependent on | Gateway to | Disclosure | Subsection | PRI Principle |
|-----------|-------------------|--------------|------------|------------|--|---------------|
| PGS 39.2 | CORE | PGS 39 | N/A | PUBLIC | Stewardship: Engagement with policy makers | 2 |

During the reporting year, did your organisation publicly disclose details of your engagement with policy makers conducted as part of your responsible investment approach, including through external investment managers or service providers?

- ☒ (A) We publicly disclosed all our policy positions

Add link(s):

<https://www.columbiathreadneedle.co.uk/document-library-default/services/documents/retrieveDocument/?token=088c999b-44eb-4774-893f-8a7e4942de6f&clientCode=fc004c7d5534e4099404975cbb7e2e1f65544892&filename=Responsible%20Investment%20-%20Engagement%20policy%20and%20approach.pdf>

<https://www.columbiathreadneedle.co.uk/document-library-default/services/documents/retrieveDocument/?token=088c999b-44eb-4774-893f-8a7e4942de6f&clientCode=60a91ff6ee745d42387449e921f5b95f80a9575e&filename=Responsible%20Investment%20-%20Engagement%20policy%20addendum%20-%20Environmental%20and%20social%20practices.pdf>

<https://www.columbiathreadneedleus.com/binaries/content/assets/cti/public/4.-engagement-policy--conflicts-of-interest.pdf>

- ☐ (B) We publicly disclosed details of our engagements with policy makers
 - ☐ (C) No, we did not publicly disclose details of our engagement with policy makers conducted as part of our responsible investment approach during the reporting year

CLIMATE CHANGE

| Indicator | Type of indicator | Dependent on | Gateway to | Disclosure | Subsection | PRI Principle |
|-----------|-------------------|--------------|------------|------------|----------------|---------------|
| PGS 41 | CORE | N/A | PGS 41.1 | PUBLIC | Climate change | General |

Has your organisation identified climate-related risks and opportunities affecting your investments?

☒ (A) Yes, within our standard planning horizon

Specify the risks and opportunities identified and your relevant standard planning horizon:

We define short term as less than 1 year; medium term as 1-5 years; and long term as 5-10 years, in line with our standard planning horizon.

Analysis of risks and opportunities can be found in the June 2023 TCFD Report.

☐ (B) Yes, beyond our standard planning horizon

☐ (C) No, we have not identified climate-related risks and/or opportunities affecting our investments

| Indicator | Type of indicator | Dependent on | Gateway to | Disclosure | Subsection | PRI Principle |
|-----------|-------------------|--------------|------------|------------|----------------|---------------|
| PGS 41.1 | CORE | PGS 41 | N/A | PUBLIC | Climate change | General |

Does your organisation integrate climate-related risks and opportunities affecting your investments in its overall investment strategy, financial planning and (if relevant) products?

☒ (A) Yes, our overall investment strategy, financial planning and (if relevant) products integrate climate-related risks and opportunities

Describe how climate-related risks and opportunities have affected or are expected to affect your investment strategy, financial planning and (if relevant) products:

Our strategy is set out in our June 2023 TCFD report. As a research-driven active manager, we believe that the integration of ESG considerations into our investment research builds a fuller picture of the risks and opportunities and future return prospects of the companies, debt issuers and assets we invest, or look to invest in. While our investment approaches and styles vary depending on the product and strategy, our investment professionals share a common belief that companies that demonstrate a sustainable business model, organisational stability, and the ability to evolve where necessary are best placed to deliver long-term value for our clients, support economic growth, and serve broader prosperity. ESG factors are therefore integrated into our fundamental research process, led by a team of approximately 200 analysts and research associates.

The integration of ESG factors, including climate-related risk and opportunities, is available to our investment teams as part of their decision making, as appropriate. Information is tailored by asset class and product type, as set out in our full TCFD report for key asset classes. In equities and corporate debt, which together make up the majority of our assets, tools are made available to our investment teams through Aladdin Enterprise System (our portfolio management system). They include TCFD carbon metrics and our proprietary Net Zero tool, based on the Net Zero Investment Framework, which rates companies from Aligned, through Aligning or Committed, to Not Aligned. Additionally, we offer investment solutions that allow investors, if they wish, to place extra emphasis on managing climate risks and opportunities in their portfolios.

These strategies are available to institutional investors globally and can be tailored to specific goals. Examples of our current EMEA strategies include: Responsible and sustainable equity: These have exclusions related to companies' fossil fuel exposure, and some additionally have a thematic focus, targeting investments in areas including energy transition and sustainable mobility. Social and green bonds: Our EMEA-based social bond strategy is designed to unlock the full potential of bonds to deliver both a financial return and positive social outcomes. As the pursuit of a net zero world implicates issues beyond purely the environmental, the strategy focuses on issuers who factor in social considerations in their transition to a lower carbon world in order to minimise potentially negative societal impacts.

We also provide green bond mandates for segregated clients. Private equity and infrastructure: Our Climate Opportunity Partners Private Equity Fund provides its investors access to investment opportunities arising from global efforts to tackle the causes and impacts of climate change. Our European Sustainable Infrastructure strategy actively targets environmental and social outcomes, including investing in assets supporting Europe's energy transition. Real estate: Our Carbon Neutral Real Estate strategy, developed in 2010 as a joint venture between Columbia Threadneedle, the Carbon Trust and Stanhope, aims to reduce the carbon emissions of the built environment. Responsible Engagement Overlay (reo®) service: Clients of our engagement and voting service benefit from a comprehensive approach to active ownership across their assets, wherever they may be managed. Climate change is one of the seven key themes covered by this service.

- (B) No, our organisation has not yet integrated climate-related risks and opportunities into its investment strategy, financial planning and (if relevant) products

| Indicator | Type of indicator | Dependent on | Gateway to | Disclosure | Subsection | PRI Principle |
|-----------|-------------------|--------------|------------|------------|----------------|---------------|
| PGS 43 | CORE | N/A | N/A | PUBLIC | Climate change | General |

Has your organisation assessed the resilience of its investment strategy in different climate scenarios, including one in which the average temperature rise is held to below 2 degrees Celsius (preferably to 1.5 degrees Celsius) above pre-industrial levels?

- ☐ (A) Yes, using the Inevitable Policy Response Forecast Policy Scenario (FPS) or Required Policy Scenario (RPS)
- ☐ (B) Yes, using the One Earth Climate Model scenario
- ☐ (C) Yes, using the International Energy Agency (IEA) Net Zero scenario
- ☒ **(D) Yes, using other scenarios**
Specify:

NGFS Scenarios

- (E) No, we have not assessed the resilience of our investment strategy in different climate scenarios, including one that holds temperature rise to below 2 degrees

| Indicator | Type of indicator | Dependent on | Gateway to | Disclosure | Subsection | PRI Principle |
|-----------|-------------------|--------------|------------|------------|----------------|---------------|
| PGS 44 | CORE | N/A | N/A | PUBLIC | Climate change | General |

Does your organisation have a process to identify, assess, and manage the climate-related risks (potentially) affecting your investments?

- ☒ **(A) Yes, we have a process to identify and assess climate-related risks**
(1) Describe your process

Our enterprise risk management process includes assessing, protecting against and mitigating the physical risks of catastrophic weather events affecting our own internal business operations. The future path of global temperature is uncertain. Transition risk and physical risks can be seen as potentially offsetting each other – earlier and more vigorous government action could increase transition risk but decrease physical risk. This uncertainty leads us to the use of climate scenario analysis to understand the different sensitivities of our investment holdings and portfolios to these various options as we remain focused on delivering long-term for our clients. One of the scenario analysis tools we use for listed equity and debt portfolios is Climate Value at Risk.

We scrutinise climate value at risk data for client portfolios and benchmarks. The data provides a relative guide on the potential upside or downside impact to a portfolio from climate risks, under a variety of climate scenarios. The scenarios are based on the Network for Greening the Financial System (NGFS) public scenarios and are modelled using the REMIND model. In our direct real estate businesses, our standard due diligence protocol when considering investments involves the detailed consideration of a wide range of ESG factors. We specifically focus on investment-critical aspects such as energy efficiency characteristics, flood risk, longer-term resilience to climate change and impact on net zero carbon ambitions, as appropriate to each individual property. In our European direct real estate businesses, our standard due diligence protocol when considering investments involves the detailed consideration of a wide range of ESG factors. We specifically focus on investment-critical aspects such as energy efficiency characteristics, flood risk, longer-term resilience to climate change and impact on net zero carbon ambitions, as appropriate to each individual property. Our private equity team assesses exposure to climate-related risks and opportunities as part of our ESG due diligence on each investment that we make and monitored through to exit. We integrate a number of internationally recognised frameworks into our private equity investment process, which address the potential impacts of climate change, such as the UN Sustainable Development Goals ('UN SDGs') where we have participated in climate-focused private equity working groups.

(2) Describe how this process is integrated into your overall risk management

Our independent Investment Risk team monitors portfolios daily against a number of risk-based guidelines. We do not prioritise between climate-related risks and the other types of risks we consider (e.g., market, liquidity, credit). In our view risks should be monitored holistically. The levels of our risk guidelines are informed by the risk and return preferences and targets and guidelines of our clients' portfolios, as well as each portfolio's level of ESG integration (funds will have different levels of ESG integration within their investment portfolio depending on how they are categorised internally in alignment with applicable regulatory requirements, how portfolio managers have determined to evaluate such risks consistent with the requirements of client mandates, and any applicable regulatory labelling or disclosure regime that they must comply with). This helps to consider how to prioritise climate-related risks overall. The compliance team also monitors portfolios for compliance with client directed investment limits.

☒ **(B) Yes, we have a process to manage climate-related risks**

(1) Describe your process

Our investment risk teams compare scenario analysis results across the portfolios we run to identify portfolios with potentially higher negative exposure to climate related risks.

Our Investment Risk team reviewing these results would firstly view the portfolios where the risk adjusted figures were significantly negative, and then calculate which individual underlying names in a particular portfolio were large drivers of the negative relative performance. The team would discuss these names with both the portfolio managers and the RI team to see if any action is required. A potential outcome of this could be to engage with these companies to encourage them to reduce their carbon emissions.

(2) Describe how this process is integrated into your overall risk management

If a portfolio breaches a climate related guideline or a limit, this will cause an investment risk analyst to look at the cause of the breach and, if needed, discuss it with the portfolio manager. We have our Investment Risk Advisory Groups (IRAGs), which cover listed assets, property and alternatives as a whole, where the investment risk team can raise exceptions they have determined may not be being dealt with effectively. These groups are chaired by the European Chief Investment Officer, the Head of the property business and the Head of the alternatives business, respectively. If the issue is not dealt with in these forums, it can be raised to the relevant Risk and Controls Committee and, ultimately, the relevant Board.

- (C) No, we do not have any processes to identify, assess, or manage the climate-related risks affecting our investments

| Indicator | Type of indicator | Dependent on | Gateway to | Disclosure | Subsection | PRI Principle |
|-----------|-------------------|--------------|------------|------------|----------------|---------------|
| PGS 45 | CORE | N/A | N/A | PUBLIC | Climate change | General |

During the reporting year, which of the following climate risk metrics or variables affecting your investments did your organisation use and disclose?

☒ **(A) Exposure to physical risk**

(1) Indicate whether this metric or variable was used and disclosed, including the methodology

- (1) Metric or variable used
- (2) Metric or variable used and disclosed

☒ **(3) Metric or variable used and disclosed, including methodology**

(2) Provide link to the disclosed metric or variable, including the methodology followed, as applicable

https://www.columbiathreadneedle.co.uk/document-library/services/documents/retrieveDocument/?token=088c999b-44eb-4774-893f-8a7e4942de6f&clientCode=TCFD_7_LI&filename=CTSOGE_en_TCFD.pdf

☒ **(B) Exposure to transition risk**

(1) Indicate whether this metric or variable was used and disclosed, including the methodology

- (1) Metric or variable used
- (2) Metric or variable used and disclosed

☒ **(3) Metric or variable used and disclosed, including methodology**

(2) Provide link to the disclosed metric or variable, including the methodology followed, as applicable

https://www.columbiathreadneedle.co.uk/document-library/services/documents/retrieveDocument/?token=088c999b-44eb-4774-893f-8a7e4942de6f&clientCode=TCFD_7_LI&filename=CTSOGE_en_TCFD.pdf

☐ (C) Internal carbon price

☒ **(D) Total carbon emissions**

(1) Indicate whether this metric or variable was used and disclosed, including the methodology

- (1) Metric or variable used
- (2) Metric or variable used and disclosed

☒ **(3) Metric or variable used and disclosed, including methodology**

(2) Provide link to the disclosed metric or variable, including the methodology followed, as applicable

https://www.columbiathreadneedle.co.uk/document-library/services/documents/retrieveDocument/?token=088c999b-44eb-4774-893f-8a7e4942de6f&clientCode=TCFD_7_LI&filename=CTSOGE_en_TCFD.pdf

☒ **(E) Weighted average carbon intensity**

(1) Indicate whether this metric or variable was used and disclosed, including the methodology

- (1) Metric or variable used
- (2) Metric or variable used and disclosed

☒ **(3) Metric or variable used and disclosed, including methodology**

(2) Provide link to the disclosed metric or variable, including the methodology followed, as applicable

- ☐ (F) Avoided emissions
- ☐ (G) Implied Temperature Rise (ITR)
- ☒ **(H) Non-ITR measure of portfolio alignment with UNFCCC Paris Agreement goals**
 - (1) Indicate whether this metric or variable was used and disclosed, including the methodology
 - ☐ (1) Metric or variable used
 - ☐ (2) Metric or variable used and disclosed
 - ☒ **(3) Metric or variable used and disclosed, including methodology**
 - (2) Provide link to the disclosed metric or variable, including the methodology followed, as applicable

<https://docs.columbiathreadneedle.com/documents/Net%20Zero%20Investing%20-%20Columbia%20Threadneedle%20Investments%20Approach.pdf?inline=true>

- ☐ (I) Proportion of assets or other business activities aligned with climate-related opportunities
- ☐ (J) Other metrics or variables
 - ☐ (K) Our organisation did not use or disclose any climate risk metrics or variables affecting our investments during the reporting year

| Indicator | Type of indicator | Dependent on | Gateway to | Disclosure | Subsection | PRI Principle |
|-----------|-------------------|--------------|------------|------------|----------------|---------------|
| PGS 46 | CORE | N/A | N/A | PUBLIC | Climate change | General |

During the reporting year, did your organisation disclose its Scope 1, Scope 2, and/or Scope 3 greenhouse gas emissions?

- ☒ **(A) Scope 1 emissions**
 - (1) Indicate whether this metric was disclosed, including the methodology
 - ☐ (1) Metric disclosed
 - ☒ **(2) Metric and methodology disclosed**
 - (2) Provide links to the disclosed metric and methodology, as applicable

https://docs.columbiathreadneedle.com/documents/Climate%20Change%20Report_TCFD.pdf?inline=true
- ☒ **(B) Scope 2 emissions**
 - (1) Indicate whether this metric was disclosed, including the methodology
 - ☐ (1) Metric disclosed
 - ☒ **(2) Metric and methodology disclosed**
 - (2) Provide links to the disclosed metric and methodology, as applicable

https://docs.columbiathreadneedle.com/documents/Climate%20Change%20Report_TCFD.pdf?inline=true
- ☒ **(C) Scope 3 emissions (including financed emissions)**
 - (1) Indicate whether this metric was disclosed, including the methodology
 - ☐ (1) Metric disclosed
 - ☒ **(2) Metric and methodology disclosed**
 - (2) Provide links to the disclosed metric and methodology, as applicable

https://docs.columbiathreadneedle.com/documents/Climate%20Change%20Report_TCFD.pdf?inline=true

- (D) Our organisation did not disclose its Scope 1, Scope 2, or Scope 3 greenhouse gas emissions during the reporting year

SUSTAINABILITY OUTCOMES

| Indicator | Type of indicator | Dependent on | Gateway to | Disclosure | Subsection | PRI Principle |
|-----------|-------------------|--------------|---------------------|------------|-------------------------|---------------|
| PGS 47 | CORE | N/A | Multiple indicators | PUBLIC | Sustainability outcomes | 1, 2 |

Has your organisation identified the intended and unintended sustainability outcomes connected to its investment activities?

- ☒ (A) Yes, we have identified one or more specific sustainability outcomes connected to our investment activities
- (B) No, we have not yet identified the sustainability outcomes connected to any of our investment activities

| Indicator | Type of indicator | Dependent on | Gateway to | Disclosure | Subsection | PRI Principle |
|-----------|-------------------|--------------|------------|------------|-------------------------|---------------|
| PGS 47.1 | CORE | PGS 47 | N/A | PUBLIC | Sustainability outcomes | 1, 2 |

Which widely recognised frameworks has your organisation used to identify the intended and unintended sustainability outcomes connected to its investment activities?

- ☒ (A) The UN Sustainable Development Goals (SDGs) and targets
- ☒ (B) The UNFCCC Paris Agreement
- ☒ (C) The UN Guiding Principles on Business and Human Rights (UNGPs)
- ☒ (D) OECD frameworks: OECD Guidelines for Multinational Enterprises and Guidance on Responsible Business Conduct for Institutional Investors
- ☐ (E) The EU Taxonomy
- ☐ (F) Other relevant taxonomies
- ☒ (G) The International Bill of Human Rights
- ☒ (H) The International Labour Organization's Declaration on Fundamental Principles and Rights at Work and the eight core conventions
- ☒ (I) The Convention on Biological Diversity
- ☐ (J) Other international framework(s)
- ☐ (K) Other regional framework(s)
- ☐ (L) Other sectoral/issue-specific framework(s)
- (M) Our organisation did not use any widely recognised frameworks to identify the intended and unintended sustainability outcomes connected to its investment activities

| Indicator | Type of indicator | Dependent on | Gateway to | Disclosure | Subsection | PRI Principle |
|-----------|-------------------|--------------|------------|------------|-------------------------|---------------|
| PGS 47.2 | CORE | PGS 47 | PGS 48 | PUBLIC | Sustainability outcomes | 1, 2 |

What are the primary methods that your organisation has used to determine the most important intended and unintended sustainability outcomes connected to its investment activities?

- ☒ (A) Identify sustainability outcomes that are closely linked to our core investment activities
- ☒ (B) Consult with key clients and/or beneficiaries to align with their priorities
- ☐ (C) Assess which actual or potential negative outcomes for people are most severe based on their scale, scope, and irremediable character
- ☒ (D) Identify sustainability outcomes that are closely linked to systematic sustainability issues
- ☒ (E) Analyse the input from different stakeholders (e.g. affected communities, civil society, trade unions or similar)
- ☐ (F) Understand the geographical relevance of specific sustainability outcome objectives
- ☐ (G) Other method
- ☐ (H) We have not yet determined the most important sustainability outcomes connected to our investment activities

| Indicator | Type of indicator | Dependent on | Gateway to | Disclosure | Subsection | PRI Principle |
|-----------|-------------------|--------------|----------------|------------|-------------------------|---------------|
| PGS 48 | CORE | PGS 47.2 | PGS 48.1, SO 1 | PUBLIC | Sustainability outcomes | 1, 2 |

Has your organisation taken action on any specific sustainability outcomes connected to its investment activities, including to prevent and mitigate actual and potential negative outcomes?

- ☒ (A) Yes, we have taken action on some of the specific sustainability outcomes connected to our investment activities
- ☐ (B) No, we have not yet taken action on any specific sustainability outcomes connected to our investment activities

| Indicator | Type of indicator | Dependent on | Gateway to | Disclosure | Subsection | PRI Principle |
|-----------|-------------------|--------------|------------|------------|-------------------------|---------------|
| PGS 48.1 | PLUS | PGS 48 | N/A | PUBLIC | Sustainability outcomes | 1, 2 |

Why has your organisation taken action on specific sustainability outcomes connected to its investment activities?

- ☒ (A) We believe that taking action on sustainability outcomes is relevant to our financial risks and returns over both short- and long-term horizons
- ☒ (B) We believe that taking action on sustainability outcomes, although not yet relevant to our financial risks and returns, will become so over a long-time horizon
- ☐ (C) We have been requested to do so by our clients and/or beneficiaries

- ☒ (D) We want to prepare for and respond to legal and regulatory developments that are increasingly addressing sustainability outcomes
- ☒ (E) We want to protect our reputation, particularly in the event of negative sustainability outcomes connected to investments
- ☐ (F) We want to enhance our social licence-to-operate (i.e. the trust of beneficiaries, clients, and other stakeholders)
- ☐ (G) We believe that taking action on sustainability outcomes in parallel to financial return goals has merit in its own right
- ☐ (H) Other

HUMAN RIGHTS

| Indicator | Type of indicator | Dependent on | Gateway to | Disclosure | Subsection | PRI Principle |
|-----------|-------------------|--------------|------------|------------|--------------|---------------|
| PGS 49 | PLUS | PGS 47 | PGS 49.1 | PUBLIC | Human rights | 1, 2 |

During the reporting year, what steps did your organisation take to identify and take action on the actual and potentially negative outcomes for people connected to your investment activities?

- ☒ (A) We assessed the human rights context of our potential and/or existing investments and projected how this could connect our organisation to negative human rights outcomes

Explain how these activities were conducted:

Our approach to identifying and managing human rights risks across our portfolio companies continues to evolve.

In 2022 steps taken included:

- ☐ ESG integration: Where exposure to and implication in human rights risk is deemed financially material this may be reflected in ESG risk scores which are considered in the course of investment evaluation and decision-making.
- ☐ Screening: Within our SFDR Article 8 and Article 9 labelled funds including the 'Responsible' and 'Sustainable' ranges, we operate formal screening and exclusions frameworks relating to human rights violations. United Nations Global Compact (UNGC) and
- ☐ Organization for Economic Co-operation and Development (OECD) adherence is one of the Principal Adverse Indicators (PAIs) that we check for. Precise exclusion criteria vary by strategy but include:
 - o Non-compliance with UN Global Compact and OECD Guidelines for Multinational Enterprises
 - o Operations directly and significantly contributing to the persistence of oppressive regimes
 - o Failure to cooperate in legitimate remediation
 - o Failure to respond to significant concerns of local communities, including indigenous communities
- ☐ Active ownership:
 - o Engagement:
 - o Human rights is one of seven priority E, S and G themes around which we structure our engagement programme. Human rights issues we engage on include freedom of expression, forced labour and modern slavery, data privacy and discriminatory use of technology, conflict risk and high risk areas, and community and indigenous rights. These issues span a wide spectrum of sectors and often intersect with other priority ESG topics, including business conduct and ethics, labour standards, racial justice, and access to health and nutrition.

We have six dedicated analysts with social thematic expertise involved in research and company engagement on the topic, in addition to work undertaken by the Corporate Governance team and the wider investment research function. Engagement work is conducted one on one with issuers as well as part of wider investment collaborations such as the ICCR Investor Alliance for Human Rights and PRI Advance where this aligns with our own engagement objectives and expectations.

o We lay out our how certain social practices can inform how investee companies could manage the social aspects of their operations and supply chains within our published environmental and social practices statement.

In line with the UN Guiding Principles for Business and Human Rights (UNGPs), we encourage companies through our engagement efforts to:

- Have a robust governance of human rights in place, including a policy commitment adhering to international standards, formal management responsibilities for human rights and board oversight
- Have a due diligence process in place to identify salient human rights issues and assess severe impacts
- Engage with stakeholders, including those in their extended supply chain - effective grievance mechanisms are key to achieving this
- Have a process in place to assess the effectiveness of mitigation programs, track actions and performance
- Enable effective remedy if people are harmed
- Provide transparent and consistent disclosure throughout the process

Voting:

o In 2022 we introduced a social voting watchlist within our Corporate Governance Guidelines in which we integrated potential social votes against management into the workflow.

For companies on the watchlist (derived based on MSCI indicators and CHRB data), we conduct additional research on companies flagged and assess whether a company has publicly disclosed the prohibition of child and forced labour in its own operations and supply chains. Where this is not publicly disclosed, we may engage the company on the omission and, where appropriate as an escalation strategy, vote against directors for a perceived lack of transparency and risk mitigation.

For companies on the watchlist (derived based on MSCI indicators and CHRB data), we conduct additional research on companies flagging and assess whether a company has publicly disclosed the prohibition of child and forced labour in its own operations and supply chains. Where this is not publicly disclosed, we may engage the company on the omission and/or vote against directors for a perceived lack of transparency and risk mitigation.

☐ (B) We assessed whether individuals at risk or already affected might be at heightened risk of harm

☒ (C) We consulted with individuals and groups who were at risk or already affected, their representatives and/or other relevant stakeholders such as human rights experts

Explain how these activities were conducted:

We referred to research from human rights experts such as the work of Sheffield Hallam University to help inform a risk assessment and targeted engagement activity.

☐ (D) We took other steps to assess and manage the actual and potentially negative outcomes for people connected to our investment activities

o (E) We did not identify and take action on the actual and potentially negative outcomes for people connected to any of our investment activities during the reporting year

| Indicator | Type of indicator | Dependent on | Gateway to | Disclosure | Subsection | PRI Principle |
|-----------|-------------------|--------------|------------|------------|--------------|---------------|
| PGS 49.1 | PLUS | PGS 49 | N/A | PUBLIC | Human rights | 1, 2 |

During the reporting year, which stakeholder groups did your organisation include when identifying and taking action on the actual and potentially negative outcomes for people connected to your investment activities?

☒ (A) Workers

Sector(s) for which each stakeholder group was included

- ☒ (1) Energy
- ☒ (2) Materials
- ☒ (3) Industrials
- ☒ (4) Consumer discretionary
- ☒ (5) Consumer staples
- ☒ (6) Healthcare
- ☒ (7) Finance
- ☒ (8) Information technology

☒ (9) Communication services

☒ (10) Utilities

☒ (11) Real estate

☒ (B) Communities

Sector(s) for which each stakeholder group was included

☒ (1) Energy

☐ (2) Materials

☐ (3) Industrials

☒ (4) Consumer discretionary

☐ (5) Consumer staples

☐ (6) Healthcare

☐ (7) Finance

☐ (8) Information technology

☒ (9) Communication services

☐ (10) Utilities

☐ (11) Real estate

☒ (C) Customers and end-users

Sector(s) for which each stakeholder group was included

☐ (1) Energy

☐ (2) Materials

☐ (3) Industrials

☐ (4) Consumer discretionary

☐ (5) Consumer staples

☐ (6) Healthcare

☐ (7) Finance

☐ (8) Information technology

☐ (9) Communication services

☐ (10) Utilities

☐ (11) Real estate

☐ (D) Other stakeholder groups

| Indicator | Type of indicator | Dependent on | Gateway to | Disclosure | Subsection | PRI Principle |
|-----------|-------------------|--------------|------------|------------|--------------|---------------|
| PGS 49.2 | PLUS | PGS 47 | N/A | PUBLIC | Human rights | 1, 2 |

During the reporting year, what information sources did your organisation use to identify the actual and potentially negative outcomes for people connected to its investment activities?

☒ (A) Corporate disclosures

Provide further detail on how your organisation used these information sources:

We use corporate disclosure and engagement dialogue to expand on our understanding of the nature and quality of human rights related due diligence conducted by businesses.

☒ (B) Media reports

Provide further detail on how your organisation used these information sources:

We use media reports of human rights related controversies including those highlighted by RepRisk as part of our process to screen companies for engagement prioritization.

☒ (C) Reports and other information from NGOs and human rights institutions

Provide further detail on how your organisation used these information sources:

We use NGO benchmarks including the Corporate Human Rights Benchmark, the WBA Social Transformation Benchmark and KnowTheChain to enrich our bottom-up company research and to highlight highest risk companies to help plan engagement prioritisation and feed a watchlist for potential votes against directors where we deem management of severe human rights risk is inadequate. We will also make use of relevant academic research for example the work of Sheffield Hallam on Uyghur forced labour, and leverage data sets and research created by collaborative engagement initiatives that we participate in such as the Interfaith Center for Corporate Responsibility (ICCR) Investor Alliance for Human Rights, and the PRI Advance initiative. Freedom House dataset referred to for sovereign risk assessment. The Access to Medicine Index and AMR resistance benchmark are also used.

☐ (D) Country reports, for example, by multilateral institutions, e.g. OECD, World Bank

☒ (E) **Data provider scores or benchmarks**

Provide further detail on how your organisation used these information sources:

We use MSCI ESG controversy data sets on human rights and UN Global Compact breaches

☒ (F) **Human rights violation alerts**

Provide further detail on how your organisation used these information sources:

RepRisk and MSCI ESG controversy flags

☒ (G) **Sell-side research**

Provide further detail on how your organisation used these information sources:

Used selectively to supplement company research

☒ (H) **Investor networks or other investors**

Provide further detail on how your organisation used these information sources:

Networks including ICCR and PRI Advance

☐ (I) Information provided directly by affected stakeholders or their representatives

☒ (J) **Social media analysis**

Specify:

Utilize data inputs from various external service providers.

Provide further detail on how your organisation used these information sources:

☐ (K) Other

MANAGER SELECTION, APPOINTMENT AND MONITORING (SAM)

OVERALL APPROACH

EXTERNAL INVESTMENT MANAGERS

| Indicator | Type of indicator | Dependent on | Gateway to | Disclosure | Subsection | PRI Principle |
|-----------|-------------------|--------------|------------|------------|------------------------------|---------------|
| SAM 1 | CORE | OO 21 | N/A | PUBLIC | External investment managers | 4 |

For the majority of your externally managed AUM in each asset class, which responsible investment aspects does your organisation consider important in the assessment of external investment managers?

| | (1) Listed equity (active) | (2) Listed equity (passive) | (3) Fixed income (active) |
|--|-------------------------------------|-------------------------------------|-------------------------------------|
| Organisation | | | |
| (A) Commitment to and experience in responsible investment | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| (B) Responsible investment policy(ies) | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| (C) Governance structure and senior-level oversight and accountability | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| People and Culture | | | |
| (D) Adequate resourcing and incentives | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| (E) Staff competencies and experience in responsible investment | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| Investment Process | | | |

| | | | |
|--|-------------------------------------|-------------------------------------|-------------------------------------|
| (F) Incorporation of material ESG factors in the investment process | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| (G) Incorporation of risks connected to systematic sustainability issues in the investment process | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| (H) Incorporation of material ESG factors and ESG risks connected to systematic sustainability issues in portfolio risk assessment | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| Stewardship | | | |
| (I) Policy(ies) or guidelines on stewardship | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| (J) Policy(ies) or guidelines on (proxy) voting | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| (K) Use of stewardship tools and activities | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| (L) Incorporation of risks connected to systematic sustainability issues in stewardship practices | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| (M) Involvement in collaborative engagement and stewardship initiatives | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| (N) Engagement with policy makers and other non-investee stakeholders | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| (O) Results of stewardship activities | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| Performance and Reporting | | | |
| (P) ESG disclosure in regular client reporting | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

(Q) Inclusion of ESG factors in contractual agreements ☐ ☐ ☐

(R) We do not consider any of the above responsible investment aspects important in the assessment of external investment managers ☐ ☐ ☐

SERVICE PROVIDERS

| Indicator | Type of indicator | Dependent on | Gateway to | Disclosure | Subsection | PRI Principle |
|-----------|-------------------|--------------|------------|------------|-------------------|---------------|
| SAM 2 | CORE | OO 21 | N/A | PUBLIC | Service providers | 4 |

Which responsible investment aspects does your organisation consider important when assessing all service providers that advise you in the selection, appointment and/or monitoring of external investment managers?

- ☐ (A) Incorporation of their responsible investment policy into advisory services
- ☐ (B) Ability to accommodate our responsible investment policy
- ☐ (C) Level of staff's responsible investment expertise
- ☐ (D) Use of data and analytical tools to assess the external investment manager's responsible investment performance
- ☐ (E) Other
- ☐ (F) We do not consider any of the above responsible investment aspects important when assessing service providers that advise us in the selection, appointment and/or monitoring of external investment managers
- ☒ (G) **Not applicable; we do not engage service providers in the selection, appointment or monitoring of external investment managers**

SELECTION

RESPONSIBLE INVESTMENT PRACTICES

| Indicator | Type of indicator | Dependent on | Gateway to | Disclosure | Subsection | PRI Principle |
|-----------|-------------------|--------------|---------------------|------------|----------------------------------|---------------|
| SAM 4 | CORE | OO 12, OO 21 | SAM 5, SAM 6, SAM 7 | PUBLIC | Responsible investment practices | General |

During the reporting year, did your organisation select new external investment managers or allocate new mandates to existing investment managers?

- ☒ (A) **Yes, we selected external investment managers or allocated new mandates to existing investment managers during the reporting year**
- ☐ (B) No, we did not select new external investment managers or allocate new mandates to existing investment managers during the reporting year

- (C) Not applicable; our organisation is in a captive relationship with external investment managers, which applies to 90% or more of our AUM

| Indicator | Type of indicator | Dependent on | Gateway to | Disclosure | Subsection | PRI Principle |
|-----------|-------------------|--------------|------------|------------|----------------------------------|---------------|
| SAM 5 | CORE | SAM 4 | N/A | PUBLIC | Responsible investment practices | 4 |

During the reporting year, what responsible investment aspects did your organisation, or the service provider acting on your behalf, review and evaluate when selecting new external investment managers or allocating new mandates to existing investment managers?

Organisation

☒ **(A) Commitment to and experience in responsible investment (e.g. commitment to responsible investment principles and standards)**

Select from dropdown list

- (1) for all of our mandates
- ☒ **(2) for a majority of our mandates**
- (3) for a minority of our mandates

☒ **(B) Responsible investment policy(ies) (e.g. the alignment of their responsible investment policy with the investment mandate)**

Select from dropdown list

- (1) for all of our mandates
- ☒ **(2) for a majority of our mandates**
- (3) for a minority of our mandates

☒ **(C) Governance structure and senior-level oversight and accountability (e.g. the adequacy of their governance structure and reported conflicts of interest)**

Select from dropdown list

- (1) for all of our mandates
- ☒ **(2) for a majority of our mandates**
- (3) for a minority of our mandates

People and Culture

☒ **(D) Adequate resourcing and incentives (e.g. their team structures, operating model and remuneration structure, including alignment of interests)**

Select from dropdown list

- (1) for all of our mandates
- ☒ **(2) for a majority of our mandates**
- (3) for a minority of our mandates

☒ **(E) Staff competencies and experience in responsible investment (e.g. level of responsible investment responsibilities in their investment team, their responsible investment training and capacity building)**

Select from dropdown list

- (1) for all of our mandates
- ☒ **(2) for a majority of our mandates**
- (3) for a minority of our mandates

Investment Process

☒ (F) Incorporation of material ESG factors in the investment process (e.g. detail and evidence of how such factors are incorporated into the selection of individual assets and in portfolio construction)

Select from dropdown list

- ☐ (1) for all of our mandates
- ☒ (2) for a majority of our mandates
- ☐ (3) for a minority of our mandates

☒ (G) Incorporation of risks connected to systematic sustainability issues in the investment process (e.g. detail and evidence of how such risks are incorporated into the selection of individual assets and in portfolio construction)

Select from dropdown list

- ☐ (1) for all of our mandates
- ☒ (2) for a majority of our mandates
- ☐ (3) for a minority of our mandates

☒ (H) Incorporation of material ESG factors and ESG risks connected to systematic sustainability issues in portfolio risk assessment (e.g. their process to measure and report such risks)

Select from dropdown list

- ☐ (1) for all of our mandates
- ☒ (2) for a majority of our mandates
- ☐ (3) for a minority of our mandates

Performance and Reporting

☒ (I) ESG disclosure in regular client reporting

Select from dropdown list

- ☐ (1) for all of our mandates
- ☐ (2) for a majority of our mandates
- ☒ (3) for a minority of our mandates

☒ (J) Inclusion of ESG factors in contractual agreements

Select from dropdown list

- ☐ (1) for all of our mandates
- ☐ (2) for a majority of our mandates
- ☒ (3) for a minority of our mandates

☐ (K) We did not review and evaluate any of the above responsible investment aspects when selecting new external investment managers or allocating new mandates to existing investment managers during the reporting year

APPOINTMENT

SEGREGATED MANDATES

| Indicator | Type of indicator | Dependent on | Gateway to | Disclosure | Subsection | PRI Principle |
|-----------|-------------------|---------------|------------|------------|---------------------|---------------|
| SAM 8 | CORE | OO 5.2, OO 13 | N/A | PUBLIC | Segregated mandates | 4 |

Which responsible investment aspects do your organisation, or the service provider acting on your behalf, explicitly include in clauses within your contractual agreements with your external investment managers for segregated mandates?

☒ (A) Their commitment to following our responsible investment strategy in the management of our assets

Select from dropdown list

- ☐ (1) for all of our segregated mandates
- ☐ (2) for a majority of our segregated mandates
- ☒ (3) for a minority of our segregated mandates

☒ (B) Their commitment to incorporating material ESG factors into their investment activities

- Select from dropdown list
- (1) for all of our segregated mandates
 - (2) for a majority of our segregated mandates
 - (3) for a minority of our segregated mandates
- ☒ (C) Their commitment to incorporating material ESG factors into their stewardship activities
- Select from dropdown list
- (1) for all of our segregated mandates
 - (2) for a majority of our segregated mandates
 - (3) for a minority of our segregated mandates
- ☒ (D) Their commitment to incorporating risks connected to systematic sustainability issues into their investment activities
- Select from dropdown list
- (1) for all of our segregated mandates
 - (2) for a majority of our segregated mandates
 - (3) for a minority of our segregated mandates
- ☒ (E) Their commitment to incorporating risks connected to systematic sustainability issues into their stewardship activities
- Select from dropdown list
- (1) for all of our segregated mandates
 - (2) for a majority of our segregated mandates
 - (3) for a minority of our segregated mandates
- ☒ (F) Exclusion list(s) or criteria
- Select from dropdown list
- (1) for all of our segregated mandates
 - (2) for a majority of our segregated mandates
 - (3) for a minority of our segregated mandates
- ☒ (G) Responsible investment communications and reporting obligations, including stewardship activities and results
- Select from dropdown list
- (1) for all of our segregated mandates
 - (2) for a majority of our segregated mandates
 - (3) for a minority of our segregated mandates
- ☒ (H) Incentives and controls to ensure alignment of interests
- Select from dropdown list
- (1) for all of our segregated mandates
 - (2) for a majority of our segregated mandates
 - (3) for a minority of our segregated mandates
- ☒ (I) Commitments on climate-related disclosure in line with internationally-recognised frameworks such as the TCFD
- Select from dropdown list
- (1) for all of our segregated mandates
 - (2) for a majority of our segregated mandates
 - (3) for a minority of our segregated mandates
- ☒ (J) Commitment to respect human rights as defined in the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights
- Select from dropdown list
- (1) for all of our segregated mandates
 - (2) for a majority of our segregated mandates
 - (3) for a minority of our segregated mandates
- ☒ (K) Their acknowledgement that their appointment is conditional on the fulfilment of their agreed responsible investment commitments

Select from dropdown list

- (1) for all of our segregated mandates
- (2) for a majority of our segregated mandates
- (3) for a minority of our segregated mandates

☐ (L) Other

○ (M) We do not include responsible investment aspects in clauses within our contractual agreements with external investment managers for segregated mandates

MONITORING

RESPONSIBLE INVESTMENT PRACTICES

| Indicator | Type of indicator | Dependent on | Gateway to | Disclosure | Subsection | PRI Principle |
|-----------|-------------------|--------------|------------|------------|----------------------------------|---------------|
| SAM 9 | CORE | OO 14, OO 21 | N/A | PUBLIC | Responsible investment practices | 4 |

For the majority of your externally managed AUM in each asset class, which aspects of your external investment managers' responsible investment practices did your organisation, or the service provider acting on your behalf, monitor during the reporting year?

| | (1) Listed equity (active) | (2) Listed equity (passive) | (3) Fixed income (active) |
|---|-------------------------------------|-------------------------------------|-------------------------------------|
| Organisation | | | |
| (A) Commitment to and experience in responsible investment (e.g. commitment to responsible investment principles and standards) | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| (B) Responsible investment policy(ies) (e.g. the continued alignment of their responsible investment policy with the investment mandate) | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| (C) Governance structure and senior level oversight and accountability (e.g. the adequacy of their governance structure and reported conflicts of interest) | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| People and Culture | | | |

(D) Adequate resourcing and incentives (e.g. their team structures, operating model and remuneration structure, including alignment of interests)



(E) Staff competencies and experience in responsible investment (e.g. level of responsible investment responsibilities in their investment team, their responsible investment training and capacity building)



Investment Process

(F) Incorporation of material ESG factors in the investment process (e.g. detail and evidence of how such factors are incorporated into the selection of individual assets and in portfolio construction)



(G) Incorporation of risks connected to systematic sustainability issues in the investment process (e.g. detail and evidence of how such risks are incorporated into the selection of individual assets and in portfolio construction)



(H) Incorporation of material ESG factors and ESG risks connected to systematic sustainability issues in portfolio risk assessment (e.g. their process to measure and report such risks, their response to ESG incidents)



Performance and Reporting

(I) ESG disclosure in regular client reporting (e.g. any changes in their regular client reporting)

☐
☐
☐

(J) Inclusion of ESG factors in contractual agreements

☐
☐
☐

(K) We did not monitor any of the above aspects of our external investment managers' responsible investment practices during the reporting year

☐
☐
☐

| Indicator | Type of indicator | Dependent on | Gateway to | Disclosure | Subsection | PRI Principle |
|-----------|-------------------|--------------|------------|------------|----------------------------------|---------------|
| SAM 12 | CORE | OO 14, OO 21 | N/A | PUBLIC | Responsible investment practices | 1 |

For the majority of your externally managed AUM in each asset class, how often does your organisation, or the service provider acting on your behalf, monitor your external investment managers' responsible investment practices?

(1) Listed equity (active)

(2) Listed equity (passive)

(3) Fixed income (active)

(A) At least annually

☒
☒
☒

(B) Less than once a year

☐
☐
☐

(C) On an ad hoc basis

☐
☐
☐

ENGAGEMENT AND ESCALATION

| Indicator | Type of indicator | Dependent on | Gateway to | Disclosure | Subsection | PRI Principle |
|-----------|-------------------|--------------|------------|------------|---------------------------|---------------|
| SAM 16 | CORE | OO 14, OO 21 | N/A | PUBLIC | Engagement and escalation | 4 |

What actions does your organisation, or the service provider acting on your behalf, include in its formal escalation process to address concerns raised during monitoring of your external investment managers' responsible investment practices?

| | (1) Listed equity (active) | (2) Listed equity (passive) | (3) Fixed income (active) |
|---|-------------------------------------|-------------------------------------|-------------------------------------|
| (A) Engagement with their investment professionals, investment committee or other representatives | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| (B) Notification about their placement on a watch list or relationship coming under review | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| (C) Reduction of capital allocation to the external investment managers until any concerns have been rectified | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| (D) Termination of the contract if failings persist over a (notified) period, including an explanation of the reasons for termination | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| (E) Holding off selecting the external investment managers for new mandates or allocating additional capital until any concerns have been rectified | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| (F) Other | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

(G) Our organisation does not have a formal escalation process to address concerns raised during monitoring

○

○

○

VERIFICATION

| Indicator | Type of indicator | Dependent on | Gateway to | Disclosure | Subsection | PRI Principle |
|-----------|-------------------|--------------|------------|------------|--------------|---------------|
| SAM 17 | CORE | OO 14, OO 21 | N/A | PUBLIC | Verification | 1 |

For the majority of your externally managed AUM in each asset class, how did your organisation, or the service provider acting on your behalf, verify that the information reported by external investment managers on their responsible investment practices was correct during the reporting year?

| | (1) Listed equity (active) | (2) Listed equity (passive) | (3) Fixed income (active) |
|--|-------------------------------------|-------------------------------------|-------------------------------------|
| (A) We checked that the information reported was verified through a third-party assurance process | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| (B) We checked that the information reported was verified by an independent third party | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| (C) We checked for evidence of internal monitoring or compliance | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| (D) Other | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| (E) We did not verify the information reported by external investment managers on their responsible investment practices during the reporting year | ○ | ○ | ○ |

LISTED EQUITY (LE)

OVERALL APPROACH

MATERIALITY ANALYSIS

| Indicator | Type of indicator | Dependent on | Gateway to | Disclosure | Subsection | PRI Principle |
|-----------|-------------------|--------------|------------|------------|----------------------|---------------|
| LE 1 | CORE | OO 21 | N/A | PUBLIC | Materiality analysis | 1 |

Does your organisation have a formal investment process to identify and incorporate material ESG factors across your listed equity strategies?

| | (1) Passive equity | (2) Active - quantitative | (3) Active - fundamental |
|---|-------------------------------|---------------------------|--------------------------|
| (A) Yes, our investment process incorporates material governance factors | (3) for a minority of our AUM | (1) for all of our AUM | (1) for all of our AUM |
| (B) Yes, our investment process incorporates material environmental and social factors | (3) for a minority of our AUM | (1) for all of our AUM | (1) for all of our AUM |
| (C) Yes, our investment process incorporates material ESG factors beyond our organisation's average investment holding period | (3) for a minority of our AUM | (1) for all of our AUM | (1) for all of our AUM |
| (D) No, we do not have a formal process. Our investment professionals identify material ESG factors at their discretion | ○ | ○ | ○ |
| (E) No, we do not have a formal or informal process to identify and incorporate material ESG factors | ○ | ○ | ○ |

MONITORING ESG TRENDS

| Indicator | Type of indicator | Dependent on | Gateway to | Disclosure | Subsection | PRI Principle |
|-----------|-------------------|--------------|------------|------------|-----------------------|---------------|
| LE 2 | CORE | OO 21 | N/A | PUBLIC | Monitoring ESG trends | 1 |

Does your organisation have a formal process for monitoring and reviewing the implications of changing ESG trends across your listed equity strategies?

| | (1) Passive equity | (2) Active - quantitative | (3) Active - fundamental |
|--|-------------------------------|-------------------------------|-------------------------------|
| (A) Yes, we have a formal process that includes scenario analyses | (3) for a minority of our AUM | (2) for a majority of our AUM | (2) for a majority of our AUM |
| (B) Yes, we have a formal process, but it does not include scenario analyses | | | |
| (C) We do not have a formal process for our listed equity strategies; our investment professionals monitor how ESG trends vary over time at their discretion | ○ | ○ | ○ |
| (D) We do not monitor and review the implications of changing ESG trends on our listed equity strategies | ○ | ○ | ○ |

(A) Yes, we have a formal process that includes scenario analysis - Specify: (Voluntary)

Scenario analysis is taken at issuer level where analysts include ESG factors in their forward-looking models where material. For minority of our AUM, TCFD is capable of scenario analysis.

PRE-INVESTMENT

ESG INCORPORATION IN RESEARCH

| Indicator | Type of indicator | Dependent on | Gateway to | Disclosure | Subsection | PRI Principle |
|-----------|-------------------|--------------|------------|------------|-------------------------------|---------------|
| LE 3 | CORE | OO 21 | N/A | PUBLIC | ESG incorporation in research | 1 |

How does your financial analysis and equity valuation or security rating process incorporate material ESG risks?

| | (1) Active - quantitative | (2) Active - fundamental |
|--|----------------------------|----------------------------|
| (A) We incorporate material governance-related risks into our financial analysis and equity valuation or security rating process | (1) in all cases | (1) in all cases |
| (B) We incorporate material environmental and social risks into our financial analysis and equity valuation or security rating process | (2) in a majority of cases | (2) in a majority of cases |
| (C) We incorporate material environmental and social risks related to companies' supply chains into our financial analysis and equity valuation or security rating process | (3) in a minority of cases | (3) in a minority of cases |
| (D) We do not incorporate material ESG risks into our financial analysis, equity valuation or security rating processes | ○ | ○ |

| Indicator | Type of indicator | Dependent on | Gateway to | Disclosure | Subsection | PRI Principle |
|-----------|-------------------|--------------|------------|------------|-------------------------------|---------------|
| LE 4 | CORE | OO 21 | N/A | PUBLIC | ESG incorporation in research | 1 |

What information do you incorporate when you assess the ESG performance of companies in your financial analysis, benchmark selection and/or portfolio construction process?

| | (1) Passive equity | (2) Active - quantitative | (3) Active - fundamental |
|--|----------------------------|----------------------------|----------------------------|
| (A) We incorporate qualitative and/or quantitative information on current performance across a range of material ESG factors | (3) in a minority of cases | (3) in a minority of cases | (3) in a minority of cases |
| (B) We incorporate qualitative and/or quantitative information on historical performance across a range of material ESG factors | (3) in a minority of cases | (3) in a minority of cases | (3) in a minority of cases |
| (C) We incorporate qualitative and/or quantitative information on material ESG factors that may impact or influence future corporate revenues and/or profitability | (3) in a minority of cases | (3) in a minority of cases | (2) in a majority of cases |
| (D) We incorporate qualitative and/or quantitative information enabling current, historical and/or future performance comparison within a selected peer group across a range of material ESG factors | (3) in a minority of cases | (3) in a minority of cases | (3) in a minority of cases |

(E) We do not incorporate qualitative or quantitative information on material ESG factors when assessing the ESG performance of companies in our financial analysis, equity investment or portfolio construction process

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ESG INCORPORATION IN PORTFOLIO CONSTRUCTION

| Indicator | Type of indicator | Dependent on | Gateway to | Disclosure | Subsection | PRI Principle |
|-----------|-------------------|--------------|------------|------------|---|---------------|
| LE 6 | CORE | OO 21 | N/A | PUBLIC | ESG incorporation in portfolio construction | 1 |

How do material ESG factors contribute to your stock selection, portfolio construction and/or benchmark selection process?

| | (1) Passive equity | (2) Active - quantitative | (3) Active - fundamental |
|---|-------------------------------|-------------------------------|-------------------------------|
| (A) Material ESG factors contribute to the selection of individual assets and/or sector weightings within our portfolio construction and/or benchmark selection process | (3) for a minority of our AUM | (3) for a minority of our AUM | (3) for a minority of our AUM |
| (B) Material ESG factors contribute to the portfolio weighting of individual assets within our portfolio construction and/or benchmark selection process | (3) for a minority of our AUM | (3) for a minority of our AUM | (3) for a minority of our AUM |
| (C) Material ESG factors contribute to the country or region weighting of assets within our portfolio construction and/or benchmark selection process | (3) for a minority of our AUM | (3) for a minority of our AUM | (3) for a minority of our AUM |

(D) Other ways material ESG factors contribute to your portfolio construction and/or benchmark selection process

(E) Our stock selection, portfolio construction or benchmark selection process does not include the incorporation of material ESG factors

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PASSIVE INVESTMENTS

| Indicator | Type of indicator | Dependent on | Gateway to | Disclosure | Subsection | PRI Principle |
|-----------|-------------------|--------------|------------|------------|---------------------|---------------|
| LE 7 | PLUS | OO 21 | N/A | PUBLIC | Passive investments | 1 |

Provide an example of how material ESG factors influenced weightings and tilts in the design of your passively managed funds.

We manage The Beta Advantage® U.S. ESG Equity Income Index (“the Index”) which aims to provide exposures to companies which can offer reliable equity income, attractive total return potential, and includes companies with favourable ESG Materiality (“ESGM”) ratings based on Columbia Threadneedle Investment’s proprietary ESG Materiality (ESGM) Ratings. The Index’s premise is that companies that lead and report on the most material industry ESG factors, such as environmental, social capital, human capital, business model and innovation, and leadership and governance should be well-positioned to build competitive advantage and sustain their long-term future. The Index, which implements a rules-based framework, will generally consist of 100 constituents from the MSCI USA Index (the Investment Universe) in order to meet this objective.

A company’s recognition and management of its material ESG exposures and related disclosures can provide an additional lens to help understand the quality, leadership, strategic focus, risk management and operational standards of a business. In assessing what the material ESG exposures are for a business, Columbia Threadneedle Investments, through the ESGM Ratings system, draws on the Sustainability Accounting Standards Board (SASB) materiality framework. The ESGM Ratings system (as defined below, subject to amendments from time to time) seeks to identify and assess potential material ESG risk and opportunity factors in companies.

The ESGM Ratings provide subjective (based on Columbia Threadneedle’s internal analysis) indicators into how effectively a company appears to be managing its material ESG risks and opportunities, expressed as a numerical ESGM Rating of a company from 1 to 5. A company determined to have an ESGM Rating of 1 reflects the Investment Manager’s then-current subjective assessment that the company is managing its material ESG risks and opportunities with low risk exposure. Conversely, a company determined to have an ESGM Rating of 5 reflects the Investment Manager’s then-current subjective assessment that the company is managing its material ESG risks and opportunities with high risk exposure.

Companies in the MSCI USA Index that do not report or publish the necessary data to calculate an ESGM Rating will not receive an ESGM Rating by the Investment Manager and, being unrated, are not eligible for inclusion in the Index.

At Index reconstitution, a company must have an ESGM Rating of 1 or 2 to be eligible for inclusion in the Index. A company’s ESGM Rating may change, including to be downgraded, after Index reconstitution. If a company is subsequently rated a 3, 4 or 5, it will not be reviewed for removal from the Index until the next Index reconstitution.

POST-INVESTMENT

ESG RISK MANAGEMENT

| Indicator | Type of indicator | Dependent on | Gateway to | Disclosure | Subsection | PRI Principle |
|-----------|-------------------|-------------------|------------|------------|---------------------|---------------|
| LE 9 | CORE | OO 17.1 LE, OO 21 | N/A | PUBLIC | ESG risk management | 1 |

What compliance processes do you have in place to ensure that your listed equity assets subject to negative exclusionary screens meet the screening criteria?

- ☒ (A) We have internal compliance procedures that ensure all funds or portfolios that are subject to negative exclusionary screening have pre-trade checks
- ☐ (B) We have an external committee that oversees the screening implementation process for all funds or portfolios that are subject to negative exclusionary screening
- ☐ (C) We have an independent internal committee that oversees the screening implementation process for all funds or portfolios that are subject to negative exclusionary screening
- ☐ (D) We do not have compliance processes in place to ensure that we meet our stated negative exclusionary screens

| Indicator | Type of indicator | Dependent on | Gateway to | Disclosure | Subsection | PRI Principle |
|-----------|-------------------|--------------|------------|------------|---------------------|---------------|
| LE 10 | CORE | OO 21 | N/A | PUBLIC | ESG risk management | 1 |

For the majority of your listed equity assets, do you have a formal process to identify and incorporate material ESG risks and ESG incidents into your risk management process?

(1) Active - quantitative**(2) Active - fundamental**

(A) Yes, our formal process includes reviews of quantitative and/or qualitative information on material ESG risks and ESG incidents and their implications for individual listed equity holdings



(B) Yes, our formal process includes reviews of quantitative and/or qualitative information on material ESG risks and ESG incidents and their implications for other listed equity holdings exposed to similar risks and/or incidents



(C) Yes, our formal process includes reviews of quantitative and/or qualitative information on material ESG risks and ESG incidents and their implications for our stewardship activities



(D) Yes, our formal process includes ad hoc reviews of quantitative and/or qualitative information on severe ESG incidents



(E) We do not have a formal process to identify and incorporate material ESG risks and ESG incidents into our risk management process; our investment professionals identify and incorporate material ESG risks and ESG incidents at their discretion



(F) We do not have a formal process to identify and incorporate material ESG risks and ESG incidents into our risk management process

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DISCLOSURE OF ESG SCREENS

| Indicator | Type of indicator | Dependent on | Gateway to | Disclosure | Subsection | PRI Principle |
|-----------|-------------------|-----------------|------------|------------|---------------------------|---------------|
| LE 12 | CORE | OO 17 LE, OO 21 | N/A | PUBLIC | Disclosure of ESG screens | 6 |

For all your listed equity assets subject to ESG screens, how do you ensure that clients understand ESG screens and their implications?

- ☒ (A) We share a list of ESG screens
- ☒ (B) We share any changes in ESG screens
- ☒ (C) We explain any implications of ESG screens, such as their deviation from a benchmark or impact on sector weightings
- ☐ (D) We do not share the above information for all our listed equity assets subject to ESG screens

FIXED INCOME (FI)

OVERALL APPROACH

MATERIALITY ANALYSIS

| Indicator | Type of indicator | Dependent on | Gateway to | Disclosure | Subsection | PRI Principle |
|-----------|-------------------|--------------|------------|------------|----------------------|---------------|
| FI 1 | CORE | OO 21 | N/A | PUBLIC | Materiality analysis | 1 |

Does your organisation have a formal investment process to identify and incorporate material ESG factors across your fixed income assets?

| | (1) SSA | (2) Corporate | (3) Securitised |
|---|-------------------------------|-------------------------------|-------------------------------|
| (A) Yes, our investment process incorporates material governance factors | (3) for a minority of our AUM | (2) for a majority of our AUM | (3) for a minority of our AUM |
| (B) Yes, our investment process incorporates material environmental and social factors | (3) for a minority of our AUM | (2) for a majority of our AUM | (3) for a minority of our AUM |
| (C) Yes, our investment process incorporates material ESG factors depending on different investment time horizons | (3) for a minority of our AUM | (2) for a majority of our AUM | (3) for a minority of our AUM |
| (D) No, we do not have a formal process; our investment professionals identify material ESG factors at their discretion | ○ | ○ | ○ |
| (E) No, we do not have a formal or informal process to identify and incorporate material ESG factors | ○ | ○ | ○ |

MONITORING ESG TRENDS

| Indicator | Type of indicator | Dependent on | Gateway to | Disclosure | Subsection | PRI Principle |
|-----------|-------------------|--------------|------------|------------|-----------------------|---------------|
| FI 2 | CORE | OO 21 | N/A | PUBLIC | Monitoring ESG trends | 1 |

Does your organisation have a formal process for monitoring and reviewing the implications of changing ESG trends across your fixed income assets?

| | (1) SSA | (2) Corporate | (3) Securitised |
|---|-------------------------------|-------------------------------|-------------------------------|
| (A) Yes, we have a formal process that includes scenario analyses | (3) for a minority of our AUM | (2) for a majority of our AUM | (3) for a minority of our AUM |
| (B) Yes, we have a formal process, but does it not include scenario analyses | | | |
| (C) We do not have a formal process for our fixed income assets; our investment professionals monitor how ESG trends vary over time at their discretion | ○ | ○ | ○ |
| (D) We do not monitor and review the implications of changing ESG trends on our fixed income assets | ○ | ○ | ○ |

(A) Yes, we have a formal process that includes scenario analyses - Specify: (Voluntary)

Scenario analysis is taken at issuer level where credit analysts include ESG factors in their forward-looking models where material. For minority of our AUM, TCFD is capable of scenario analysis.

PRE-INVESTMENT

ESG INCORPORATION IN RESEARCH

| Indicator | Type of indicator | Dependent on | Gateway to | Disclosure | Subsection | PRI Principle |
|-----------|-------------------|--------------|------------|------------|-------------------------------|---------------|
| FI 3 | CORE | OO 21 | N/A | PUBLIC | ESG incorporation in research | 1 |

For the majority of your fixed income investments, does your organisation incorporate material ESG factors when assessing their credit quality?

| | (1) SSA | (2) Corporate | (3) Securitised |
|---|----------------------------------|-------------------------------------|----------------------------------|
| (A) We incorporate material environmental and social factors | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| (B) We incorporate material governance-related factors | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| (C) We do not incorporate material ESG factors for the majority of our fixed income investments | <input checked="" type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> |

| Indicator | Type of indicator | Dependent on | Gateway to | Disclosure | Subsection | PRI Principle |
|-----------|-------------------|--------------|------------|------------|-------------------------------|---------------|
| FI 4 | CORE | OO 21 | N/A | PUBLIC | ESG incorporation in research | 1 |

Does your organisation have a framework that differentiates ESG risks by issuer country, region and/or sector?

| | (1) SSA | (2) Corporate | (3) Securitised |
|--|-------------------------------|-------------------------------|-------------------------------|
| (A) Yes, we have a framework that differentiates ESG risks by country and/or region (e.g. local governance and labour practices) | | | |
| (B) Yes, we have a framework that differentiates ESG risks by sector | (3) for a minority of our AUM | (2) for a majority of our AUM | (3) for a minority of our AUM |
| (C) No, we do not have a framework that differentiates ESG risks by issuer country, region and/or sector | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |

(D) Not applicable; we are not able to differentiate ESG risks by issuer country, region and/or sector due to the limited universe of our issuers

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| Indicator | Type of indicator | Dependent on | Gateway to | Disclosure | Subsection | PRI Principle |
|-----------|-------------------|--------------|------------|------------|-------------------------------|---------------|
| FI 6 | CORE | OO 21 | N/A | PUBLIC | ESG incorporation in research | 1 |

How do you incorporate significant changes in material ESG factors over time into your fixed income asset valuation process?

(1) SSA

(2) Corporate

(A) We incorporate it into the forecast of financial metrics or other quantitative assessments

(3) for a minority of our AUM

(2) for a majority of our AUM

(B) We make a qualitative assessment of how material ESG factors may evolve

(3) for a minority of our AUM

(2) for a majority of our AUM

(C) We do not incorporate significant changes in material ESG factors

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| Indicator | Type of indicator | Dependent on | Gateway to | Disclosure | Subsection | PRI Principle |
|-----------|-------------------|--------------|------------|------------|-------------------------------|---------------|
| FI 7 | CORE | OO 21 | N/A | PUBLIC | ESG incorporation in research | 1 |

At what level do you incorporate material ESG factors into the risks and/or returns of your securitised products?

- (A) At both key counterparties' and at the underlying collateral pool's levels
- **(B) At key counterparties' level only**
Explain: (Voluntary)
- (C) At the underlying collateral pool's level only

ESG INCORPORATION IN PORTFOLIO CONSTRUCTION

| Indicator | Type of indicator | Dependent on | Gateway to | Disclosure | Subsection | PRI Principle |
|-----------|-------------------|--------------|------------|------------|---|---------------|
| FI 8 | CORE | OO 21 | N/A | PUBLIC | ESG incorporation in portfolio construction | 1 |

How do material ESG factors contribute to your security selection, portfolio construction and/or benchmark selection process?

| | (1) SSA | (2) Corporate | (3) Securitised |
|---|-------------------------------|-------------------------------|-------------------------------|
| (A) Material ESG factors contribute to the selection of individual assets and/or sector weightings within our portfolio construction and/or benchmark selection process | (3) for a minority of our AUM | (2) for a majority of our AUM | (3) for a minority of our AUM |
| (B) Material ESG factors contribute to determining the holding period of individual assets within our portfolio construction and/or benchmark selection process | (3) for a minority of our AUM | (3) for a minority of our AUM | (3) for a minority of our AUM |
| (C) Material ESG factors contribute to the portfolio weighting of individual assets within our portfolio construction and/or benchmark selection process | (3) for a minority of our AUM | (2) for a majority of our AUM | (3) for a minority of our AUM |
| (D) Material ESG factors contribute to the country or region weighting of assets within our portfolio construction and/or benchmark selection process | | | |
| (E) Material ESG factors contribute to our portfolio construction and/or benchmark selection process in other ways | | | |

(F) Our security selection, portfolio construction or benchmark selection process does not include the incorporation of material ESG factors

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POST-INVESTMENT

ESG RISK MANAGEMENT

| Indicator | Type of indicator | Dependent on | Gateway to | Disclosure | Subsection | PRI Principle |
|-----------|-------------------|--------------|------------|------------|---------------------|---------------|
| FI 11 | CORE | OO 21 | N/A | PUBLIC | ESG risk management | 1 |

How are material ESG factors incorporated into your portfolio risk management process?

| | (1) SSA | (2) Corporate | (3) Securitised |
|---|-------------------------------|-------------------------------|-------------------------------|
| (A) Investment committee members, or the equivalent function or group, can veto investment decisions based on ESG considerations | (3) for a minority of our AUM | (3) for a minority of our AUM | (3) for a minority of our AUM |
| (B) Companies, sectors, countries and/or currencies are monitored for changes in exposure to material ESG factors and any breaches of risk limits | (3) for a minority of our AUM | (3) for a minority of our AUM | (3) for a minority of our AUM |
| (C) Overall exposure to specific material ESG factors is measured for our portfolio construction, and sizing or hedging adjustments are made depending on the individual issuer or issue sensitivity to these factors | (3) for a minority of our AUM | (3) for a minority of our AUM | (3) for a minority of our AUM |
| (D) We use another method of incorporating material ESG factors into our portfolio's risk management process | | | |

(E) We do not have a process to incorporate material ESG factors into our portfolio's risk management process

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| Indicator | Type of indicator | Dependent on | Gateway to | Disclosure | Subsection | PRI Principle |
|-----------|-------------------|--------------|------------|------------|---------------------|---------------|
| FI 12 | CORE | OO 21 | N/A | PUBLIC | ESG risk management | 1 |

For the majority of your fixed income assets, do you have a formal process to identify and incorporate material ESG risks and ESG incidents into your risk management process?

| | (1) SSA | (2) Corporate | (3) Securitised |
|---|--------------------------|-------------------------------------|--------------------------|
| (A) Yes, our formal process includes reviews of quantitative and/or qualitative information on material ESG risks and ESG incidents and their implications for individual fixed income holdings | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| (B) Yes, our formal process includes reviews of quantitative and/or qualitative information on material ESG risks and ESG incidents, and their implications for other fixed income holdings exposed to similar risks and/or incidents | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| (C) Yes, our formal process includes reviews of quantitative and/or qualitative information on material ESG risks and ESG incidents, and their implications for our stewardship activities | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

(D) Yes, our formal process includes ad hoc reviews of quantitative and/or qualitative information on severe ESG incidents



(E) We do not have a formal process to identify and incorporate ESG risks and ESG incidents; our investment professionals identify and incorporate ESG risks and ESG incidents at their discretion



(F) We do not have a formal process to identify and incorporate ESG risks and ESG incidents into our risk management process



THEMATIC BONDS

| Indicator | Type of indicator | Dependent on | Gateway to | Disclosure | Subsection | PRI Principle |
|-----------|-------------------|--------------|------------|------------|----------------|---------------|
| FI 15 | PLUS | OO 20, OO 21 | N/A | PUBLIC | Thematic bonds | 3 |

What percentage of environmental, social and/or other labelled thematic bonds held by your organisation has been verified?

As a percentage of your total labelled bonds:

(A) Third-party assurance

(5) >75%

(B) Second-party opinion

(5) >75%

(C) Approved verifiers or external reviewers (e.g. via CBI or ICMA)

(5) >75%

| Indicator | Type of indicator | Dependent on | Gateway to | Disclosure | Subsection | PRI Principle |
|-----------|-------------------|-----------------|------------|------------|----------------|---------------|
| FI 16 | CORE | OO 17 FI, OO 21 | N/A | PUBLIC | Thematic bonds | 1 |

What pre-determined criteria does your organisation use to identify which non-labelled thematic bonds to invest in?

- ☒ (A) The bond's use of proceeds
- ☒ (B) The issuers' targets
- ☒ (C) The issuers' progress towards achieving their targets
- ☒ (D) The issuer profile and how it contributes to their targets
- ☐ (E) We do not use pre-determined criteria to identify which non-labelled thematic bonds to invest in
- ☐ (F) Not applicable; we do not invest in non-labelled thematic bonds

| Indicator | Type of indicator | Dependent on | Gateway to | Disclosure | Subsection | PRI Principle |
|-----------|-------------------|------------------------|------------|------------|----------------|---------------|
| FI 17 | CORE | Multiple, see guidance | N/A | PUBLIC | Thematic bonds | 1, 2, 6 |

During the reporting year, what action did you take in the majority of cases when you felt that the proceeds of a thematic bond were not allocated appropriately or in accordance with the terms of the bond deal or prospectus?

- ☐ (A) We engaged with the issuer
- ☐ (B) We alerted thematic bond certification agencies
- ☐ (C) We sold the security
- ☐ (D) We blacklisted the issuer
- ☐ (E) Other action
- ☐ (F) We did not take any specific actions when the proceeds of a thematic bond were not allocated according to the terms of the bond deal during the reporting year
- ☒ (G) Not applicable; in the majority of cases, the proceeds of thematic bonds were allocated according to the terms of the bond deal during the reporting year

DISCLOSURE OF ESG SCREENS

| Indicator | Type of indicator | Dependent on | Gateway to | Disclosure | Subsection | PRI Principle |
|-----------|-------------------|-----------------|------------|------------|---------------------------|---------------|
| FI 18 | CORE | OO 17 FI, OO 21 | N/A | PUBLIC | Disclosure of ESG screens | 6 |

For all your fixed income assets subject to ESG screens, how do you ensure that clients understand ESG screens and their implications?

- ☒ (A) We share a list of ESG screens
- ☒ (B) We share any changes in ESG screens
- ☒ (C) We explain any implications of ESG screens, such as any deviation from a benchmark or impact on sector weightings
- ☐ (D) We do not share the above information for all our fixed income assets subject to ESG screens

REAL ESTATE (RE)

POLICY

INVESTMENT GUIDELINES

| Indicator | Type of indicator | Dependent on | Gateway to | Disclosure | Subsection | PRI Principle |
|-----------|-------------------|---------------------|------------|------------|-----------------------|---------------|
| RE 1 | CORE | OO 21, OO 24, OO 26 | N/A | PUBLIC | Investment guidelines | 1 to 6 |

What real estate-specific ESG guidelines are currently covered in your organisation's responsible investment policy(ies)?

- ☒ (A) Guidelines on our ESG approach to real estate depending on use (e.g. retail and education) and geography
- ☒ (B) Guidelines on our ESG approach to new construction
- ☒ (C) Guidelines on our ESG approach to major renovations
- ☒ (D) Guidelines on our ESG approach to standing real estate investments
- ☒ (E) Guidelines on pre-investment screening
- ☐ (F) Guidelines on our approach to ESG integration into short-term or 100-day plans (or equivalent)
- ☐ (G) Guidelines on our approach to ESG integration into long-term value creation efforts
- ☒ (H) Guidelines on our approach to ESG reporting
- ☒ (I) Guidelines on our engagement approach related to third-party property managers
- ☒ (J) Guidelines on our engagement approach related to tenants
- ☒ (K) Guidelines on our engagement approach related to construction contractors
- ☐ (L) Our responsible investment policy(ies) does not cover real estate-specific ESG guidelines

FUNDRAISING

COMMITMENTS TO INVESTORS

| Indicator | Type of indicator | Dependent on | Gateway to | Disclosure | Subsection | PRI Principle |
|-----------|-------------------|--------------|------------|------------|--------------------------|---------------|
| RE 2 | CORE | OO 21 | N/A | PUBLIC | Commitments to investors | 1, 4 |

For all of the funds that you closed during the reporting year, what type of formal responsible investment commitments did you make in Limited Partnership Agreements (LPAs), side letters, or other constitutive fund documents?

- ☐ (A) We incorporated responsible investment commitments in LPAs (or equivalent) as a standard default procedure
- ☒ (B) We added responsible investment commitments in LPAs (or equivalent) upon a client's request
- ☐ (C) We added responsible investment commitments in side letters upon a client's request
- ☐ (D) We did not make any formal responsible investment commitments for the relevant reporting year
- ☐ (E) Not applicable; we have not raised funds in the last five years

PRE-INVESTMENT

MATERIALITY ANALYSIS

| Indicator | Type of indicator | Dependent on | Gateway to | Disclosure | Subsection | PRI Principle |
|-----------|-------------------|--------------|------------|------------|----------------------|---------------|
| RE 3 | CORE | OO 21 | RE 3.1 | PUBLIC | Materiality analysis | 1 |

During the reporting year, how did you conduct ESG materiality analysis for your potential real estate investments?

- ☒ (A) We assessed ESG materiality for each property, as each case is unique
 - Select from dropdown list:
 - ☐ (1) for all of our potential real estate investments
 - ☒ (2) for a majority of our potential real estate investments
 - ☐ (3) for a minority of our potential real estate investments
- ☐ (B) We performed a mix of property level and property type or category level ESG materiality analysis
- ☐ (C) We assessed ESG materiality at the property type or category level only
- ☐ (D) We did not conduct ESG materiality analysis for our potential real estate investments

| Indicator | Type of indicator | Dependent on | Gateway to | Disclosure | Subsection | PRI Principle |
|-----------|-------------------|--------------|------------|------------|----------------------|---------------|
| RE 3.1 | CORE | RE 3 | N/A | PUBLIC | Materiality analysis | 1 |

During the reporting year, what tools, standards and data did you use in your ESG materiality analysis of potential real estate investments?

- ☒ (A) We used GRI standards to inform our real estate ESG materiality analysis
- ☐ (B) We used SASB standards to inform our real estate ESG materiality analysis
- ☐ (C) We used the UN Sustainable Development Goals (SDGs) to inform our real estate ESG materiality analysis
- ☒ (D) We used GRESB Materiality Assessment (RC7) or similar to inform our real estate ESG materiality analysis
- ☒ (E) We used climate disclosures, such as the TCFD recommendations or other climate risk and/or exposure analysis tools, to inform our real estate ESG materiality analysis
- ☐ (F) We used the UN Guiding Principles on Business and Human Rights (UNGPs) to inform our real estate ESG materiality analysis
- ☒ (G) We used geopolitical and macro-economic considerations in our real estate ESG materiality analysis
- ☒ (H) We used green building certifications to inform our real estate ESG materiality analysis
- ☒ (I) We engaged with the existing owners and/or managers (or developers for new properties) to inform our real estate ESG materiality analysis
- ☐ (J) Other

DUE DILIGENCE

| Indicator | Type of indicator | Dependent on | Gateway to | Disclosure | Subsection | PRI Principle |
|-----------|-------------------|--------------|------------|------------|---------------|---------------|
| RE 4 | CORE | OO 21 | N/A | PUBLIC | Due diligence | 1 |

During the reporting year, how did material ESG factors influence your selection of real estate investments?

☒ (A) Material ESG factors were used to identify risks

Select from dropdown list:

- ☒ (1) for all of our potential real estate investments
- ☐ (2) for a majority of our potential real estate investments
- ☐ (3) for a minority of our potential real estate investments

☒ (B) Material ESG factors were discussed by the investment committee (or equivalent)

Select from dropdown list:

- ☐ (1) for all of our potential real estate investments
- ☒ (2) for a majority of our potential real estate investments
- ☐ (3) for a minority of our potential real estate investments

☒ (C) Material ESG factors were used to identify remedial actions for our 100-day plans (or equivalent)

Select from dropdown list:

- ☐ (1) for all of our potential real estate investments
- ☒ (2) for a majority of our potential real estate investments
- ☐ (3) for a minority of our potential real estate investments

☒ (D) Material ESG factors were used to identify opportunities for value creation

Select from dropdown list:

- ☐ (1) for all of our potential real estate investments
- ☐ (2) for a majority of our potential real estate investments
- ☒ (3) for a minority of our potential real estate investments

☒ (E) Material ESG factors informed our decision to abandon potential investments in the due diligence phase in cases where ESG risks were considered too high to mitigate

Select from dropdown list:

- ☐ (1) for all of our potential real estate investments
- ☒ (2) for a majority of our potential real estate investments
- ☐ (3) for a minority of our potential real estate investments

☒ (F) Material ESG factors impacted investments in terms of the price offered and/or paid

Select from dropdown list:

- ☐ (1) for all of our potential real estate investments
- ☐ (2) for a majority of our potential real estate investments
- ☒ (3) for a minority of our potential real estate investments

☐ (G) Material ESG factors did not influence the selection of our real estate investments

| Indicator | Type of indicator | Dependent on | Gateway to | Disclosure | Subsection | PRI Principle |
|-----------|-------------------|--------------|------------|------------|---------------|---------------|
| RE 5 | CORE | OO 21 | N/A | PUBLIC | Due diligence | 1 |

Once material ESG factors have been identified, what processes do you use to conduct due diligence on these factors for potential real estate investments?

☒ (A) We conduct a high-level or desktop review against an ESG checklist for initial red flags

Select from dropdown list:

- ☒ (1) for all of our potential real estate investments
- ☐ (2) for a majority of our potential real estate investments
- ☐ (3) for a minority of our potential real estate investments

☒ (B) We send detailed ESG questionnaires to target properties

Select from dropdown list:

- ☐ (1) for all of our potential real estate investments
- ☒ (2) for a majority of our potential real estate investments
- ☐ (3) for a minority of our potential real estate investments

☒ (C) We hire third-party consultants to do technical due diligence on specific material ESG factors

Select from dropdown list:

- ☒ (1) for all of our potential real estate investments
- ☐ (2) for a majority of our potential real estate investments
- ☐ (3) for a minority of our potential real estate investments

☒ (D) We conduct site visits

Select from dropdown list:

- ☒ (1) for all of our potential real estate investments
- ☐ (2) for a majority of our potential real estate investments
- ☐ (3) for a minority of our potential real estate investments

☐ (E) We conduct in-depth interviews with management and/or personnel

☐ (F) We conduct detailed external stakeholder analysis and/or engagement

☒ (G) We incorporate ESG due diligence findings in all of our relevant investment process documentation in the same manner as for other key due diligence, e.g. commercial, accounting and legal

Select from dropdown list:

- ☐ (1) for all of our potential real estate investments
- ☒ (2) for a majority of our potential real estate investments
- ☐ (3) for a minority of our potential real estate investments

☒ (H) Our investment committee (or an equivalent decision-making body) is ultimately responsible for ensuring all ESG due diligence is completed in the same manner as for other key due diligence, e.g. commercial, accounting and legal

Select from dropdown list:

- ☐ (1) for all of our potential real estate investments
- ☒ (2) for a majority of our potential real estate investments
- ☐ (3) for a minority of our potential real estate investments

☐ (I) Other

☐ (J) We do not conduct due diligence on material ESG factors for potential real estate investments

SELECTION, APPOINTMENT AND MONITORING OF THIRD-PARTY PROPERTY MANAGERS

SELECTION PROCESS OF THIRD-PARTY PROPERTY MANAGERS

| Indicator | Type of indicator | Dependent on | Gateway to | Disclosure | Subsection | PRI Principle |
|-----------|-------------------|--------------|------------|------------|--|---------------|
| RE 6 | CORE | OO 21, OO 26 | N/A | PUBLIC | Selection process of third-party property managers | 1, 4 |

During the reporting year, how did you include material ESG factors in all of your selections of third-party property managers?

- ☒ (A) We requested information from potential third-party property managers on their overall approach to material ESG factors
- ☒ (B) We requested track records and examples from potential third-party property managers on their management of material ESG factors
- ☒ (C) We requested information from potential third-party property managers on their engagement process(es) with stakeholders
- ☒ (D) We requested documentation from potential third-party property managers on their responsible procurement practices, including responsibilities, approach and incentives
- ☒ (E) We requested the assessment of current and planned availability and aggregation of metering data from potential third-party property managers
- ☐ (F) Other
- ☐ (G) We did not include material ESG factors in our selection of third-party property managers

APPOINTMENT PROCESS OF THIRD-PARTY PROPERTY MANAGERS

| Indicator | Type of indicator | Dependent on | Gateway to | Disclosure | Subsection | PRI Principle |
|-----------|-------------------|--------------|------------|------------|--|---------------|
| RE 7 | CORE | OO 21, OO 26 | N/A | PUBLIC | Appointment process of third-party property managers | 1, 4 |

How did you include material ESG factors when appointing your current third-party property managers?

- ☒ (A) We set dedicated ESG procedures in all relevant property management phases
Select from dropdown list:
 - ☐ (1) for all of our third-party property managers
 - ☒ (2) for a majority of our third-party property managers
 - ☐ (3) for a minority of our third-party property managers
- ☒ (B) We set clear ESG reporting requirements
Select from dropdown list:
 - ☐ (1) for all of our third-party property managers
 - ☒ (2) for a majority of our third-party property managers
 - ☐ (3) for a minority of our third-party property managers
- ☒ (C) We set clear targets on material ESG factors

Select from dropdown list:

- (1) for all of our third-party property managers
- (2) for a majority of our third-party property managers
- (3) for a minority of our third-party property managers

☒ (D) We set incentives related to targets on material ESG factors

Select from dropdown list:

- (1) for all of our third-party property managers
- (2) for a majority of our third-party property managers
- (3) for a minority of our third-party property managers

☐ (E) We included responsible investment clauses in property management contracts

☐ (F) Other

○ (G) We did not include material ESG factors in the appointment of third-party property managers

MONITORING PROCESS OF THIRD-PARTY PROPERTY MANAGERS

| Indicator | Type of indicator | Dependent on | Gateway to | Disclosure | Subsection | PRI Principle |
|-----------|-------------------|--------------|------------|------------|---|---------------|
| RE 8 | CORE | OO 21, OO 26 | N/A | PUBLIC | Monitoring process of third-party property managers | 1, 4 |

How do you include material ESG factors when monitoring current third-party property managers?

☒ (A) We monitor the performance of quantitative and/or qualitative targets on material environmental factors

Select from dropdown list:

- (1) for all of our third-party property managers
- (2) for a majority of our third-party property managers
- (3) for a minority of our third-party property managers

☒ (B) We monitor the performance of quantitative and/or qualitative targets on material social factors

Select from dropdown list:

- (1) for all of our third-party property managers
- (2) for a majority of our third-party property managers
- (3) for a minority of our third-party property managers

☒ (C) We monitor the performance of quantitative and/or qualitative targets on material governance factors

Select from dropdown list:

- (1) for all of our third-party property managers
- (2) for a majority of our third-party property managers
- (3) for a minority of our third-party property managers

☒ (D) We monitor progress reports on engagement with tenants

Select from dropdown list:

- (1) for all of our third-party property managers
- (2) for a majority of our third-party property managers
- (3) for a minority of our third-party property managers

☒ (E) We require formal reporting at least yearly

Select from dropdown list:

- (1) for all of our third-party property managers
- (2) for a majority of our third-party property managers
- (3) for a minority of our third-party property managers

☒ (F) We have discussions about material ESG factors with all relevant stakeholders at least yearly

Select from dropdown list:

- (1) for all of our third-party property managers
- (2) for a majority of our third-party property managers
- (3) for a minority of our third-party property managers

☒ (G) We conduct a performance review of third-party property managers against targets on material ESG factors and/or a financial incentive structure linked to material ESG factors

Select from dropdown list:

- (1) for all of our third-party property managers
- (2) for a majority of our third-party property managers
- (3) for a minority of our third-party property managers

☒ (H) We have internal or external parties conduct site visits at least yearly

Select from dropdown list:

- (1) for all of our third-party property managers
- (2) for a majority of our third-party property managers
- (3) for a minority of our third-party property managers

☐ (I) Other

○ (J) We do not include material ESG factors in the monitoring of third-party property managers

CONSTRUCTION AND DEVELOPMENT

CONSTRUCTION REQUIREMENTS

| Indicator | Type of indicator | Dependent on | Gateway to | Disclosure | Subsection | PRI Principle |
|-----------|-------------------|--------------|------------|------------|---------------------------|---------------|
| RE 9 | CORE | OO 21, OO 24 | N/A | PUBLIC | Construction requirements | 1 |

What ESG requirements do you currently have in place for all development projects and major renovations?

- ☒ (A) We require the management of waste by diverting materials (e.g. from construction and demolition, reusable vegetation, rocks and soil) from disposal
- ☒ (B) We require the minimisation of light and noise pollution that would affect the surrounding community
- ☒ (C) We require the performance of an environmental and social site impact assessment
- ☒ (D) We require the protection of the air quality during construction
- ☐ (E) We require the protection and restoration of the habitat and soils disturbed during construction and/or during previous development
- ☒ (F) We require the protection of surface water, groundwater and aquatic ecosystems by controlling and retaining construction pollutants
- ☒ (G) We require constant monitoring of health and safety at the construction site
- ☒ (H) We require engagement with local communities and other stakeholders during the design and/or planning process
- ☐ (I) Other
- (J) We do not have ESG requirements in place for development projects and major renovations

MINIMUM BUILDING REQUIREMENTS

| Indicator | Type of indicator | Dependent on | Gateway to | Disclosure | Subsection | PRI Principle |
|-----------|-------------------|--------------|------------|------------|-------------------------------|---------------|
| RE 10 | CORE | OO 21, OO 24 | N/A | PUBLIC | Minimum building requirements | 1 |

What minimum building requirements do you have in place for development projects and major renovations?

☒ **(A) We require the implementation of the latest available metering and internet of things (IoT) technology**

Select from dropdown list:

- ☐ (1) for all development projects and major renovations
- ☒ **(2) for a majority of our development projects and major renovations**
- ☐ (3) for a minority of our development projects and major renovations

☒ **(B) We require the building to be able to obtain a recognised green and/or healthy building certification for new buildings**

Select from dropdown list:

- ☐ (1) for all development projects and major renovations
- ☒ **(2) for a majority of our development projects and major renovations**
- ☐ (3) for a minority of our development projects and major renovations

☒ **(C) We require the use of certified (or labelled) sustainable building materials**

Select from dropdown list:

- ☐ (1) for all development projects and major renovations
- ☒ **(2) for a majority of our development projects and major renovations**
- ☐ (3) for a minority of our development projects and major renovations

☒ **(D) We require the installation of renewable energy technologies where feasible**

Select from dropdown list:

- ☐ (1) for all development projects and major renovations
- ☒ **(2) for a majority of our development projects and major renovations**
- ☐ (3) for a minority of our development projects and major renovations

☐ **(E) We require that development projects and major renovations become net-zero carbon emitters within five years of completion of the construction**

☒ **(F) We require water conservation measures**

Select from dropdown list:

- ☐ (1) for all development projects and major renovations
- ☒ **(2) for a majority of our development projects and major renovations**
- ☐ (3) for a minority of our development projects and major renovations

☒ **(G) We require common health and well-being measures for occupants**

Select from dropdown list:

- ☐ (1) for all development projects and major renovations
- ☒ **(2) for a majority of our development projects and major renovations**
- ☐ (3) for a minority of our development projects and major renovations

☐ **(H) Other**

- ☐ (I) We do not have minimum building requirements in place for development projects and major renovations

POST-INVESTMENT

MONITORING

| Indicator | Type of indicator | Dependent on | Gateway to | Disclosure | Subsection | PRI Principle |
|-----------|-------------------|--------------|------------|------------|------------|---------------|
| RE 11 | CORE | OO 21 | RE 11.1 | PUBLIC | Monitoring | 1 |

During the reporting year, did you track one or more KPIs on material ESG factors across your real estate investments?

☒ (A) Yes, we tracked KPIs on environmental factors

Percentage of real estate assets this applies to:

- ☐ (1) >0 to 10%
- ☐ (2) >10 to 50%
- ☐ (3) >50 to 75%
- ☒ (4) >75 to 95%
- ☐ (5) >95%

☒ (B) Yes, we tracked KPIs on social factors

Percentage of real estate assets this applies to:

- ☒ (1) >0 to 10%
- ☐ (2) >10 to 50%
- ☐ (3) >50 to 75%
- ☐ (4) >75 to 95%
- ☐ (5) >95%

☒ (C) Yes, we tracked KPIs on governance factors

Percentage of real estate assets this applies to:

- ☒ (1) >0 to 10%
- ☐ (2) >10 to 50%
- ☐ (3) >50 to 75%
- ☐ (4) >75 to 95%
- ☐ (5) >95%

☐ (D) We did not track KPIs on material ESG factors across our real estate investments

| Indicator | Type of indicator | Dependent on | Gateway to | Disclosure | Subsection | PRI Principle |
|-----------|-------------------|--------------|------------|------------|------------|---------------|
| RE 12 | CORE | OO 21 | N/A | PUBLIC | Monitoring | 1 |

During the reporting year, what ESG building performance data did you collect for your real estate assets?

☒ (A) Energy consumption

Select from dropdown list:

- ☐ (1) for all of our real estate assets
- ☒ (2) for a majority of our real estate assets
- ☐ (3) for a minority of our real estate assets

☒ (B) Water consumption

Select from dropdown list:

- ☐ (1) for all of our real estate assets
- ☒ (2) for a majority of our real estate assets
- ☐ (3) for a minority of our real estate assets

☒ (C) Waste production

Select from dropdown list:

- ☐ (1) for all of our real estate assets
- ☒ (2) for a majority of our real estate assets
- ☐ (3) for a minority of our real estate assets

☐ (D) Other

- ☐ (E) We did not collect ESG building performance data for our real estate assets

| Indicator | Type of indicator | Dependent on | Gateway to | Disclosure | Subsection | PRI Principle |
|-----------|-------------------|--------------|------------|------------|------------|---------------|
| RE 13 | CORE | OO 21, OO 26 | RE 13.1 | PUBLIC | Monitoring | 1, 2 |

What processes do you have in place to support meeting your targets on material ESG factors for your real estate investments?

☒ (A) We use operational-level benchmarks to assess and analyse the performance of assets against sector performance

Select from dropdown list:

- ☐ (1) for all of our real estate assets
- ☒ (2) for a majority of our real estate assets
- ☐ (3) for a minority of our real estate assets

☒ (B) We implement certified environmental and social management systems across our portfolio

Select from dropdown list:

- ☐ (1) for all of our real estate assets
- ☒ (2) for a majority of our real estate assets
- ☐ (3) for a minority of our real estate assets

☒ (C) We make sufficient budget available to ensure that the systems and procedures needed are established

Select from dropdown list:

- ☐ (1) for all of our real estate assets
- ☒ (2) for a majority of our real estate assets
- ☐ (3) for a minority of our real estate assets

☒ (D) We hire external verification services to audit performance, systems, and procedures

Select from dropdown list:

- ☐ (1) for all of our real estate assets
- ☒ (2) for a majority of our real estate assets
- ☐ (3) for a minority of our real estate assets

☒ (E) We collaborate and engage with our third-party property managers and/or tenants to develop action plans

Select from dropdown list:

- ☐ (1) for all of our real estate assets
- ☒ (2) for a majority of our real estate assets
- ☐ (3) for a minority of our real estate assets

☒ (F) We develop minimum health and safety standards

Select from dropdown list:

- ☐ (1) for all of our real estate assets
- ☒ (2) for a majority of our real estate assets
- ☐ (3) for a minority of our real estate assets

☐ (G) We conduct ongoing engagement with all key stakeholders, e.g. local communities, NGOs, governments, and end-users

☐ (H) Other

- (I) We do not have processes in place to help meet our targets on material ESG factors for our real estate investments

| Indicator | Type of indicator | Dependent on | Gateway to | Disclosure | Subsection | PRI Principle |
|-----------|-------------------|--------------|------------|------------|------------|---------------|
| RE 14 | CORE | OO 21 | N/A | PUBLIC | Monitoring | 1, 2 |

Post-investment, how do you manage material ESG risks and ESG opportunities to create value during the holding period?

☒ **(A) We develop property-specific ESG action plans based on pre-investment research, due diligence and materiality findings**

Select from dropdown list:

- ☒ **(1) for all of our real estate investments**
- (2) for a majority of our real estate investments
- (3) for a minority of our real estate investments

☒ **(B) We adjust our ESG action plans based on performance monitoring findings at least yearly**

Select from dropdown list:

- (1) for all of our real estate investments
- ☒ **(2) for a majority of our real estate investments**
- (3) for a minority of our real estate investments

☒ **(C) We, or the external advisors that we hire, support our real estate investments with specific ESG value-creation opportunities**

Select from dropdown list:

- ☒ **(1) for all of our real estate investments**
- (2) for a majority of our real estate investments
- (3) for a minority of our real estate investments

☐ (D) Other

- (E) We do not manage material ESG risks and opportunities post-investment

| Indicator | Type of indicator | Dependent on | Gateway to | Disclosure | Subsection | PRI Principle |
|-----------|-------------------|--------------|------------|------------|------------|---------------|
| RE 17 | CORE | OO 21 | N/A | PUBLIC | Monitoring | 1 |

What proportion of your real estate assets has obtained a green or sustainable building certification?

- (A) All of our real estate assets have obtained a green or sustainable building certification
- (B) A majority of our real estate assets have obtained a green or sustainable building certification
- ☒ **(C) A minority of our real estate assets have obtained a green or sustainable building certification**
- (D) None of our real estate assets have obtained a green or sustainable building certification

STAKEHOLDER ENGAGEMENT

| Indicator | Type of indicator | Dependent on | Gateway to | Disclosure | Subsection | PRI Principle |
|-----------|-------------------|--------------|------------|------------|------------------------|---------------|
| RE 18 | CORE | OO 21 | N/A | PUBLIC | Stakeholder engagement | 1, 2 |

How does your third-party property manager(s) engage with tenants?

☒ (A) They engage with real estate tenants on energy, water consumption and/or waste production

Select from dropdown list:

- ☐ (1) for all of our buildings or properties
- ☒ (2) for a majority of our buildings or properties
- ☐ (3) for a minority of our buildings or properties

☒ (B) They engage with real estate tenants by organising tenant events focused on increasing sustainability awareness, ESG training and guidance

Select from dropdown list:

- ☐ (1) for all of our buildings or properties
- ☒ (2) for a majority of our buildings or properties
- ☐ (3) for a minority of our buildings or properties

☒ (C) They engage with real estate tenants by offering green leases

Select from dropdown list:

- ☐ (1) for all of our buildings or properties
- ☒ (2) for a majority of our buildings or properties
- ☐ (3) for a minority of our buildings or properties

☒ (D) They engage with real estate tenants by identifying collaboration opportunities that support targets related to material ESG factors

Select from dropdown list:

- ☐ (1) for all of our buildings or properties
- ☐ (2) for a majority of our buildings or properties
- ☒ (3) for a minority of our buildings or properties

☒ (E) They engage with real estate tenants by offering shared financial benefits from equipment upgrades

Select from dropdown list:

- ☐ (1) for all of our buildings or properties
- ☒ (2) for a majority of our buildings or properties
- ☐ (3) for a minority of our buildings or properties

☐ (F) Other

- ☐ (G) Our third-party property manager(s) do not engage with tenants

| Indicator | Type of indicator | Dependent on | Gateway to | Disclosure | Subsection | PRI Principle |
|-----------|-------------------|--------------|------------|------------|------------|---------------|
| RE 20 | CORE | OO 21 | N/A | PUBLIC | Exit | 4, 6 |

During the reporting year, what responsible investment information was shared with potential buyers of real estate investments?

☒ (A) Our firm's high-level commitment to responsible investment, e.g. that we are a PRI signatory

Select from dropdown list:

- ☐ (1) for all of our real estate investments
- ☒ (2) for a majority of our real estate investments
- ☐ (3) for a minority of our real estate investments

☒ (B) A description of what industry and asset class standards our firm aligns with, e.g. TCFD or GRESB

Select from dropdown list:

- ☐ (1) for all of our real estate investments
- ☒ (2) for a majority of our real estate investments
- ☐ (3) for a minority of our real estate investments

☒ (C) Our firm's responsible investment policy (at minimum, a summary of key aspects and firm-specific approach)

Select from dropdown list:

- ☐ (1) for all of our real estate investments
- ☒ (2) for a majority of our real estate investments
- ☐ (3) for a minority of our real estate investments

☒ (D) Our firm's ESG risk assessment methodology (topics covered in-house and/or with external support)

Select from dropdown list:

- ☐ (1) for all of our real estate investments
- ☒ (2) for a majority of our real estate investments
- ☐ (3) for a minority of our real estate investments

☐ (E) The outcome of our latest ESG risk assessment of the property(s)

☐ (F) Key ESG performance data on the property(s) being sold

☐ (G) Other

☐ (H) No responsible investment information was shared with potential buyers of real estate investments during the reporting year

☐ (I) Not applicable; we had no sales process (or control over the sales process) during the reporting year

DISCLOSURE OF ESG PORTFOLIO INFORMATION

| Indicator | Type of indicator | Dependent on | Gateway to | Disclosure | Subsection | PRI Principle |
|-----------|-------------------|--------------|------------|------------|---|---------------|
| RE 21 | CORE | OO 21 | N/A | PUBLIC | Disclosure of ESG portfolio information | 6 |

During the reporting year, how did you report on your targets on material ESG factors and related data to your investors?

- ☒ (A) We reported through a publicly disclosed sustainability report
- ☒ (B) We reported in aggregate through formal reporting to investors
- ☒ (C) We reported at the property level through formal reporting to investors
- ☐ (D) We reported through a limited partners advisory committee (or equivalent)
- ☒ (E) We reported at digital or physical events or meetings with investors
- ☒ (F) We had a process in place to ensure that serious ESG incidents were reported
- ☐ (G) Other
- ☐ (H) We did not report our targets on material ESG factors and related data to our investors during the reporting year

INFRASTRUCTURE (INF)

POLICY

INVESTMENT GUIDELINES

| Indicator | Type of indicator | Dependent on | Gateway to | Disclosure | Subsection | PRI Principle |
|-----------|-------------------|---------------------|------------|------------|-----------------------|---------------|
| INF 1 | CORE | OO 21, OO 29, OO 30 | N/A | PUBLIC | Investment guidelines | 1 to 6 |

What infrastructure-specific ESG guidelines are currently covered in your organisation's responsible investment policy(ies)?

- ☒ (A) Guidelines on our ESG approach tailored to each infrastructure sector and geography where we invest
- ☒ (C) Guidelines on our ESG approach to brownfield investments
- ☒ (D) Guidelines on pre-investment screening
- ☐ (E) Guidelines on our approach to ESG integration into short-term or 100-day plans (or equivalent)
- ☒ (F) Guidelines on our approach to ESG integration into long-term value-creation efforts
- ☒ (G) Guidelines on our approach to ESG reporting
- ☐ (H) Guidelines on our engagement approach related to the workforce
- ☒ (I) Guidelines on our engagement approach related to third-party operators
- ☐ (J) Guidelines on our engagement approach related to contractors
- ☐ (K) Guidelines on our engagement approach related to other external stakeholders, e.g. governments, local communities, and end-users
- ☐ (L) Our responsible investment policy(ies) does not cover infrastructure-specific ESG guidelines

FUNDRAISING

COMMITMENTS TO INVESTORS

| Indicator | Type of indicator | Dependent on | Gateway to | Disclosure | Subsection | PRI Principle |
|-----------|-------------------|--------------|------------|------------|--------------------------|---------------|
| INF 2 | CORE | OO 21 | N/A | PUBLIC | Commitments to investors | 1, 4 |

For all of the funds that you closed during the reporting year, what type of formal responsible investment commitments did you make in Limited Partnership Agreements (LPAs), side letters, or other constitutive fund documents?

- ☒ (A) We incorporated responsible investment commitments in LPAs (or equivalent) as a standard default procedure
- ☐ (B) We added responsible investment commitments in LPAs (or equivalent) upon a client's request
- ☐ (C) We added responsible investment commitments in side letters upon a client's request
- ☐ (D) We did not make any formal responsible investment commitments for the relevant reporting year
- ☐ (E) Not applicable; we have not raised funds in the last five years

PRE-INVESTMENT

MATERIALITY ANALYSIS

| Indicator | Type of indicator | Dependent on | Gateway to | Disclosure | Subsection | PRI Principle |
|-----------|-------------------|--------------|------------|------------|----------------------|---------------|
| INF 3 | CORE | OO 21 | INF 3.1 | PUBLIC | Materiality analysis | 1 |

During the reporting year, how did you conduct ESG materiality analysis for your potential infrastructure investments?

- ☒ (A) We assessed ESG materiality at the asset level, as each case is unique
 - Select from dropdown list
 - ☒ (1) for all of our potential infrastructure investments
 - ☐ (2) for a majority of our potential infrastructure investments
 - ☐ (3) for a minority of our potential infrastructure investments
- ☐ (B) We performed a mix of industry-level and asset-level ESG materiality analyses
- ☐ (C) We assessed ESG materiality at the industry level only
- ☐ (D) We did not conduct ESG materiality analysis for our potential infrastructure investments

| Indicator | Type of indicator | Dependent on | Gateway to | Disclosure | Subsection | PRI Principle |
|-----------|-------------------|--------------|------------|------------|----------------------|---------------|
| INF 3.1 | CORE | INF 3 | N/A | PUBLIC | Materiality analysis | 1 |

During the reporting year, what tools, standards and data did you use in your ESG materiality analysis of potential infrastructure investments?

- ☐ (A) We used GRI standards to inform our infrastructure ESG materiality analysis
- ☒ (B) We used SASB standards to inform our infrastructure ESG materiality analysis
- ☒ (C) We used the UN Sustainable Development Goals (SDGs) to inform our infrastructure ESG materiality analysis
- ☒ (D) We used the GRESB Materiality Assessment (RC7) or similar to inform our infrastructure ESG materiality analysis
- ☒ (E) We used the environmental and social factors detailed in the IFC Performance Standards (or similar standards used by development finance institutions) in our infrastructure ESG materiality analysis
- ☐ (F) We used climate disclosures, such as the TCFD recommendations or other climate risk and/or exposure analysis tools, to inform our infrastructure ESG materiality analysis
- ☐ (G) We used the UN Guiding Principles on Business and Human Rights (UNGPs) to inform our infrastructure ESG materiality analysis
- ☐ (H) We used geopolitical and macro-economic considerations in our infrastructure ESG materiality analysis
- ☐ (I) We engaged with existing owners and/or managers (or developers for new infrastructure assets) to inform our infrastructure ESG materiality analysis
- ☐ (J) Other

DUE DILIGENCE

| Indicator | Type of indicator | Dependent on | Gateway to | Disclosure | Subsection | PRI Principle |
|-----------|-------------------|--------------|------------|------------|---------------|---------------|
| INF 4 | CORE | OO 21 | N/A | PUBLIC | Due diligence | 1 |

During the reporting year, how did material ESG factors influence the selection of your infrastructure investments?

- ☒ (A) Material ESG factors were used to identify risks
 - Select from dropdown list
 - ☒ (1) for all of our potential infrastructure investments
 - ☐ (2) for a majority of our potential infrastructure investments
 - ☐ (3) for a minority of our potential infrastructure investments
- ☐ (B) Material ESG factors were discussed by the investment committee (or equivalent)
- ☐ (C) Material ESG factors were used to identify remedial actions for our 100-day plans (or equivalent)
- ☐ (D) Material ESG factors were used to identify opportunities for value creation
- ☐ (E) Material ESG factors informed our decision to abandon potential investments in the due diligence phase in cases where ESG risks were considered too high to mitigate
- ☐ (F) Material ESG factors impacted investments in terms of the price offered and/or paid
- ☐ (G) Material ESG factors did not influence the selection of our infrastructure investments

| Indicator | Type of indicator | Dependent on | Gateway to | Disclosure | Subsection | PRI Principle |
|-----------|-------------------|--------------|------------|------------|---------------|---------------|
| INF 5 | CORE | OO 21 | N/A | PUBLIC | Due diligence | 1 |

Once material ESG factors have been identified, what processes do you use to conduct due diligence on these factors for potential infrastructure investments?

- ☒ (A) We conduct a high-level or desktop review against an ESG checklist for initial red flags

Select from dropdown list

- ☒ (1) for all of our potential infrastructure investments
- ☐ (2) for a majority of our potential infrastructure investments
- ☐ (3) for a minority of our potential infrastructure investments

☒ (B) We send detailed ESG questionnaires to target assets

Select from dropdown list

- ☒ (1) for all of our potential infrastructure investments
- ☐ (2) for a majority of our potential infrastructure investments
- ☐ (3) for a minority of our potential infrastructure investments

☐ (C) We hire third-party consultants to do technical due diligence on specific material ESG factors

☒ (D) We conduct site visits

Select from dropdown list

- ☒ (1) for all of our potential infrastructure investments
- ☐ (2) for a majority of our potential infrastructure investments
- ☐ (3) for a minority of our potential infrastructure investments

☒ (E) We conduct in-depth interviews with management and/or personnel

Select from dropdown list

- ☒ (1) for all of our potential infrastructure investments
- ☐ (2) for a majority of our potential infrastructure investments
- ☐ (3) for a minority of our potential infrastructure investments

☐ (F) We conduct detailed external stakeholder analyses and/or engagement

☒ (G) We incorporate ESG due diligence findings in all of our relevant investment process documentation in the same manner as other key due diligence, e.g. commercial, accounting and legal

Select from dropdown list

- ☒ (1) for all of our potential infrastructure investments
- ☐ (2) for a majority of our potential infrastructure investments
- ☐ (3) for a minority of our potential infrastructure investments

☒ (H) Our investment committee (or an equivalent decision-making body) is ultimately responsible for ensuring all ESG due diligence is completed in the same manner as for other key due diligence, e.g. commercial, accounting and legal

Select from dropdown list

- ☒ (1) for all of our potential infrastructure investments
- ☐ (2) for a majority of our potential infrastructure investments
- ☐ (3) for a minority of our potential infrastructure investments

☐ (I) Other

- ☐ (J) We do not conduct due diligence on material ESG factors for potential infrastructure investments

SELECTION, APPOINTMENT AND MONITORING OF THIRD-PARTY OPERATORS

SELECTION PROCESS OF THIRD-PARTY OPERATORS

| Indicator | Type of indicator | Dependent on | Gateway to | Disclosure | Subsection | PRI Principle |
|-----------|-------------------|--------------|------------|------------|--|---------------|
| INF 6 | CORE | OO 21, OO 30 | N/A | PUBLIC | Selection process of third-party operators | 1, 4 |

During the reporting year, how did you include material ESG factors in all of your selections of third-party operators?

- ☒ (A) We requested information from potential third-party operators on their overall approach to material ESG factors
- ☒ (B) We requested track records and examples from potential third-party operators on how they manage material ESG factors
- ☒ (C) We requested information from potential third-party operators on their engagement process(es) with stakeholders
- ☒ (D) We requested documentation from potential third-party operators on their responsible procurement and/or contractor practices, including responsibilities, approach, and incentives
- ☐ (E) Other
- ☐ (F) We did not include material ESG factors in our selection of third-party operators

APPOINTMENT PROCESS OF THIRD-PARTY OPERATORS

| Indicator | Type of indicator | Dependent on | Gateway to | Disclosure | Subsection | PRI Principle |
|-----------|-------------------|--------------|------------|------------|--|---------------|
| INF 7 | CORE | OO 21, OO 30 | N/A | PUBLIC | Appointment process of third-party operators | 1, 4 |

How did you include material ESG factors when appointing your current third-party operators?

- ☒ (A) We set clear and detailed expectations for incorporating material ESG factors into all relevant elements of infrastructure asset management
 - Select from dropdown list
 - ☒ (1) for all of our third-party operators
 - ☐ (2) for a majority of our third-party operators
 - ☐ (3) for a minority of our third-party operators
- ☒ (B) We set clear ESG reporting requirements
 - Select from dropdown list
 - ☒ (1) for all of our third-party operators
 - ☐ (2) for a majority of our third-party operators
 - ☐ (3) for a minority of our third-party operators
- ☒ (C) We set clear targets for material ESG factors
 - Select from dropdown list
 - ☒ (1) for all of our third-party operators
 - ☐ (2) for a majority of our third-party operators
 - ☐ (3) for a minority of our third-party operators
- ☐ (D) We set incentives related to targets on material ESG factors
- ☐ (E) Other
- ☐ (F) We did not include material ESG factors when appointing third-party operators

MONITORING PROCESS OF THIRD-PARTY OPERATORS

| Indicator | Type of indicator | Dependent on | Gateway to | Disclosure | Subsection | PRI Principle |
|-----------|-------------------|--------------|------------|------------|---|---------------|
| INF 8 | CORE | OO 21, OO 30 | N/A | PUBLIC | Monitoring process of third-party operators | 1, 4 |

How do you include material ESG factors when monitoring current third-party operators?

- ☒ (A) We monitor the performance of quantitative and/or qualitative targets on material environmental factors
 - Select from dropdown list
 - ☒ (1) for all of our third-party operators
 - ☐ (2) for a majority of our third-party operators
 - ☐ (3) for a minority of our third-party operators
- ☒ (B) We monitor the performance of quantitative and/or qualitative targets on material social factors
 - Select from dropdown list
 - ☒ (1) for all of our third-party operators
 - ☐ (2) for a majority of our third-party operators
 - ☐ (3) for a minority of our third-party operators
- ☒ (C) We monitor the performance of quantitative and/or qualitative targets on material governance factors
 - Select from dropdown list
 - ☒ (1) for all of our third-party operators
 - ☐ (2) for a majority of our third-party operators
 - ☐ (3) for a minority of our third-party operators
- ☒ (D) We require formal reporting at least yearly
 - Select from dropdown list
 - ☒ (1) for all of our third-party operators
 - ☐ (2) for a majority of our third-party operators
 - ☐ (3) for a minority of our third-party operators
- ☒ (E) We have discussions about material ESG factors with all relevant stakeholders at least yearly
 - Select from dropdown list
 - ☒ (1) for all of our third-party operators
 - ☐ (2) for a majority of our third-party operators
 - ☐ (3) for a minority of our third-party operators
- ☐ (F) We conduct a performance review of third-party operators against targets on material ESG factors and/or a financial incentive structure linked to material ESG factors
- ☐ (G) We have internal or external parties conduct site visits at least yearly
- ☐ (H) Other
- ☐ (I) We do not include material ESG factors in the monitoring of third-party operators

POST-INVESTMENT

MONITORING

| Indicator | Type of indicator | Dependent on | Gateway to | Disclosure | Subsection | PRI Principle |
|-----------|-------------------|--------------|------------|------------|------------|---------------|
| INF 9 | CORE | OO 21 | INF 9.1 | PUBLIC | Monitoring | 1 |

During the reporting year, did you track one or more KPIs on material ESG factors across your infrastructure investments?

☒ (A) Yes, we tracked KPIs on environmental factors

Percentage of infrastructure assets this applies to:

- ☐ (1) >0 to 10%
- ☐ (2) >10 to 50%
- ☐ (3) >50 to 75%
- ☐ (4) >75 to 95%

☒ (5) >95%

☒ (B) Yes, we tracked KPIs on social factors

Percentage of infrastructure assets this applies to:

- ☐ (1) >0 to 10%
- ☐ (2) >10 to 50%
- ☐ (3) >50 to 75%
- ☐ (4) >75 to 95%

☒ (5) >95%

☒ (C) Yes, we tracked KPIs on governance factors

Percentage of infrastructure assets this applies to:

- ☐ (1) >0 to 10%
- ☐ (2) >10 to 50%
- ☐ (3) >50 to 75%
- ☐ (4) >75 to 95%

☒ (5) >95%

- ☐ (D) We did not track KPIs on material ESG factors across our infrastructure investments

| Indicator | Type of indicator | Dependent on | Gateway to | Disclosure | Subsection | PRI Principle |
|-----------|-------------------|--------------|------------|------------|------------|---------------|
| INF 9.1 | PLUS | INF 9 | N/A | PUBLIC | Monitoring | 1 |

Provide examples of KPIs on material ESG factors you tracked across your infrastructure investments during the reporting year.

(A) ESG KPI #1

Scope 1-3 emissions

(B) ESG KPI #2

Carbon Footprint

(C) ESG KPI #3

Carbon Intensity

(D) ESG KPI #4

Gender Pay Gap

(E) ESG KPI #5

Hazardous Waste Ratio

(F) ESG KPI #6

Violations of UNGC

(G) ESG KPI #7

Board Gender Diversity

(H) ESG KPI #8

Emissions to Water

(I) ESG KPI #9

Biodiversity

(J) ESG KPI #10

Business Integrity and Governance Checks

| Indicator | Type of indicator | Dependent on | Gateway to | Disclosure | Subsection | PRI Principle |
|-----------|-------------------|--------------|------------|------------|------------|---------------|
| INF 10 | CORE | OO 21, OO 30 | INF 10.1 | PUBLIC | Monitoring | 1, 2 |

What processes do you have in place to support meeting your targets on material ESG factors for your infrastructure investments?

- ☐ (A) We use operational-level benchmarks to assess and analyse the performance of assets against sector performance
- ☒ **(B) We implement international best practice standards such as the IFC Performance Standards to guide ongoing assessments and analyses**
Select from dropdown list
- ☒ **(1) for all of our infrastructure investments**
 - ☐ (2) for a majority of our infrastructure investments
 - ☐ (3) for a minority of our infrastructure investments
- ☐ (C) We implement certified environmental and social management systems across our portfolio
- ☐ (D) We make sufficient budget available to ensure that the systems and procedures needed are established
- ☐ (E) We hire external verification services to audit performance, systems, and procedures
- ☒ **(F) We collaborate and engage with our third-party operators to develop action plans**
Select from dropdown list
- ☒ **(1) for all of our infrastructure investments**
 - ☐ (2) for a majority of our infrastructure investments
 - ☐ (3) for a minority of our infrastructure investments
- ☒ **(G) We develop minimum health and safety standards**

Select from dropdown list

- ☒ (1) for all of our infrastructure investments
- ☐ (2) for a majority of our infrastructure investments
- ☐ (3) for a minority of our infrastructure investments

☒ (H) We conduct ongoing engagement with all key stakeholders, e.g. local communities, NGOs, governments, and end-users

Select from dropdown list

- ☒ (1) for all of our infrastructure investments
- ☐ (2) for a majority of our infrastructure investments
- ☐ (3) for a minority of our infrastructure investments

☒ (I) Other

Specify:

We meet and monitor fund's material ESG factors through:

proprietary research (SASB standards),

thematic SDG alignments,

ESG model based on FMO Model developed by the Dutch Development Bank (monitoring ESG risk & opportunities). This draws on the developments of the IFC Performance Standards, the Corporate Governance Development Framework, and the UK's Development Finance Institution (CDFI).

Exclusion Screening: specific industries, normative screening following the UNGC principles.

Select from dropdown list

- ☒ (1) for all of our infrastructure investments
- ☐ (2) for a majority of our infrastructure investments
- ☐ (3) for a minority of our infrastructure investments
- ☐ (J) We do not have processes in place to help meet our targets on material ESG factors for our infrastructure investments

| Indicator | Type of indicator | Dependent on | Gateway to | Disclosure | Subsection | PRI Principle |
|-----------|-------------------|--------------|------------|------------|------------|---------------|
| INF 10.1 | PLUS | INF 10 | N/A | PUBLIC | Monitoring | 1, 2 |

Describe up to two processes you put in place during the reporting year to support meeting your targets on material ESG factors.

(A) Process one

Process one: In this asset class we are the outright or substantial majority holders in the assets and companies in our portfolios, thus our views are conveyed directly through our ownership.

(B) Process two

The fund follows its custom-build investment framework "OMS" (Operational, Macroeconomic, Sustainable), where a progressive approach to assessing and integrating sustainability risks and opportunities is undertaken through the above-mentioned ownership structures of the assets and companies.

The proactive approach to sustainability risks and opportunities is driven through a combination of sustainability concepts which include (but are not limited to):

- Exclusion screening based on specific industries as well as exclusion based on normative screening following the UN Global Compact principles.
- ESG model to monitor ESG risks and opportunities based on the FMO Model developed by the Dutch Development Bank.

The FMO itself draws on the developments of the IFC Performance Standards, the Corporate Governance Development Framework, and the UK's Development Finance Institution (CDC).

- Thematic SDG alignments with an impact analysis tailored to the asset as well as scoring based on additive impact generated based on the countries current SDGs achievement and trend towards the goal achievements (time series).

Covering 58 measures across 18 ESG themes, allows the fund to engage with all companies and asset actively and regularly regarding all ESG sustainability risks and opportunities.

| Indicator | Type of indicator | Dependent on | Gateway to | Disclosure | Subsection | PRI Principle |
|-----------|-------------------|--------------|------------|------------|------------|---------------|
| INF 11 | CORE | OO 21 | N/A | PUBLIC | Monitoring | 1, 2 |

Post-investment, how do you manage material ESG risks and ESG opportunities to create value during the holding period of your investments?

☒ **(A) We develop asset-specific ESG action plans based on pre-investment research, due diligence and materiality findings**

Select from dropdown list

- ☒ **(1) for all of our infrastructure investments**
- ☐ (2) for a majority of our infrastructure investments
- ☐ (3) for a minority of our infrastructure investments

☒ **(B) We adjust our ESG action plans based on performance monitoring findings at least yearly**

Select from dropdown list

- ☒ **(1) for all of our infrastructure investments**
- ☐ (2) for a majority of our infrastructure investments
- ☐ (3) for a minority of our infrastructure investments

☒ **(C) We, or the external advisors that we hire, support our infrastructure investments with specific ESG value-creation opportunities**

Select from dropdown list

- ☒ **(1) for all of our infrastructure investments**
- ☐ (2) for a majority of our infrastructure investments
- ☐ (3) for a minority of our infrastructure investments

☒ **(D) Other**

Specify:

The fund follows its custom-build investment framework "OMS" (Operational, Macroeconomic, Sustainable), where a progressive approach to assessing and integrating sustainability risks and opportunities is undertaken through the above-mentioned ownership structures of the assets and companies. Covering 58 measures across 18 ESG themes, allows the fund to engage with all companies and asset actively and regularly regarding all ESG sustainability risks and opportunities.

Select from dropdown list

- ☒ **(1) for all of our infrastructure investments**
- ☐ (2) for a majority of our infrastructure investments
- ☐ (3) for a minority of our infrastructure investments
- ☐ (E) We do not manage material ESG risks and opportunities post-investment

| Indicator | Type of indicator | Dependent on | Gateway to | Disclosure | Subsection | PRI Principle |
|-----------|-------------------|--------------|------------|------------|------------|---------------|
| INF 14 | CORE | OO 21 | INF 14.1 | PUBLIC | Monitoring | 1, 2 |

How do you ensure that adequate ESG-related competence exists at the asset level?

☒ **(A) We assign our board responsibility for ESG matters**

Select from dropdown list

- ☒ **(1) for all of our infrastructure investments**
- ☐ (2) for a majority of our infrastructure investments
- ☐ (3) for a minority of our infrastructure investments

☒ **(B) We ensure that material ESG matters are discussed by our board at least yearly**

Select from dropdown list

- ☒ **(1) for all of our infrastructure investments**
- ☐ (2) for a majority of our infrastructure investments
- ☐ (3) for a minority of our infrastructure investments

☐ **(C) We provide training on ESG aspects and management best practices relevant to the asset to C-suite executives only**

☒ **(D) We provide training on ESG aspects and management best practices relevant to the asset to employees (excl. C-suite executives)**

Select from dropdown list

- ☒ **(1) for all of our infrastructure investments**
- ☐ (2) for a majority of our infrastructure investments
- ☐ (3) for a minority of our infrastructure investments

☒ **(E) We support the asset by finding external ESG expertise, e.g. consultants or auditors**

Select from dropdown list

- ☒ **(1) for all of our infrastructure investments**
- ☐ (2) for a majority of our infrastructure investments
- ☐ (3) for a minority of our infrastructure investments

☐ **(F) We share best practices across assets, e.g. educational sessions and the implementation of environmental and social management systems**

☐ **(G) We apply penalties or incentives to improve ESG performance in management remuneration schemes**

☒ **(H) Other**

Specify:

Monthly ESG meetings with the assets where various ESG topics are being discussed.

Select from dropdown list

- ☒ **(1) for all of our infrastructure investments**
- ☐ (2) for a majority of our infrastructure investments
- ☐ (3) for a minority of our infrastructure investments

☐ **(I) We do not ensure that adequate ESG-related competence exists at the asset level**

EXIT

| Indicator | Type of indicator | Dependent on | Gateway to | Disclosure | Subsection | PRI Principle |
|-----------|-------------------|--------------|------------|------------|------------|---------------|
| INF 16 | CORE | OO 21 | N/A | PUBLIC | Exit | 4, 6 |

During the reporting year, what responsible investment information was shared with potential buyers of infrastructure investments?

- ☐ (A) Our firm's high-level commitment to responsible investment, e.g. that we are a PRI signatory
- ☐ (B) A description of what industry and asset class standards our firm aligns with, e.g. TCFD or GRESB
- ☐ (C) Our firm's responsible investment policy (at minimum, a summary of key aspects and firm-specific approach)
- ☐ (D) Our firm's ESG risk assessment methodology (topics covered in-house and/or with external support)
- ☐ (E) The outcome of our latest ESG risk assessment on the asset or portfolio company
- ☐ (F) Key ESG performance data on the asset or portfolio company being sold
- ☐ (G) Other
 - ☐ (H) No responsible investment information was shared with potential buyers of infrastructure investments during the reporting year
- ☒ (I) Not applicable; we had no sales process (or control over the sales process) during the reporting year

DISCLOSURE OF ESG PORTFOLIO INFORMATION

| Indicator | Type of indicator | Dependent on | Gateway to | Disclosure | Subsection | PRI Principle |
|-----------|-------------------|--------------|------------|------------|---|---------------|
| INF 17 | CORE | OO 21 | N/A | PUBLIC | Disclosure of ESG portfolio information | 6 |

During the reporting year, how did you report your targets on material ESG factors and related data to your investors?

- ☒ (A) We reported through a publicly-disclosed sustainability report
- ☒ (B) We reported in aggregate through formal reporting to investors
- ☒ (C) We reported at the asset level through formal reporting to investors
- ☐ (D) We reported through a limited partners advisory committee (or equivalent)
- ☐ (E) We reported at digital or physical events or meetings with investors
- ☐ (F) We had a process in place to ensure that reporting on serious ESG incidents occurred
- ☐ (G) Other
 - ☐ (H) We did not report our targets on material ESG factors and related data to our investors during the reporting year

PRIVATE EQUITY (PE)

POLICY

INVESTMENT GUIDELINES

| Indicator | Type of indicator | Dependent on | Gateway to | Disclosure | Subsection | PRI Principle |
|-----------|-------------------|--------------|------------|------------|-----------------------|---------------|
| PE 1 | CORE | OO 21 | N/A | PUBLIC | Investment guidelines | 1 to 6 |

What private equity-specific ESG guidelines are currently covered in your organisation's responsible investment policy(ies)?

- ☐ (A) Guidelines on our ESG approach tailored to the sector(s) and geography(ies) where we invest
- ☒ (B) Guidelines on our ESG approach tailored to the strategy(ies) and company stage(s) where we invest, e.g. venture capital, buy-out and distressed
- ☒ (C) Guidelines on pre-investment screening
- ☒ (D) Guidelines on minimum ESG due diligence requirements
- ☒ (E) Guidelines on our approach to ESG integration into short-term or 100-day plans (or equivalent)
- ☒ (F) Guidelines on our approach to ESG integration into long-term value-creation efforts
- ☒ (G) Guidelines on our approach to monitoring ESG risks, ESG opportunities and ESG incidents
- ☒ (H) Guidelines on our approach to ESG reporting
- ☐ (I) Our responsible investment policy(ies) does not cover private equity-specific ESG guidelines

FUNDRAISING

COMMITMENTS TO INVESTORS

| Indicator | Type of indicator | Dependent on | Gateway to | Disclosure | Subsection | PRI Principle |
|-----------|-------------------|--------------|------------|------------|--------------------------|---------------|
| PE 2 | CORE | OO 21 | N/A | PUBLIC | Commitments to investors | 1, 4 |

For all of the funds that you closed during the reporting year, what type of formal responsible investment commitments did you make in Limited Partnership Agreements (LPAs), side letters or other constitutive fund documents?

- ☒ (A) We incorporated responsible investment commitments in LPAs (or equivalent) as a standard default procedure
- ☐ (B) We added responsible investment commitments in LPAs (or equivalent) upon clients' request
- ☐ (C) We added responsible investment commitments in side letters upon clients' request
- ☐ (D) We did not make any formal responsible investment commitments for the relevant reporting year
- ☐ (E) Not applicable; we have not raised funds in the last five years

PRE-INVESTMENT

MATERIALITY ANALYSIS

| Indicator | Type of indicator | Dependent on | Gateway to | Disclosure | Subsection | PRI Principle |
|-----------|-------------------|--------------|------------|------------|----------------------|---------------|
| PE 3 | CORE | OO 21 | PE 3.1 | PUBLIC | Materiality analysis | 1 |

During the reporting year, how did you conduct ESG materiality analysis for your potential private equity investments?

☒ (A) We assessed ESG materiality at the portfolio company level, as each case is unique

Select from dropdown list

- ☒ (1) for all of our potential private equity investments
 - ☐ (2) for the majority of our potential private equity investments
 - ☐ (3) for a minority of our potential private equity investments
- ☐ (B) We performed a mix of industry-level and portfolio company-level ESG materiality analyses
- ☐ (C) We assessed ESG materiality at the industry level only
- ☐ (D) We did not conduct ESG materiality analyses for our potential private equity investments

| Indicator | Type of indicator | Dependent on | Gateway to | Disclosure | Subsection | PRI Principle |
|-----------|-------------------|--------------|------------|------------|----------------------|---------------|
| PE 3.1 | CORE | PE 3 | N/A | PUBLIC | Materiality analysis | 1 |

During the reporting year, what tools, standards and data did you use in your ESG materiality analysis of potential private equity investments?

- ☐ (A) We used GRI standards to inform our private equity ESG materiality analysis
- ☐ (B) We used SASB standards to inform our private equity ESG materiality analysis
- ☒ (C) We used the UN Sustainable Development Goals (SDGs) to inform our private equity ESG materiality analysis
- ☐ (D) We used environmental and social factors detailed in the IFC Performance Standards (or other similar standards used by development-focused financial institutions) in our private equity ESG materiality analysis
- ☐ (E) We used climate disclosures, such as the TCFD recommendations or other climate risk and/or exposure analysis tools, to inform our private equity ESG materiality analysis
- ☐ (F) We used the UN Guiding Principles on Business and Human Rights (UNGPs) to inform our private equity ESG materiality analysis
- ☒ (G) We used geopolitical and macro-economic considerations in our private equity ESG materiality analysis
- ☒ (H) We engaged with the prospective portfolio company to inform our private equity ESG materiality analysis
- ☒ (I) Other

Specify:

ESG risks and opportunities are integrated throughout our process, from initial screening to exit. Our assessment using formal frameworks such as UN SDG's, UN Global Compact and UN PRI principals. We use a broad dataset sourced internally (e.g., at due diligence days, meetings, AGMs, or via our proprietary Annual ESG survey) and externally (e.g., ESG due diligence reports). We also leverage the knowledge and research of our dedicated Responsible Investment Team comprising over 40 professionals.

DUE DILIGENCE

| Indicator | Type of indicator | Dependent on | Gateway to | Disclosure | Subsection | PRI Principle |
|-----------|-------------------|--------------|------------|------------|---------------|---------------|
| PE 4 | CORE | OO 21 | N/A | PUBLIC | Due diligence | 1 |

During the reporting year, how did material ESG factors influence the selection of your private equity investments?

☒ (A) Material ESG factors were used to identify risks

Select from dropdown list

- ☒ (1) for all of our potential private equity investments
- ☐ (2) for the majority of our potential private equity investments
- ☐ (3) for a minority of our potential private equity investments

☒ (B) Material ESG factors were discussed by the investment committee (or equivalent)

Select from dropdown list

- ☒ (1) for all of our potential private equity investments
- ☐ (2) for the majority of our potential private equity investments
- ☐ (3) for a minority of our potential private equity investments

☒ (C) Material ESG factors were used to identify remedial actions for our 100-day plans (or equivalent)

Select from dropdown list

- ☒ (1) for all of our potential private equity investments
- ☐ (2) for the majority of our potential private equity investments
- ☐ (3) for a minority of our potential private equity investments

☒ (D) Material ESG factors were used to identify opportunities for value creation

Select from dropdown list

- ☒ (1) for all of our potential private equity investments
- ☐ (2) for the majority of our potential private equity investments
- ☐ (3) for a minority of our potential private equity investments

☒ (E) Material ESG factors informed our decision to abandon potential investments in the due diligence phase in cases where ESG risks were considered too high to mitigate

Select from dropdown list

- ☒ (1) for all of our potential private equity investments
- ☐ (2) for the majority of our potential private equity investments
- ☐ (3) for a minority of our potential private equity investments

☐ (F) Material ESG factors impacted investments in terms of the price offered and/or paid

☐ (G) Material ESG factors did not influence the selection of our private equity investments

| Indicator | Type of indicator | Dependent on | Gateway to | Disclosure | Subsection | PRI Principle |
|-----------|-------------------|--------------|------------|------------|---------------|---------------|
| PE 5 | CORE | OO 21 | N/A | PUBLIC | Due diligence | 1 |

Once material ESG factors have been identified, what processes do you use to conduct due diligence on these factors for potential private equity investments?

☒ (A) We do a high-level or desktop review using an ESG checklist for initial red flags

Select from dropdown list

- ☒ (1) for all of our potential private equity investments
- ☐ (2) for a majority of our potential private equity investments
- ☐ (3) for a minority of our potential private equity investments

☐ (B) We send detailed ESG questionnaires to target companies

☒ (C) We hire third-party consultants to do technical due diligence on specific material ESG factors

Select from dropdown list

- ☐ (1) for all of our potential private equity investments
- ☒ (2) for a majority of our potential private equity investments
- ☐ (3) for a minority of our potential private equity investments

☒ (D) We conduct site visits

Select from dropdown list

- ☒ (1) for all of our potential private equity investments
- ☐ (2) for a majority of our potential private equity investments
- ☐ (3) for a minority of our potential private equity investments

☒ (E) We conduct in-depth interviews with management and/or personnel

Select from dropdown list

- ☒ (1) for all of our potential private equity investments
- ☐ (2) for a majority of our potential private equity investments
- ☐ (3) for a minority of our potential private equity investments

☐ (F) We conduct detailed external stakeholder analyses and/or engagement

☒ (G) We incorporate ESG due diligence findings in all of our relevant investment process documentation in the same manner as other key due diligence, e.g. commercial, accounting and legal

Select from dropdown list

- ☒ (1) for all of our potential private equity investments
- ☐ (2) for a majority of our potential private equity investments
- ☐ (3) for a minority of our potential private equity investments

☒ (H) Our investment committee (or an equivalent decision-making body) is ultimately responsible for ensuring all ESG due diligence is completed in the same manner as for other key due diligence, e.g. commercial, accounting, and legal

Select from dropdown list

- ☒ (1) for all of our potential private equity investments
- ☐ (2) for a majority of our potential private equity investments
- ☐ (3) for a minority of our potential private equity investments

☒ (I) Other

Specify:

Given we are a Private Equity Fund Limited Partner (LP) and a minority/co-investor, the General Partner (GP) or lead manager is the one to appoint third party ESG consultants. We are privy to this information however, set expectations to receive it and use it within our own due diligence. We leverage our position to drive ESG development over the life of our hold and this includes the development of sophisticated ESG due diligence from our GPs.

Select from dropdown list

- ☒ (1) for all of our potential private equity investments
- ☐ (2) for a majority of our potential private equity investments
- ☐ (3) for a minority of our potential private equity investments

☐ (J) We do not conduct due diligence on material ESG factors for potential private equity investments

POST-INVESTMENT

MONITORING

| Indicator | Type of indicator | Dependent on | Gateway to | Disclosure | Subsection | PRI Principle |
|-----------|-------------------|--------------|------------|------------|------------|---------------|
| PE 6 | CORE | OO 21 | PE 6.1 | PUBLIC | Monitoring | 1 |

During the reporting year, did you track one or more KPIs on material ESG factors across your private equity investments?

☒ (A) Yes, we tracked KPIs on environmental factors

Percentage of portfolio companies this applies to:

- ☐ (1) >0 to 10%
- ☐ (2) >10 to 50%
- ☐ (3) >50 to 75%
- ☒ (4) >75 to 95%
- ☐ (5) >95%

☒ (B) Yes, we tracked KPIs on social factors

Percentage of portfolio companies this applies to:

- ☐ (1) >0 to 10%
- ☐ (2) >10 to 50%
- ☐ (3) >50 to 75%
- ☒ (4) >75 to 95%
- ☐ (5) >95%

☒ (C) Yes, we tracked KPIs on governance factors

Percentage of portfolio companies this applies to:

- ☐ (1) >0 to 10%
- ☐ (2) >10 to 50%
- ☐ (3) >50 to 75%
- ☒ (4) >75 to 95%
- ☐ (5) >95%

☐ (D) We did not track KPIs on material ESG factors across our private equity investments

| Indicator | Type of indicator | Dependent on | Gateway to | Disclosure | Subsection | PRI Principle |
|-----------|-------------------|--------------|------------|------------|------------|---------------|
| PE 7 | CORE | OO 21 | PE 7.1 | PUBLIC | Monitoring | 1, 2 |

What processes do you have in place to support meeting your targets on material ESG factors for your private equity investments?

☐ (A) We use operational-level benchmarks to assess and analyse the performance of portfolio companies against sector performance

☒ (B) We implement international best practice standards, such as the IFC Performance Standards, to guide ongoing assessments and analyses

Select from dropdown list

- ☒ (1) for all of our private equity investments
- ☐ (2) for a majority of our private equity investments
- ☐ (3) for a minority of our private equity investments

☐ (C) We implement certified environmental and social management systems across our portfolio

☒ (D) We make sufficient budget available to ensure that the systems and procedures needed are established

Select from dropdown list

- ☒ (1) for all of our private equity investments
- ☐ (2) for a majority of our private equity investments
- ☐ (3) for a minority of our private equity investments

☒ (E) We hire external verification services to audit performance, systems, and procedures

Select from dropdown list

- ☒ (1) for all of our private equity investments
- ☐ (2) for a majority of our private equity investments
- ☐ (3) for a minority of our private equity investments

☒ (F) We conduct ongoing engagement with all key stakeholders at the portfolio company level, e.g. local communities, NGOs, governments, and end-users

Select from dropdown list

- ☒ (1) for all of our private equity investments
- ☐ (2) for a majority of our private equity investments
- ☐ (3) for a minority of our private equity investments

☒ (G) We implement 100-day plans, ESG roadmaps and similar processes

Select from dropdown list

- ☐ (1) for all of our private equity investments
- ☒ (2) for a majority of our private equity investments
- ☐ (3) for a minority of our private equity investments

☒ (H) Other

Specify:

We assess c.60 ESG KPIs across our PE funds and co-investments via our Annual ESG Survey to ensure targets are being met. 'Investment Processes' and 'Active Management' are core elements and form part of their ESG rating. This includes (but not limited to) ESG frameworks, ESG-related audits, stakeholder engagement, 100-day plans and other factors that ensure ESG is being actively managed. Where we see room for improvement, we leverage our position to engage and drive development.

Select from dropdown list

- ☒ (1) for all of our private equity investments
- ☐ (2) for a majority of our private equity investments
- ☐ (3) for a minority of our private equity investments
- ☐ (I) We do not have processes in place to help meet our targets on material ESG factors for our private equity investments

| Indicator | Type of indicator | Dependent on | Gateway to | Disclosure | Subsection | PRI Principle |
|-----------|-------------------|--------------|------------|------------|------------|---------------|
| PE 9 | CORE | OO 21 | N/A | PUBLIC | Monitoring | 1, 2 |

Post-investment, how do you manage material ESG risks and ESG opportunities to create value during the holding period of your investments?

☒ (A) We develop company-specific ESG action plans based on pre-investment research, due diligence and materiality findings

Select from dropdown list

- ☐ (1) for all of our private equity investments
- ☒ (2) for a majority of our private equity investments
- ☐ (3) for a minority of our private equity investments

☒ (B) We adjust our ESG action plans based on performance monitoring findings at least yearly

Select from dropdown list

- ☒ (1) for all of our private equity investments
- ☐ (2) for a majority of our private equity investments
- ☐ (3) for a minority of our private equity investments

☒ (C) We, or the external advisors that we hire, support our private equity investments with specific ESG value-creation opportunities

Select from dropdown list

- ☐ (1) for all of our private equity investments
- ☒ (2) for a majority of our private equity investments
- ☐ (3) for a minority of our private equity investments

☒ (D) We engage with the board to manage ESG risks and ESG opportunities post-investment

Select from dropdown list

- ☒ (1) for all of our private equity investments
- ☐ (2) for a majority of our private equity investments
- ☐ (3) for a minority of our private equity investments

☒ (E) Other

Specify:

As a private equity fund LP and minority/co-investor, we leverage our position to engage and influence through management meetings, site visits, AGMs, catch ups and formally through our Annual ESG Survey. We review, evaluate and influence lead investors (the GPs) and management teams wherever necessary, including ESG risks / opportunities and ESG action plans. We monitor our underlying investments annually via our formal Annual ESG Survey and will adjust our exertion based on the results.

Select from dropdown list

- ☒ (1) for all of our private equity investments
- ☐ (2) for a majority of our private equity investments
- ☐ (3) for a minority of our private equity investments

☐ (F) We do not manage material ESG risks and opportunities post-investment

| Indicator | Type of indicator | Dependent on | Gateway to | Disclosure | Subsection | PRI Principle |
|-----------|-------------------|--------------|------------|------------|------------|---------------|
| PE 12 | CORE | OO 21 | PE 12.1 | PUBLIC | Monitoring | 1, 2 |

How do you ensure that adequate ESG-related competence exists at the portfolio company level?

☒ (A) We assign the board responsibility for ESG matters

Select from dropdown list

- ☐ (1) for all of our private equity investments
- ☒ (2) for a majority of our private equity investments
- ☐ (3) for a minority of our private equity investments

☐ (B) We ensure that material ESG matters are discussed by the board at least yearly

☐ (C) We provide training on ESG aspects and management best practices relevant to the portfolio company to C-suite executives only

☐ (D) We provide training on ESG aspects and management best practices relevant to the portfolio company to employees (excl. C-suite executives)

☒ (E) We support the portfolio company in developing and implementing its ESG strategy

Select from dropdown list

- ☒ (1) for all of our private equity investments
- ☐ (2) for a majority of our private equity investments
- ☐ (3) for a minority of our private equity investments

☒ (F) We support portfolio companies by finding external ESG expertise, e.g. consultants or auditors

Select from dropdown list

- ☐ (1) for all of our private equity investments
- ☒ **(2) for a majority of our private equity investments**
- ☐ (3) for a minority of our private equity investments

☒ **(G) We share best practices across portfolio companies, e.g. educational sessions or the implementation of environmental and social management systems**

Select from dropdown list

- ☐ (1) for all of our private equity investments
- ☒ **(2) for a majority of our private equity investments**
- ☐ (3) for a minority of our private equity investments

☐ (H) We include penalties or incentives to improve ESG performance in management remuneration schemes

☒ **(I) Other**

Specify:

Our Annual ESG Co-investment survey is sent to all of our investee GPs and management teams. This is a formal engagement tool that assesses ESG competence at both the GP and company-level and assigns an ESG rating based on a proprietary scoring system. This process is repeated annually with development measured and published within our Annual Private Equity ESG Report. As an LP, we influence our GPs / underlying investments to further develop their ESG competence over the life of our investment.

Select from dropdown list

- ☒ **(1) for all of our private equity investments**
- ☐ (2) for a majority of our private equity investments
- ☐ (3) for a minority of our private equity investments

☐ (J) We do not ensure that adequate ESG-related competence exists at the portfolio company level

EXIT

| Indicator | Type of indicator | Dependent on | Gateway to | Disclosure | Subsection | PRI Principle |
|-----------|-------------------|--------------|------------|------------|------------|---------------|
| PE 13 | CORE | OO 21 | N/A | PUBLIC | Exit | 4, 6 |

During the reporting year, what responsible investment information was shared with potential buyers of private equity investments?

- ☐ (A) Our firm's high-level commitment to responsible investment, e.g. that we are a PRI signatory
- ☐ (B) A description of what industry and asset class standards our firm aligns with, e.g. TCFD
- ☐ (C) Our firm's responsible investment policy (at minimum, a summary of key aspects and firm-specific approach)
- ☐ (D) Our firm's ESG risk assessment methodology (topics covered in-house and/or with external support)
- ☐ (E) The outcome of our latest ESG risk assessment on the asset or portfolio company
- ☐ (F) Key ESG performance data on the asset or portfolio company being sold
- ☐ (G) Other
- ☐ (H) No responsible investment information was shared with potential buyers of private equity investments during the reporting year
- ☒ **(I) Not applicable; we had no sales process (or control over the sales process) during the reporting year**

DISCLOSURE OF ESG PORTFOLIO INFORMATION

| Indicator | Type of indicator | Dependent on | Gateway to | Disclosure | Subsection | PRI Principle |
|-----------|-------------------|--------------|------------|------------|---|---------------|
| PE 14 | CORE | OO 21 | N/A | PUBLIC | Disclosure of ESG portfolio information | 6 |

During the reporting year, how did you report your targets on material ESG factors and related data to your investors?

- ☒ (A) We used a publicly disclosed sustainability report
- ☒ (B) We reported in aggregate through formal reporting to investors
- ☐ (C) We reported at the portfolio company level through formal reporting to investors
- ☒ (D) We reported through a limited partners advisory committee (or equivalent)
- ☒ (E) We reported back at digital or physical events or meetings with investors
- ☒ (F) We had a process in place to ensure that reporting on serious ESG incidents occurred
- ☐ (G) Other
- ☐ (H) We did not report our targets on material ESG factors and related data to our investors during the reporting year

CONFIDENCE-BUILDING MEASURES (CBM)

CONFIDENCE-BUILDING MEASURES

APPROACH TO CONFIDENCE-BUILDING MEASURES

| Indicator | Type of indicator | Dependent on | Gateway to | Disclosure | Subsection | PRI Principle |
|-----------|-------------------|--------------|---------------------|------------|--|---------------|
| CBM 1 | CORE | N/A | Multiple indicators | PUBLIC | Approach to confidence-building measures | 6 |

How did your organisation verify the information submitted in your PRI report this reporting year?

- ☐ (A) We conducted independent third-party assurance of selected processes and/or data related to the responsible investment processes reported in our PRI report, which resulted in a formal assurance conclusion
- ☐ (B) We conducted a third-party readiness review and are making changes to our internal controls or governance processes to be able to conduct independent third-party assurance next year
- ☐ (C) We conducted an internal audit of selected processes and/or data related to the responsible investment processes reported in our PRI report
- ☒ (D) Our board, trustees (or equivalent), senior executive-level staff (or equivalent), and/or investment committee (or equivalent) signed off on our PRI report
- ☐ (E) We conducted an external ESG audit of our holdings to verify that our funds comply with our responsible investment policy
- ☒ (F) We conducted an external ESG audit of our holdings as part of risk management, engagement identification or investment decision-making

☒ (G) Our responses in selected sections and/or the entirety of our PRI report were internally reviewed before submission to the PRI

☐ (H) We did not verify the information submitted in our PRI report this reporting year

INTERNAL REVIEW

| Indicator | Type of indicator | Dependent on | Gateway to | Disclosure | Subsection | PRI Principle |
|-----------|-------------------|--------------|------------|------------|-----------------|---------------|
| CBM 6 | CORE | CBM 1 | N/A | PUBLIC | Internal review | 6 |

Who in your organisation reviewed the responses submitted in your PRI report this year?

☐ (A) Board, trustees, or equivalent

☒ (B) Senior executive-level staff, investment committee, head of department, or equivalent

Sections of PRI report reviewed

☒ (1) the entire report

☐ (2) selected sections of the report

☐ (C) None of the above internal roles reviewed selected sections or the entirety of the responses submitted in our PRI report this year