

Controversial Weapons Policy

Columbia Threadneedle Investments

February 2025

Policy

This Policy applies to active strategies and segregated mandates (unless their stated investment guidelines conflict with this policy) managed by companies within Columbia Threadneedle Investments, EMEA.¹ This policy also applies where the portfolio management for a financial product or service that is distributed or offered in the EU is delegated to an entity within the Columbia Threadneedle group located in North America or Asia-Pacific. Please note that Pymfords International Limited and externally managed fiduciary mandates are out-of-scope.

To protect our clients and broader stakeholders' interests, we have maintained a controversial weapons exclusion policy since 2011. Reflecting both international conventions and the legal requirements in certain jurisdictions, we seek to avoid our active strategies investing in companies involved in the production, sale or distribution of controversial weapons including landmines, cluster munitions, blinding laser, non-detectable fragment and biochemical weapons and depleted uranium ammunition and armour.

Our definition of production extends to manufacturers of controversial weapon systems, munitions, exclusive delivery platforms and key components. This includes companies that own 50% or more in another firm engaged in such activities. Dual use platforms or components and past involvement in these weapons are not included in scope.

If an investment becomes exposed to excluded activities, it should be divested as soon as possible, and no later than 30 calendar days.² Where an issuer is involved in excluded activities, we reserve the right to take short positions in such securities.

¹ Subsidiaries of TAM UK International Holdings Limited (TAMUKIL) and Columbia Threadneedle Investments UK International Limited, together known as Columbia Threadneedle Investments, EMEA.

² In exceptional circumstances, the Head of Asset Class may approve an extension to divest in accordance with the applicable regulatory requirements.

Basis

Exclusions under the core controversial weapons policy will be applied in line with the following international conventions and national law which prohibit the production, sale, distribution and use of the following weapons:

Weapon	Basis	Effective
Biological	UN Biological Weapons Convention	1975
Blinding Lasers	UN Convention on Certain Conventional Weapons, Protocol IV	1998
Chemical	UN Chemical Weapons Convention	1997
Cluster Munitions	UN Convention on Cluster Munitions	2010
Depleted Uranium (incl. armour)	Belgian Law on Weapons (Loi sur les Armes)	2009
Land Mines	UN Anti-Personnel Landmines Convention	1999
Non-Detectable Fragments	UN Convention on Certain Conventional Weapons, Protocol I	1983

Additional exclusions for white phosphorus and nuclear weapons are integrated into our general exclusions framework for developing fund strategies, for example, those funds which promote environmental and/or social characteristics or have a sustainable investment objective. These exclusions refer to the following international conventions:

Weapon	Basis	Effective
White Phosphorus	UN Convention on Certain Conventional Weapons, Protocol III	1983
Nuclear	UN Treaty on the Non-Proliferation of Nuclear Weapons	1970
	UN Treaty on the Prohibition of Nuclear Weapons	2021

It was recognised that white phosphorous may be deemed controversial only in specific applications and its use is regulated without total prohibition. Where we seek to avoid investment in nuclear weapons, we respect the principle of disarmament underpinning the Non-Proliferation Treaty, and more stringent requirements under the Treaty on the Prohibition of Nuclear Weapons.

Implementation

In implementing our policy, we engage a third-party research provider to help identify companies involved in the production, sale or distribution of controversial weapons. The exclusion of identified securities follows a defined process incorporating Compliance, Research and Responsible Investment, increasing collaboration and research intensity. Our procedures and exclusion list are reviewed and updated on an annual basis.

To find out more, visit columbiathreadneedle.com



Important information: This document is intended for informational purposes only and should not be considered representative of any particular investment. This should not be considered an offer or solicitation to buy or sell any securities or other financial instruments, or to provide investment advice or services.

Investing involves risk including the risk of loss of principal. Your capital is at risk. Market risk may affect a single issuer, sector of the economy, industry or the market as a whole. The value of investments is not guaranteed, and therefore an investor may not get back the amount invested. International investing involves certain risks and volatility due to potential political, economic or currency fluctuations and different financial and accounting standards.

The views expressed are as of the date given, may change as market or other conditions change and may differ from views expressed by other Columbia Threadneedle Investments (Columbia Threadneedle) associates or affiliates. Actual investments or investment decisions made by Columbia Threadneedle and its affiliates, whether for its own account or on behalf of clients, may not necessarily reflect the views expressed. Investment decisions should always be made based on an investor's specific financial needs, objectives, goals, time horizon and risk tolerance. Asset classes described may not be suitable for all investors.

Information and opinions provided by third parties have been obtained from sources believed to be reliable, but accuracy and completeness cannot be guaranteed.

In Australia: Issued by Threadneedle Investments Singapore (Pte.) Limited ["TIS"], ARBN 600 027 414. TIS is exempt from the requirement to hold an Australian financial services licence under the Corporations Act and relies on Class Order 03/1102 in marketing and providing financial services to Australian wholesale clients as defined in Section 761G of the Corporations Act 2001. TIS is regulated in Singapore (Registration number: 201101559W) by the Monetary Authority of Singapore under the Securities and Futures Act (Chapter 289), which differ from Australian laws.

In Singapore: Issued by Threadneedle Investments Singapore (Pte.) Limited, 3 Killiney Road, #07-07, Winsland House 1, Singapore 239519, which is regulated in Singapore by the Monetary Authority of Singapore under the Securities and Futures Act (Chapter 289). Registration number: 201101559W. This advertisement has not been reviewed by the Monetary Authority of Singapore.

In Hong Kong: Issued by Threadneedle Portfolio Services Hong Kong Limited 天利投资管理香港有限公司. Unit 3004, Two Exchange Square, 8 Connaught Place, Hong Kong, which is licensed by the Securities and Futures Commission ("SFC") to conduct Type 1 regulated activities (CE:QA779). Registered in Hong Kong under the Companies Ordinance (Chapter 622), No. 1173058.

In UK: Issued by Threadneedle Asset Management Limited. Registered in England and Wales, Registered No. 573204, Cannon Place, 78 Cannon Street, London EC4N 6AG, United Kingdom. Authorized and regulated in the UK by the Financial Conduct Authority.

In the EEA: Issued by Threadneedle Management Luxembourg S.A. Registered with the Registre de Commerce et des Societes (Luxembourg), Registered No. B 110242, 44, rue de la Vallée, L-2661 Luxembourg, Grand Duchy of Luxembourg.

In Switzerland: issued by Threadneedle Portfolio Services AG, Registered address: Claridenstrasse 41, 8002 Zurich, Switzerland.

This document is distributed by Columbia Threadneedle Investments (ME) Limited, which is regulated by the Dubai Financial Services Authority (DFSA). For Distributors: This document is intended to provide distributors' with information about Group products and services and is not for further distribution. For Institutional Clients: The information in this document is not intended as financial advice and is only intended for persons with appropriate investment knowledge and who meet the regulatory criteria to be classified as a Professional Client or Market Counterparties and no other Person should act upon it.

Columbia Threadneedle Investments (Columbia Threadneedle) is the global brand name of the Columbia and Threadneedle group of companies. columbiathreadneedle.com