RBC BlueBay Asset Management

RBC Global Asset Management (UK) Limited

Website disclosure
SFDR Article 8 Portfolio

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SFDR Article 8 Strategies – RBC Global Equity Portfolio - Segregated Account 17 ("the Portfolio")

This disclosure applies to the following strategy: Segregated Account 17

Summary

The Portfolio promotes environmental or social characteristics but does not have sustainable investments as its objective. The Portfolio promotes environmental or social characteristics by investing in companies that provide a net benefit to stakeholders and society. Companies are assessed using a proprietary environmental, social and governance (ESG) rating methodology, where companies are given a rating between 1 and 5, while excluding companies included in "the Carbon Underground 200"; or that are involved in any of the following restricted activities (data and definitions restricted using the Sustainalytics database): adult entertainment; alcohol; gambling; weapons; small arms; and tobacco; or issuers whose primary business is directly involved in extracting, processing or transporting fossil fuels. Companies given a rating between 1 and 3 are assessed as providing a net benefit to stakeholders and society. ESG ratings assigned to each company are reviewed quarterly and updated as new material information becomes available. An assessment of good governance contributes to the investment strategy.

The Portfolio commits to only owning assets that are deemed to be aligned to the environmental or social characteristics of the Portfolio, excluding cash and cash equivalents. A minimum of 95% of the NAV of the Portfolio will be in assets that promote the environmental or social characteristics. If a company is assessed to no longer be a net benefit to stakeholders and society, it will be disposed of in a timely manner and in the best interests of the client.

The investment team may use multiple ESG data sources as part of its assessment of an issuer. Sources include, but are not limited to, direct disclosures from the company, third-party data vendors, and independent research. The data utilised covers environmental, social, and governance data, as well as ESG-related controversies. As part of the investment process, the investment team uses this data and its own due diligence on a company to assess how and if it provides a net benefit to society.

The investment team engages with many issuers and other stakeholders on material ESG issues. The majority of engagements are with issuers, where the investment team seeks information on how an issuer is addressing its material ESG risks and opportunities and conveys its views on those risks and opportunities. The investment team meets with many issuers in which it invests on an ongoing basis and develops an in-depth dialogue with issuers over time. The investment team will generally keep the particulars about its engagements confidential to foster a constructive relationship with investee companies.

No sustainable investment objective

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

Environmental or social characteristics of the financial product

The Portfolio will invest in companies which provide a net benefit to stakeholders and society based on a proprietary ESG rating methodology, while excluding companies included in “the Carbon Underground 200”; or that are involved in any of the following restricted activities: adult entertainment; alcohol; gambling; weapons; small arms; and tobacco; or issuers whose primary business is directly involved in extracting, processing or transporting fossil fuels.

Investment strategy

The Portfolio promotes environmental or social characteristics through the investment team’s ESG integration process. It is the investment team’s investment philosophy that companies must provide a net benefit to stakeholders and society in order to be a sustainable business, suitable for long-term investment. The investment team conducts an ESG assessment by determining the net benefit of the company to stakeholders and society. The team assesses material ESG factors applicable to the investment as either a contingent liability or contingent asset, and rates the management of these factors on a scale of 1 to 5, where 1 is considered strong ESG management and 5 is considered poor ESG management. Ratings between 1 and 3 are given to companies that provide a net positive benefit to society and enjoy strong ESG management capabilities. Companies assigned a rating of 4 or 5 are deemed to not have a positive benefit to society, suffer from weak material ESG management capabilities, and are excluded from investment.

Example of areas of assessment include:

- Carbon emissions
- Supply chain labour standards
- Corruption & Instability

To complement the investment team’s own research, the team uses third-party ESG research providers which help to evaluate companies’ ESG practices and to monitor ESG-related controversies.

The investment team has frequent contact with management teams of investee companies and monitors ESG data on an ongoing basis in order to highlight new controversies and ESG risks. New information or a change of view that leads to the downgrade of the proprietary ESG rating below the required level will lead to divestment and the reallocation of capital. This is done in a timely manner that is consistent with the best interests of the client.

Binding elements of the investment strategy used to select the investments to attain each of the environmental or social characteristics promoted

Based on the ESG integration process described above, the Portfolio will only invest in companies with a proprietary ESG rating of 3 or better (i.e. 3, 2, or 1).

The Portfolio also excludes issuers identified in its exclusion list. The Portfolio's exclusion list is maintained by RBC GAM and constructed using two initial inputs, used concurrently. The first input into the exclusion list is based on the Carbon Underground 200 list and the second is based on product involvement revenues. Issuers or their majority-owned subsidiaries involved in the following are excluded from the investment universe for this Portfolio.

- Alcohol: issuers or their majority-owned subsidiaries deriving 5% or more of its revenues from the production of alcoholic beverages, or deriving 10% or more of its revenues from activities related to the production of alcoholic beverages, or the sale of alcoholic beverages.
- Gambling: issuers or their majority-owned subsidiaries deriving 5% or more of its revenues from owning or operating a gambling establishment, or deriving 10% or more of its revenues from the production of specialised equipment used exclusively for gambling or services related to gambling operations.
- Weapons: issuers or their majority-owned subsidiaries deriving 5% or more of its revenues from the development, design and/or manufacturing of military weapons, small arms, weapons-delivery systems and/or specialized components of weapons, or deriving 10% or more of its revenues from the design, manufacturing and/or provision of non-specialized components of weapons, components or parts for weapons-delivery systems, support services for weapons-delivery systems, or the retail sales of small arms.
- Adult entertainment: issuers or their majority-owned subsidiaries deriving 5% or more of its revenues from the production of pornographic materials, or deriving 10% or more of its revenues from the production of goods and services related to pornography, or the sale of pornographic materials.
- Tobacco: issuers or their majority-owned subsidiaries deriving 5% or more of its revenues from the manufacturing of tobacco products, or deriving 10% or more of its revenues from the production of tobacco-related products or sale of tobacco products.
- Small Arms: issuers or their majority-owned subsidiaries deriving 5% or more of its revenues from the sale of small arms to civilian or military or law enforcement customers, or deriving 10% or more of its revenues from the manufacture of key components of small arms, or the sale and distribution of small arms or their key components.
- Predatory lending issuers or their majority-owned subsidiaries deriving 5% or more of its revenues from the predatory lending operations.
- Fossil Fuels:
    - issuers or their majority-owned subsidiaries deriving any revenue from or are involved in the exploration and extraction of Arctic oil and gas, (ii) exploration, production, refining, transportation and/or storage of oil and natural gas, (iii) extraction of oil sands, shale energy, and/or thermal coal, and/or (iv) provision of storage, transportation, mining and refining of thermal coal.

- issuers or their majority-owned subsidiaries deriving 10% of more of its revenues from the provision of tailor-made products and services that support oil and gas exploration, production, refining, transportation and/or storage, or from power generated by thermal coal.

To finalize the Portfolio's exclusion list, RBC GAM may use issuer filings and reports, or data from third-party providers to complement and/or assess data informing the strategies' exclusion list. For instance, RBC GAM may update the Portfolio's exclusion list where it has identified inaccuracies in the initial input data, or incomplete initial input data due to more recent developments or events A Portfolio may also hold securities of issuers that are added to its exclusion lists following the strategy's investment in such securities until such time that it can appropriately divest of such securities.

New information or a change of view that leads to the downgrade of our proprietary ESG rating below a level that meets the requirements will lead to divestment and the reallocation of capital to other opportunities. This is done in a timely manner that is consistent with the client's interests.

Policy to assess good governance practices of the investee companies

The Portfolio includes an assessment of governance practices, where the investment team considers factors including the appropriateness of executive remuneration; company track records in areas such as corruption, integrity, and business ethics; company focus and practices related to the board, management, and workforce diversity; respect for shareholder rights; and board independence, among other factors.

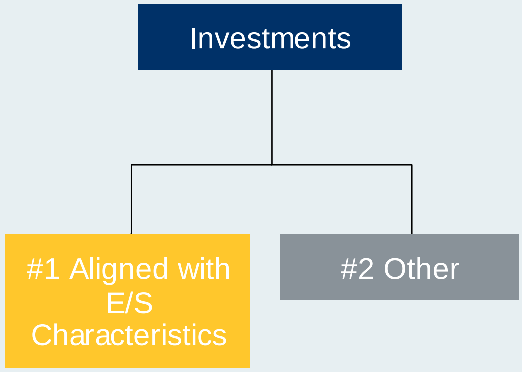
Good governance practices include sound management structures, employee relations, remuneration or staff and tax compliance.

Proportion of investments

The Portfolio will generally invest 100% of its NAV (excluding cash, cash equivalents, hedging instruments or other securities not designed to provide equity exposure) in companies aligned with the E/S characteristics promoted by the Portfolio (#1). A minimum of 95% of the entire Portfolio will be invested in companies aligned with the E/S characteristics promoted by the Portfolio (#1), subject to re-ratings which will be divested in a manner consistent with the best interests of the client and, in any event, within three months.

The remaining (5%) - which will be cash or cash equivalents – will not incorporate E/S characteristics and will fall under #2.

Investments included under "#2 Other", what is their purpose and any minimum environmental or social safeguards:



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

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

The Portfolio may hold certain instruments which do not contribute directly to the Portfolio such as cash or cash equivalents.

There are no environmental or social safeguards applicable to such instruments, which do not provide direct exposure to investee companies.

Monitoring of environmental or social characteristics

Proprietary ESG ratings for each holding company are reviewed quarterly and may also be reviewed and updated should new material information become available. The investment team monitors environmental and/or social controversies and news flows on an ongoing basis. Independent research and monitoring is used to inform any changes to the ESG rating. The environmental or social characteristics of the constituent companies are discussed regularly in team meetings.

The investment team engages with many issuers on environmental and/or social issues which are chosen and prioritised using a risk-based approach.

Methodologies

The investment team uses a proprietary ESG rating methodology to assess a company's net benefit to stakeholders and society. The investment team assigns a rating to each assessed company from 1 to 5. Companies assigned a rating between 1 and 3 provide a net benefit to stakeholders and society, as determined by the investment team.

Data sources and processing

Data sources used

The investment team has access to a range of ESG data from third-party data providers, including MSCI ESG Research LLC, Sustainalytics, Institutional Shareholder Services Inc. and Glass, Lewis & Co, in addition to accessing ESG data directly from company disclosures. Which sources, factors, and methods used varies according to the ESG materiality and relevance of each factor to the company. These include, but are not limited to, the following ESG data and inputs:

- Third Party ESG ratings: Includes top level ratings, and both ratings and weights for component environmental, social, and governance factors.
- ESG controversies and severity levels related to factors including, but not limited to: labour rights, corruption, customer practices, privacy, land use management, climate change, supply chains, water and waste management, executive compensation, governance practices, human rights, community, business ethics, accounting.
- Environmental: carbon emissions, low-carbon transition risk exposure and management, temperature alignment, pollution and waste, resource use, land use management, biodiversity, e-waste, water consumption and use, green building, and energy demand.
- Social: product safety, employee health and safety, human capital management, labour management, privacy, supply chain, social opportunities.
- Governance: board independence, audit and accounting, executive compensation, shareholder rights, anti-competitive practices, bribery and corruption.

Measures taken to ensure data quality

There are a number of steps undertaken to ensure that the provider and quality of data/research will meet expectations:

1. Before purchasing data or research from a provider, market analysis is conducted to compare the potential product with its competitors.
2. Where applicable, the RBC GAM Quantitative Investments team back tests data being considered for core investment and stewardship functions, and both the RBC Quantitative Investments team and Investment Risk group may assist in reviewing prospective subscriptions for data quality and consistency, where appropriate. Where inaccuracies and shortcomings in methodology are found, and it is unlikely the provider will be able to address them and meet expectations, the provider is removed from consideration.

3. During a trial period, investment teams may test potential research and data provider subscriptions within the context of the portfolios they manage. Investment teams then provide feedback on any research or data issues, including systemic issues that would prevent the provider from being applicable or useful to the investment process or minor issues that can be resolved through engagement with the provider.
4. Once the provider is on-boarded, open dialogue and engagement is maintained between users of the data and the providers themselves to ensure that the quality and accuracy of data and research continues to meet expectations. For example, direct training opportunities may be sought for users of the data to understand the product and new ways to integrate it. Investment teams may also discuss research findings directly with research providers' sector analysts or research managers to ensure a thorough and complete understanding between both parties.
5. In certain cases, where inaccuracies on issuers have been identified, RBC GAM may facilitate engagements between the issuers and research providers to discuss and resolve inconsistencies in data/research. Historically, these inaccuracies have resulted from issuers failing to disclose policies or practices on which the research provider is evaluating them, or providers' review cycles lagging issuers' publications/data releases.

In cases where existing research or data providers fail to meet expectations despite engagement efforts or where superior research or products are identified, RBC GAM may terminate the subscription. Subscriptions and contracts are reviewed by the internal legal department prior to signing and upon contract renewal to stipulate the conditions where termination may be appropriate.

How data is processed

The investment team focuses on the ESG factors that it considers have the potential to impact the value of the investment and tailors the ESG integration tools and processes used for the investment strategy. This includes using, but is not limited to the following:

- Issuer-level reports that identify and discuss material ESG issues, based on third-party ESG research, company reports, and internal analyst/manager views.
- Internal ESG checklists and questionnaires for issuers held in the Portfolio.
- ESG engagement questions and engagement tracking.
- ESG data from third-party vendors considered in the fundamental investment framework.
- ESG controversies monitored on an ongoing basis.
- Climate data and climate scenario analysis.
- The Principle Adverse Impact indicators considered by the Portfolio.

The investment team integrates material ESG factors into the investment process by selecting the ESG tools and processes that work best for the investment decision-making process. Sustainability risks are deemed material if they have the potential to impact the risk-adjusted returns of the investments.

The investment team places particular focus on the ESG factors that have the potential to impact the value of the investment, with the extent of these impacts depending on the issuer, the industries and geographies in which it operates and the nature of the investment vehicle for which it is purchased.

Proportion of data estimated

Where possible, data used will always be the most recently published by an investee company. This is received either directly from the investee company or via a third-party data vendor. Where no data has been published, an estimation of that data point may be used. These estimations may be produced through an industry standard model or from a third-party vendors internal methodologies. Where this is not available no data will be used.

Limitations to methodologies and data

Limitations to methodologies and data

The assessment of a company's environmental or social characteristics is limited by the investment team's reliance on publicly available information. This also applies to data availability.

The investment team may use third-party research to evaluate the ESG characteristics, risks and opportunities regarding an issuer. Such research information and data may be incomplete, inaccurate or unavailable, resulting in incorrect assessments of the ESG practices of an issuer. Legislative and regulatory changes, market developments and/or changes in data availability and reliability could also materially affect the quality and comparability of such research information and data.

How limitations do not affect the environmental or social characteristics promoted.

The investment team performs due diligence on holding companies. If following the due diligence and assessment of the ESG characteristics of the company the investment team does not believe it provides a net benefit to society, it will be reflected in the ESG rating given to the company.

The investment team uses multiple ESG data and research sources, where possible, including company disclosures. This mitigates the limitations of inaccurate, incomplete, or unavailable research from third-party providers.

However, there may be some non-public information that the investment team could not be aware of at the time of the assessment, which could harm the promoted environmental or social characteristics.

Due diligence

As part of the investment process the investment team performs an analysis of the underlying issuers before investing. Analysis continues throughout the ownership of a company, including through regular reviews on a company's proprietary ESG rating.

The team utilises site visits, assesses publicly available information, data, research, and information learned from engagements to monitor performance of the company on its environmental and social characteristics. From time to time, the investment team may commission independent research into a company in order to fully assess its environmental and social characteristics.

The compliance of the Portfolio with their investment mandate is monitored through internal systems by the RBC GAM's Investment Policy team.

Engagement policies

The investment team engages with many issuers and other stakeholders on material ESG issues. The majority of engagements are with issuers, where the investment team seeks information on how an issuer is addressing its material ESG risks and opportunities and conveys its views on those risks and opportunities. The investment team meets with many issuers in which it invests on an ongoing basis and develops an in-depth dialogue with issuers over time. The team will generally keep the particulars about its engagements confidential to foster a constructive relationship with investee companies.

Typically, the purpose of engagements includes:

1. Information gathering on ESG risks and opportunities and the steps the issuer is taking to address them. This may result in continued monitoring of an existing or emerging ESG risk or opportunity, or an update to the analysis and assessment of an issuer.
2. Seeking better public disclosure of material ESG risks and opportunities and the steps the issuer is taking to address them.
3. Encouraging more effective management of material ESG factors when the team believes they may impact the value of an investment.
4. Where an issuer is lagging its peers on a material ESG issue, or insufficiently managing a material ESG issue, requesting a commitment for change, monitoring any changes, and encouraging continued improvements that are expected to positively impact the long-term value of an investment

A majority of engagements are for information gathering but there are cases where a specific outcome is desired. In these instances, where engagement efforts have been unsuccessful and the issue being discussed is material, RBC GAM may comment publicly, either alone or in collaboration with other investors, or take more formal steps, such as filing a shareholder resolution for equity investments, if there is the belief that it is in the best interest of the client to do so.

Ultimately, at any stage of engagement with an issuer, the investment team may choose to divest from the investment entirely. This may occur when the investment team does not believe that the ESG issue is being appropriately managed, despite ongoing engagement and stewardship efforts, and deems that the issue materially affects the investment case overall. The outcomes of an engagement generally are not the sole factor in an investment decision but can help inform the investment case. It is at the discretion of the investment team to decide whether to continue with an investment or to divest.

The specific ESG factors engaged on will differ based on sector, asset class, and geography. Seeking to understand each issuer individually and through the lens of local norms and the laws and regulations of the market in which it operates.

Designated reference benchmark

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

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