RBC BlueBay Asset Management

RBC Global Asset Management (UK) Limited

Website disclosure
SFDR Article 8 Portfolio

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SFDR Article 8 Strategy – RBC Emerging Markets Equity Portfolio - Segregated Account 20 (“the Portfolio”)

This disclosure applies to the following strategy: Segregated Account 20

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 ESG rating methodology, where companies are given a rating between 0 and 100, while excluding those included in the “UN Convention on Conventional Weapons” or the client’s Controversial Weapons Policy, or those that are involved in any of the following restricted activities, as identified by the Investment Manager using MSCI Research’s Global Norms Screen: anti-personnel mines; biological weapons; chemical weapons; cluster munitions; nuclear weapons in countries not party to the Non-Proliferation Treaty; or those with material business in the following industry sectors, as identified by the Investment Manager using the Sustainalytics database: armaments; adult entertainment; alcohol; tobacco; gambling; coal mining; and oil sands. Companies given a rating above 70 are assessed as providing a net benefit to stakeholders and society. ESG ratings assigned to each company are reviewed regularly 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 90% 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 to perform its assessment of an asset. 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 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 those included in the "UN Convention on Conventional Weapons" or the client's Controversial Weapons Policy, or those that are involved in any of the following restricted activities, as identified by the Investment Manager using MSCI Research's Global Norms Screen: anti-personnel mines; biological weapons; chemical weapons; cluster munitions; nuclear weapons in countries not party to the Non-Proliferation Treaty; or those with material business in the following industry sectors, as identified by the Investment Manager using the Sustainalytics database: armaments; adult entertainment; alcohol; tobacco; gambling; coal mining; and oil sands.

Investment strategy

The Portfolio seeks to invest in a long term, high conviction portfolio of companies operating in Emerging Markets with strong ESG credentials. The team's approach to ESG comprises of three key pillars: Stock Selection; Active Ownership; and Research.

The investment team use a proprietary investment checklist as the final stage of its bottom-up research process. Within the checklist, the investment team review the questions geared towards ESG and sustainability factors to produce a stock-specific "ESG Rating". Examples of the checklist questions include:

- Do the company's activities have a negative impact on the climate?
- Is the franchise socially useful?
- Does the company work in the best interests of all shareholders?

This assessment results in an overall company rating as well as a dedicated ESG rating from 0-100 (100 being the highest). Investee companies are assessed closely by the investment team on an ongoing basis, through regular company meetings and engagement with company management and key stakeholders. The ESG Rating will be reviewed and reported on a regular basis in order to capture any changes in the ESG assessment of a company. If a company is given an ESG Rating less than 70 after a review, it will be divested in a timely manner that is consistent with the best interests of the client.

The team engages with many investee companies in order to instigate positive change in the environmental or social characteristics supported by the Portfolio. Focus areas of engagement include ESG disclosure, executive remuneration, workforce diversity and climate change.

Direct engagement activities are supported through thoughtful proxy voting. The team considers votes as it can serve as an effective way to convey views to investee companies on material ESG factors, especially governance related factors. The team may engage directly with many investee companies on proposal items that appeared on the voting ballot.

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

The Portfolio will only invest in companies with an ESG Rating of 70 or above.

If a company is given an ESG Rating less than 70 after a review, it will be divested in a timely manner that is consistent with the best interests of the client.

The Portfolio also excludes issuers identified in its exclusion list. The Portfolio's exclusion list in maintained by RBC GAM and constructed using various inputs, used concurrently. The first input into the exclusion list is Nestlé S.A. or any of its affiliated companies and any companies which appear on the UN Global Compact Red List, as will be identified using MSCI ESG Reseach's Global Norms Screen, which identifies companies involved in ESG controversies where the company's alleged actions constitute a violation of global norms in accordance with MSCI's controversy severity assessment methodology. Secondly, based on MSCI Research's Global Norms Screen, to exclude companies directly involved with any of the following: anti-personnel mines, biological weapons, chemical weapons, cluster munitions, nuclear weapons in countries not party to the Non-Proliferation Treaty. The client's Controversial Weapons Policy and the UN Convention on Conventional Weapons are additional inputs into the exclusion list, whereby the Portfolio may not invest in any companies directly involved with any weapons appearing on these lists. The final input into the exclusion list is the Sustainalytics database. The investment manager will use the database to identify and exclude companies with material business in the following industry sectors: armaments; adult entertainment; alcohol; tobacco; gambling; coal mining; and oil sands. The working definitions for exclusion are as follows:

A material business in Tobacco is deemed to be:

i. Direct Involvement: The company derives >0% of revenues from the manufacture of tobacco products.
ii. Related Involvement: The company derives 5% of revenues or more from tobacco-related products.
iii. Related Involvement: The company derives 5% of revenues or more from the distribution and/or retail sale of tobacco products.
iv. Related Involvement: The company derives 5% of revenues or more a license of its company or brand name to tobacco products.
v. For the avoidance of doubt, companies involved in the packaging (cartons, films and foil) are eligible for inclusion in the portfolio.

A material business in Adult Entertainment is deemed to be:

i. Direct Involvement: The company derives >0% of revenues of its revenues from the production of adult entertainment materials (including film, video, games, print media, live entertainment and online products) or the ownership/operation of an adult entertainment establishment.

ii. Related Involvement: The company derives 5% of revenues or more from the distribution of adult entertainment materials. N.b. For the avoidance of doubt, several media and telecoms businesses have Adult Entertainment media pass though their distribution channels. We view this related involved as immaterial for those companies as the revenue generated is incidental to the main business.

A material business in Armaments is deemed to be:

i. Direct Involvement: The company derives >0% of revenues from the manufacture of military weapons and/or weapons systems. These products being tailor-made for military use.
ii. Related Involvement: The company derives 5% of revenues or more from the manufacture of secondary components of weapons and/or weapons systems. These products being tailor-made for military use.
iii. Related Involvement: The company derives 5% of revenues or more from the provision of weapons-related services. These services or products being tailor made to the military industry.

A material business in Gambling is deemed to be:

i. Direct Involvement: The company derives >5% of revenues or more from the owning or operating of a gambling establishment or operation (casinos, racetracks, bingo parlours and other betting establishments, incl. online)
ii. Related Involvement: The company derives >5% of revenues or more from the manufacture of specialized equipment used exclusively for gambling.
iii. Related Involvement: The company derives >5% of revenues or more from the provision of supporting products and services to gambling operations.

A material business in Alcohol is deemed to be:

i. Direct Involvement: The company derives 5% or more of its revenues from the manufacture of alcoholic beverages.
ii. Related Involvement: The company derives 5% or more of its revenues from the provision of alcohol-related products/services.
iii. Related Involvement: The company derives 5% or more of its revenues from distribution and/or retail sale of alcoholic beverages.

A material business in Coal Mining is deemed to be

i. Any company on the Carbon Underground 200 list. The Carbon Underground 200 list identifies the top 100 public coal - and the top 100 public oil and gas - companies globally, ranked by the potential carbon emissions content of their reported reserves. The Carbon Underground 200 list is maintained by Fossil Free Indexes LLC; and/or
ii. The company derives 25% or more of its revenues from coal mining, including coal production and coal services. For these purposes “coal production” refers to coal exploration, coal mining (surface and underground mines), as well as the production of coke; and “coal services” designate relevant services to Coal Production such as contract drilling.

A material business in Oil Sands is deemed to be:

i. Any company on the Carbon Underground 200 list. The Carbon Underground 200 list identifies the top 100 public coal - and the top 100 public oil and gas - companies globally, ranked by the potential carbon emissions content of their reported reserves. The Carbon Underground 200 list is maintained by Fossil Free Indexes LLC; and/or
ii. The company derives 10% or more of its revenues from oil sands production including all stages of the process employed to extract, upgrade and refine.

Policy to assess good governance practices of the investee companies

The investment team assesses the governance of investee companies through detailed research as well as company engagement, which forms a component of its investment checklist and contributes to its ESG rating. Factors considered include the appropriateness of executive remuneration; company track records in areas such as integrity and business ethics; company focus and practices related to the board, management, and workforce diversity; treatment of minority shareholders; and board independence, among other factors. Understanding how management thinks about important ESG issues and what actions they are implementing is a critical component of the investment team's view on a company's governance practices and ESG standards more broadly.

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

Proportion of investments

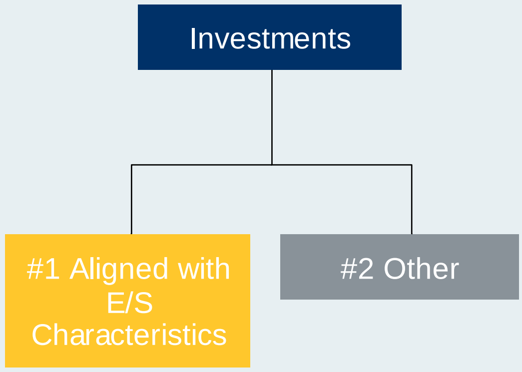
The Portfolio will generally invest 100% of its NAV (excluding cash, cash equivalents, hedging instruments or other securities not designed to provide equity exposure) in companies aligned with the E/S characteristics promoted by the Portfolio (#1). A minimum of 90% of an entire strategy will be invested 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 (10%) - 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:

The Portfolio may hold certain instruments which do not contribute directly to the investment strategy 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



#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.

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 0 to 100.

Companies assigned a rating above 70 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, ewaste, 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 a 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 its 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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