RBC BlueBay
Asset Management

RBC Global Asset Management (UK) Limited

Website disclosure
SFDR Article 8 Portfolio

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SFDR Article 8 Strategies – BlueBay Investment Grade European Corporate Debt Strategy - Portfolio – Segregated Account 57

This disclosure applies to the following Portfolio

Product name: Portfolio - segregated account 57[1]

Legal entity identifier:

Summary

The environmental and social characteristics promoted by the Portfolio consists in favouring fixed income securities in scope whose business activities and/or business conduct take an appropriate and responsible approach on such matters. On the environmental front, where relevant, this includes, but is not limited to, characteristics such as appropriate and responsible management of climate change and waste. The social characteristics promoted by the Portfolio where relevant include, but are not limited to, appropriate and responsible management of employee relations and health and safety practices.

The Portfolio implements environmental, social and governance (ESG) integration (via the assessment of issuers based on a proprietary ESG risk rating methodology), ESG screening (via criteria as detailed in the Investment Management Agreement), ESG engagement may also occur (where appropriate to ensure an issuer continues to meet the required environmental and social characteristics being promoted).

No sustainable investment objective

The Portfolio promotes environmental and social characteristics and investments but does not have as its objective sustainable investment.

Environmental or social characteristics of the financial product

The environmental and social characteristics promoted by the Portfolio consist in favouring fixed income securities in scope whose business activities and/or conduct take an appropriate and responsible approach on such matters. On the environmental front, where relevant, this includes, but is not limited to,

[1] Please note product names are anonymised for client confidentiality purposes.

characteristics such as appropriate and responsible management of climate change and waste. The social characteristics promoted by the Portfolio where relevant include, but are not limited to, appropriate and responsible management of employee relations and health and safety practices.

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

Investment strategy

The environmental and social characteristics promoted by the Portfolio consist in favouring fixed income securities in scope whose business activities and/or conduct take an appropriate and responsible approach on such matters, with the aim of reducing harmful impact on the environment and/or society. This is achieved through ESG integration (non-binding), ESG screening (binding), and ESG engagement (non-binding) approaches.

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

ESG integration

Whilst not a binding condition, in-scope issuers are assessed using a proprietary ESG evaluation framework, where one of the ESG metrics assigned is a Fundamental ESG (Risk) Rating (which relates to an assessment of the extent to which the issuer is effectively managing the key ESG risks it faces). The Fundamental ESG (Risk) Rating comprises of five possible ratings categories, ranging from 'very high' to 'very low'.

ESG screening

The Portfolio implements negative screening and/or norms-based screening which are applicable to the Portfolio as detailed in the Investment Management Agreement.

ESG engagement

Whilst not a binding condition, engagement with issuers and key other stakeholders may be conducted on material ESG issues to protect for the environmental and social characteristic being promoted by the Portfolio. The Investment Manager may actively engage with companies and issuers in order to seek to improve their ESG practices and the Portfolio may retain securities from such companies and issuers if the Investment Manager deems this engagement is in the best interests of the Portfolio and Client, where feasible and appropriate to do so.

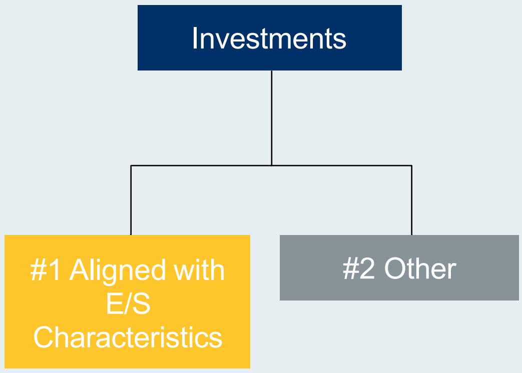
Policy to assess good governance practices of the investee companies

The assessment of good governance practices are considered as part of the negative screening and/or norms-based screening applicable to the Portfolio as detailed in the Investment Management Agreement. This includes, but is not limited to, using available data from external ESG research providers, and based on those considered to have (i) failed to comply with UN Global Compact Principles (which cover human rights, labour standards, the environment and anti-corruption).

Proportion of investments

The Portfolio is expected to invest 100% of its net assets in fixed income securities in scope which are aligned with the E/S characteristics promoted by the Portfolio (#1).

In line with the Portfolio's investment policy, at least eighty percent (80%) of the Portfolio's net assets will be invested in fixed income securities in scope which are aligned with the E/S characteristics promoted by the Portfolio (#1), subject to any security which is in the process of selling because it no longer meets the ESG considerations applied by the Portfolio. Such a proportion is solely a minimum and the exact percentage of the investments of the Portfolio that attained the promoted environmental or social characteristics will be available in the annual report.



#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.

At a maximum, the remaining twenty percent (20%) may be held in cash and in short-term bank certificates and Money Market Instruments which 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 a maximum of twenty percent (20%) of its net assets in instruments which do not contribute directly to the E/S characteristics promoted by the Portfolio such as cash, short-term bank certificates and Money Market Instruments.

Such instruments may be used for the purposes of capital preservation and do not follow any minimum environmental or social safeguards.

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

The Portfolio may use derivatives, but this is not to promote the environmental or social characteristics. The ESG evaluation applies to financial derivative instruments where a single issuer is the underlying asset (i.e., credit default swaps) and neither long or short positions are permitted on any excluded issuers as a result of sustainability factors in order to promote the environmental or social characteristics.

A Portfolio may have exposure to excluded issuers via financial derivative instruments including, but not limited to, those where a financial index is the underlying, which may be used for investment, hedging purposes and efficient portfolio management and not to promote the environmental or social characteristics. Moreover, any exclusion applicable to sovereign issuers (where relevant to the strategy) does not restrict the Portfolio from having exposure to instruments which are indirectly related to such issuers such as currency or interest rate derivative instruments, as these do not promote the environmental or social characteristics. Exposure to financial derivative instruments is not monitored based on the Portfolio's net assets and therefore not reflected as part of the asset allocation above. Instead, monitoring will be in line with the global exposure limits of the Portfolio.

Monitoring of environmental or social characteristics

To attain the environmental and social characteristics being promoted by the Portfolio, the sustainability indicators used to assess, measure and monitor fixed income securities in scope include, but are not limited to:

- The share of in scope fixed income securities held by the Portfolio which are covered by the Investment Manager's ESG evaluation.
- The share of in scope fixed income securities which are compliant and not in active breach of any ESG Exclusion / Negative screening (product based) and ESG Norms Based Screening (conduct based) screening applicable to the Portfolio as detailed in the Investment Management Agreement.

In-scope securities include 1) securities with direct exposure to the issuer, such as corporate and/or sovereign bonds (as applicable) as well as Securitised Credit Securities, and 2) financial derivative instruments with indirect exposure where the issuer is the underlying, such as credit default swap, which contribute to the attainment of the environmental or social characteristics being promoted.

The Portfolio operates a range of mechanisms to ensure ongoing attainment of the environmental and social characteristics. These include, but are not limited to:

- A formal review of the issuer ESG evaluations every two years, although this can be initiated sooner where there is sufficient cause to question the ongoing validity of the assigned Fundamental ESG (Risk) Rating,..
- There are processes in place for implementing, maintaining and monitoring issuers restricted from investment (resulting from ESG screening). This is managed internally by compliance and investment policy functions.
- Ongoing engagements with issuers (and other stakeholders as appropriate) which provide updated ESG insights and views of issuers and ESG issues.
- There are internal mechanisms which enable ongoing monitoring by investment professionals and fixed income members of the Responsible Investment (RI) team of individual investments and portfolios against a range of ESG metrics (e.g., portfolio ESG score), information on the status of issuer ESG evaluations completed, as well as enable alerts to be set up to prompt action (e.g., when the formal 2-year ESG review is due).

Methodologies

There are different methodologies applied to fixed income securities in scope to ensure that the environmental and social characteristics of the Portfolio are met.

ESG integration

In-scope issuers are assessed using a proprietary ESG evaluation framework, where the ESG assessment results in two complementary ESG metrics: a Fundamental ESG (Risk) Rating (which relates to an assessment of the extent to which the issuer is effectively managing the key ESG risks it faces), and an Investment ESG Score (which refers to the extent to which the ESG factors/risks the issuer is exposed to are considered to have any investment relevance and materiality).

To arrive at the Fundamental ESG (Risk) Rating for an issuer, the issuers ESG profile is assessed through different lenses including, but not limited to:

- How the issuer is perceived from third-party vendor.
- How the issuer performs across a range of core ESG factors/risks of concern, irrespective of its specific industry/economic peer group and profile.

  For corporate issuers, these include areas such as:

  - The business footprint including, but not limited to, the presence of the issuer in countries with high corruption, the extent to which the business model is sensitive to bribery & corruption risks, and the inherent sustainability footprint of the business on the planet and society.
  - Governance matters where considerations include, but are not limited to, factors such as: ownership/sound management structures, board independence and accountability, management quality, accounting practices, as well as broader issues of culture and ethical conduct.
  - Social matters including, but not limited to, the existence of formal internal and external stakeholder engagement practices, employee relations and the regulatory compliance track record.
  - The environment and the existence of environmental management practices, climate/carbon management efforts and regulatory compliance track record for instance.

  For SSAs issuers like sovereigns, these include areas such as:

  - Governance matters include, but are not limited to, institutional frameworks and rule of law, corruption risks, and the existence of democratic governance processes.
  - Social issues including but are not limited to, working conditions and labour rights, income inequalities, as well as education and healthcare provisioning.
  - Environment factors such as, but are not limited to, vulnerability and management of climate change risks, natural resource management, and food security risks.

- How the issuer compares relative to its industry / economic peer group (where applicable) on the most material ESG factors/risks, and whether its practices are improving or not.

Multiple ESG data sources are utilised as part of the assessment of an issuer, and in ongoing monitoring activities. Such data forms an input, rather than dictating what the Fundamental ESG (Risk) Rating that is assigned to each issuer should be. The monitoring of ESG data and developments on an ongoing basis may potentially highlight new ESG risks and controversies and may also prompt a review of the ongoing validity of the assigned Fundamental ESG (Risk) Rating.

The credit analysts conduct the initial issuer ESG evaluation and assigns the ESG metrics, this is based on a qualitative judgement, balancing consideration of the various ESG factors/risks included in the analysis. These are then reviewed and finalised by the fixed income members of the RI team, prioritised depending on the assigned Fundamental ESG (Risk) Rating. The process operates by consensus.

A new issuer cannot be invested in without prior ESG assessment to ensure it is suitable. Given potential timing challenges in completing the standard ESG evaluation and primary issuance placements in the market, a preliminary ESG analysis can be undertaken as a minimum in certain instances. A more concise version of the standard issuer ESG evaluation, the preliminary ESG analysis is based primarily on third-party ESG metrics.

There is a formal review of an issuer ESG evaluation every two years, although it can be initiated sooner where there is sufficient cause to question the ongoing validity of the assigned Fundamental ESG (Risk) Rating.

ESG screening

The Portfolio implements negative screening and/or norms-based screening as detailed in the Investment Management Agreement.

ESG engagement

Whilst not a binding condition, engagement with issuers and key other stakeholders may be conducted on material ESG issues. Such activities will inform on the issuer ESG assessment and the ongoing validity of the assigned Fundamental ESG (Risk) Rating. Such activities may be undertaken by the credit analyst and/or fixed income members of the RI team.

Data Source and Processing

Data sources used

Different data sources, from different stakeholders, input into the attainment of the environmental and social characteristic being promoted by the Portfolio by informing on which fixed income securities in scope are eligible and which are excluded from investment.

ESG integration

Multiple ESG data sources are utilised as part of the assessment of an issuer (in terms of what the Fundamental ESG (Risk) Rating that is assigned to each issuer should be), and in ongoing monitoring activities. These include a mix of external and internal (credit and ESG) insights such as: third-party vendors, company management contact / disclosures, sell-side brokers, stakeholders such as regulators, non-governmental organizations, industry groups, media channels specializing in ESG news flow, as well as the in-house sector credit analyst's knowledge of issuers, sectors and regions they have responsibility for.

External ESG data forms an input, rather than dictating whether the issuer/security qualifies for the sustainability themes, or what the Fundamental ESG (Risk) Rating that is assigned to each issuer should be. Access to some of the external ESG data and insights incur of fee, whilst others are open-source and so available at no cost. The timeliness of the ESG data update also varies between the different sources.

ESG screening

The Portfolio implements negative screening and/or norms-based screening as detailed in the Investment Management Agreement.

Data from third-party ESG vendors, as well as from other sources (including but not limited to, those such as regulatory agencies), define the specific issuers excluded based on the ESG exclusion criteria. Such information is refreshed on a routine basis to ensure it remains up to date. Where an issuer is held, and its eligibility status changes such that it no longer eligible for investment, it will be disposed of in a timely manner that is consistent with the best interests of clients.

Updated investment restrictions lists implemented and monitored by compliance and investment policy functions.

ESG engagement

Many of the ESG data sources utilised for ESG integration are also used to inform on engagement activities. There may also be targeted dialogue with issuers and other relevant stakeholders.

Measures taken to ensure data quality

The scope of the ESG data can range from an issuer overall ESG rating and scores, to its status on specific issues such as ESG controversies, or on their exposure to climate change and positive impact solutions. There is ongoing refresh and reviews of the data from providers on a regular basis to ensure access to the most recent ESG data.

Data from third-party ESG vendors is accessed in a variety of ways, such as via the provider's online platform or via a data feed which incorporates the data into internal investment information systems to enable ESG analysis and monitoring. The majority of data from the providers is derived from publicly available information generated by the issuer or other stakeholders, but in some cases the data has been generated by the vendor's in-house experts. In more limited instances, some of the data may be estimated e.g., carbon related estimates.

There are a number of steps undertaken to ensure that the provide and quality of data/research from third

party ESG vendors will meet expectations. These include, but are not limited to the following:

• Prior to any subscription, market analysis is conducted to determine the different competitors for the product/services, where the assessment considers, but is not limited to matters of issuer coverage, product quality, client servicing levels as well as costs.

• A trial access period is usually undertaken, during which, ESG and investment professionals will test potential research and analysis may be conducted on specific portfolios to evaluate the outputs in terms of the investment coverage and output quality. In this way, potential limitations are identified, evaluated and inform on decisions as to whether the provider is suitable.

Once successful providers are onboarded, there is ongoing dialogue and engagement between users of the output and the provider representations to ensure that the quality and accuracy of data and research continues to meet expectations, and issues are flagged and addressed effectively and efficiently. For example, direct training opportunities may be sought for users of the data to understand the product and new ways to integrate it. Engagement may be trigger where there are consultations around changing research product methodologies or new solutions developed.

Investment teams may also discuss research findings directly with the providers' ESG analysts. In certain cases, where inaccuracies have been identified or other data quality issues have been identified, these are addressed by engagements facilitated 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, the subscription will be terminated.

Data and information on an issuer sourced from third party ESG vendor(s) may also be verified with the issuer directly as well as other stakeholders to ensure quality. Examples where this may occur are in relation to exposure data to areas such as, but not limited to, sustainable impact solutions, involvement in ESG controversies or sensitive/controversial economic activities. In some instances, where there is greater confidence in the accuracy and integrity of the data from the alternative source other than the third party ESG vendor(s) or in the internal interpretation of qualification, this will replace what has come from the third party ESG vendor(s). Examples where this may be the case are where the third party ESG vendor(s)'s data and information is based on an estimate and now there is reported data, or where their data does not reflect the latest publicly disclosed by the issuer as their update cycle is lagging, or due to the specifics of their methodology.

How data is processed

Data from third-party ESG vendors is accessed in a variety of ways, such as via the provider's online platform or via a data feed which incorporates the data into internal investment information systems to enable ESG analysis and monitoring.

The investment and RI teams focus on the ESG factors/risks that it considers have the potential to impact the value of the investment. 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 analysis and evaluations for issuers held in/relevant to a strategy.
- 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.
- Specific tools and analytics such as issuer business involvement analysis, exposure to positive sustainable impacts, and climate data and climate scenario analysis.
- Metrics which will be relevant for ESG regulations such as the Principle Adverse Impact indicators (PAIs) being considered by the strategies derived from European regulation such as SFDR.

The issuer ESG evaluation process applied as part of the ESG integration approach contains specific ESG data points into the template, and the completion of the document involves documentation of views, backed by any information resources this is based on. These inform on the assigned Fundamental ESG (Risk) Rating assigned to the issuer.

Proportion of data estimated

Where possible, data used will always be the most recently publicly published by an issuer. This is received either directly from the issuer or via third-party ESG vendor(s). Where no data has been published, whether an estimation of that data point may be used, varies depending on the nature of the ESG data and the specific data point. In some in cases, no estimation is used, in others, an estimation may be applied. For example, estimates may be applied to revenues exposure to sensitive/controversial economic activities, but not to whether the issuer is exposed to that activity unless there is reported information. Where estimates are used, these may be produced by a third-party proprietary internal methodology (e.g., such as is the case by the third party ESG vendor in producing estimate for carbon emissions where it has not been reported by the issuer).

Limitations to methodologies and data

There may be limitations to the methodologies and data used in the Portfolio for ESG integration, ESG negative screening, ESG engagement for fixed income securities in scope. These include, but are not limited to:

ESG integration

The assessment of an issuer's environmental and social characteristics is reliant on publicly available information, whether it is sourced directly by the Investment Manager or via third-party ESG vendor(s), which may could negatively impact the perceived quality of their ESG practices. The publicly available information is largely derived from the issuer's own public reporting, but also includes data from various other stakeholders. The resulting range in the availability (e.g., there being less coverage of the fixed income issuers universe as compared to equity), quality (e.g. accuracy, timeliness, comparability etc.) and reliability of data (e.g. potential bias and subjectivity), differing ESG assessment methodologies (e.g. differing in scope and assessment criteria) of the external parties could materially affect the Investment Manager's ESG assessments. 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.

Limitations may also result due to the resource constraints of the issuers themselves as a function of their size, sector or geography. For example, smaller, private corporate issuers, those not in high ESG impact sectors, or those in emerging markets may be more likely to lack the resources or awareness to publicly report on ESG matters. The practice of annual reporting covering the previous 12-month period, may mean ESG data and information disclosed by the issuers is a backward looking and may not sufficiently capture more forward-looking trends. Issuers themselves may also be selective in the ESG data and information they choose to disclose, and in which investors they engage with and provide requested information to, so smaller investors may lack the leverage to obtain data and information.

The ESG assessment based on the proprietary issuer ESG evaluation framework is ultimately a subjective one. Whilst it utilises a range of quantitative and qualitative data from a range of sources are used as inputs, the resulting assigned issuer ESG metrics reflects the Investment Manager's views on the relative balance of different ESG performance characteristics for that issuer, and the risk this can present.

ESG screening

The Portfolio implements negative screening and/or norms-based screening as detailed in the Investment Management Agreement.

The determination of whether an issuer is restricted from investment is reliant on the information provided by third-party ESG vendors, who in turn are reliant on the publicly available information derived from the issuer's own public reporting, but also includes data from various other stakeholders. The scope of issuer coverage, quality (e.g., accuracy, timeliness etc.) and reliability of data, differing ESG assessment methodologies of the external parties could materially affect the accuracy of the investment restrictions applied.

ESG engagement

Whether there is engagement with an issuer and/or its relevant stakeholders, and how this is designed and conducted may impact the quality of the ESG assessment. As may the level of ESG expertise and resourcing available, which would impact on the Investment Manager's ability to effectively engage.

How limitations do not affect the environmental or social characteristics promoted

In the absence of publicly available ESG data and information from/on issuers, and even in cases where information is available on an issuer sourced from third party ESG vendor(s), the Investment Manager may take steps to source or verify this for quality. Engagement may be directed at issuers, but also other relevant stakeholders such as regulators or civil society. In this way, the quality of ESG data and information can also be cross-referenced and validated. In some instances, where there is greater confidence in the accuracy and integrity of the data from the alternative source other than the third party ESG vendor(s) or in the internal interpretation of qualification, this will replace what has come from the third party ESG vendor(s).

The design of the issuer ESG assessment process involves the investment analysts conducting the initial ESG evaluation assigning the associated ESG metrics, and this is reviewed and finalised by fixed income members of the RI team, prioritised depending on the assigned Fundamental ESG (Risk) Rating. This ensures a consistency in how issuers are being assessed and metrics assigned, and that the analysis captures the most appropriate and relevant points. The ongoing monitoring, formal 2-year review cycle and the potential to conduct the review sooner if considered appropriate to do so, enables the ESG assessment to be informed by data and information as and when it becomes available/is updated. Ongoing review is conducted to ensure maintenance of appropriate ESG resources in order for ESG assessments to be robust. This includes consideration of ESG education and training, as well as internal ESG specialist staffing capacity and access to necessary ESG data and information.

Due diligence

The Investment Manager implements a range of processes to support the ESG integration, ESG screening and ESG engagement approaches applied by the Portfolio for fixed income securities in scope.

To aid the selection of third-party ESG vendors, market analysis is conducted on their offering in terms of quality of ESG analysis and coverage of issuers. The Investment Manager trials the services of interest, and if onboarded, there is continuous interactions to ensure the products subscribed to remain fit for purpose.

Where a data or methodology issue has been identified, these will be shared with the provider and actions discussed to address them.

Whilst ESG data and information on issuers, sectors, and specific ESG topics may be available from third-party ESG vendors, the Investment Manager may itself review the underlying source material as circumstances may have changed since they collated the details in terms of availability and quality. Engagement may be directed at issuers, but also other relevant stakeholders such as regulators or civil society. In this way, the quality of ESG data and information can also be cross-referenced and validated.

The investment analysts conduct the initial ESG evaluation assigning the ESG metrics, and this is reviewed and finalised by fixed income members of the RI team, prioritised depending on the assigned Fundamental ESG (Risk) Rating. This ensures a consistency in how issuers are being assessed and metrics assigned, and that the analysis captures the most appropriate and relevant points. Decisions on the ESG metrics assigned to issuers are documented in the Investment Manager's internal investment information systems, and investment professionals are responsible for maintaining these. The process for assigning of the issuer

Fundamental ESG (Risk) Rating process operates by consensus. Where an agreement on an issuer cannot be reached, the case is escalated to the Chief Investment Officer (CIO) for a decision.

As well as ongoing monitoring of ESG developments to capture new/updated data and information there is a formal full deep dive review of the ESG evaluations every two years, although it can be initiated sooner where we have sufficient cause to question the ongoing validity of the assigned ESG metrics (particularly the Fundamental ESG (Risk) Rating). Engagement activities with issuers and other relevant stakeholders, which may include research trips/site visits, also support due diligence activities. From time to time, bespoke independent ESG research may be commissioned in order to fully assess its environmental and social characteristics.

There is also portfolio level ESG analysis leveraging either third-party ESG vendors (e.g., portfolio level ESG scores, carbon emissions analysts, alignment to the UN Sustainable Development Goals) or in-house ESG metrics which enable tracking of the overall portfolio environmental and social characteristics. The investment policy and risk functions have processes in place to monitor issuer and portfolio holdings against ESG restrictions (as well as other portfolio guidelines) and can prompt action as needed.

Engagement policies

Whilst not a binding condition, engagement with fixed income securities in scope focusing on issuers and key other stakeholders may be conducted on material ESG issues. Such activities will inform on the issuer ESG assessment and the ongoing validity of the assigned sustainability themes and Fundamental ESG (Risk) Rating.

The majority of engagement activities focussed on gaining insights into an issuer's management of key ESG matters. In other instances, engagement may be to encourage issuers to adopt more progressive ESG practices, or to better determine its qualification to our sustainability themes.

- ***Engagement for insight (fact finding):*** this type of interaction may occur in order to better understand where an ESG practice or performance matter is something we are comfortable with, or better determine its qualification to our sustainability themes. In the case of the former, it may occur as part of a routine issuer interaction and be unprompted by an actual performance issue. We would then evaluate whether the information gained would lead to a change of view on an issuer, and this would be factored into the ESG assessment of the issuer, and/or the investment positioning. Whether it would change the ESG assessment would depend on a number of factors including how material an issue is given the economic activity, geographical footprint, and performance trend, etc. If there is no change in the Fundamental ESG (Risk) Rating assigned, this would reflect the conclusion that the information does not change the status of the issuer's ongoing ESG suitability, so there are no resulting investment action required. The escalation process would stop. Where there is a change, the change could be an upgrade or a downgrade of the issuer's ESG metric (e.g., Fundamental ESG (Risk) Rating). The escalation process may stop at this stage, but if it is felt there is scope to engagement to improve practices, the escalation would move to engaging for influence.

- ***Engagement for influence (change facilitation):*** this type of engagement may occur as a result of an incident and/or performance being at a level which is not considered in line with what the Investment Manager would consider to be acceptable/appropriate.

  Where this is considered an action the Investment Manager would want to proceed with, the Investment Manager would evaluate the best possible approach to bring about the required outcome. Considerations of what the goals/objectives would be, the potential timelines for results, and what outputs/outcomes would evidence the results needed. Considerations would also be whether bilateral engagement would be effective (a function of the extent to which the Investment Manager has existing relations with the issuer, and how good these are) as compared with working collaboratively with other stakeholders including other investors; and consideration of whether the issue being engaged on is one the issuer can reasonably be expected to influence or whether it is a systematic issue, which requires wider industry/policy change to bring about positive change.

  The Investment Manager would look to track its engagement activities and monitor progress and effectiveness and take the appropriate action.

Engagement may occur in response to an event or proactively as part of the Investment Manager's engagement activities. The focus of engagement may include, but not limited to, ESG disclosure, ethical business conduct, labour and human rights as well as environmental issues such as climate change. It can occur bilaterally or working in collaboration with external stakeholders. Such activities may be undertaken by the credit analyst and/or fixed income members of the RI team. Details of engagement activities may be kept confidential in order to foster a constructive relationship with the issuer.

Incidents/controversies and reputational risks are considered as part of the ESG assessment process. The issuer ESG evaluation process provides an avenue for identification of areas where issuers may have heightened exposure to potential ESG related incidents, either through industry/operational exposure or weak management/mitigation of risks and resultant poor performance. In terms of responding to material ESG incidents/controversies where this has been identified, this is a collaborative effort between the Investment Manager's fixed income members of the RI team and the investment teams, primarily with the investment analyst covering the issuer/sector/region. In some instances, it may require issuer engagement to better understand the situation, the management response and any actions resulting from this. In other cases, engagement may require the Investment Manager to suggest changes to existing issuer ESG practices to mitigate further risks.

NOTE: the Investment Manager shall have full responsibility for any proxy voting activity for the Portfolio .

Where an index is designated as a reference benchmark for the purpose of attaining the environmental or social characteristics promoted by the financial product, '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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