

Statement on principal adverse impacts of investment decisions on sustainability factors

Dated 28 June 2024 (amendment to the version dated 8 March 2024)

Financial market participant Name: J.P. Morgan SE ("JPMSE"); LEI: 549300ZK53CNGEEI6A29

Summary

J.P Morgan SE ("JPMSE"), LEI: 549300ZK53CNGEEI6A29 considers principal adverse impacts ("PAIs") of its investment decisions on sustainability factors. The present statement is the consolidated statement on principal adverse impacts on sustainability factors of JPMSE.

This statement on principal adverse impacts on sustainability factors covers the reference period from 1 January to 31 December 2023.

The EU Sustainable Finance Disclosure Regulations (SFDR)¹ aim is to help investors by providing more transparency on sustainability-related topics. SFDR requires specific disclosures regarding how Financial Market Participants (FMPs) consider Principal Adverse Impacts (PAIs), which are defined as negative effects that investment advice could have on sustainability factors. FMPs are required to describe the PAIs associated with their investment decisions as well as policies with reference to indicators covering the environment and social issues that may, by way of example, include respect for human rights, anti-corruption, and anti-bribery matters.

This statement covers activity where JPMSE is the FMP as defined under SFDR. The report covers the following registered branches where JPMSE conducts its activities in London, Brussels, Luxembourg, Milan, Madrid, and Frankfurt platforms, and beginning in October 2023 also incorporates data from the Paris branch. The transfer of material business activities of JPMorgan Chase Bank, N.A., Paris ("JPMCB Paris") to JPMSE Paris was completed in October 2023. The underlying products covered within this legal entity report, include any instrument held in a discretionary investment management account within the JPMSE entity. This would encompass the following types of products:

Product family	Examples of products within family	
Cash Equities	Equities which are traded on exchanges globally	
Cash Fixed Income	Fixed Income securities (investment grade and high yield) issued by governments, agencies and entities globally	
Structured Products	Structured Products issued by financial counterparties and offered on a private placement basis	
Over The Counter Derivatives	FX forwards (PAIs are not considered for this product type)	
Mutual Funds, Exchange Traded Funds (ETFs) and Exchange Traded Commodities (ETCs)	Mutual Funds, ETFs and ETCs	
Hedge Funds	Hedge Funds	

With regards to JPMSE's discretionary investment management business, JPMSE has enhanced its due diligence procedures to create a focused PAI outreach process. This outreach process involves asking third-party managers and investment advisors, on a periodic basis, a series of questions designed to identify the current and potential PAIs of funds/strategies approved for use in JPMSE's products. Please note the source of the data contained within this report and in the table below was MSCI Inc., MSCI ESG Research LLC, or their affiliates ("MSCI"2), a third-party data provider.

¹ Regulation (EU) 2019/2088 of the European Parliament and of the Council of 27 November 2019 on sustainability - related disclosures in the financial services sector

² This disclosure was developed using information from MSCI ESG Research LLC or its affiliates or information providers. Although JPMSE and its affiliates' information, MSCI ESG Research LLC and its affiliates (the "ESG Parties"), obtain information (the "Information") from sources they consider reliable, none of the ESG Parties warrants or guarantees the originality, accuracy and/or completeness of any data herein and expressly disclaim all express or implied warranties, including those of merchantability and fitness for a particular purpose. The Information may only be used for your internal use, may not be reproduced or redisseminated in any form and may not be used as a basis for, or a component of, any financial instruments or products or indices. Further, none of the Information can in and of itself be used to determine which securities to buy or sell or when to buy or sell them. None of the ESG Parties shall have any liability for any errors or omissions in connection with any data herein, or any liability for any other damages (including lost profits) even if notified of the possibility of such damages.



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Within this legal entity report 18 mandatory³ and 2 voluntary PAI⁴ indicators, as defined by SFDR, include the Mandatory PAI indicators that apply to investee companies (GHG emissions, Carbon footprint, GHG intensity of investee companies, Companies exposure to companies active in the fossil fuel sector, Share of non-renewable energy consumption and production, Energy consumption intensity per high impact climate sector, Activities negatively affecting biodiversity-sensitive areas, Emissions to water, Hazardous waste and radioactive waste ratio, Violations of UN Global Compact principles and Organisation for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises, Lack of processes and compliance mechanisms to monitor compliance with UN Global Compact principles and OECD Guidelines for Multinational Enterprises, Unadjusted gender pay gap, Board gender diversity, Exposure to controversial weapons (anti-personnel mines, cluster munitions, chemical weapons and biological weapons), Mandatory PAIs that apply to Sovereign/Supranationals (GHG intensity, Investee countries subject to social violations), Mandatory PAIs that apply to investments in Real Estate Assets (Exposure to fossil fuels through real estate assets, Exposure to energy-inefficient real estate assets), Voluntary PAI indicators (Exposure to areas of high water stress and Lack of human rights policy).

JPMSE utilises a third-party data provider, MSCI, to obtain the PAI data used in this legal entity report and to calculate the PAI metric values. This third-party data is used in conjunction with JPMSE's internal portfolio position level data utilising snapshots taken on 31 March, 30 June, 30 September and 31 December of the relevant year. For this report, the final PAI value was calculated using PAI values from MSCI as of 31 December 2023.

AUM for the underlying portfolios within JPMSE varied throughout the reference period. Please see below for reference as to AUM variance throughout the year- all figures are in reflected in EUR.

31 March 2023	30 June 2023	30 September 2023	31 December 2023
26 billion	27 billion	27 billion	30 billion ⁵

The PAIs of JPMSE investments varied throughout 2023, fluctuating in values across the four aforementioned quarterly periods for which JPMSE collected data.

We do not consider the PAIs related to real estate assets as they are not held within JPMSE discretionary investment management accounts.

The inclusion of the Paris branch significantly impacted AUM in Q4 2023 and led to an increase in some absolute PAI values. Increases were observed in Scope 1 and Scope 2 GHG emissions, GHG intensity of investee companies, non-renewable energy consumption and production, and energy consumption intensity across various NACE Codes (C, E, F, H, L), hazardous and radioactive waste ratios, and exposure to controversial weapons as compared to the previous reference period.

Conversely, there were improvements or decreases in several PAIs, including Scope 3 GHG emissions, total GHG emissions, carbon footprint, exposure to fossil fuel sector companies, and energy consumption intensity for other specific NACE Codes (A, B, D, G). Additionally, there were reductions in activities negatively affecting biodiversity-sensitive areas, emissions to water, violations of UN Global Compact principles and OECD Guidelines, unadjusted gender pay gap, board gender diversity, GHG intensity for sovereigns and supranationals, sovereign and supranational investee countries subject to social violations, exposure to high water stress areas, and lack of human rights policy as compared to the previous reference period.

JPM senior leadership reviews these final PAI numbers annually to see how they are changing from year to year to stay informed on how our PAI numbers are trending and evolving.

Reporting is impacted by MSCI's (our vendor for PAI) methodology for SFDR reporting. Changes include the consideration of coverage as a factor in portfolio weighting, data coverage for the energy consumption intensity and enhanced features to better differentiate corporate from sovereign issuers. Data coverage is based on MSCI methodology and data. (See 'Historical comparison' section for details)

As in 2022, the aggregate exposure in a number of PAIs may have been impacted over the course of the year by changes in the current value of investments driven by major geopolitical and market developments. As JPMSE continues to monitor its PAI exposures over time, the actions planned to enhance its process are outlined in the following table. Please refer to additional disclosures noted in the section "Description of policies to identify and prioritise principal adverse impacts on sustainability factors" for information about the limitations of the data and associated commentary in this legal entity report.

Agency Securities Financing (as defined below)

For the agency securities financing ("Agency Securities Financing") business, JPMSE (acting through its Luxembourg Branch) ("JPMSE Luxembourg") acts as an agent lender with limited discretion by re-investing cash collateral in accordance with investment guidelines approved by its clients ("Portfolio Management Activities"). Due to the limited discretion afforded to JPMSE Luxembourg as an agent lender, it does not consider the PAIs of its investment decisions on sustainability factors for the Agency Securities Financing business' Portfolio Management Activities.

Description of the principal adverse impacts on sustainability factors

Indicators applicable to investments in investee companies

³ Mandatory PAIs refers to the PAIs that need to be reported on, as long as they apply to the entities' line of business at a legal entity level according to Table 1 of Annex 1 of the SFDR Regulatory Technical Standards

⁴ Voluntary PAIs refers to the PAIs listed in Table 2 and Table 3 of Annex 1 of the SFDR Regulatory Technical Standards, where one environmental indicator in Table 2 and one social indicator in Table 3 needs to be selected at minimum

⁵ Includes assets from the Paris branch



Adverse sustai	nability indicator	Metric	Impact 2023	Impact 2022	Explanation	Actions taken, and actions planned and targets set for the next reference period
			CLIMATE AND C	THER ENVIRON	MENT-RELATED INDICATORS	
Greenhouse gas emissions	1. GHG emissions	Scope 1 GHG emissions	1,074,801 Tons of CO2 equivalent emissions	1,020,018 Tons of CO2 equivalent emissions	Scope 1 emissions are emissions caused directly by an organisation's activities (e.g. company facilities/vehicles) GHG emissions are calculated according to following formula using data obtained from MSCI \[\sum_{\text{investee company's enterprise value}}^{\text{Current Value of Investments in investee company}} \] Note that Investee companies scope(x) GHG emissions are calculated according to following formula using data obtained from MSCI \[\sum_{\text{investee company's enterprise value}}^{\text{Value of Investments in investee company}} \] The property of the total AUM in scope for PAI legal entity reporting and an average of the PAI and AUM values at the end of each quarter in 2023.	Actions taken in 2023 Continued to evaluate and update PAI data sources and methodologies from third-part vendor(s) and third-party managers.
		Scope 2 GHG emissions	207,806 Tons of CO2 equivalent emissions	196,089 Tons of CO2 equivalent emissions	Scope 2 emissions are indirect emissions resulting from an organisation's energy consumption (e.g. purchased electricity). GHG emissions are calculated according to following formula using data obtained from MSCI. \[\sum_{\text{current Value of Investments in investee company}} \] \[\sum_{\text{Investee company's enterprise value}} \] Yes long to fine total AUM in scope for PAI legal entity reporting and an average of the PAI and AUM values at the end of each quarter in 2023.	Implemented enhanced outreach by requesting descriptions from some third-party managers and investment advisors of an actions taken that avoid or
		emissions equivalent emissions of CO2 equivalent emissions GHG emissions are calculated from MSCI. Current Value of Investme Investee company's scope for PAI legal entity	Scope 3 emissions are all other indirect emissions including. value chain (e.g. leased assets, business travel, distribution). GHG emissions are calculated according to following formula using data obtained from MSCI. \[\sum_{\text{Investee company's enterprise value}}^{\text{Current Value of Investments in investee company}} \] Yes to be a company's enterprise value of the total AUM in scope for PAI legal entity reporting and is based on an average of the PAI and AUM values at the end of each quarter in 2023.	Technology infrastructure enhancement for the collection of PAI data were		
		Total GHG emissions	9,156,165 Tons of CO2 equivalent emissions	9,490,928 Tons of CO2 equivalent emissions	Total GHG emissions is the sum total annual Scope 1, Scope 2 and estimated Scope 3 GHG emissions associated with the market value of the portfolio. Companies' carbon emissions are apportioned across all outstanding shares and bonds (based on the most recently available enterprise value including cash).	our Taskforce for Climate- Related Disclosures (TCFD) • JPMSE
	2. Carbon footprint	Carbon footprint	387 Tons CO2/EUR million invested	442 Tons CO2/EUR million invested	Carbon footprint has been calculated according to following formula using data obtained from MSCI. Current Value of Investments in investee company Investee companies enterprise value X sum of investee company's scope 1,2,3 GHG Emissions current value of all investments (€M)	implemented a process to assess carbon footprint acros its discretional investment strategies to identify areas

				with 1 million EUR invested in the portfolio. Companies' carbon emissions are apportioned across all outstanding shares and bonds (based on the most recently available enterprise value including cash).
3. GHG intensity of investee companies	GHG intensity of investee companies	922.13 Tons of Scope 1, 2, and estimated 3 GHG emissions/EUR million revenue	899.59 Tons of Scope 1, 2, and estimated 3 GHG emissions/EUR million revenue	GHG intensity of investee companies is the portfolio's weighted average of its holding issuers' GHG intensity (Scope 1, Scope 2 and estimated Scope 3 GHG emissions/EUR million revenue). This has been calculated according to following formula using data obtained from MSCI: Current Value of Investments in investee company current value of all investments (€M) Investee companies revenue (€M) Please note this PAI figure is based on data coverage of 79.5% of the total AUM in scope for PAI legal entity reporting and an average of the PAI and AUM values at the end of each quarter in 2023.
4. Exposure to companies active in the fossil fuel sector	Share of investments in companies active in the fossil fuel sector	9.04 % of investments exposed to fossil fuel activities	9.10% of investments exposed to fossil fuel activities	Exposure to companies active in the fossil fuel sector has been calculated using the following MSCI formula, with MSCI data: \[\begin{align*} \text{current value of investments} \\ \text{in companies active in fossil fuel sector} \\ \text{current value of all investments (€M)} \end{align*} \text{x 100} \] This represents the percentage of the portfolio's market value exposed to issuers wit fossil fuels related activities, including exploration, extraction, mining, storage, distribution and trading of oil and gas, production and distribution of thermal coal, and production, distribution, storage and reserves of metallurgical coal Please note this PAI figure is based on data coverage of 81.5% of the total AUM in scope for PAI legal entity reporting and an average of the PAI and AUM values at the end of each quarter in 2023.
5. Share of non-renewable energy consumption and production	Share of non-renewable energy consumption and non-renewable energy production of investee companies from non-renewable energy sources compared to renewable energy sources, expressed as a percentage of total energy sources	64.21 % of investments in non-renewable energy consumption and production	64.04% of investments in non-renewable energy consumption and production	Share of non-renewable energy consumption and production has been calculated using the following MSCI formula with MSCI data: \[\sum_{\text{investee company}}^{\text{Current Value of Investments in investee company}}^{\text{Investee companies total %}} \] \[\text{Non-renewable energy consumption and/ or non renewable energy production}} \] This represents the portfolio's weighted average of issuers' energy consumption and/or production from non-renewable sources as a percentage of total energy used and/or generated. Non-renewable resources are defined as per definition (7) in this document. Please note this PAI figure is based on data coverage of 54,3% of the total AUM in scope for PAI legal entity reporting and is based on an average of the PAI and AUM values at the end of each quarter in 2023.

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6. Energy consumption intensity per high impact climate sector	Energy consumption in GWh per million EUR of revenue of investee companies, per high impact climate sector:	See below per sector	See below per sector	NACE (Nomenclature of Economic Activities) is the European statistical classification of economic activities / industry sectors. Energy consumption has been calculated for each high-impact climate sector as defined by Regulation (EC) No 1893/2006, which are associated with NACE Codes A-H and L, shown below. NACE are comparable at European level and at world level is closely aligned with the United Nations' International Standard Industrial Classification (ISIC). All figures have been calculated using MSCI data in the following formula: \[\sum_{\text{energy consumption per million EUR}} \] Please note this PAI figure is based on data coverage of 61%of the total AUM in scope for PAI legal entity reporting and is based on an average of the PAI and AUM values at the end of each quarter in 2023.	management account. In addition, with respect to investment management strategies which promote environmental and/or social characteristics (classified as Article 8 under SFDR) or which have a sustainable investment objective (classified as Article 9 under
	NACE Code A (Agriculture, Forestry and Fishing)	0.7701 GwH/million EUR revenue	0.8225 GwH/million EUR revenue	The portfolio's weighted average of Energy Consumption Intensity (GwH/million EUR revenue) for issuers classified within NACE Code A (Agriculture, Forestry and Fishing) Data coverage will be reported at the aggregate 'Energy consumption intensity' and not per sector pursuant to MSCI's revised methodology. Please note this PAI figure is based on the total AUM in scope for PAI legal entity reporting and an average of the PAI and AUM values at the end of each quarter in 2023.	SFDR), at the product level, JPMSE will continue to evaluate the potential for further incorporation of PAIs within the investment process.
	NACE Code B (Mining and Quarrying)	1.5486 GwH/million EUR revenue	1.5901 GwH/million EUR revenue	The portfolio's weighted average of Energy Consumption Intensity (GwH/million EUR revenue) for issuers classified within NACE Code B (Mining and Quarrying) Data coverage will be reported at the aggregate 'Energy consumption intensity' and not per sector pursuant to MSCI's revised methodology. Please note this PAI figure is based on the total AUM in scope for PAI legal entity reporting and an average of the PAI and AUM values at the end of each quarter in 2023.	
	NACE Code C (Manufacturing)	0.3594 GwH/million EUR revenue	0.3079 GwH/million EUR revenue	The portfolio's weighted average of Energy Consumption Intensity (GwH/million EUR revenue) for issuers classified within NACE Code C (Manufacturing) Data coverage will be reported at the aggregate 'Energy consumption intensity' and not per sector pursuant to MSCI's revised methodology. Please note this PAI figure is based on the total AUM in scope for PAI legal entity reporting and an average of the PAI and AUM values at the end of each quarter in 2023.	

NACE Code D (Electricity, Gas, Steam and Air Conditioning Supply)	6.4168 GwH/EUR million revenue	7.3730 GwH/EUR million revenue	The portfolio's weighted average of Energy Consumption Intensity (GwH/million EUR revenue) for issuers classified within NACE Code D (Electricity, Gas, Steam and Air Conditioning Supply) Data coverage will be reported at the aggregate 'Energy consumption intensity' and not per sector pursuant to MSCI's revised methodology. Please note this PAI figure is based on the total AUM in scope for PAI legal entity reporting and an average of the PAI and AUM values at the end of each quarter in 2023.
NACE Code E (Water Supply; Sewerage, Waste Management and Remediation Activities)	1.4956 GwH/EUR million revenue	1.4113 GwH/EUR million revenue	The portfolio's weighted average of Energy Consumption Intensity (GwH/million EUR revenue) for issuers classified within NACE Code E (Water Supply; Sewerage, Waste Management and Remediation Activities) Data coverage will be reported at the aggregate 'Energy consumption intensity' and not per sector pursuant to MSCI's revised methodology. Please note this PAI figure is based on the total AUM in scope for PAI legal entity reporting and an average of the PAI and AUM values at the end of each quarter in 2023.
NACE Code F (Construction)	0.1833 GwH/EUR million revenue	0.1689 GwH/EUR million revenue	The portfolio's weighted average of Energy Consumption Intensity (GwH/million EUR revenue) for issuers classified within NACE Code F (Construction) Data coverage will be reported at the aggregate 'Energy consumption intensity' and not per sector pursuant to MSCI's revised methodology. Please note this PAI figure is based on the total AUM in scope for PAI legal entity reporting and an average of the PAI and AUM values at the end of each quarter in 2023.
NACE Code G (Wholesale and Retail Trade; Repair of Motor Vehicles and Motorcycles)	0.1290 GwH/EUR million revenue	0.1507 GwH/EUR million revenue	The fund's weighted average of Energy Consumption Intensity (GwH/million EUR revenue) for issuers classified within NACE Code G (Wholesale and Retail Trade; Repair of Motor Vehicles and Motorcycles) Data coverage will be reported at the aggregate 'Energy consumption intensity' and not per sector pursuant to MSCI's revised methodology. Please note this PAI figure is based on the total AUM in scope for PAI legal entity reporting and an average of the PAI and AUM values at the end of each quarter in 2023.
NACE Code H (Transportation and Storage)	2.3374 GwH/EUR million revenue	2.0032 GwH/EUR million revenue	The portfolio's weighted average of Energy Consumption Intensity (GwH/million EUR revenue) for issuers classified within NACE Code H (Transportation and Storage) Data coverage will be reported at the aggregate 'Energy consumption intensity' and not per sector pursuant to MSCI's revised methodology. Please note this PAI figure is based on the total AUM in scope for PAI legal entity reporting and an average of the PAI and AUM values at the end of each quarter in 2023.
NACE Code L (Real Estate Activities)	0.5713 GwH/EUR million revenue	0.4935 GwH/EUR million revenue	The portfolio's weighted average of Energy Consumption Intensity (GwH/million EUR revenue) for issuers classified within NACE Code L (Real Estate Activities) Data coverage will be reported at the aggregate 'Energy consumption intensity' and not per sector pursuant to MSCI's revised methodology.

					Please note this PAI figure is based on the total AUM in scope for PAI legal entity reporting and an average of the PAI and AUM values at the end of each quarter in 2023.
Biodiversity	7. Activities negatively affecting biodiversity-sensitive areas	Share of investments in investee companies with sites/operations located in or near to biodiversity-sensitive areas where activities of those investee companies negatively affect those areas	0.12% of investments negatively affecting biodiversity-sensitive areas	0.18% of investments negatively affecting biodiversity-sensitive areas	Activities negatively affecting biodiversity sensitive areas has been calculated using the following MSCI formula with MSCI data: Current Value of Investments in companies with sites/operations located in or near to biodiversity-sensitive areas negatively affecting those areas
Water	8. Emissions to water	Tons of emissions to water generated by investee companies per million EUR invested, expressed as a weighted average	0.3416 Metric Tons/EUR million invested	0.3769 Metric Tons/EUR million invested	Emissions to water has been calculated using the following MSCI formula, with MSCI data: \[\begin{align*} \text{Current Value of Investments in investee company} & \text{Investee companies total emissions to water} \\ \text{Value of all investments (€M)} & \text{Investee company's enterprise value (in €mm)} \\ \end{align*} This represents the total annual wastewater discharged (metric tons reported) into surface waters as a result of industrial or manufacturing activities associated with 1 million EUR invested in the portfolio. Companies' water emissions are apportioned across all outstanding shares and bonds (based on the most recently available enterprise value including cash). Please note this PAI figure is based on data coverage below 0.01% of the total AUM in scope for PAI legal entity reporting and an average of the PAI and AUM values at the end of each quarter in 2023.
Waste	9. Hazardous waste and radioactive waste ratio	Tons of hazardous waste and radioactive waste generated by investee companies per million EUR invested, expressed as a weighted average	7.49 Metric Tons/EUR million invested	5.87 Metric Tons/EUR million invested	Hazardous waste and radioactive waste ratio has been calculated using the following MSCI formula, with MSCI data: Current Value of Investments in investee company Investee companies total hazardous waste ratio Investee company's enterprise value (in €mm)

					Please note this PAI figure is based on data coverage of 25%% of the total AUM in scope for PAI legal entity reporting and reflects PAI values as of 30 April 2023 and an average of the PAI and AUM values at the end of each quarter in 2023.	
Adverse susta	ainability indicator	Metric	Impact 2023	Impact 2022	Explanation	Actions taken, and actions planned and targets set for the next reference period
	INDICATO	RS FOR SOCIAL	AND EMPLOYEE, RES	PECT FOR HUM	AN RIGHTS, ANTI-CORRUPTION AND ANTI-BRIBERY MATTERS	
Social and employee matters	10. Violations of UN Global Compact principles and Organisation for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises	olations of UN Compact investments in investee via companies that have been involved in violations of the ational Share of investments in investee via companies that have been involved in violations of the UNGC principles	Share of investments in investee companies that have been involved in violations of the UNGC principles or OECD Guidelines for Multinational Enterprises Share of investments with UNGC/OECD violations O.62% of investments with UNGC/OECD violations O.62% of investments with UNGC/OECD violations O.62% of investments with UNGC/OECD violations Current Value have been or OECD Guidelines for Multinational Enterprises This represents with severe or viproducts. For midetermining 'severand Global Norm Please note this scope for PAI le	Violations of UN Global Compact principles and OECD guidelines for Multinational Enterprises has been calculated using the following MSCI formula, with MSCI data: Current Value of Investments in investee companies that have been involved in violations of the UNGC principles or OECD Guidelines for Multinational Enterprises X 100 Current value for all investments (€M) This represents the percentage of the portfolio's market value exposed to issuers with severe or very severe controversies related to the company's operations and/or products. For more information on the underlying methodology involved in determining 'severity' please refer to pages 5 to 7 of the "MSCI ESG Controversies and Global Norms Methodology" public document, especially Exhibit 2. Please note this PAI figure is based on data coverage of 81.5% of the total AUM in scope for PAI legal entity reporting and an average of the PAI and AUM values at the end of each quarter in 2023.	Actions taken in 2023 Continued to evaluate and updates to Padata sources and methodologie from third-party vendor(s) and third-party managers. Implemented enhanced outreach by requesting	
	11. Lack of processes and compliance mechanisms to monitor compliance with UN Global Compact principles and OECD Guidelines for Multinational Enterprises	Share of investments in investee companies without policies to monitor compliance with the UNGC principles or OECD Guidelines for Multinational Enterprises or grievance /complaints handling mechanisms to address violations of the UNGC principles or OECD Guidelines for Multinational Enterprises	41.81% of investments with lack of processes to monitor UNGC/OECD	43.19% of investments with lack of processes to monitor UNGC/OECD	Lack of processes and compliance mechanisms to monitor compliance with UN Global Compact principles and OECD Guidelines for Multinational Enterprises has been calculated using the following MSCI formula, with MSCI data: Current Value of Investments in investee companies without policies to monitor compliance with the UNGC principles or OECD Guidelines for Multinational Enterprises X 100 Current value for all investments (€M) The percentage of the portfolio's market value exposed to issuers that are not signatories in the UN Global Compact, not in compliance with UN Global Compact principles, or not in compliance with OECD Guidelines. Please note this PAI figure is based on data coverage of 81.5% of the total AUM in scope for PAI legal entity reporting and an average of the PAI and AUM values at the end of each quarter in 2023.	descriptions from third-party managers and investment advisors of any actions taken that avoid or reduce any PAIs identified. Actions planned in 2024 • Continue to expand PAI data sources to include information from third-party vendor(s), third-party managers and other external channels.
	12. Unadjusted gender pay gap	Average unadjusted gender pay gap of investee companies	13.06 EUR average gap between male and female pay	13.28 EUR average gap between male and female pay	Average unadjusted gender pay gap of investee companies has been calculated using the following MSCI formula with MSCI data:	

					∑ Current Value of Investments in investee companies Current value for all investments (€M) Sinvestee companies gender pay gap ratio This represents the portfolio holdings' weighted average of the difference between the average gross hourly earnings of male and female employees. Please note this PAI figure is based on data coverage of 21.5% of the total AUM in scope for PAI legal entity reporting and an average of the PAI and AUM values at the end of each quarter in 2023.	The actions above are relevant to any instrument held within a JPMSE discretionary investment management account. In addition, with respect to
	13. Board gender diversity	Average ratio of female to male board members in investee companies, expressed as a percentage of all board members	35.02% number of women on board per 100 men	34.53% number of women on board per 100 men	Board gender diversity has been calculated using the following MSCI formula with MSCI data Current Value of Investments in investee companies Current value of all investments (€M) X Board gender diversity ratio This represents the portfolio holdings' weighted average of the ratio of female to male board members, expressed as a percentage of all board members. Please note this PAI figure is based on data coverage of 80.3% of the total AUM in scope for PAI legal entity reporting and an average of the PAI and AUM values at the end of each quarter in 2023.	investment management strategies which promote environmental and/or social characteristics (classified as Article 8 under SFDR) or which have a sustainable investment objective (classified as Article 9 under
	14. Exposure to controversial weapons (anti-personnel mines, cluster munitions, chemical weapons and biological weapons)	Share of investments in investee companies involved in the manufacture or selling of controversial weapons	0.22% of investments with exposure to controversial weapons	0.21% of investments with exposure to controversial weapons	Exposure to controversial weapons has been calculated using the following MSCI formula with MSCI data: Current value of investments in investee companies involved in the manufacture or selling of controversial weapons Current value of all investments (€M) This represents the percentage of the portfolio's market value exposed to issuers with an industry tie to landmines, cluster munitions, chemical weapons or biological weapons. Note: Industry ties includes ownership, manufacturing and investments. Ties to landmines do not include related safety products. Please note this PAI figure is based on data coverage of 81.5% of the total AUM in scope for PAI legal entity reporting and an average of the PAI and AUM values at the end of each quarter in 2023.	SFDR), at the product level, JPMSE will continue to evaluate the potential for further incorporation of PAIs within the investment process.
Adverse sustaina	ability indicator	Metric	Impact 2023	Impact 2022	Explanation	Actions taken, and actions planned and targets set for the next reference period
		INDICA	TORS APPLICABLE TO	O INVESTMENTS	S IN SOVEREIGNS AND SUPRANATIONALS	
Environmental	15. GHG intensity	GHG intensity of investee countries	320.79 Tons of Scope 1, 2, and 3 emissions/EUR million revenue	327.08 Tons of Scope 1, 2, and 3	GHG intensity of sovereigns and supranational investments has been calculated using the following MSCI formula with MSCI data:	Actions taken in 2023

				emissions/EUR million revenue	$\sum_{n}^{l} \left(\frac{current\ value\ of\ investment_{i}}{current\ value\ of\ all\ investments\ (\in\!M)} \times \frac{The\ country's\ Scope\ 1,2\ and\ 3\ GHG\ emissions_{i}}{Gross\ Domestic\ Product_{l}(\in\!M)}\right)$ This represents the portfolio's weighted average of sovereign issuers' GHG Emissions Intensity (Scope 1, 2 and 3 emissions/ EUR million GDP), where "GDP" refers to the nominal gross domestic product of a country. Please note this PAI figure is based on data coverage of 48.0% of the total AUM in scope for PAI legal entity reporting and an average of the PAI and AUM values at the end of each quarter in 2023.	Continued to evaluate and updates to PAI data sources and methodologies from third-party vendor(s) and third-party
Social	16. Investee countries subject to social violations	Number of investee countries subject to social violations (absolute number and relative number divided by all investee countries), as referred to in international treaties and conventions, United Nations principles and, where applicable, national law:	6 unique countries in the portfolio 5.00% investee countries subject to social violations	7 unique countries in the portfolio 6.19% investee countries subject to social violations	Investee countries subject to social violations has been calculated through the sum of the unique count of issuers where European Union sanctions apply. This represents the portfolio's absolute number of unique sovereign issuers with European External Action Service (EEAS) restrictive measures (sanctions) on imports and exports. Please note this PAI figure is based on data coverage of 48.0% of the total AUM in scope for PAI legal entity reporting and an average of the PAI and AUM values at the end of each quarter in 2023.	managers. Implemented enhanced outreach by requesting descriptions from third-party managers and investment advisors of any actions taken that avoid or reduce any PAIs identified. Technology infrastructure enhancements for the collection of PAI data were completed to re-baseline for consistency with metrics considered for our Taskforce for Climate-Related Disclosures (TCFD) JPMSE implemented a process to assess carbon footprint across its discretionary investment strategies to identify areas of material environmental risk.



Actions planned in 2024
Continue to
expand PAI
data sources to include
information
from third- party
vendor(s),
third-party managers and
other external channels.
JPMSE
continues to evaluate
prioritisation of
carbon footprint as a
key indicator
within its discretionary
investment
management activities and
is considering
is considering feasibility of further
research to
assess the severity,
probability of
occurrence, and potentially
irremediable character of
the impacts of
climate change via the
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relevant to any instrument
held within a JPMSE
discretionary
investment
management account. In
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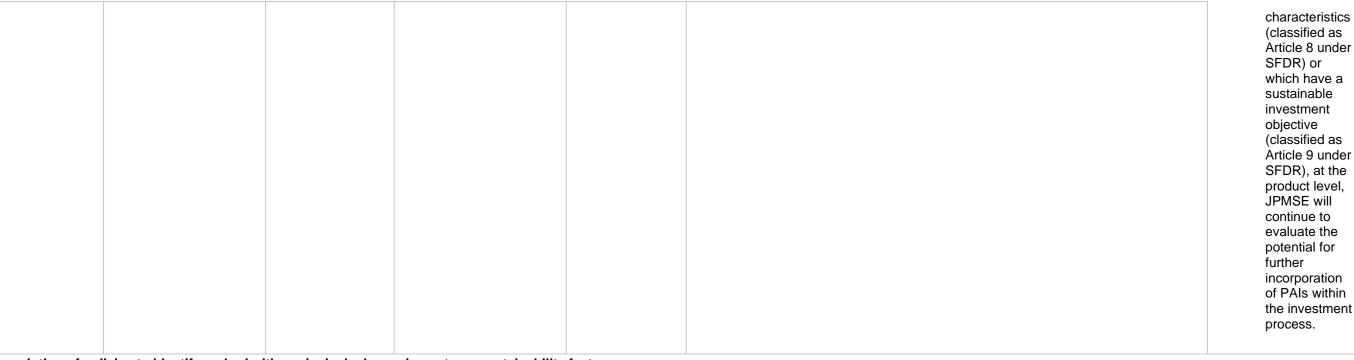
Adverse sustai	nability indicator	Metric	Impact 2023	Impact 2022	Explanation	which promote environmental and/or social characteristics (classified as Article 8 under SFDR) or which have a sustainable investment objective (classified as Article 9 under SFDR), at the product level, JPMSE will continue to evaluate the potential for further incorporation of PAIs within the investment process. Actions taken, and actions planned and targets set for the
						next reference period
			INDICATORS APPLICA	ABLE TO INVES	TMENTS IN REAL ESTATE ASSETS	
Fossil fuels	17. Exposure to fossil fuels through real estate assets	Share of investments in real estate assets involved in the extraction, storage, transport or manufacture of fossil fuels	0%	0%	Real estate assets are not held within JPMSE entity discretionary investment management accounts. As a result this PAI is not applicable and is being reported with a value of zero.	N/A
Energy efficiency	18. Exposure to energy-inefficient real estate assets	Share of investments in energy inefficient real estate assets	NA	N/A	Real estate assets are not held within JPMSE entity discretionary investment management accounts. As a result this PAI is not applicable and is being reported with a value of zero.	
Adverse sustai	nability indicator	Metric	Impact 2023	Impact 2022	Explanation	Actions taken, and actions planned and targets set for the next reference period
		OTHER I	NDICATORS FOR PRIN	NCIPAL ADVERS	SE IMPACTS ON SUSTAINABILITY FACTORS	
Water, waste and material emissions	19. Exposure to areas of high-water stress	Share of investments in investee companies with	1.9500% of investments in investee companies with sites located in areas of high-water	2.0882% of investments in investee companies with	The percentage of the portfolio's market value exposed to areas of high water stress and lack of water management policy.	Actions taken in 2023 Continued to evaluate and



Human Rights 20. Lack of human rights policy Share of investments in entities without a human rights policy Share of investments in entities without human rights policy Share of investments in entities without human rights policy The percentage of the portfolio's market value invested in entities without a human rights policy. The social voluntary indicator, tack of human rights policy, was selected based on data coverage and alignment with JPMSE's statements on human rights. Please note this PAI figure is based on data coverage of the PAI and AUM values at the end of each quarter in 2023.
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Description of policies to identify and prioritise principal adverse impacts on sustainability factors

A summary of JPMSE's policy to identify and prioritise principal adverse impacts on sustainability factors is set out below.

The governing body of JPMSE approved the policy to identify and prioritise principal adverse impacts on sustainability factors (at legal entity level) on 21 June 2024. Responsibility for the implementation of the policy (including within strategies and procedures) is allocated to the International Private Bank Head of ESG as owner of the policy and to other relevant functions. The procedure to identify and prioritise principal adverse impacts is reviewed and updated annually.

JPMSE considers principal adverse impacts ("PAIs") of its investment decisions on sustainability factors, where applicable, through the collection of PAI information from third-party fund managers and investment advisors, and dissemination of this information to our portfolio managers in its discretionary investment management (IM) business.

The methodologies used to identify and assess PAIs disclosed in this report are based on the 18 mandatory and 2 selected voluntary PAI indicators, as defined in the SFDR Regulatory Technical Standards (RTS), and the methodologies that are used by our data vendor (MSCI) to calculate the relevant PAI indicators. The 2 voluntary PAI indicators that have been selected for inclusion in this report are: (1) exposure to areas of high water stress, and (2) lack of human rights policy. The explanations regarding why these were chosen can be seen in the 'Explanation' section above.

For the reference period of 2023, JPMSE did not prioritise any PAI over the other, or assess the probability or severity of occurrence and potentially irremediable character of any PAI.

JPMSE utilises a third-party data provider, MSCI⁶, to obtain the PAI data used in this report and to calculate the PAI metric values. This third-party data is used in conjunction with JPMSE's internal portfolio position level data, utilising a snapshot taken on 31 December 2023. Quarterly snapshots were also captured internally for position data as of 31 March, 30 June, 30 September of the relevant year. For this report, the final PAI value was calculated using an average of the PAI and AUM values at the end of each quarter in 2023. MSCI's datasets are built based on proprietary methodologies and are informed by data from companies, market and industry peers, media, NGOs, multilateral and other institutions. The following sources are used by MSCI ESG Research to collect company-reported data:

- Company direct disclosure: sustainability reports, annual reports, regulatory filings and company websites.
- · Company indirect disclosure: government agency published data, industry and trade associations data and third-party financial data providers; and
- Direct communication with companies.

Data availability and quality varies across asset class. Where information in relation to an indicator was not readily available, JPMSE took the following additional steps:

- Additional third party PAI data providers were considered and monitored throughout the year for data coverage.
- An outreach exercise to fund managers was conducted in certain instances where MSCI had no data coverage.

Where PAI data was not available despite the above steps having been taken, the proportion of assets under management related to that missing data is disclosed as outlined in the coverage percentages noted in the table above.

⁶ This disclosure was developed using information from MSCI ESG Research LLC or its affiliates or information providers. Although MSCI ESG Research LLC and its affiliates (the "ESG Parties"), obtain information (the "Information") from sources they consider reliable, none of the ESG Parties warrants or guarantees the originality, accuracy and/or completeness of any data herein and expressly disclaim all express or implied warranties, including those of merchantability and fitness for a particular purpose. The Information may only be used for your internal use, may not be reproduced or redisseminated in any form and may not be used as a basis for, or a component of, any financial instruments or products or indices. Further, none of the Information can in and of itself be used to determine which securities to buy or sell them. None of the ESG Parties shall have any liability for any errors or omissions in connection with any data herein, or any liability for any direct, indirect, special, punitive, consequential or any other damages (including lost profits) even if notified of the possibility of such damages.



The underlying products covered within this legal entity report are detailed in the Summary section. JPMSE does not currently conduct any consideration of PAIs pertaining to cash and FX forwards.

The following interpretations from SFDR guidance were made in relation to PAI calculation methodology:

- JPMSE will only consider long positions in our calculations as JPMSE does not have short positions in our discretionary investment management business and MSCI only considers long positions for calculations.
- JPMSE will exclude cash and FX forwards as part of 'current investment value' calculations in both the numerator and denominator due to lack of data availability for the calculation of derivatives. We have taken the decision to exclude cash and derivatives on both sides of the calculation.
- JPMSE will include AUM from Hedge Funds but put a zero value when calculating Hedge Fund contribution to PAIs where data was not available.

JPMSE will continue to monitor upcoming regulatory guidance and adapt our methodology as further guidance is issued.

PAI information is included as part of the due diligence process for onboarding and reviewing third party managers and investment advisors. The Due Diligence team sends all third-party firms that are being recommended for distribution to EEA clients (via UCITs, AIFs, SMAs and Hedge Funds) an 'SFDR Addendum' designed to collate additional firm and strategy level information. This addendum requests information on, among other things, the approach taken to PAI at underlying product level.

This document includes data sourced by JPMSE from third party data providers (i.e., MSCI). Such data may be subject to limitations including, but not limited to: i) limitations in the third-party data provider's methodologies; ii) data lags, data coverage gaps or other issues impacting the quality of the data; iii) the fact that there are divergent views, approaches, methodologies and disclosure standards in the market, including among data providers, with respect to the identification, assessment, disclosure or determination of PAIs or indicators; iv) the fact that information, including where obtained from third-party data providers, may be based on qualitative or subjective assessments, and any one data source may not in itself present a complete picture relating to the PAI indicator that it represents; v) the fact that such data may be subject to change without notice to JPMSE by the third-party data provider, in which case JPMSE may choose to take such action (or inaction) as it deems appropriate in the circumstances. Furthermore, some data JPMSE obtains from third-party providers may not be obtained directly from investee companies, but rather represents estimated or proxy data that the third-party data provider has prepared using its own proprietary methodologies (e.g., because there is no actual investee company data available to the third-party data provider), which may be subject to limitations. While information contained in this disclosure has been obtained from sources believed to be reliable, no representation or warranty is made by JPMSE as to the quality or accuracy of such information. Content is presented only as of the date published or indicated and may be superseded by subsequent market events or other reasons.

There may be a margin of error associated with third-party data used which cannot currently be quantified.

Engagement policies

JPMSE's discretionary investment management business does not directly undertake shareholder engagement activities with investee companies (as it does not typically hold significant positions in investee companies due to the nature of its private wealth business and client base). However, as set out further in the disclosures made under Article 3g of the Directive (EC) 2007/36 of the European Parliament and of the Council, as amended by Directive (EU) 2017/828 of the European Parliament and of the Council of 17 May 2017 (Shareholder Rights Directive II – SRD II), JPMSE engages with external fund managers both before and during the period of investment to collate information as part of the selection and ongoing monitoring processes, including information about the fund managers' approaches to engagement. JPMSE's due diligence teams collect information on third party funds via requests for information and manager/strategy level questionnaires. These questionnaires include requests for further information on how each fund manager is taking actions to identify and reduce PAI exposures over time, including in relation to the voluntary PAIs selected. Once a fund or strategy is approved, an ongoing monitoring process commences. For further information, please see a link to our public SRD II disclosure here.

At present, JPMSE's discretionary investment management business does not exercise voting rights on behalf of clients and is not currently engaged with any proxy voting advisors. However, clients of JPMSE may exercise their votes, on the shares they hold in their account(s), via J.P. Morgan Online International ("JPOI") at no cost.

References to international standards

The methodologies used to identify and assess PAIs disclosed in this report are based on the 18 mandatory and 2 selected voluntary PAI indicators, as defined in the SFDR Regulatory Technical Standards (RTS), and the methodologies that are used by our data vendor (MSCI) to calculate the relevant PAI indicators. The 2 voluntary PAI indicators that have been selected for inclusion in this report are: (1) exposure to areas of high water stress, and (2) lack of human rights policy. The explanations regarding why these were chosen can be seen in the 'Explanation' section above.

For the reference period of 2023, JPMSE did not prioritise any PAI over the other, or assess the probability or severity of occurrence and potentially irremediable character of any PAI.

JPMSE utilises a third-party data provider, MSCI⁸, to obtain the PAI data used in this report and to calculate the PAI metric values. This third-party data is used in conjunction with JPMSE's internal portfolio position level data, utilising a snapshot taken on 31 December 2023. Quarterly snapshots were also captured internally for position data as of 31 March, 30 June, 30 September of the relevant year. For this report, the final

⁷ This report includes certain information on JPMSE's approach to PAIs at an organisational level, which may not be reflected within specific products or strategies offered or managed by JPMSE or J.P. Morgan more broadly. Nothing contained in this report shall be relied on as a promise or representation regarding the historic, current or future position or performance of any JPMSE product. Please refer to product-specific documentation for details of any particular financial product's approach to PAIs.

⁸ This disclosure was developed using information from MSCI ESG Research LLC or its affiliates or information providers. Although MSCI ESG Research LLC and its affiliates (the "ESG Parties"), obtain information (the "Information") from sources they consider reliable, none of the ESG Parties warrants or guarantees the originality, accuracy and/or completeness of any data herein and expressly disclaim all express or implied warranties, including those of merchantability and fitness for a particular purpose. The Information may only be used for your internal use, may not be reproduced or redisseminated in any form and may not be used as a basis for, or a



PAI value was calculated using AUM as of 31 December 2023 and PAI values from MSCI as of 31 December 2023 except where noted for certain PAI indicators noted in the table above. MSCI's datasets are built based on proprietary methodologies and are informed by data from companies, market and industry peers, media, NGOs, multilateral and other institutions. The following sources are used by MSCI ESG Research to collect company-reported data:

- Company direct disclosure: sustainability reports, annual reports, regulatory filings and company websites.
- · Company indirect disclosure: government agency published data, industry and trade associations data and third-party financial data providers; and
- Direct communication with companies.

Data availability and quality varies across asset class. Where information in relation to an indicator was not readily available, JPMSE took the following additional steps:

- Additional third party PAI data providers were considered and monitored throughout the year for data coverage.
- An outreach exercise to fund managers was conducted in certain instances where MSCI had no data coverage.

Where PAI data was not available despite the above steps having been taken, the proportion of assets under management related to that missing data is disclosed as outlined in the coverage percentages noted in the table above.

JPMSE is guided by United Nations Universal Declaration of Human Rights and the Guiding Principles on Business and Human Rights as the overarching framework for corporations to respect human rights in their own operations and through their business relationships. In addition, the Management Board of J.P. Morgan SE has affirmed the JPMorgan Chase Modern Slavery Act Statement, re-affirming our commitment to the protection of human rights. JPMorgan Chase is a member of the Wolfsberg Group, an association of 13 global banks that aims to develop frameworks and guidance for the management of financial crime risks, particularly with respect to anti-money laundering and counter-terror financing policies to enhance ethical standards and practices.

JPMSE leverages data from MSCI which incorporates international standards for PAI calculations, where applicable. For example, the "Violations of UN Global Compact principles and Organisation for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises" and "Lack of processes and compliance mechanisms to monitor compliance with UN Global Compact principles and OECD Guidelines for Multinational Enterprises" mandatory PAIs use the UNGC principles and OECD Guidelines for Multinational Enterprises.

Due to the rapidly evolving regulatory landscape and framework surrounding environmental, social and governance (ESG), JPMSE is developing an approach to consider forward looking climate scenarios but does not currently use climate scenario analysis in its investment management.

Historical comparison

Please refer to the 'Description of the principal adverse impacts on sustainability factors' section to see comparison of the 2023 PAI values. Inclusion of the Paris branch significantly impacted AUM in Q4 2023 and led to an increase in some absolute PAI values. Increases were observed in Scope 1 and Scope 2 GHG emissions, GHG intensity of investee companies, non-renewable energy consumption and production, and energy consumption intensity across various NACE Codes (C, E, F, H, L), hazardous and radioactive waste ratios, and exposure to controversial weapons as compared to the previous reference period.

Conversely, there were improvements or decreases in several PAIs, including Scope 3 GHG emissions, total GHG emissions, carbon footprint, exposure to fossil fuel sector companies, and energy consumption intensity for other specific NACE Codes (A, B, D, G). Additionally, there were reductions in activities negatively affecting biodiversity-sensitive areas, emissions to water, violations of UN Global Compact principles and OECD Guidelines, unadjusted gender pay gap, board gender diversity, GHG intensity for sovereigns and supranationals, sovereign and supranational investee countries subject to social violations, exposure to high water stress areas, and lack of human rights policy as compared to the previous reference period.

Methodology updates impacting all PAIs for the 2023 reference period, compared to the 2022 reference period, include:

- MSCI's revised methodology for SFDR reporting now considers coverage as a factor in portfolio weighting. The calculation rebases the PAI indicators to account for a full portfolio view. This in effect assumes that the value for the PAI indicators for assets for which no coverage data is available is on average the same as that for which data is available, thus the numbers disclosed in this report are representative of the entire JPMSE portfolio. Previously, assets with no coverage were included in the portfolio weighting and assumed to not have any values for the PAI indicators.
- The PAI impacts for 2022 shown here were recalculated with 2022 holdings and PAI values as of September 2023 using the revised methodology. Impacts calculated with the previous methodology are available in our 2022 report.
- Data coverage for the energy consumption intensity PAI will no longer be available per high impact climate sector. Only an aggregate across all high impact climate sectors will be provided.
- The ability to differentiate corporate from sovereign issuers within funds enables investments to be assigned more accurately to the appropriate PAI indicators.

The approach to identifying investee companies subject to social violations has been updated to include the relative proportion, which is the ratio of unique countries facing sanctions in the entity's portfolio to the total number of countries the entity has exposure to.