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Sustainable Fixed Income Strategy SFDR[1] Website Disclosure

Date of Publication: 03 February 2025

(a). Summary

The Sustainable Fixed Income Strategy (SFIS) promotes environmental or social characteristics (E/S) but does not have as its objective sustainable investment.

SFIS seeks to achieve long-term capital appreciation by investing primarily in fixed income funds with the flexibility to invest globally across sectors and capitalisations, with a preference towards funds that promote environmental, social, and governance ("ESG") factors in their investment process and/or focus on sustainable themes. The underlying investment strategy associated with SFIS includes: economic analysis, market analysis, portfolio construction, and vehicle selection considerations. SFIS includes investment principles that cover environmental, social, and governance considerations. These principles provide a consistent framework will be utilized throughout the course of implementation of the financial product.

The strategy seeks to maintain a minimum proportion of at least 80% of its portfolio weight in funds with an Article 8 or 9 designation. Within that, the strategy also seeks to maintain a minimum proportion of at least 20% of its portfolio weight in sustainable investments.

SFIS leverages data from third party sources in addition to Manager Selection and Due Diligence teams to identify funds in the investable universe that meet the promoted characteristics and asset allocation of the strategy.

In terms of monitoring environmental or social characteristics, SFIS has controls in place to monitor the proportion of investments with an SFDR Article 8 or 9 designation throughout the lifecycle of the product. In cases where a fund's SFDR designation is unavailable from third party vendors, the fund may obtain the SFDR designation(s) from other sources. SFIS also has controls in place to monitor the proportion of its portfolio weight in sustainable investments throughout the lifecycle of the product.

Due Diligence includes assessing and monitoring underlying instruments, comparing manager performance to traditional market benchmarks, and understanding how managers integrate sustainability risks and environmental and social factors into portfolio management.

While engagement is not part of the environmental or social investment strategy, SFIS leverages Manager Selection's engagement with fund managers in order to understand how environmental and social elements are considered when running their strategy, including information about the fund manager's approaches to engagement with underlying investments.

Lastly, SFIS does not have a designated reference benchmark as defined by SFDR.

1 Sustainable Finance Disclosure Regulation

(b). No Sustainable Investment Objective

This financial product promotes environmental or social characteristics but does not have as its objective sustainable investment. The strategy seeks to maintain a minimum proportion of at least 20% of its portfolio weight in sustainable investments, measured as the fund-weighted average of the minimum sustainable investment commitments made by the managers of the underlying funds within the strategy.

The strategy invests in funds, some of which make sustainable investments. Under the SFDR, fund managers making a minimum sustainable investment commitment must complete a “Do No Significant Harm” (“DNSH”) assessment to determine whether these investments are involved in activities deemed to have highly negative environmental and social impacts.

Fund managers must apply the DNSH assessment to the proportion of sustainable investments they intend to make, and they must report how those investments do not cause significant harm to any environmental or social investment objective in their SFDR pre-contractual and periodic disclosures.

In addition, fund managers making a minimum sustainable investment commitment must explain how “Principal Adverse Impacts” (“PAI”) indicators are taken into account as part of the DNSH assessment of their sustainable investments in their SFDR disclosures.

The SFDR disclosures of fund managers making a minimum sustainable investment commitment must also explain how those investments are aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights.

The methodologies for how the DNSH assessment is conducted, how PAIs are taken into account as part of the DNSH assessment, and how the sustainable investments are aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights and principles, is conducted by our underlying fund managers and thus, their methodologies may vary and may change over time.

Within our strategy, there is no commitment to consider significant harm to environmental or social sustainable investment objectives outside of the investments where managers of the underlying funds have made commitments to do so in the context of their sustainable investment proportion.

(c). Environmental or social characteristics of the financial product

SFIS invests primarily in funds that promote environmental and/or social characteristics (have an Article 8 designation under SFDR) or have a sustainable investment objective (have an Article 9 designation under SFDR). These underlying funds may promote a variety of environmental and social characteristics that they disclose in line with the requirements under SFDR, as applicable.

The strategy seeks to maintain a minimum proportion of at least 80% of its portfolio weight in funds with an Article 8 or 9 designation. Within that, the strategy also seeks to maintain a minimum proportion of at least 20% of its portfolio weight in sustainable investments, which is measured by the fund-weighted average of the minimum sustainable investment commitments made by the managers of the underlying funds within the strategy.

Environmental, social, and governance factors promoted by such funds may include:

- Environment: environmental sustainability and innovation including a reduction of carbon emissions and protecting natural capital
- Social: respect for stakeholders including shareholders, employees, customers, suppliers, and communities
- Governance: fair, transparent, and accountable governance, as well as sound risk management

(d). Investment Strategy

The financial product seeks to achieve long-term capital appreciation by investing primarily in fixed income funds with the flexibility to invest globally across sectors and capitalisations, with a preference for funds that promote environmental, social and governance ("ESG") factors into their investment process and/or focus on sustainable themes. The investment strategy is implemented via the maintenance of:

- At least 80% of the strategy's portfolio weight in funds with an SFDR Article 8 or 9 designation.
- At least 20% of the strategy's portfolio weight in sustainable investments, which is defined by the fund-weighted average of the minimum sustainable investment commitments made by the managers of the underlying funds.

The strategy aims to incorporate ESG analysis into the investment process in the following areas:

- Economic Analysis: The strategy's portfolio management team evaluates the effects of economic cycle and financial conditions on the strategy and its investments.
- Market Analysis: The portfolio management team's perspectives on earnings, valuations, secular trends and market sentiment, including ongoing analysis of trends in ESG-related investment and valuation disparities, are incorporated into the strategy.
- Portfolio Construction: The strategy's portfolio management team flexibly adjusts the strategy's asset allocation to reflect their views, leveraging financial and ESG data. ESG metrics are utilised to assess e.g., controversial activities associated with investments or carbon intensity of investments. Comparisons are made relative to traditional indices and views on ESG metrics may be considered alongside traditional considerations such as sector, size, region, volatility, etc.
- Vehicle Selection: The strategy seeks to invest in funds that have the people, philosophy and process in place to deliver financially, while promoting factors consistent with the aforementioned principles.

In terms of governance, SFIS will primarily hold funds with an SFDR Article 8 or 9 designation, and whose underlying investments resultantly follow good governance practices, as required by SFDR. Our manager selection process includes consideration of third-party provider classifications complemented by our own due diligence on sources of information including the funds own SFDR designation and disclosures.

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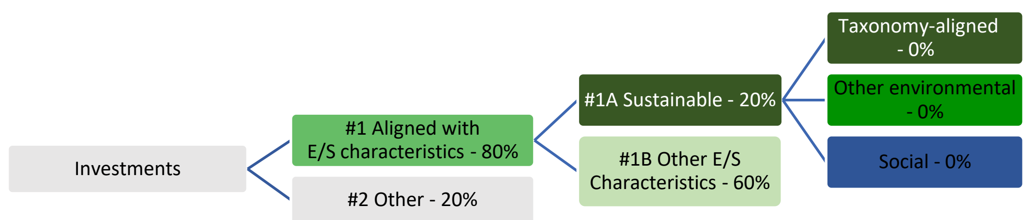
(e). Proportion of Investments

The Strategy seeks to maintain a minimum of 80% of the portfolio in investments that are aligned with the promoted environmental and social characteristics, and at least 20% of its portfolio weight in sustainable investments, which is defined by the fund-weighted average of the minimum sustainable investment commitments made by our underlying managers.



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

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

The category **#1 Aligned with E/S characteristics** covers:

- The sub-category **#1A Sustainable** covers sustainable investments with environmental or social objectives.
- The sub-category **#1B other E/S characteristics** covers investments aligned with the environmental or social characteristics that do not qualify as sustainable investments.

(f). Monitoring of environmental or social characteristics

SFIS has controls in place to monitor the proportion of investments with an SFDR Article 8 or 9 designation throughout the lifecycle of a product. In addition, SFIS has controls to monitor the allocation the strategy's portfolio weight in sustainable investments, which is defined by the fund-weighted average of the minimum sustainable investment commitments made by the managers of the underlying funds.

Among these controls, for instance, the allocation of 80% of the strategy's investments to funds with an SFDR Article 8 or 9 designation as well as the allocation of 20% of the strategy's portfolio weight in sustainable investments is monitored through the portfolio management team's pre-trade check process as well as a post-trade check via a weekly guideline assessment carried out as part of the ongoing monitoring Governance process.

(g). Methodologies

SFIS primarily invests in fixed income funds with an Article 8 or 9 designation. SFIS measures alignment to the promoted E/S characteristics by measuring the proportion of the portfolio invested in funds with an SFDR Article 8 or 9 designation and seeks to maintain a minimum of 80% of its investments to be held in such SFDR designated funds.

SFIS also seeks to maintain a minimum proportion of at least 20% of its portfolio weight in sustainable investments, which is measured by the fund-weighted average of the minimum sustainable investment commitments made by the managers of the underlying funds within the strategy.

(h). Data Sources and Processing

SFIS uses fund SFDR designations received from third party data sources in order to determine the proportion of the portfolio invested in funds with an SFDR Article 8 or 9 designation. SFIS also uses the minimum sustainable investment commitments made by the managers of the underlying funds in the strategy to determine the proportion of the portfolio weight in sustainable investments. We calculate the strategy's sustainable investments holdings using values reported by the underlying fund managers in the European ESG Template (EET), a data source that we access via a third-party data provider.

During the course of data receipt into internal systems from third party vendors, a number of technical and non-technical checks are performed to ensure the quality of the data. In the event that received data is flagged as potentially incorrect, a vendor outreach and remediation process begins. The processing and outreach processes are coordinated centrally through the chief data office.

As Article 8 and Article 9 SFDR designated funds are required to comply with the SFDR requirements, the data utilized is not generally expected to be estimated data. The proportion of estimated data should be at or close to 0%. Article 8 and 9 fund designation is data is sourced from Morningstar.

(i). Limitations to methodologies and data

In cases where a fund's SFDR designation is unavailable from third party vendors, SFIS may obtain the SFDR designation(s) from other sources, such as the fund manager. In cases where a fund manager's minimum sustainable investment commitment value is unavailable from third party vendors, SFIS may assume the value for that manager is zero sustainable investments. Therefore the limitations described do not affect how the environmental or social characteristics promoted by the financial product are met.

(j). Due Diligence

SFIS leverages a dedicated Sustainable Investment team that collaborates with Due Diligence and Manager Selection teams; this due diligence benefits the financial product in the following ways:

- We apply certain criteria to assess and monitor underlying instruments. Managers are reviewed through a "4P" due diligence process answering the question - "Does the strategy have the

People, Philosophy, Process, and Performance in place to deliver competitive returns in-line with its investment objectives?" This also includes a review of the investment managers' processes regarding ESG broadly, as cited in their materials and disclosures.
- We assess, measure, and monitor manager performance against traditional market benchmarks.
- We engage with fund managers to understand the ways in which they incorporate sustainability risk, environmental, and social considerations into the management of their portfolios.

(k). Engagement policies

Engagement is not part of the environmental or social investment strategy. SFIS leverages Manager Solutions' engagement with fund managers in order to understand how environmental and social elements are considered when running their strategy, including information about the fund manager's approaches to engagement with underlying investments.

(l). Designated reference benchmark

SFIS does not have a designated reference benchmark as defined by SFDR.