



## **PUBLIC TRANSPARENCY REPORT**

**2025**

**Sarasin & Partners LLP**

Generated 24-11-2025

# About this report

PRI reporting is the largest global reporting project on responsible investment.

It was developed with investors, for investors. PRI signatories are required to report publicly on their responsible investment activities each year. In turn, they receive a number of outputs, including a public and private Transparency Report.

The public Transparency Reports, which are produced using signatories' reported information, provide accountability and support signatories to have internal discussions about their practices and to discuss these with their clients, beneficiaries, and other stakeholders. This public Transparency Report is an export of the signatory's responses to the PRI Reporting Framework during the 2025 reporting period. It includes the signatory's responses to core indicators, as well as responses to plus indicators that the signatory has agreed to make public.

In response to signatory feedback, the PRI has not summarised signatories' responses – the information in this document is presented exactly as it was reported.

For each of the indicators in this document, all options selected by the signatory are presented, including links and qualitative responses. In some indicators, all applicable options are included for additional context.

## Disclaimers

### Legal Context

PRI recognises that the laws and regulations to which signatories are subject differ by jurisdiction. We do not seek or require any signatory to take an action that is not in compliance with applicable laws. All signatory responses should therefore be understood to be subject to and informed by the legal and regulatory context in which the signatory operates.

### Responsible investment definitions

Within the PRI Reporting Framework Glossary, we provide definitions for key terms to guide reporting on responsible investment practices in the Reporting Framework. These definitions may differ from those used or proposed by other authorities and regulatory bodies due to evolving industry perspectives and changing legislative landscapes. Users of this report should be aware of these variations, as they may impact interpretations of the information provided.

### Data accuracy

This document presents information reported directly by signatories in the 2025 reporting cycle. This information has not been audited by the PRI or any other party acting on its behalf. While this information is believed to be reliable, no representations or warranties are made as to the accuracy of the information presented.

The PRI has taken reasonable action to ensure that data submitted by signatories in the reporting tool is reflected in their official PRI reports accurately. However, it is possible that small data inaccuracies and/or gaps remain, and the PRI shall not be responsible or liable for such inaccuracies and gaps.

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# SENIOR LEADERSHIP STATEMENT (SLS)

## SENIOR LEADERSHIP STATEMENT

### SENIOR LEADERSHIP STATEMENT

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SLS 1	CORE	N/A	N/A	PUBLIC	Senior Leadership Statement	GENERAL

#### Section 1. Our commitment

- Why does your organisation engage in responsible investment?
- What is your organisation's overall approach to responsible investment, and what major responsible investment commitment(s) have you made?

Responsible investment is at the very core of how our clients' assets are managed. We believe that responsible entities are best-placed to create enduring value over the long term. Specifically, we favour entities that articulate compelling long-term strategies and take seriously their responsibilities to their customers, staff, local communities, the environment and their investors. We seek to avoid issuers whose success depends on imposing material adverse impacts on society and/or the environment, which cannot be addressed through active engagement.

Our investment approach consists of three pillars:

A global thematic investment process focused on long term value drivers. We implement a thematic investment process in equities. We look for companies that are well-positioned to deliver value through the provision of goods and services that align with long-term societal trends such as the transition to a low-carbon world, digitalisation, automation, ageing and evolving consumption. In fixed income we seek issuers that will deliver sustainable income streams and capital preservation.

Across all asset classes, we undertake rigorous bottom-up analysis to identify leaders that offer long-term return prospects. We examine ESG characteristics as core elements of the investment process and these are incorporated into our valuation analysis. We undertake stress tests for climate risks, as well as regular reviews when concerns arise.

Active ownership. Once we have bought an issuer's security on behalf of our clients, we monitor the entity's performance. We seek regular dialogue with board members and management to articulate our concerns and monitor progress. In the case of shares, we vote thoughtfully, based on our Corporate Governance and Voting Guidelines. Where necessary, we escalate our engagement using tools such as building investor coalitions, making public statements, filing shareholder resolutions or voting against management resolutions.

Thought leadership and policy outreach. Where we find harmful market practices or policy failures that result in materially adverse impacts on the environment or particular stakeholder groups, and we believe we can contribute to positive change, we will speak out. We engage with other investors, non-governmental organisations, policymakers, regulators and market influencers – such as auditors or standard setters – to deliver a market environment in which sustainable behaviours are properly rewarded and harmful activities penalised.

#### Section 2. Annual overview

- Discuss your organisation's progress during the reporting year on the responsible investment issue you consider most relevant or material to your organisation or its assets.
- Reflect on your performance with respect to your organisation's responsible investment objectives and targets during the reporting year. Details might include, for example, outlining your single most important achievement or describing your general progress on topics such as the following (where applicable):
  - refinement of ESG analysis and incorporation
  - stewardship activities with investees and/or with policymakers
  - collaborative engagements
  - attainment of responsible investment certifications and/or awards

We have made significant progress on several responsible investment initiatives. We include progress we made in 2024 integration of ESG into our investment process and recognition by investor groups and civil society organisations. Following that, we highlight our climate engagement as an example of the most relevant stewardship activity. We refined our ESG analysis and integration: For Equities we:

- Reviewed the quality and comprehensiveness of MSCI ESG Manager data, and integrated relevant data points into our proprietary Sustainability Impact Matrix (SIM). This enhances our ESG risk and opportunity analysis, allowing for better comparisons across industries, geographies and benchmarks. The integration preserves scope for analytical judgement and overriding to ensure insights gained through deeper research, engagements and voting are properly reflected.

For Fixed income we:

- Reviewed and updated our fixed income ESG process and materiality map.
- Conducted net zero alignment assessments for high-carbon bond holdings.
- Updated our climate stress testing to align with our NZAM commitments.

For Alternatives we:

- Intensified our focus on the governance of investment trusts, encouraging boards and managers to better align with shareholder interests. This aims to ensure investment trusts remain relevant for private investors in an expanding private markets landscape.
- Engaged with seven board chairs of investment trusts, focusing on board effectiveness and their oversight of strategic decisions in a challenging environment.
- At one of the alternative investment trusts, we established a coalition of investors aiming to improve the board skillset, strategic focus and quality of communication with investors. We have achieved significant progress here.

Attainment of responsible investment certifications and/or awards:

In 2024 we were honoured to receive the International Corporate Governance Network (ICGN) Asset Managers Disclosure Award for firms with less than £60 billion in assets under management. This recognition was awarded for our commitment to transparency and best practices in stewardship, specifically for:

- Providing a clear and accessible link to our stewardship policies and reports, prominently displayed on our website homepage.
- Transparently disclosing our corporate governance structure, including detailed bios of all team members.
- Publishing a well-crafted Ownership Discipline document, demonstrating out long-term commitment to client holdings.
- Ensuring easy to access voting records, categorised into 'key votes' and 'voting details', along with a comprehensive list of resolutions. We also provide rationale for all 'against' votes.

- Maintaining a quarterly tracker that offers regular updates on voting and engagement activities.

In recognition of our strong climate commitment and stewardship performance, we received Imperial College Business School's and Carbon Tracker's Gold Award in Net Zero Finance 2024. The criteria for this recognition were described as follows: "To identify those institutions that the report's authors say are walking the net zero path, the researchers screened both debt and equity investors' climate commitment and delivery and awarded the top institutions a Gold status reflecting their high scores."

Engagements on climate change. This is one of our six priority stewardship initiatives. In 2024, we were involved in 183 goal-linked engagement activities on climate, on 18 of which we have achieved significant outcomes. To apply focused approach, we maintain climate watchlist of companies exposed to climate risks. We engage with these companies on individual basis or collectively and we seek improvements through policy work with relevant regulators and standard setting organisations. To emphasise our concerns, we voted against 67% of directors of such companies, 70% of auditors, 75% of annual reports and accounts and 61% of remuneration policies or reports at those companies' AGMs. We highlight one specific example of this below. Our stewardship work with Equinor most effectively showcases our holistic approach to working with companies, governments, policymakers, and through collaborative initiatives – all aimed at advancing the transition to a net-zero economy.

For the full Equinor case study please see the additional context box in Section 5.

### Section 3. Next steps

- What specific steps has your organisation outlined to advance your commitment to responsible investment in the next two years?

Over the next two years, we will continue our stewardship activities, focusing on the following six priority initiatives:

- Paris alignment: Promoting alignment with the Paris Agreement's 1.5°C pathway and advocating for supportive policies.
- Social Value Chain: Ensuring responsible corporate behaviour regarding employees, suppliers, customers and communities. Focus areas include diversity, equity and inclusion (DEI), human and labour rights.
- Good Governance: Advocating for strong governance structures, including diverse, independent and effective boards, aligned executive remuneration and robust internal controls.
- Robust and independent accounting and audit: Ensuring accounting practices that prioritise long-term capital protection and independent audit oversight. We expect strict policies to prevent conflicts of interest, regular audit firm rotation and meaningful disclosures by auditors to investors.
- Responsible Tech: Addressing digital risks, including privacy, security threats, violation of intellectual property rights, biases and disinformation, anti-competitive behaviour and tax avoidance.
- Nature and Circularity: Aim for acceleration of a sustainable circular economy with a particular focus on plastics We want to reaffirm that we remain fully committed to the core values and principles that have underpinned our investment philosophy for many years. A thoughtful and responsible approach to investment, ownership and engagement is more important than ever during times of uncertainty. Our responsibility is clear:

- Put our clients' long-term interests first.
- Engage constructively with companies to promote responsible capital management.
- Advocate for sustainable financial system that supports long-term value creation.

#### Section 4. Endorsement

**'The Senior Leadership Statement has been prepared and/or reviewed by the undersigned and reflects our organisation-wide commitment and approach to responsible investment'.**

Name

Guy Matthews

Position

Managing Partner

Organisation's Name

Sarasin & Partners LLP

#### ● A

**'This endorsement applies only to the Senior Leadership Statement and should not be considered an endorsement of the information reported by the above-mentioned organisation in the various modules of the Reporting Framework. The Senior Leadership Statement serves as a general overview of the above-mentioned organisation's responsible investment approach. The Senior Leadership Statement does not constitute advice and should not be relied upon as such. Further, it is not a substitute for the skill, judgement and experience of any third parties, their management, employees, advisors and/or clients when making investment and other business decisions'.**

#### ○ B

#### Section 5. Additional Organisation Statements (Voluntary)

If you wish to do so, provide a document or link including information about any relevant legal or regulatory restrictions that apply to your responsible investment activities and how you comply with them.

[https://sarasinandpartners.com/wp-content/uploads/2025/04/00102\\_Stewardship-Report\\_UK.pdf](https://sarasinandpartners.com/wp-content/uploads/2025/04/00102_Stewardship-Report_UK.pdf)

#### Additional context to your response(s): (Voluntary)

Section 2. Annual overview

Case Study Equinor

The Issue Equinor, Norway's national oil and gas company (67% state-owned), faces the challenge of aligning with Paris Agreement while remaining financially viable. The Paris Agreement requires a steady decline in fossil fuel production, yet Equinor's earnings remain heavily dependent on oil and gas. As it maps out its future, the company must decide whether to:

- Expand its low-carbon business to replace fossil fuel reserves.
- Return capital to shareholders rather than reinvest.

Sarasin has held shares in Equinor since 2021, viewing it as one of the best-positioned oil majors to navigate decarbonization, given its:

- Low-cost reserves
  - Investments in onshore and offshore wind, hydrogen and carbon capture
  - Government pressure to align with net-zero goals
- Despite Equinor's potential, it lacks a strategy aligned with a 1.5°C pathway. Our three key objectives for our engagement with Equinor are:

- 1.5°C-aligned emission target
- 1.5°C-aligned capital expenditure strategy
- 1.5°C-aligned accounting disclosures

What We Did:  
Since November 2020, we have engaged with Equinor's audit committee chair and the lead audit partner. This engagement was part of a broader initiative led by Sarasin and the Institutional Investors Group on Climate Change (IIGCC). Our focus has been on pressing carbon-intensive companies to:

- Ensure their financial statements properly reflected material climate risks.
- Incorporate the costs of implementing their commitments.
- Provide greater visibility on exposure to a 1.5°C pathway.

In early 2021, Sarasin became a lead investor in the CA100+ initiative, working closely with the co-leads to push Equinor towards a more ambitious climate strategy. A key element of our engagement has been a dialogue with the Norwegian government, Equinor's largest shareholder. Building on increasingly intensive engagement from 2021 to 2023, we undertook 26 engagement activities in 2024, including discussions with company executives, the board and the Norwegian Government's Ownership Department. In 2024, our efforts focused on three key initiatives:

- Filing a shareholder resolution at Equinor's May AGM, together with three other investors (see box above).
- Proposing the appointment of an external advisory panel to support Equinor's Energy Transition Plan review.
- Nominating a non-executive director (NED) to Equinor's board in December.

To strengthen our shareholder resolution, we conducted extensive outreach to other investors, proxy advisory agencies and the public. As a result, our resolution secured over 30% support from non-state shareholders. You can find Sarasin's supporting statement for our proposed shareholder resolution on our website.

Outcomes Our engagement with Equinor has driven meaningful progress over the years:

- Leading emissions reductions: Equinor's efforts to lower scope 1 and 2 emissions remain industry-leading.
- Increased renewables investment: the company has maintained its commitment to raise renewable energy investments to 50% of total gross capex by 2030.
- Enhanced financial disclosures: since 2023, Equinor has improved transparency in its financial statements, providing better visibility into climate-related risks.
- Consistent net-zero strategy: unlike many peers, Equinor has not reversed its net-zero commitments.

While Equinor did not announce new commitments in 2024, its Energy Transition Plan is set for review in 2025. Nevertheless, the strong investor support for our shareholder resolution marked a significant step forward. Additionally, while the Norwegian government did not vote in favour of our resolution, it reaffirmed its expectation that Equinor must ensure alignment with a 1.5°C pathway in a statement to Parliament following an inquiry on the Sarasin resolution.

We were also pleased to see Equinor take a 10% stake in Orsted, the leading global offshore wind company, reinforcing its commitment to the low-carbon transition.

# OTHER RESPONSIBLE INVESTMENT REPORTING OBLIGATIONS (ORO)

## OTHER RESPONSIBLE INVESTMENT REPORTING OBLIGATIONS

### OTHER RESPONSIBLE INVESTMENT REPORTING OBLIGATIONS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
ORO 1	CORE	N/A	N/A	PUBLIC	Other Responsible Investment Reporting Obligations	6

During the reporting year, to which international or regional ESG-related legislation(s) and/or regulation(s) did your organisation report?

- (A) Corporate Sustainability Reporting Directive (CSRD) [European Union]
- (B) Directive on AIFM (2011/61/EU) [European Union]
- (C) **Enhancing climate-related disclosures by asset managers, life insurers and FCA-regulated pension providers (PS21/24) [United Kingdom]**
- (D) EU Taxonomy Regulation [European Union]
- (E) **Improving shareholder engagement and increasing transparency around stewardship (PS19/13) [United Kingdom]**
- (F) IORP II (Directive 2016/2341) [European Union]
- (G) Law on Energy and Climate (Article 29) [France]
- (H) MiFID II (2017/565) [European Union]
- (I) **Modern Slavery Act [United Kingdom]**
- (J) PEPP Regulation (2019/1238) [European Union]
- (K) PRIIPS Regulation (2016/2340 and 2014/286) [European Union]
- (L) Regulation on the Integration of Sustainability Risks in the Governance of Insurance and Reinsurance Undertakings (2021/1256) [European Union]
- (M) SFDR Regulation (2019/2088) [European Union]
- (N) SRD II (Directive 2017/828) [European Union]
- (O) The Occupational Pension Schemes Regulation on Climate Change Governance and Reporting [United Kingdom]
- (P) Climate Risk Management (Guideline B-15) [Canada]
- (Q) Continuous Disclosure Obligations (National Instrument 51-102) [Canada]
- (R) Disposiciones de Carácter General Aplicables a los Fondos de Inversión y a las Personas que les Prestan Servicios (SIEFORE) [Mexico]
- (S) Instrucciones para la Integración de Datores ASG en Los Mecanismos de Revelación de Información para FIC (External Circular 005, updated) [Colombia]
- (T) Provides for the creation, operation, and disclosure of information of investment funds, as well as the provision of services for the funds, and revokes the regulations that specifies (CVM Resolution No. 175) [Brazil]
- (U) SEC Expansion of the Names Rule [United States of America]
- (V) SEC Pay Ratio Disclosure Rule [United States of America]
- (W) ASIC RG65 Section 1013DA Disclosure Guidelines [Australia]
- (X) Circular to Licensed Corporations: Management and Disclosure of Climate-related Risks by Fund Managers [Hong Kong SAR]
- (Y) Financial Investment Services and Capital Markets Act (FSCMA) [Republic of Korea]
- (Z) Financial Instruments and Exchange Act (FIEA) [Japan]
- (AA) Financial Markets Conduct Act [New Zealand]
- (AB) Guiding Opinions on Regulating the Asset Management Business of Financial Institutions [China]
- (AC) Guidelines on Environmental Risk Management for Asset Managers [Singapore]
- (AD) Guidelines on Sustainable and Responsible Investment Funds [Malaysia]
- (AE) Modern Slavery Act (2018) [Australia]

- (AF) Stewardship Code for all Mutual Funds and All Categories of AIFs [India]
- (AG) ADGM Sustainable Finance Regulatory Framework [United Arab Emirates]
- (AH) JSE Limited Listings Requirements [South Africa]
- (AI) Other
- (AJ) Other
- (AK) Other
- (AL) Other
- (AM) Other
- (AN) Not applicable; our organisation did not report to any ESG-related legislation and/or regulation during the reporting year.

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
ORO 2	CORE	N/A	N/A	PUBLIC	Other Responsible Investment Reporting Obligations	6

**During the reporting year, to which voluntary responsible investment/ESG frameworks did your organisation report?**

- (A) Asset Owners Stewardship Code [Australia]
- (B) Código Brasileiro de Stewardship [Brazil]
- (C) New Zealand Stewardship Code
- (D) Principles for Responsible Institutional Investors (Stewardship Code) [Japan]
- (E) Stewardship Code [United Kingdom]
- (F) Stewardship Framework for Institutional Investors [United States of America]
- (G) CFA Institute ESG Disclosure Standards for Investment Products [Global]
- (H) Guidelines on Funds' Names using ESG or Sustainability-related Terms [European Union]
- (I) Luxflag ESG Label [Luxembourg]
- (J) RIAA Responsible Investment Certification Program [Australia]
- (K) SRI Label [France]
- (L) ANBIMA Code of Regulation and Best Practices of Investment Funds [Brazil]
- (M) Code for Institutional Investors 2022 [Malaysia]
- (N) Code for Responsible Investing in South Africa (CRISA 2) [South Africa]
- (O) Corporate Governance Guidelines [Canada]
- (P) Defined Contribution Code of Practice [United Kingdom]
- (Q) European Association for Investors in Non-Listed Real Estate Vehicles (INREV) Guidelines [Global]
- (R) Global ESG Benchmark for Real Assets (GRESB) [Global]
- (S) Global Impact Investing Network (GIIN) Impact Reporting and Investment Standards (IRIS+) [Global]
- (T) OECD Guidelines for MNES - Responsible Business Conduct for Institutional Investors [Global]
- (U) UN Guiding Principles (UNGP) on Business and Human Rights [Global]
- (V) Net Zero Asset Managers (NZAM) Initiative [Global]
- (W) Net-Zero Asset Owner Alliance (NZAOA) [Global]
- (X) Recommendations of the Taskforce for Climate-related Financial Disclosure (TCFD) [Global]
- (Y) The Net Zero Investment Framework (NZIF) 2.0 [Global]
- (Z) Recommendations of the Taskforce for Nature-related Financial Disclosure (TNFD) [Global]
- (AA) Global Reporting Initiative (GRI) Standards [Global]
- (AB) IFC Performance Standard [Global]
- (AC) International Sustainability Standards Board (ISSB) Standards [Global]
- (AD) Sustainability Accounting Standards Board (SASB) Standards [Global]
- (AE) Other
- (AF) Other
- (AG) Other
- (AH) Other
- (AI) Other
- (AJ) Not applicable; our organisation did not report to any voluntary responsible investment/ESG frameworks during the reporting year.

# ORGANISATIONAL OVERVIEW (OO)

## ORGANISATIONAL INFORMATION

### REPORTING YEAR

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 1	CORE	N/A	N/A	PUBLIC	Reporting year	GENERAL

What is the year-end date of the 12-month period you have chosen to report for PRI reporting purposes?

	Date	Month	Year
Year-end date of the 12-month period for PRI reporting purposes:	31	12	2024

## SUBSIDIARY INFORMATION

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 2	CORE	N/A	OO 2.1	PUBLIC	Subsidiary information	GENERAL

Does your organisation have subsidiaries?

- (A) Yes
- (B) No

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 2.1	CORE	OO 2	OO 2.2	PUBLIC	Subsidiary information	GENERAL

Are any of your organisation's subsidiaries PRI signatories in their own right?

- (A) Yes
- (B) No

# ASSETS UNDER MANAGEMENT

## ALL ASSET CLASSES

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 4	CORE	OO 3	N/A	PUBLIC	All asset classes	GENERAL

What are your total assets under management (AUM) at the end of the reporting year, as indicated in [OO 1]?

USD

(A) AUM of your organisation, including subsidiaries not part of row (B), and excluding the AUM subject to execution, advisory, custody, or research advisory only

US\$ 22,894,000,000.00

(B) AUM of subsidiaries that are PRI signatories in their own right and excluded from this submission, as indicated in [OO 2.2]

US\$ 0.00

(C) AUM subject to execution, advisory, custody, or research advisory only

US\$ 0.00

## ASSET BREAKDOWN

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 5	CORE	OO 3	Multiple indicators	PUBLIC	Asset breakdown	GENERAL

Provide a percentage breakdown of your total AUM at the end of the reporting year as indicated in [OO 1].

	(1) Percentage of Internally managed AUM	(2) Percentage of Externally managed AUM
(A) Listed equity	>75%	0%
(B) Fixed income	>10-50%	0%
(C) Private equity	0%	0%
(D) Real estate	0%	0%
(E) Infrastructure	0%	0%
(F) Hedge funds	0%	0%
(G) Forestry	0%	0%
(H) Farmland	0%	0%
(I) Other	>0-10%	0%
(J) Off-balance sheet	0%	0%

**(I) Other - (1) Percentage of Internally managed AUM - Specify:**

Liquid assets and Private market secondaries

## ASSET BREAKDOWN: INTERNALLY MANAGED LISTED EQUITY

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 5.3 LE	CORE	OO 5	Multiple	PUBLIC	Asset breakdown: Internally managed listed equity	GENERAL

**Provide a further breakdown of your internally managed listed equity AUM.**

(A) Passive equity 0%

(B) Active – quantitative 0%

(C) Active – fundamental >75%

(D) Other strategies >0-10%

**(D) Other strategies - Specify:**

Investment trusts

## ASSET BREAKDOWN: INTERNALLY MANAGED FIXED INCOME

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 5.3 FI	CORE	OO 5	Multiple	PUBLIC	Asset breakdown: Internally managed fixed income	GENERAL

**Provide a further breakdown of your internally managed fixed income AUM.**

(A) Passive – SSA 0%

(B) Passive – corporate 0%

(C) Active – SSA >10-50%

(D) Active – corporate >50-75%

(E) Securitised 0%

(F) Private debt 0%

## GEOGRAPHICAL BREAKDOWN

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 7	CORE	Multiple, see guidance	N/A	PUBLIC	Geographical breakdown	GENERAL

How much of your AUM in each asset class is invested in emerging markets and developing economies?

### AUM in Emerging Markets and Developing Economies

(A) Listed equity	(2) >0 to 10%
(B) Fixed income – SSA	(2) >0 to 10%
(C) Fixed income – corporate	(2) >0 to 10%

## STEWARDSHIP

### STEWARDSHIP

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 8	CORE	Multiple, see guidance	Multiple indicators	PUBLIC	Stewardship	GENERAL

Does your organisation conduct stewardship activities, excluding (proxy) voting, for any of your assets?

	(1) Listed equity - active	(3) Fixed income - active	(11) Other
(A) Yes, through internal staff	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(B) Yes, through service providers	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(C) Yes, through external managers	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(D) We do not conduct stewardship	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

## STEWARDSHIP: (PROXY) VOTING

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 9	CORE	Multiple, see guidance	Multiple indicators	PUBLIC	Stewardship: (Proxy) voting	GENERAL

Does your organisation conduct (proxy) voting activities for any of your listed equity holdings?

**(1) Listed equity - active**

(A) Yes, through internal staff	<input checked="" type="checkbox"/>
(B) Yes, through service providers	<input checked="" type="checkbox"/>
(C) Yes, through external managers	<input type="checkbox"/>
(D) We do not conduct (proxy) voting	<input type="radio"/>

**Additional context to your response(s): (Voluntary)**

Institutional Shareholder Services (ISS) Proxy Exchange

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 9.1	CORE	OO 9	PGS 10.1, PGS 31	PUBLIC	Stewardship: (Proxy) voting	GENERAL

For each asset class, on what percentage of your listed equity holdings do you have the discretion to vote?

**Percentage of your listed equity holdings over which you have the discretion to vote**

(A) Listed equity – active	(10) >80 to 90%
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**Additional context to your response(s): (Voluntary)**

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## ESG INCORPORATION

### INTERNALLY MANAGED ASSETS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 11	CORE	Multiple, see guidance	Multiple indicators	PUBLIC	Internally managed assets	1

**For each internally managed asset class, does your organisation incorporate ESG factors, to some extent, into your investment decisions?**

	(1) Yes, we incorporate ESG factors into our investment decisions	(2) No, we do not incorporate ESG factors into our investment decisions
(C) Listed equity - active - fundamental	<input checked="" type="radio"/>	<input type="radio"/>
(D) Listed equity - other strategies	<input checked="" type="radio"/>	<input type="radio"/>
(E) Fixed income - SSA	<input checked="" type="radio"/>	<input type="radio"/>
(F) Fixed income - corporate	<input checked="" type="radio"/>	<input type="radio"/>
(V) Other: Liquid assets and Private market secondaries	<input checked="" type="radio"/>	<input type="radio"/>

### ESG IN OTHER ASSET CLASSES

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 15	CORE	OO 11, OO 12–14	N/A	PUBLIC	ESG in other asset classes	1

**Describe how your organisation incorporates ESG factors into the following asset classes.**

Internally managed  
(C) Other

They are subject to the firmwide ESG screening guidelines where relevant.

# ESG STRATEGIES

## LISTED EQUITY

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 17 LE	CORE	OO 11	OO 17.1 LE, LE 12	PUBLIC	Listed equity	1

**Which ESG incorporation approach and/or combination of approaches does your organisation apply to your internally managed active listed equity?**

**Percentage out of total internally managed active listed equity**

(A) Screening alone	0%
(B) Thematic alone	0%
(C) Integration alone	0%
(D) Screening and integration	0%
(E) Thematic and integration	0%
(F) Screening and thematic	0%
(G) All three approaches combined	>75%
(H) None	0%

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 17.1 LE	CORE	OO 17 LE	LE 9	PUBLIC	Listed equity	1

**What type of screening does your organisation use for your internally managed active listed equity assets where a screening approach is applied?**

**Percentage coverage out of your total listed equity assets where a screening approach is applied**

(A) Positive/best-in-class screening only	0%
(B) Negative screening only	>75%
(C) A combination of screening approaches	0%

## FIXED INCOME

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 17 FI	CORE	OO 5.3 FI, OO 11	Multiple, see guidance	PUBLIC	Fixed income	1

**Which ESG incorporation approach and/or combination of approaches does your organisation apply to your internally managed active fixed income?**

	(1) Fixed income - SSA	(2) Fixed income - corporate
(A) Screening alone	0%	0%
(B) Thematic alone	0%	0%
(C) Integration alone	0%	0%
(D) Screening and integration	0%	0%
(E) Thematic and integration	0%	0%
(F) Screening and thematic	0%	0%

(G) All three approaches combined	>75%	>75%
(H) None	0%	0%

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 17.1 FI	CORE	OO 17 FI	N/A	PUBLIC	Fixed income	1

**What type of screening does your organisation use for your internally managed active fixed income where a screening approach is applied?**

	(1) Fixed income - SSA	(2) Fixed income - corporate
(A) Positive/best-in-class screening only	0%	0%
(B) Negative screening only	0%	0%
(C) A combination of screening approaches	>75%	>75%

## ESG/SUSTAINABILITY FUNDS AND PRODUCTS

### LABELLING AND MARKETING

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 18	CORE	OO 11–14	OO 18.1	PUBLIC	Labelling and marketing	1

**Do you explicitly market any of your products and/or funds as ESG and/or sustainable?**

**(A) Yes, we market products and/or funds as ESG and/or sustainable**

Provide the percentage of total AUM that your ESG and/or sustainability-marketed products or funds represent:

>10-50%

- (B) No, we do not offer products or funds explicitly marketed as ESG and/or sustainable
- (C) Not applicable; we do not offer products or funds

**Additional context to your response(s): (Voluntary)**

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 18.1	CORE	OO 18	OO 18.2	PUBLIC	Labelling and marketing	1

Do any of your ESG and/or sustainability-marketed products and/or funds hold formal ESG and/or RI certification(s) or label(s) awarded by a third party?

- (A) Yes, our ESG and/or sustainability-marketed products and/or funds hold formal labels or certifications
- (B) No, our ESG and/or sustainability-marketed products and/or funds do not hold formal labels or certifications

## THEMATIC BONDS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 20	CORE	OO 17 FI	FI 15, FI 17	PUBLIC	Thematic bonds	1

What percentage of your total environmental and/or social thematic bonds are labelled by the issuers in accordance with industry-recognised standards?

Percentage of your total environmental and/or social thematic bonds labelled by the issuers

(A) Green or climate bonds	0%
(B) Social bonds	0%
(C) Sustainability bonds	0%
(D) Sustainability-linked bonds	0%
(E) SDG or SDG-linked bonds	0%
(F) Other	0%
(G) Bonds not labelled by the issuer	>75%

## SUMMARY OF REPORTING REQUIREMENTS

### SUMMARY OF REPORTING REQUIREMENTS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 21	CORE	Multiple indicators	Multiple indicators	PUBLIC	Summary of reporting requirements	GENERAL

The following table shows which modules are mandatory or voluntary to report on in the separate PRI asset class modules. Where a module is voluntary, indicate if you wish to report on it.

Applicable modules	(1) Mandatory to report (pre-filled based on previous responses)	(2.1) Voluntary to report. Yes, I want to opt-in to reporting on the module	(2.2) Voluntary to report. No, I want to opt-out of reporting on the module
Policy, Governance and Strategy	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Confidence Building Measures	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
(C) Listed equity – active – fundamental	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
(D) Listed equity – other strategies	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
(E) Fixed income – SSA	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
(F) Fixed income – corporate	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

## SUBMISSION INFORMATION

### REPORT DISCLOSURE

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 32	CORE	OO 3, OO 31	N/A	PUBLIC	Report disclosure	GENERAL

How would you like to disclose the detailed percentage figures you reported throughout the Reporting Framework?

- (A) Publish as absolute numbers
- (B) Publish as ranges

# POLICY, GOVERNANCE AND STRATEGY (PGS)

## POLICY

### RESPONSIBLE INVESTMENT POLICY ELEMENTS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 1	CORE	OO 8, OO 9	Multiple indicators	PUBLIC	Responsible investment policy elements	1, 2

Which elements are covered in your formal responsible investment policy(ies)?

- (A) Overall approach to responsible investment
- (B) Guidelines on environmental factors
- (C) Guidelines on social factors
- (D) Guidelines on governance factors
- (E) Guidelines on sustainability outcomes
- (F) Guidelines tailored to the specific asset class(es) we hold
- (G) Guidelines on exclusions
- (H) Guidelines on managing conflicts of interest related to responsible investment
- (I) Stewardship: Guidelines on engagement with investees
- (J) Stewardship: Guidelines on overall political engagement
- (K) Stewardship: Guidelines on engagement with other key stakeholders
- (L) Stewardship: Guidelines on (proxy) voting
- (M) Other responsible investment elements not listed here
- (N) Our organisation does not have a formal responsible investment policy and/or our policy(ies) do not cover any responsible investment elements

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 2	CORE	PGS 1	Multiple, see guidance	PUBLIC	Responsible investment policy elements	1

Does your formal responsible investment policy(ies) include specific guidelines on systematic sustainability issues?

- (A) Specific guidelines on climate change (may be part of guidelines on environmental factors)
  - (B) Specific guidelines on human rights (may be part of guidelines on social factors)
  - (C) Specific guidelines on other systematic sustainability issues
- Specify:
- NZAM Action Plan sets out approach to climate change; Governance & Voting Policy outlines approaches across a range of ESG topics, such as labour and human rights, pay equity- gender and ethnicity; pay for performance; board independence; shareholder rights; accounting & audit; and other governance issues. We also publish detailed position papers and policy submissions on specific topics. Our decisions are informed by specific internal assessments.
- (D) Our formal responsible investment policy(ies) does not include guidelines on systematic sustainability issues

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 3	CORE	PGS 1, PGS 2	N/A	PUBLIC	Responsible investment policy elements	6

**Which elements of your formal responsible investment policy(ies) are publicly available?**

**(A) Overall approach to responsible investment**

Add link:

[https://sarasinandpartners.com/wp-content/uploads/2023/05/00114\\_Framework-for-implementing-responsible-stewardship.pdf](https://sarasinandpartners.com/wp-content/uploads/2023/05/00114_Framework-for-implementing-responsible-stewardship.pdf)

**(B) Guidelines on environmental factors**

Add link:

[https://sarasinandpartners.com/wp-content/uploads/2025/04/00102\\_Stewardship-Report\\_UK.pdf](https://sarasinandpartners.com/wp-content/uploads/2025/04/00102_Stewardship-Report_UK.pdf)

**(C) Guidelines on social factors**

Add link:

[https://sarasinandpartners.com/wp-content/uploads/2025/04/00102\\_Stewardship-Report\\_UK.pdf](https://sarasinandpartners.com/wp-content/uploads/2025/04/00102_Stewardship-Report_UK.pdf)

**(D) Guidelines on governance factors**

Add link:

[https://sarasinandpartners.com/wp-content/uploads/2025/04/00102\\_Stewardship-Report\\_UK.pdf](https://sarasinandpartners.com/wp-content/uploads/2025/04/00102_Stewardship-Report_UK.pdf)

**(E) Guidelines on sustainability outcomes**

Add link:

[https://sarasinandpartners.com/wp-content/uploads/2025/04/00102\\_Stewardship-Report\\_UK.pdf](https://sarasinandpartners.com/wp-content/uploads/2025/04/00102_Stewardship-Report_UK.pdf)

**(F) Specific guidelines on climate change (may be part of guidelines on environmental factors)**

Add link:

<https://sarasinandpartners.com/wp-content/uploads/2022/02/NZAM-report-2022.pdf>

**(G) Specific guidelines on human rights (may be part of guidelines on social factors)**

Add link:

[https://sarasinandpartners.com/wp-content/uploads/2025/04/00102\\_Stewardship-Report\\_UK.pdf](https://sarasinandpartners.com/wp-content/uploads/2025/04/00102_Stewardship-Report_UK.pdf)

**(H) Specific guidelines on other systematic sustainability issues**

Add link:

[https://sarasinandpartners.com/wp-content/uploads/2025/04/00102\\_Stewardship-Report\\_UK.pdf](https://sarasinandpartners.com/wp-content/uploads/2025/04/00102_Stewardship-Report_UK.pdf)

**(I) Guidelines tailored to the specific asset class(es) we hold**

Add link:

[https://sarasinandpartners.com/wp-content/uploads/2025/04/00102\\_Stewardship-Report\\_UK.pdf](https://sarasinandpartners.com/wp-content/uploads/2025/04/00102_Stewardship-Report_UK.pdf)

**(J) Guidelines on exclusions**

Add link:

<https://sarasinandpartners.com/wp-content/uploads/2020/05/guide-to-ethical-restrictions.pdf>

**(K) Guidelines on managing conflicts of interest related to responsible investment**

Add link:

[https://sarasinandpartners.com/wp-content/uploads/2025/04/00102\\_Stewardship-Report\\_UK.pdf](https://sarasinandpartners.com/wp-content/uploads/2025/04/00102_Stewardship-Report_UK.pdf)

(L) Stewardship: Guidelines on engagement with investees

Add link:

<https://sarasinpartner.wpengine.com/wp-content/uploads/2020/05/ownership-discipline.pdf>

(M) Stewardship: Guidelines on overall political engagement

Add link:

[https://sarasinandpartners.com/wp-content/uploads/2025/04/00102\\_Stewardship-Report\\_UK.pdf](https://sarasinandpartners.com/wp-content/uploads/2025/04/00102_Stewardship-Report_UK.pdf)

(N) Stewardship: Guidelines on engagement with other key stakeholders

Add link:

[https://sarasinandpartners.com/wp-content/uploads/2025/04/00102\\_Stewardship-Report\\_UK.pdf](https://sarasinandpartners.com/wp-content/uploads/2025/04/00102_Stewardship-Report_UK.pdf)

(O) Stewardship: Guidelines on (proxy) voting

Add link:

<https://sarasinpartner.wpengine.com/wp-content/uploads/2020/05/corporate-governance-and-voting-guidelines.pdf>

- (Q) No elements of our formal responsible investment policy(ies) are publicly available

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 4	PLUS	PGS 1	N/A	PUBLIC	Responsible investment policy elements	1 – 6

**Does your formal responsible investment policy(ies) identify a link between your responsible investment activities and your fiduciary duties or equivalent obligations?**

(A) Yes

Elaborate:

At Sarasin and Partners, we consider ourselves long-term stewards of our clients' assets. We invest according to a set of core underlying principles, which are covered in our policies including Our Stewardship Framework, Ownership Discipline, and Principles for Engaged Ownership. These principles highlight the link between our responsible investment activities and our commitment to deliver enduring value to our clients.

We believe that sustainable companies will tend to create more durable economic value than companies that impose adverse impacts on society or the environment. Specifically, we favour businesses that articulate compelling long-term strategies, and take seriously their responsibilities to their customers, staff, suppliers, local communities and the environment, alongside their shareholders and creditors. Once we purchase an entity's shares or debt, we act as engaged owners on behalf of our clients, fulfilling oversight responsibilities including voting and challenging the companies' leadership where concerns arise. While the tools for pressing for change often differ between shareholders and creditors, engagement is important in both cases. We understand that the world is complex, that standards, rules and expectations vary between countries and communities, and the potential for unintended consequences is high. Our core investment principles guide our approach to investment and stewardship, but we avoid hard and fast rules in implementation. We also believe that our clients' long-term interests are not best served by a narrow focus on shorter-term relative performance against a market index. Our stewardship work starts with our clients' needs and takes a holistic view of how to deliver absolute performance. Alongside our focus on finding high-performing long-term investments, we seek to promote more sustainable government policies and market practices, that rewards responsible businesses and lays the foundation for enduring prosperity for all stakeholders.

- (B) No

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 5	CORE	PGS 1	N/A	PUBLIC	Responsible investment policy elements	2

Which elements are covered in your organisation's policy(ies) or guidelines on stewardship?

- (A) Overall stewardship objectives
- (B) Prioritisation of specific ESG factors to be advanced via stewardship activities
- (C) Criteria used by our organisation to prioritise the investees, policy makers, key stakeholders, or other entities on which to focus our stewardship efforts
- (D) How different stewardship tools and activities are used across the organisation
- (E) Approach to escalation in stewardship
- (F) Approach to collaboration in stewardship
- (G) Conflicts of interest related to stewardship
- (H) How stewardship efforts and results are communicated across the organisation to feed into investment decision-making and vice versa
- (I) Other
- (J) None of the above elements is captured in our policy(ies) or guidelines on stewardship

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 6	CORE	PGS 1	N/A	PUBLIC	Responsible investment policy elements	2

Does your policy on (proxy) voting include voting principles and/or guidelines on specific ESG factors?

- (A) Yes, it includes voting principles and/or guidelines on specific environmental factors
- (B) Yes, it includes voting principles and/or guidelines on specific social factors
- (C) Yes, it includes voting principles and/or guidelines on specific governance factors
- (D) Our policy on (proxy) voting does not include voting principles or guidelines on specific ESG factors

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 7	CORE	OO 9	N/A	PUBLIC	Responsible investment policy elements	2

Does your organisation have a policy that states how (proxy) voting is addressed in your securities lending programme?

- (A) We have a publicly available policy to address (proxy) voting in our securities lending programme
- (B) We have a policy to address (proxy) voting in our securities lending programme, but it is not publicly available
- (C) We rely on the policy of our external service provider(s)
- (D) We do not have a policy to address (proxy) voting in our securities lending programme
- (E) Not applicable; we do not have a securities lending programme

## RESPONSIBLE INVESTMENT POLICY COVERAGE

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 8	CORE	PGS 1	N/A	PUBLIC	Responsible investment policy coverage	1

What percentage of your total AUM is covered by the below elements of your responsible investment policy(ies)?

### Combined AUM coverage of all policy elements

(A) Overall approach to responsible investment						
(B) Guidelines on environmental factors					(7) 100%	
(C) Guidelines on social factors						
(D) Guidelines on governance factors						

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 9	CORE	PGS 2	N/A	PUBLIC	Responsible investment policy coverage	1

What proportion of your AUM is covered by your formal policies or guidelines on climate change, human rights, or other systematic sustainability issues?

### AUM coverage

(A) Specific guidelines on climate change					(1) for all of our AUM	
(B) Specific guidelines on human rights					(1) for all of our AUM	
(C) Specific guidelines on other systematic sustainability issues					(1) for all of our AUM	

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 10	CORE	OO 8, OO 9, PGS 1	N/A	PUBLIC	Responsible investment policy coverage	2

Per asset class, what percentage of your AUM is covered by your policy(ies) or guidelines on stewardship with investees?

**(A) Listed equity**

(1) Percentage of AUM covered

- (1) >0% to 10%
- (2) >10% to 20%
- (3) >20% to 30%
- (4) >30% to 40%
- (5) >40% to 50%
- (6) >50% to 60%
- (7) >60% to 70%
- (8) >70% to 80%
- (9) >80% to 90%
- (10) >90% to <100%
- (11) 100%

(2) If your AUM coverage is below 100%, explain why: (Voluntary)

We have an institutional client that retains voting functions and are therefore covered by their own voting guidelines.

**(B) Fixed income**

(1) Percentage of AUM covered

- (1) >0% to 10%
- (2) >10% to 20%
- (3) >20% to 30%
- (4) >30% to 40%
- (5) >40% to 50%
- (6) >50% to 60%
- (7) >60% to 70%
- (8) >70% to 80%
- (9) >80% to 90%
- (10) >90% to <100%
- (11) 100%

**(I) Other**

(1) Percentage of AUM covered

- (1) >0% to 10%
- (2) >10% to 20%
- (3) >20% to 30%
- (4) >30% to 40%
- (5) >40% to 50%
- (6) >50% to 60%
- (7) >60% to 70%
- (8) >70% to 80%
- (9) >80% to 90%
- (10) >90% to <100%
- (11) 100%

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 10.1	CORE	OO 9.1, PGS 1	N/A	PUBLIC	Responsible investment policy coverage	2

What percentage of your listed equity holdings is covered by your guidelines on (proxy) voting?

(A) **Actively managed listed equity**

(1) Percentage of your listed equity holdings over which you have the discretion to vote

- (1) >0% to 10%
- (2) >10% to 20%
- (3) >20% to 30%
- (4) >30% to 40%
- (5) >40% to 50%
- (6) >50% to 60%
- (7) >60% to 70%
- (8) >70% to 80%
- (9) >80% to 90%
- (10) >90% to <100%
- (11) 100%

(2) If your AUM coverage is below 100%, explain why: (Voluntary)

## GOVERNANCE

### ROLES AND RESPONSIBILITIES

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 11	CORE	N/A	Multiple indicators	PUBLIC	Roles and responsibilities	1

Which senior level body(ies) or role(s) in your organisation have formal oversight over and accountability for responsible investment?

(A) **Board members, trustees, or equivalent**

(B) **Senior executive-level staff, or equivalent**

Specify:

Our Board oversees our stewardship and ESG integration activities. Head of Asset Management oversees implementation of Responsible Investment activities, reporting into Managing Partner.

(C) **Investment committee, or equivalent**

Specify:

Stewardship Steering Committee overseeing our stewardship activities reports into, and has members of, Executive Committee. Asset Management Committee approves our stewardship policies.

(D) **Head of department, or equivalent**

Specify department:

Head of Stewardship; Head of Asset Management

- (E) None of the above bodies and roles have oversight over and accountability for responsible investment

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 11.1	CORE	PGS 1, PGS 2, PGS 11	N/A	PUBLIC	Roles and responsibilities	1, 2

**Does your organisation's senior level body(ies) or role(s) have formal oversight over and accountability for the elements covered in your responsible investment policy(ies)?**

	(1) Board members, trustees, or equivalent	(2) Senior executive-level staff, investment committee, head of department, or equivalent
(A) Overall approach to responsible investment	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(B) Guidelines on environmental, social and/or governance factors	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(C) Guidelines on sustainability outcomes	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(D) Specific guidelines on climate change (may be part of guidelines on environmental factors)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(E) Specific guidelines on human rights (may be part of guidelines on social factors)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(F) Specific guidelines on other systematic sustainability issues	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(G) Guidelines tailored to the specific asset class(es) we hold	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(H) Guidelines on exclusions	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(I) Guidelines on managing conflicts of interest related to responsible investment	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(J) Stewardship: Guidelines on engagement with investees	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(K) Stewardship: Guidelines on overall political engagement	<input type="checkbox"/>	<input checked="" type="checkbox"/>

(L) Stewardship: Guidelines on engagement with other key stakeholders	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(M) Stewardship: Guidelines on (proxy) voting	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(N) This role has no formal oversight over and accountability for any of the above elements covered in our responsible investment policy(ies)	<input type="radio"/>	<input type="radio"/>

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 11.2	CORE	N/A	N/A	PUBLIC	Roles and responsibilities	1 – 6

**Does your organisation have governance processes or structures to ensure that your overall political engagement is aligned with your commitment to the principles of PRI, including any political engagement conducted by third parties on your behalf?**

(A) Yes

Describe how you do this:

Policy outreach is one of our three Stewardship pillars and is subject to the same governance framework that covers all our stewardship activities. The Stewardship Steering Committee has oversight of setting the engagement and policy priorities. The Head of Stewardship leads our public policy positioning, with stewardship experts driving the identification and prioritisation of stewardship issues. The policy activities we focus on are determined based on the following criteria:

- Materiality. We focus on issues that have the greatest impact on protecting and enhancing capital, recognising that harmful externalities imposed on society and the environment ultimately threaten financial performance.
- Potential for impact. We concentrate on areas where we can drive demonstrable change, leveraging our expertise, insight and a clear vision for necessary reforms.
- Client preference. We engage with clients regularly through meetings, conferences and other communications to understand their areas of interest and concern.

More details can be found in our 2024 stewardship report pages 8 & 21.

(B) No

(C) Not applicable, our organisation does not conduct any form of political engagement directly or through any third parties

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 12	CORE	N/A	N/A	PUBLIC	Roles and responsibilities	1

**In your organisation, which internal or external roles are responsible for implementing your approach to responsible investment?**

(A) Internal role(s)

Specify:

Asset Management, including the Stewardship team, Equity research and Multi-asset research teams.

(B) External investment managers, service providers, or other external partners or suppliers

Specify:

An external proxy voting service provider implements our voting according to our voting guidelines and instructions.

- (C) We do not have any internal or external roles with responsibility for implementing responsible investment

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 13	CORE	PGS 11	N/A	PUBLIC	Roles and responsibilities	1

**Does your organisation use responsible investment KPIs to evaluate the performance of your board members, trustees, or equivalent?**

- (A) Yes, we use responsible investment KPIs to evaluate the performance of our board members, trustees, or equivalent
- (B) No, we do not use responsible investment KPIs to evaluate the performance of our board members, trustees, or equivalent

Explain why: (Voluntary)

The Board has ultimate responsibility for our Responsible Investment approach but, as a Partnership, is not answerable to external shareholders and is fully focused on strategic oversight of the Business. Ensuring we meet regulatory and client requirements is central to the Board's interest and focus. Quarterly and annual reports are presented to the Board on stewardship and ESG work.

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 14	CORE	PGS 11	N/A	PUBLIC	Roles and responsibilities	1

**Does your organisation use responsible investment KPIs to evaluate the performance of your senior executive-level staff (or equivalent), and are these KPIs linked to compensation?**

- (A) Yes, we use responsible investment KPIs to evaluate the performance of our senior executive-level staff (or equivalent)

Indicate whether these responsible investment KPIs are linked to compensation

- (1) KPIs are linked to compensation
- (2) KPIs are not linked to compensation as these roles do not have variable compensation
- (3) KPIs are not linked to compensation even though these roles have variable compensation

Describe: (Voluntary)

- (B) No, we do not use responsible investment KPIs to evaluate the performance of our senior executive-level staff (or equivalent)

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 15	PLUS	PGS 11	N/A	PUBLIC	Roles and responsibilities	1

**What responsible investment competencies do you regularly include in the training of senior-level body(ies) or role(s) in your organisation?**

	(1) Board members, trustees or equivalent	(2) Senior executive-level staff, investment committee, head of department or equivalent
(A) Specific competence in climate change mitigation and adaptation	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(B) Specific competence in investors' responsibility to respect human rights	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(C) Specific competence in other systematic sustainability issues	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(D) The regular training of this senior leadership role does not include any of the above responsible investment competencies	<input type="radio"/>	<input type="radio"/>

## EXTERNAL REPORTING AND DISCLOSURES

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 16	CORE	N/A	N/A	PUBLIC	External reporting and disclosures	6

**What elements are included in your regular reporting to clients and/or beneficiaries for the majority of your AUM?**

- (A) Any changes in policies related to responsible investment
- (B) Any changes in governance or oversight related to responsible investment
- (C) Stewardship-related commitments
- (D) Progress towards stewardship-related commitments
- (E) Climate-related commitments
- (F) Progress towards climate-related commitments
- (G) Human rights-related commitments
- (H) Progress towards human rights-related commitments
- (I) Commitments to other systematic sustainability issues
- (J) Progress towards commitments on other systematic sustainability issues
- (K) We do not include any of these elements in our regular reporting to clients and/or beneficiaries for the majority of our AUM

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 17	CORE	N/A	N/A	PUBLIC	External reporting and disclosures	6

During the reporting year, did your organisation publicly disclose climate-related information in line with the Task Force on Climate-Related Financial Disclosures' (TCFD) recommendations?

- (A) Yes, including governance-related recommended disclosures
- (B) Yes, including strategy-related recommended disclosures
- (C) Yes, including risk management-related recommended disclosures
- (D) Yes, including applicable metrics and targets-related recommended disclosures
- (E) None of the above

Add link(s):

<https://sarasinandpartners.com/wp-content/uploads/2024/06/TCFD-Entity-Report-2025.pdf>

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 18	PLUS	N/A	N/A	PUBLIC	External reporting and disclosures	6

During the reporting year, to which international responsible investment standards, frameworks, or regulations did your organisation report?

- (A) Disclosures against the European Union's Sustainable Finance Disclosure Regulation (SFDR)
- (B) Disclosures against the European Union's Taxonomy
- (C) Disclosures against the CFA's ESG Disclosures Standard
- (D) Disclosures against other international standards, frameworks or regulations

Specify:

The UK Stewardship Code

Link to example of public disclosures

[https://sarasinandpartners.com/wp-content/uploads/2025/04/00102\\_Stewardship-Report\\_UK.pdf](https://sarasinandpartners.com/wp-content/uploads/2025/04/00102_Stewardship-Report_UK.pdf)

- (E) Disclosures against other international standards, frameworks or regulations
- (F) Disclosures against other international standards, frameworks or regulations
- (G) Disclosures against other international standards, frameworks or regulations

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 19	CORE	N/A	N/A	PUBLIC	External reporting and disclosures	6

**During the reporting year, did your organisation publicly disclose its membership in and support for trade associations, think tanks or similar bodies that conduct any form of political engagement?**

**(A) Yes, we publicly disclosed all of our membership in and support for trade associations, think tanks, or similar bodies that conduct any form of political engagement**

Add link(s):

[https://sarasinandpartners.com/wp-content/uploads/2025/04/00102\\_Stewardship-Report\\_UK.pdf](https://sarasinandpartners.com/wp-content/uploads/2025/04/00102_Stewardship-Report_UK.pdf)

- (B) Yes, we publicly disclosed some of our membership in and support for trade associations, think tanks, or similar bodies that conduct any form of political engagement
- (C) No, we did not publicly disclose our membership in and support for trade associations, think tanks, or similar bodies that conduct any form of political engagement
- (D) Not applicable, we were not members in or supporters of any trade associations, think tanks, or similar bodies that conduct any form of political engagement during the reporting year

**Additional context to your response(s): (Voluntary)**

Pg 22 of the 2024 Stewardship report

## STRATEGY

## CAPITAL ALLOCATION

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 20	CORE	N/A	N/A	PUBLIC	Capital allocation	1

**Which elements do your organisation-level exclusions cover?**

- (A) Exclusions based on our organisation's values or beliefs regarding particular sectors, products or services**
- (B) Exclusions based on our organisation's values or beliefs regarding particular regions or countries
- (C) Exclusions based on minimum standards of business practice aligned with international norms such as the OECD Guidelines for Multinational Enterprises, the International Bill of Human Rights, UN Security Council sanctions or the UN Global Compact**
- (D) Exclusions based on our organisation's climate change commitments**
- (E) Other elements
- (F) Not applicable; our organisation does not have any organisation-level exclusions

**Additional context to your response(s): (Voluntary)**

Regarding (B), our compliance department oversees implementation of sanctions against specific regimes.

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 21	CORE	N/A	N/A	PUBLIC	Capital allocation	1

**How does your responsible investment approach influence your strategic asset allocation process?**

**(A) We incorporate ESG factors into our assessment of expected asset class risks and returns**

Select from dropdown list:

- (1) for all of our AUM subject to strategic asset allocation**
- (2) for a majority of our AUM subject to strategic asset allocation
- (3) for a minority of our AUM subject to strategic asset allocation

**(B) We incorporate climate change–related risks and opportunities into our assessment of expected asset class risks and returns**

Select from dropdown list:

- (1) for all of our AUM subject to strategic asset allocation**
- (2) for a majority of our AUM subject to strategic asset allocation
- (3) for a minority of our AUM subject to strategic asset allocation

**(C) We incorporate human rights–related risks and opportunities into our assessment of expected asset class risks and returns**

Select from dropdown list:

- (1) for all of our AUM subject to strategic asset allocation**
- (2) for a majority of our AUM subject to strategic asset allocation
- (3) for a minority of our AUM subject to strategic asset allocation

**(D) We incorporate risks and opportunities related to other systematic sustainability issues into our assessment of expected asset class risks and returns**

Select from dropdown list:

- (1) for all of our AUM subject to strategic asset allocation**
- (2) for a majority of our AUM subject to strategic asset allocation
- (3) for a minority of our AUM subject to strategic asset allocation

Specify: (Voluntary)

Please see Principle 7 of our 2024 Stewardship Report: [https://sarasinandpartners.com/wp-content/uploads/2025/04/00102\\_Stewardship-Report\\_UK.pdf](https://sarasinandpartners.com/wp-content/uploads/2025/04/00102_Stewardship-Report_UK.pdf)

- (E) We do not incorporate ESG factors, climate change, human rights or other systematic sustainability issues into our assessment of expected asset class risks and returns
- (F) Not applicable; we do not have a strategic asset allocation process

## STEWARDSHIP: OVERALL STEWARDSHIP STRATEGY

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 22	CORE	OO 8, OO 9	N/A	PUBLIC	Stewardship: Overall stewardship strategy	2

For the majority of AUM within each asset class, which of the following best describes your primary stewardship objective?

(1) Listed equity

(2) Fixed income

(A) Maximise our portfolio-level risk-adjusted returns. In doing so, we seek to address any risks to overall portfolio performance caused by individual investees' contribution to systematic sustainability issues.

(B) Maximise our individual investments' risk-adjusted returns. In doing so, we do not seek to address any risks to overall portfolio performance caused by individual investees' contribution to systematic sustainability issues.

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 24	CORE	OO 8, OO 9	N/A	PUBLIC	Stewardship: Overall stewardship strategy	2

Which of the following best describes your organisation's default position, or the position of the external service providers or external managers acting on your behalf, concerning collaborative stewardship efforts?

- (A) We recognise the value of collective action, and as a result, we prioritise collaborative stewardship efforts wherever possible
- (B) We collaborate on a case-by-case basis
- (C) Other
- (D) We do not join collaborative stewardship efforts

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 25	PLUS	OO 5, OO 8, OO 9	N/A	PUBLIC	Stewardship: Overall stewardship strategy	2

Rank the channels that are most important for your organisation in achieving its stewardship objectives.

(A) Internal resources, e.g. stewardship team, investment team, ESG team, or staff

Select from the list:

- 1
- 4
- 5

(B) External investment managers, third-party operators and/or external property managers, if applicable

(C) External paid specialist stewardship services (e.g. engagement overlay services or, in private markets, sustainability consultants) excluding investment managers, real assets third-party operators, or external property managers

(D) Informal or unstructured collaborations with investors or other entities

Select from the list:

- 3
- 4
- 5

(E) Formal collaborative engagements, e.g. PRI-coordinated collaborative engagements, Climate Action 100+, or similar

Select from the list:

- 2
- 4
- 5

(F) We do not use any of these channels

## STEWARDSHIP: (PROXY) VOTING

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 29	CORE	OO 9, PGS 1	N/A	PUBLIC	Stewardship: (Proxy) voting	2

When you use external service providers to give recommendations, how do you ensure those recommendations are consistent with your organisation's (proxy) voting policy?

(A) Before voting is executed, we review external service providers' voting recommendations for controversial and high-profile votes

Select from the below list:

- (1) in all cases
- (2) in a majority of cases
- (3) in a minority of cases

(B) Before voting is executed, we review external service providers' voting recommendations where the application of our voting policy is unclear

Select from the below list:

- (1) in all cases
- (2) in a majority of cases
- (3) in a minority of cases

(D) We do not review external service providers' voting recommendations

(E) Not applicable; we do not use external service providers to give voting recommendations

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 30	CORE	OO 9	N/A	PUBLIC	Stewardship: (Proxy) voting	2

**How is voting addressed in your securities lending programme?**

- (A) We recall all securities for voting on all ballot items
- (B) When a vote is deemed important according to pre-established criteria (e.g. high stake in the company), we recall all our securities for voting
- (C) Other
- (D) We do not recall our securities for voting purposes
- (E) Not applicable; we do not have a securities lending programme

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 31	CORE	OO 9.1	N/A	PUBLIC	Stewardship: (Proxy) voting	2

**For the majority of votes cast over which you have discretion to vote, which of the following best describes your decision making approach regarding shareholder resolutions (or that of your external service provider(s) if decision making is delegated to them)?**

- (A) We vote in favour of resolutions expected to advance progress on our stewardship priorities, including affirming a company's good practice or prior commitment
- (B) We vote in favour of resolutions expected to advance progress on our stewardship priorities, but only if the investee company has not already publicly committed to the action(s) requested in the proposal
- (C) We vote in favour of shareholder resolutions only as an escalation measure
- (D) We vote in favour of the investee company management's recommendations by default
- (E) Not applicable; we do not vote on shareholder resolutions

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 32	CORE	OO 9	N/A	PUBLIC	Stewardship: (Proxy) voting	2

**During the reporting year, how did your organisation, or your external service provider(s), pre-declare voting intentions prior to voting in annual general meetings (AGMs) or extraordinary general meetings (EGMs)?**

- (A) We pre-declared our voting intentions publicly through the PRI's vote declaration system on the Resolution Database
- (B) We pre-declared our voting intentions publicly by other means, e.g. through our website

Add link(s) to public disclosure:

<https://sarasinandpartners.com/stewardship-post/us-solar-fund-2024-agm-how-we-are-voting/>  
<https://sarasinandpartners.com/stewardship-post/rio-tinto-2024-agm-how-we-are-voting-for-net-zero-accounting/>  
<https://sarasinpartner.wpengine.com/wp-content/uploads/2020/05/corporate-governance-and-voting-guidelines.pdf>

- (C) We privately communicated our voting decision to investee companies prior to the AGM/EGM
- (D) We did not privately or publicly communicate our voting intentions prior to the AGM/EGM
- (E) Not applicable; we did not cast any (proxy) votes during the reporting year

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 33	CORE	OO 9	PGS 33.1	PUBLIC	Stewardship: (Proxy) voting	2

**After voting has taken place, do you publicly disclose your (proxy) voting decisions or those made on your behalf by your external service provider(s), company by company and in a central source?**

**(A) Yes, for all (proxy) votes**

Add link(s):

<https://sarasinandpartners.com/stewardship/how-we-vote-for-you/>

- (B) Yes, for the majority of (proxy) votes
- (C) Yes, for a minority of (proxy) votes
- (D) No, we do not publicly report our (proxy) voting decisions company-by-company and in a central source

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 33.1	CORE	PGS 33	N/A	PUBLIC	Stewardship: (Proxy) voting	2

**In the majority of cases, how soon after an investee's annual general meeting (AGM) or extraordinary general meeting (EGM) do you publish your voting decisions?**

**(A) Within one month of the AGM/EGM**

- (B) Within three months of the AGM/EGM
- (C) Within six months of the AGM/EGM
- (D) Within one year of the AGM/EGM
- (E) More than one year after the AGM/EGM

**Additional context to your response(s): (Voluntary)**

All votes can be found on our proxy voting dashboard - <https://sarasinandpartners.com/stewardship-how-we-vote-for-you-proxy-voting-dashboard/>

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 34	CORE	OO 9	N/A	PUBLIC	Stewardship: (Proxy) voting	2

**After voting has taken place, did your organisation, and/or the external service provider(s) acting on your behalf, communicate the rationale for your voting decisions during the reporting year?**

	(1) In cases where we abstained or voted against management recommendations	(2) In cases where we voted against an ESG-related shareholder resolution
(A) Yes, we publicly disclosed the rationale	(1) for all votes	(1) for all votes
(B) Yes, we privately communicated the rationale to the company	(3) for a minority of votes	(3) for a minority of votes
(C) We did not publicly or privately communicate the rationale, or we did not track this information	○	○
(D) Not applicable; we did not abstain or vote against management recommendations or ESG-related shareholder resolutions during the reporting year	○	○

**(A) Yes, we publicly disclosed the rationale - Add link(s):**

<https://sarasinandpartners.com/wp-content/uploads/2025/02/SARASIN-FUND-VOTES-2024-YTD.xlsx>  
[https://sarasinandpartners.com/?page\\_id=14760&preview=true](https://sarasinandpartners.com/?page_id=14760&preview=true)

## STEWARDSHIP: ESCALATION

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 36	CORE	OO 8, OO 9 HF, OO 9	N/A	PUBLIC	Stewardship: Escalation	2

**For your listed equity holdings, what escalation measures did your organisation, or the external investment managers or service providers acting on your behalf, use in the past three years?**

### (1) Listed equity

(A) Joining or broadening an existing collaborative engagement or creating a new one

(B) Filing, co-filing, and/or submitting a shareholder resolution or proposal

(C) Publicly engaging the entity, e.g. signing an open letter

(D) Voting against the re-election of one or more board directors

(E) Voting against the chair of the board of directors, or equivalent, e.g. lead independent director

(F) Divesting

(G) Litigation

(H) Other

(I) In the past three years, we did not use any of the above escalation measures for our listed equity holdings

#### (H) Other - (1) Listed equity - Specify:

Pre-declaration of votes on our website.

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 37	CORE	Multiple, see guidance	N/A	PUBLIC	Stewardship: Escalation	2

For your corporate fixed income assets, what escalation measures did your organisation, or the external investment managers or service providers acting on your behalf, use in the past three years?

- (A) Joining or broadening an existing collaborative engagement or creating a new one
- (B) Publicly engaging the entity, e.g. signing an open letter
- (C) Not investing
- (D) Reducing exposure to the investee entity
- (E) Divesting
- (F) Litigation
- (G) Other
- (H) In the past three years, we did not use any of the above escalation measures for our corporate fixed income assets

## STEWARDSHIP: ENGAGEMENT WITH POLICY MAKERS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 39	CORE	OO 8, OO 9	PGS 39.1, PGS 39.2	PUBLIC	Stewardship: Engagement with policy makers	2

Did your organisation, or the external investment managers or service providers acting on your behalf, engage with policy makers as part of your responsible investment approach during the reporting year?

- (A) Yes, we engaged with policy makers directly
- (B) Yes, we engaged with policy makers through the leadership of or active participation in working groups or collaborative initiatives, including via the PRI
- (C) Yes, we were members of, supported, or were in another way affiliated with third party organisations, including trade associations and non-profit organisations, that engage with policy makers, excluding the PRI
- (D) We did not engage with policy makers directly or indirectly during the reporting year beyond our membership in the PRI

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 39.1	CORE	PGS 39	N/A	PUBLIC	Stewardship: Engagement with policy makers	2

During the reporting year, what methods did you, or the external investment managers or service providers acting on your behalf, use to engage with policy makers as part of your responsible investment approach?

- (A) We participated in 'sign-on' letters
- (B) We responded to policy consultations
- (C) We provided technical input via government- or regulator-backed working groups

Describe:

Q1 We engaged UK and global regulators to strengthen banks' resilience to climate risks. In Q1, we wrote to the UK's PRA and the Basel Committee, advocating for stronger climate stress-testing, disclosure of financial impacts, and capital adequacy rules aligned with climate risks. Separately, we met DEFRA's Minister to push for reforms to the UK Seasonal Workers Scheme to address labour exploitation and ensure fair treatment of migrant workers. Q2 We continued our push for stronger audit and accounting standards to protect investors and ensure climate risks are reflected in company reports. We met US and UK regulators, joined global standard-setter discussions, and published an op-ed urging investors to hold auditors accountable. We also supported IASB efforts to improve climate-related guidance. Separately, we opposed Exxon's legal challenge to shareholders, which threatens investor rights. Q3 Audit quality remained a key focus. PCAOB inspections showed persistent audit failures, with no improvement year-on-year. We raised concerns with the SEC on poor disclosure of critical assumptions by US energy firms, presented to PCAOB on audit committee accountability, and welcomed IASB's climate-related guidance. We also backed FCA's proposals to strengthen UK Prospectus Rules with climate disclosures, helping coordinate investor response through two webinars. Q4 We welcomed the IASB's proposed climate accounting examples, supporting clearer financial disclosures. We also backed FCA's push for climate-related disclosures in company prospectuses, calling for consistency across debt and equity issuers. Finally, following two years of engagement, proxy advisor ISS introduced new net zero voting policies aligned with 1.5°C goals, enabling more robust climate-linked voting—an approach we've championed since 2018.

**(D) We engaged policy makers on our own initiative**

Describe:

We have led a coalition of primarily UK investors over several years, calling for more prudent accounting and greater focus on capital maintenance through public position papers, submissions to government consultations, private audiences with regulators, participation on government panels and advisory boards. In 2022 our primary concern has been around the establishment of the UK Endorsement Board (UKEB). It was established following Brexit to vet IFRS for consistency with UK Company Law as a precursor for them being rolled out. In response to our concerns, we published a statement on our website in February, and raised our concerns directly with the FRC, other investors and Members of the House of Lords. We also have ongoing discussions with the UK Financial Reporting Council over ensuring financial statements are properly reflecting material climate factors. We coordinated outreach to the UK's largest audit firms (KPMG, EY, PWC and Deloitte), copying in the FRC to ensure they were kept abreast of investor concerns. Our work has contributed to a number of impacts over the year. This includes new audit market requirements in the EU and UK to strengthen independence, transparency and investor accountability, as well as the UK's decision to disband the FRC to set up a better resourced and more independent regulator.

(E) Other methods

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 39.2	CORE	PGS 39	N/A	PUBLIC	Stewardship: Engagement with policy makers	2

**During the reporting year, did your organisation publicly disclose details of your engagement with policy makers conducted as part of your responsible investment approach, including through external investment managers or service providers?**

**(A) We publicly disclosed all our policy positions**

Add link(s):

[https://sarasinandpartners.com/wp-content/uploads/2025/04/00102\\_Stewardship-Report\\_UK.pdf](https://sarasinandpartners.com/wp-content/uploads/2025/04/00102_Stewardship-Report_UK.pdf)

**(B) We publicly disclosed details of our engagements with policy makers**

Add link(s):

[https://sarasinandpartners.com/wp-content/uploads/2025/04/00102\\_Stewardship-Report\\_UK.pdf](https://sarasinandpartners.com/wp-content/uploads/2025/04/00102_Stewardship-Report_UK.pdf)

(C) No, we did not publicly disclose details of our engagement with policy makers conducted as part of our responsible investment approach during the reporting year

**Additional context to your response(s): (Voluntary)**

Most of our engagement with policy makers are also disclosed on our website: <https://sarasinandpartners.com/stewardship/engagement-and-policy-outreach/>

## STEWARDSHIP: EXAMPLES

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 40	PLUS	OO 8, OO 9	N/A	PUBLIC	Stewardship: Examples	2

**Provide examples of stewardship activities that you conducted individually or collaboratively during the reporting year that contributed to desired changes in the investees, policy makers or other entities with which you interacted.**

(A) Example 1:

Title of stewardship activity:

Air Liquide - Climate change

(1) Led by

- (1) Internally led
- (2) External service provider led
- (3) Led by an external investment manager, real assets third-party operator and/or external property manager

(2) Primary focus of stewardship activity

- (1) Environmental factors
- (2) Social factors
- (3) Governance factors

(3) Asset class(es)

- (1) Listed equity
- (2) Fixed income
- (3) Private equity
- (4) Real estate
- (5) Infrastructure
- (6) Hedge funds
- (7) Forestry
- (8) Farmland
- (9) Other

(4) Description of the activity and what was achieved. For collaborative activities, provide detail on your individual contribution.

ISSUE Air Liquide, a global industrial gases company, has one of the highest carbon footprints among our holdings, mainly due to its hydrogen production process and the energy-intensive nature of its air separation units. Additionally, its client base includes carbon-intensive sectors such as chemicals, metals, refining, and energy. Given this, Air Liquide holds a crucial role in enabling the transition to a net-zero emissions economy. Since 2019, Sarasin and other investors have actively engaged with the company, which led to the adoption of a 1.5°C-aligned strategy in 2022. This includes commitments to green hydrogen, carbon capture and storage, and science-based targets. Despite this progress, concerns remain regarding the company's decarbonisation roadmap and the financial transparency of its climate strategy. ENGAGEMENT GOALS (2024 Focus) Our 2024 engagement strategy centred on both climate and governance, with the following key objectives:

- Strengthen Scope 3 emissions targets.
- Improve disclosure of capital expenditure plans and alignment with climate goals.
- Enhance physical climate risk mapping and mitigation strategies.
- Improve climate-related financial disclosures, including sensitivity analyses.
- Link executive incentives to a 1.5°C-aligned pathway.
- Publish an annual lobbying review to demonstrate policy alignment. In 2024, we continued bilateral engagement with Air Liquide, recognising the company's constructive stance and progress. After sending a letter in December 2023 to the executive chair highlighting key concerns and voting rationale, we followed up with the investor relations and sustainability teams. Despite improvements, we abstained from voting on the financial statements and statutory report for the second year due to:

WHAT WE DID

1. Limited visibility on physical climate risks and implications for key assets.

2. Inadequate disclosure on the financial sensitivity under 1.5°C and warmer scenarios.

We also voted against the remuneration policy due to insufficient emphasis on climate performance metrics. In December 2024, we sent another letter to the executive chair reiterating our voting decisions and encouraging key improvements. OUTCOMES IN 2024

- Climate Transition Plan: Air Liquide published its first detailed plan reaffirming 1.5°C alignment and specifying strategic actions.
- Climate Lobbying: The company announced its departure from the US-based AFPM (American Fuel & Petrochemicals Manufacturers) due to misaligned climate lobbying, reflecting a rare and commendable step in climate policy alignment.
- Executive Remuneration: Climate weighting in the executive Performance Share Plan increased from 15% to 20%. With the election of President Trump in the US—a key market for Air Liquide—the company will face new challenges in delivering on its climate goals, particularly green hydrogen and carbon capture. We will continue our support and oversight through bilateral engagement, voting, and collaboration with other like-minded investors.

NEXT STEPS

(B) Example 2:

Title of stewardship activity:

Equinor Engagement - Climate Change, Collaboration & escalation

(1) Led by

- (1) Internally led
- (2) External service provider led
- (3) Led by an external investment manager, real assets third-party operator and/or external property manager

(2) Primary focus of stewardship activity

- (1) Environmental factors
- (2) Social factors
- (3) Governance factors

(3) Asset class(es)

- (1) Listed equity
- (2) Fixed income
- (3) Private equity
- (4) Real estate
- (5) Infrastructure
- (6) Hedge funds
- (7) Forestry
- (8) Farmland
- (9) Other

(4) Description of the activity and what was achieved. For collaborative activities, provide detail on your individual contribution.

THE ISSUE Equinor, Norway's 67% state-owned oil and gas company, faces a fundamental challenge: how to align with the Paris Agreement while maintaining financial viability. Its revenues remain dominated by fossil fuels, even as the energy transition demands declining oil and gas production. Sarasin & Partners, a shareholder since 2021, sees Equinor as well-positioned for transition due to its low-cost reserves, government ownership pressure, and investments in renewables and carbon capture. However, a clear 1.5°C-aligned strategy remains lacking. ENGAGEMENT GOALS Sarasin's climate engagement with Equinor is structured around three main objectives: A) 1.5°C-aligned emissions targets B) Capital allocation aligned with Paris goals C) Transparent and climate-aware accounting disclosures ACTIONS TAKEN Since 2020, Sarasin has undertaken sustained engagement with Equinor through direct dialogue and participation in the Climate Action 100+ (CA100+) initiative, where Sarasin became a lead investor in 2021. Engagement efforts focused on ensuring climate risk is properly reflected in company financials, while pushing for a credible strategy to replace fossil fuel revenues. Key activities in 2024: A) 26 engagement actions, including meetings with company leadership and Norway's Ownership Department. B) Filed a shareholder resolution at Equinor's 2024 AGM calling for a Paris-aligned capital strategy. C) Proposed an external expert advisory panel to inform the review of Equinor's Energy Transition Plan (ETP). D) Nominated a non-executive director (NED) to enhance board climate oversight. The shareholder resolution earned over 30% support from non-state shareholders, a significant vote of confidence in the need for stronger climate action.

While the Norwegian state voted against it, the government reaffirmed its expectation that Equinor align with a 1.5°C pathway in a statement to Parliament. KEY OUTCOMES Sarasin's long-term engagement has helped catalyse important shifts at Equinor: A) Emission reductions: Equinor continues to lead on Scope 1 and 2 emissions reduction efforts. B) Investment in renewables: Maintained its target of 50% of gross capex directed toward renewables by 2030. C) Improved financial disclosures: Since 2023, Equinor has enhanced climate risk visibility in financial statements. D) Sustained net-zero ambition: Unlike peers, Equinor has not backtracked on its climate commitments.

Although Equinor made no new announcements in 2024, its ETP review in 2025 is seen as a key moment. The 2024 shareholder vote laid strong groundwork for increased ambition. In a notable development, Equinor took a 10% stake in Ørsted, a leading offshore wind company, reinforcing its commitment to the low-carbon transition. ESCALATION STRATEGY Sarasin's engagement escalated in line with Equinor's limited progress: A) Coalition building: Worked collectively via CA100+ and other investor coalitions, including dialogue with the Norwegian government. B) Vote escalation: In 2024, Sarasin voted against Equinor's annual report, remuneration policy, and auditor's remuneration, while supporting a resolution for more climate expertise on the board.

C) Shareholder resolution filing: Led a resolution calling for strategic alignment with Paris goals—the first of its kind for Sarasin at Equinor. D) Letters to the Chair: Coordinated collective letters urging board action, including setting up an independent climate advisory panel and enhancing board climate competence. E) Government engagement: Maintained a dialogue with Norway’s government, emphasising its duty as majority shareholder to ensure Equinor delivers on its climate obligations. LOOKING AHEAD Sarasin’s multi-year engagement has built strong momentum for aligning Equinor’s strategy with climate science. The 2025 review of Equinor’s Energy Transition Plan will be a crucial moment to assess whether the company responds to growing investor demands and international climate expectations.

Sarasin remains committed to: A) Ensuring Equinor develops a truly Paris-aligned strategy. B) Holding the board accountable through investor votes and continued dialogue. C) Working with the Norwegian government to drive change from the top. By combining shareholder resolutions, collective action, and public pressure, Sarasin’s engagement demonstrates a robust model for driving climate accountability in carbon-intensive sectors.

(C) Example 3:

Title of stewardship activity:

Social Value Chain - Amazon

(1) Led by

- (1) Internally led
- (2) External service provider led
- (3) Led by an external investment manager, real assets third-party operator and/or external property manager

(2) Primary focus of stewardship activity

- (1) Environmental factors
- (2) Social factors
- (3) Governance factors

(3) Asset class(es)

- (1) Listed equity
- (2) Fixed income
- (3) Private equity
- (4) Real estate
- (5) Infrastructure
- (6) Hedge funds
- (7) Forestry
- (8) Farmland
- (9) Other

(4) Description of the activity and what was achieved. For collaborative activities, provide detail on your individual contribution.

ISSUE We continue to have significant concerns regarding Amazon’s approach to human rights and workforce practices, particularly at its fulfilment centres. These concerns include inadequate global reporting on health and safety metrics, challenging working conditions, and limitations on freedom of association and collective bargaining.

Multiple U.S. authorities—including OSHA, the Department of Justice, and the Senate Committee on Health, Education, Labour and Pensions—have opened investigations into the company’s health and safety practices. While Amazon discloses detailed health and safety data for its U.S. operations, similar levels of transparency are absent in other regions. Concerns have also been raised about potential underreporting of injuries and pressure on workers to return to work despite health issues. In 2023, worker strikes at several European sites further underlined discontent with workplace conditions.

Although Amazon maintains constructive relationships with some European trade unions (notably in Italy), reports from the U.S. and UK suggest that the company may be obstructing unionisation efforts. Shareholder proposals in 2023 and 2024 have called for independent audits of working conditions and freedom of association. We supported these proposals, believing third-party assessments would enhance transparency and drive improvement.

ENGAGEMENT GOALS While recognising recent improvements in U.S. health and safety disclosures, our 2024 engagement efforts focused on:

- Encouraging Amazon to publish a global safety report equivalent to its U.S. disclosures.
- Seeking commitment to independent audits assessing physical and mental health impacts on employees.
- Securing stronger assurances on freedom of association and improving communication, pay, and benefits for workers. We reached out to the Chair of Amazon’s Nominating and Corporate Governance Committee to outline our concerns and propose a meeting. In March 2024, we met with the ESG team, which included representatives from investor relations and corporate labour relations.

WHAT WE DID

Following the meeting, we requested further detail on safety disclosures and employee engagement practices, as well as a site visit. In June 2024, we visited Amazon’s largest European fulfilment centre near London to observe conditions firsthand.

**OUTCOMES** During engagement meetings, Amazon's ESG team offered reassurances on efforts to maintain a strong safety culture. However, we continued to advocate for more robust disclosure and independent evaluations. On unionisation, Amazon noted low levels of employee support (less than 0.04% across four sites), although disputes over election results remain unresolved. The company emphasised providing multiple avenues for employees to communicate with management and offer feedback.

During the fulfilment centre visit, we observed:

Working conditions:

- High levels of automation and workflow optimisation.
- Task rotation to minimise physical strain.
- Strong safety protocols and tools.
- Comprehensive training, including cross-training and pathways to managerial roles.
- Wages above the UK National Living Wage and flexible hours, especially for working mothers.

Employee communication:

- Several formal communication channels, including Voice of Associate, Dragonfly, and Ethics Hotline.
- Transparent HR presence on-site to encourage interaction.
- Regular satisfaction surveys with results tied to management incentives.

We view this engagement as a positive milestone in understanding Amazon's evolving labour practices. Around the same time, a union representation vote at the Coventry fulfilment centre in the UK resulted in a loss for the union, though election disputes persist.

**NEXT STEPS** We will continue to monitor Amazon's progress on workplace issues, paying attention to indirect signals of employee unrest beyond formal unionisation. We will maintain pressure for independent audits and more granular disclosure on workforce grievances, safety data, and staff turnover.

Our engagement will also include participation in stakeholder groups to broaden insight into emerging risks and support ongoing dialogue with the company as necessary.

(D) Example 4:

Title of stewardship activity:

Governance - Gresham House Energy Storage Fund

(1) Led by

- **(1) Internally led**
- (2) External service provider led
- (3) Led by an external investment manager, real assets third-party operator and/or external property manager

(2) Primary focus of stewardship activity

- (1) Environmental factors
- (2) Social factors
- (3) Governance factors**

(3) Asset class(es)

- (1) Listed equity**
- (2) Fixed income
- (3) Private equity
- (4) Real estate
- (5) Infrastructure
- (6) Hedge funds
- (7) Forestry
- (8) Farmland
- (9) Other

(4) Description of the activity and what was achieved. For collaborative activities, provide detail on your individual contribution.

**THE ISSUE** The UK government has committed to decarbonising its power supply by 2030. In December 2024, the National Energy System Operator (NESO) published its action plan to reach a net-zero power system. A key component of this transition is battery storage, which must expand four- to five-fold to support intermittent renewable energy sources. Batteries enable surplus energy storage during times of excess generation and release power during shortages, reducing reliance on carbon-intensive gas and smoothing electricity supply.

Sarasin invested in Gresham House Energy Storage Fund (GRID) in 2019, recognising its strategic importance as the largest player in the market, accounting for 20% of UK battery storage capacity as of June 2024.

Despite these strong investment drivers, GRID's performance deteriorated sharply from 2023, with its share price falling over 70% by the end of 2024. Two key factors contributed to this decline:

- Regulatory inaction, as promised reforms to promote battery storage were not implemented (covered in Principle .
- Governance weaknesses, which are the focus of this case study. Our engagement with GRID prioritised four key governance areas:

**THE GOALS**

- Board effectiveness - Strengthening expertise in battery storage to improve decision-making.

- Dividend policy - Adopting a more prudent dividend policy to ensure capital is available for growth, debt repayment, and resilience amid market uncertainty.
- Internal controls - Ensuring more conservative third- impact management fees and incentives. We also advocated for the appointment of a Chief Finance Officer.
- party forecasts of net asset value (NAV), which directly
- Remuneration - Aligning management fees with shareholder value, shifting from NAV-based fees (which have been consistently overstated) to a model incorporating share price performance. As governance concerns grew amid challenging market conditions, we enhanced our engagement with GRID's board throughout 2024. Key actions included:

WHAT WE DID

- Regular dialogue with the executive team to advocate for prudent capital management, realistic NAV estimates, and transparent market communication.
- A meeting with the Chair in February 2024, followed by an October letter to the board outlining our expectations.
- A meeting with the Chair and a Non-Executive Director in November to discuss our governance priorities.
- A follow-up in December with the Chair, reiterating our expectations. The Chair responded with a letter detailing steps taken and further governance enhancements planned for 2025. Key governance improvements in 2024 included:

OUTCOMES

- Dividend Policy – At its November Capital Markets Day, payments to performance and moving the largest portion of payments to year-end. While this is an improvement, we believe the board should go further to prioritise growth investment and risk mitigation, given the ongoing regulatory uncertainty, interest rate volatility, and project delivery risks.

GRID announced a shift in its dividend policy, linking

- Strengthened Internal Controls - GRID appointed a second independent forecaster, which we consider more conservative and reliable in NAV estimation.
- Fee Structure Reform - The board expressed willingness to incorporate share price performance into management fee calculations, improving alignment with shareholder value. We will continue our dialogue with GRID's board in 2025 and assess progress ahead of the AGM. If necessary, we will determine an appropriate voting strategy and consider collective engagement should improvements stall.

NEXT STEPS

(E) Example 5:

Title of stewardship activity:

Fixed Income engagement

(1) Led by

- **(1) Internally led**
- (2) External service provider led
- (3) Led by an external investment manager, real assets third-party operator and/or external property manager

(2) Primary focus of stewardship activity

- (1) Environmental factors**
- (2) Social factors
- (3) Governance factors

(3) Asset class(es)

- (1) Listed equity
- (2) Fixed income**
- (3) Private equity
- (4) Real estate
- (5) Infrastructure
- (6) Hedge funds
- (7) Forestry
- (8) Farmland
- (9) Other

(4) Description of the activity and what was achieved. For collaborative activities, provide detail on your individual contribution.

THE ISSUE EDF is a key issuer in our fixed income universe and has a lower exposure to carbon emissions risk than its peers.

However, we have concerns regarding:

- Biodiversity and water usage, particularly around water withdrawals and discharges from EDF's operations.
  - Physical risk exposure of its nuclear fleet, which could be impacted by extreme weather events as climate change progresses.
- While EDF has acknowledged these risks, the level of transparency on these issues remains insufficient, and further engagement is needed.

THE GOALS Through our engagement with EDF, we aim to:

- Improve disclosure on water extraction and how the company assesses long-term water-related risks.
- Strengthen climate risk transparency, particularly regarding the impact of extreme weather events on production capacity.
- Monitor progress against carbon reduction targets in alignment with EDF's net zero strategy.

WHAT WE DID

- Held a meeting with investor relations, raising concerns about disclosure quality and seeking more information about how EDF manages water-related risks.
- Followed up with written correspondence to clarify specific questions about EDF's approach to water withdrawals, discharges, and the impact of extreme weather events on production. Water shortages and production loss: EDF disclosed that French nuclear production losses due to water shortages have historically remained below 1% of annual production, except in 2003 when extreme heatwaves led to higher losses. The company projects these losses could rise to 1.5% by 2050, although details on the underlying assumptions remain unclear.

OUTCOMES

Increased heatwave frequency: EDF acknowledged that the frequency of heat waves exceeding 10 days is expected to increase, raising risks of production loss. However, the visibility on these risks remains limited, and we have asked EDF for further clarity. Regulatory discharge limits: Potential water shortages and reduced river flow remain a key concern, alongside the 28°C regulatory limit on water discharges, which could restrict operations. While EDF has previously received temporary allowances to discharge water at higher temperatures for network safety, increased focus on biodiversity could reduce this flexibility. Water reduction commitment: EDF has committed to reducing industrial water use by 10% by 2030, but this excludes water needed for nuclear safety and cooling systems. Technological innovation: EDF is working on innovative technologies to reuse evaporated water in cooling towers, though its feasibility remains uncertain.

NEXT STEPS EDF currently operates 56 reactors, of which 30 use closed-circuit cooling and 26 use open-circuit cooling, with the latter withdrawing far more water. Water discharges are closely monitored, but EDF maintains that the primary driver of ecosystem impact is climate change itself, rather than heat from power plants.

For now, the disclosure EDF provides in its annual reports regarding climate risk and water-related stress sensitivities remains insufficient. We will push for greater transparency in 2025.

From an investment perspective, this means we continue to avoid taking exposure at the long end of the curve, given the outstanding risks.

## CLIMATE CHANGE

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 41	CORE	N/A	PGS 41.1	PUBLIC	Climate change	General

### Has your organisation identified climate-related risks and opportunities affecting your investments?

(A) Yes, within our standard planning horizon

Specify the risks and opportunities identified and your relevant standard planning horizon:

The initial assessment of our climate-related scenario analysis focuses on identifying instruments (equities, fixed income, alternative assets) that are presented with transition, physical, or liability risks and/or opportunities. Risks to both the capital of firms and the ability of firms to generate returns are considered. Determining whether these instruments are exposed to these risk/opportunity factors is conducted via a combination of quantitative and qualitative filters.

Our analysis suggests that the implications of climate change risks and opportunities are increasingly evident in capital market asset pricing. As such, we already actively integrate these considerations into our investment process and actions. The materiality of some factors will increase quickly while others will crystallise over longer timeframes. For example, capital market pricing of transition risks will manifest over different timescales for coal extraction relative to oil, natural gas, LNG, automotive, aviation, etc. Further, risks will become evident over different timeframes according to geographic distribution and the underlying emissions intensity of assets. By incorporating specific metrics and adjustments into our valuation models, based on either Paris aligned, or high climate change scenarios, we seek to ascertain the "Climate Value at Risk" (CVAR) for companies that captures the materiality and impact of climate risks and opportunities to each firm.

This applies to companies in the following industries and sectors:

- Transition Pathway Initiative high-risk industries
- Financials
- Real estate
- Food and agriculture
- Aerospace and air freight
- CA100+ focus list

The CVAR is the potential downside or upside to capital valuation due to climate factors.

There is no standardised model to measure this impact on economic value, as it depends on specific exposures and business activities within each company. We believe this can only be analysed through rigorous bottom-up analysis to truly understand the extent of the risks within a portfolio. As such, we do not rely on Scope 1 & 2 carbon foot-printing to inform our risk/opportunity perspectives as we see this as too narrow to capture the complex economic interactions and company strategies. Some factors that are examined to evaluate the economic impacts of physical and transition risks include: impact of higher carbon prices (Scope 1, 2 & 3 emissions); physical impacts for property, plants and equipment; changes in demand and/or pricing of commodities, goods and services; impairments / stranded assets; change in CAPEX requirements; and regulatory impacts for demand or supply (e.g. licenses).

For physical risks, our risk/opportunity analysis combines qualitative and quantitative (from Bloomberg) factors. We consider the footprint of the respective company's activities (not restricted to physical footprint, rather considering the broader geographical exposure) and then plot these footprints against physical manifestation of high climate change scenarios (e.g. sea level rise, water stress, heat stress). Crucially, it is worth noting that our transition risk assessment is predicated on Paris-aligned scenarios (analogous with RCP 2.6), while our physical risk assessment is generally predicated on non-Paris aligned scenarios (analogous with RCP 8.5 impacts). This ensures we take a prudent view in understanding climate risks.

Our long-term mind-set ensures that we consider climate change impacts (both physical and transition) beyond "conventional" investment time horizons. This is evidenced by our climate scenario analysis, engagement and policy work, which focuses on net-zero carbon pathways (i.e. 2050 and beyond) and objectives.

This net zero mind-set is critical to keeping pace with the rapid development of market expectations on those sectors that were once considered "hard to abate". Such sectors (e.g. shipping, aviation, cement, steel) were until recent history considered near immune from the decarbonisation debate. However, with market participants in these sectors setting net zero targets (e.g. Maersk and Heidelberg Cement), the need to focus on cross-sector transition risks and opportunities is critical.

Similarly, on physical risks, we continue to look beyond "conventional" investment time horizons. As example, it is highly unlikely that sea-level rises will impact certain jurisdictions within the next decade but if we identify assets that are exposed to this risk, it will form part of our risk and opportunity consideration for this instrument and be integrated into our valuation approach accordingly.

**(B) Yes, beyond our standard planning horizon**

Specify the risks and opportunities identified and your relevant standard planning horizon:

**NET ZERO ALIGNMENT ASSESSMENT (NZAA)**

The NZAA is our internal qualitative assessment of an entity's exposure to climate-related risks under a 1.5°C pathway, as well as the steps taken to mitigate these. We consider: • Backward-looking data, such as historical emissions. • Forward-looking indicators, such as efforts to align with a low-carbon pathway, governance of climate-related risks, disclosure to shareholders and incentive alignment through remuneration policies. Based on this assessment, companies are rated as not aligned, partly aligned or aligned.

See more details on page 53 of our 2024 Stewardship report - [https://sarasinandpartners.com/wp-content/uploads/2025/04/00102\\_Stewardship-Report\\_UK.pdf](https://sarasinandpartners.com/wp-content/uploads/2025/04/00102_Stewardship-Report_UK.pdf)

- (C) No, we have not identified climate-related risks and/or opportunities affecting our investments

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 41.1	CORE	PGS 41	N/A	PUBLIC	Climate change	General

**Does your organisation integrate climate-related risks and opportunities affecting your investments in its overall investment strategy, financial planning and (if relevant) products?**

**(A) Yes, our overall investment strategy, financial planning and (if relevant) products integrate climate-related risks and opportunities**

Describe how climate-related risks and opportunities have affected or are expected to affect your investment strategy, financial planning and (if relevant) products:

Given our commitment to stewardship and public commitment to support the Paris Climate Agreement in 2019, it was natural that we would become a founding signatory to the Net Zero Asset Managers' Commitment (NZAM), launched in December 2020. This commits us to: "support the goal of net-zero greenhouse gas emissions by 2050, in line with global efforts to limit warming to 1.5°C...[and] to support investing aligned with net-zero emissions by 2050 or sooner."

Specifically, Sarasin & Partners is committed to:

- a) Work in partnership with asset owner clients on decarbonisation goals, consistent with an ambition to reach net-zero emissions by 2050 or sooner across all assets under management.
  - b) Set an interim target for the proportion of assets to be managed in line with the attainment of net-zero emissions by 2050 or sooner.
  - c) Review our short-term target annually, with a view to ratcheting up the proportion of AUM covered until 100% of assets are included.
- Central to this commitment is the integration of climate considerations into our investment and stewardship work. Details on how we are putting these commitments into practice can be found here: <https://reporting.unpri.org/file/4243890f-a262-428f-835f-57ed1808c14b/>. At the heart of our strategy is a focus on driving real-world emission reductions, not simply selling carbon-intensive securities from portfolios.

In brief, our strategy to address climate-related risks and opportunities includes three main elements:

- Top-down thematic analysis to identify investment opportunities relating to climate mitigation and adaptation;
- Bottom-up company specific climate risk analysis; and
- Stewardship: engagements to drive net zero alignment in companies and also the broader market.

To target out climate risk analysis, we focus on those holdings we consider to be high risk from a climate perspective. This means their business would be materially impacted by climate change and/or decarbonisation, and/or their business has a large impact on climate change. We follow NZIF guidance to include: TPI high-risk sectors. In addition, we consider entities in the following sectors to be high risk: financial sector, agriculture, real estate and companies identified on the CA100+ focus list not covered elsewhere.

For the materially held securities that are high risk, we apply the following strategies:

- The Net Zero Alignment Assessment is our internal qualitative assessment of an entity's exposure to climate-related risks under a 1.5°C pathway, as well as the steps taken to mitigate these. We consider:
  - Backward-looking data, such as historical emissions.
  - Forward-looking indicators, such as efforts to align with a low-carbon pathway, governance of climate related risks, disclosure to shareholders and incentive alignment through remuneration policies. Based on this assessment, companies are rated as not aligned, partly aligned or aligned
- Climate stress-testing assessment: we use qualitative and quantitative metrics to evaluate how these risks might translate into economic impacts for a company using our internal climate value at risk (CVAR – please see previous question) modelling. This examines how a company's outlook would be impacted by a transition to a 1.5C pathway, and may include evaluating changes in carbon pricing, stranded assets, physical asset risk, cost of capital assumptions amongst others.
- Stewardship activities: our climate investment analysis gives us a company-specific understanding which provides a strong foundation for company engagement and voting work to promote net zero alignment. For entities exposed to material climate risks, we apply our net-zero voting policy.

- (B) No, our organisation has not yet integrated climate-related risks and opportunities into its investment strategy, financial planning and (if relevant) products

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 42	PLUS	N/A	N/A	PUBLIC	Climate change	General

**Which sectors are covered by your organisation's strategy addressing high-emitting sectors?**

(A) Coal

Describe your strategy:

In recognition of the growing focus on thermal coal and tar sands, we wish to be clear that these will be captured by our overarching policy. We will not provide fresh capital to activities not aligned with the net-zero pathway, unless we can present a compelling case that this investment would permit us to catalyse net-zero alignment in the entity, and thus wind down these activities. Any such investment would be accompanied by a time-limited engagement window for achieving demonstrable impacts.

In addition to our overall risk management system, for certain clients that seek exclusionary investment policies, we implement formal exclusion on investing in companies that derive a material proportion of their revenue from harmful industries, such as thermal coal, oil and gas extraction, production and refining.

(B) Gas

Describe your strategy:

Gas is covered by our overarching strategy (see above)

In addition, we have set out a commitment to avoid providing fresh capital for fossil-fuel extraction or energy generation principally powered by fossil fuels, unless they are verifiably carbon neutral (for instance due to use of carbon capture and storage), or an engagement target with clear time-bound 1.5°C-alignment objectives. This includes investment in any new issue of shares or bonds. We further commit not to purchase such bonds in the secondary market which might encourage future issuance of these securities

**(C) Oil**

Describe your strategy:

Oil is covered by our overarching strategy (see above)

In addition, we have set out a commitment to avoid providing fresh capital for fossil-fuel extraction or energy generation principally powered by fossil fuels, unless they are verifiably carbon neutral (for instance due to use of carbon capture and storage), or an engagement target with clear time-bound 1.5°C-alignment objectives. This includes investment in any new issue of shares or bonds. We further commit not to purchase such bonds in the secondary market which might encourage future issuance of these securities

**(D) Utilities**

Describe your strategy:

Utilities is covered by our overarching strategy (see above)

In addition, we have set out a commitment to avoid providing fresh capital for fossil-fuel extraction or energy generation principally powered by fossil fuels, unless they are verifiably carbon neutral (for instance due to use of carbon capture and storage), or an engagement target with clear time-bound 1.5°C-alignment objectives. This includes investment in any new issue of shares or bonds. We further commit not to purchase such bonds in the secondary market which might encourage future issuance of these securities

**(E) Cement**

Describe your strategy:

Cement is covered by our overarching strategy (see above)

**(F) Steel**

Describe your strategy:

Steel is covered by our overarching strategy (see above)

**(G) Aviation**

Describe your strategy:

Aviation is covered by our overarching strategy (see above)

**(H) Heavy duty road**

Describe your strategy:

Heavy duty road is covered by our overarching strategy (see above)

**(I) Light duty road**

Describe your strategy:

Light duty road is covered by our overarching strategy (see above)

**(J) Shipping**

Describe your strategy:

Shipping is covered by our overarching strategy (see above)

**(K) Aluminium**

Describe your strategy:

Aluminum is covered by our overarching strategy (see above)

**(L) Agriculture, forestry, fishery**

Describe your strategy:

Agriculture is covered by our overarching strategy (see above)

**(M) Chemicals**

Describe your strategy:

Chemicals is covered by our overarching strategy (see above)

**(N) Construction and buildings**

Describe your strategy:

Buildings and real estate are covered by our overarching strategy (see above)

(O) Textile and leather

(P) Water

**(Q) Other**

Specify:

Financials, and particularly banks, are also covered by our overarching strategy (see above)

Describe your strategy:

See above

(R) We do not have a strategy addressing high-emitting sectors

**Provide a link(s) to your strategy(ies), if available**

[https://sarasinandpartners.com/wp-content/uploads/2025/04/00102\\_Stewardship-Report\\_UK.pdf](https://sarasinandpartners.com/wp-content/uploads/2025/04/00102_Stewardship-Report_UK.pdf)

<https://sarasinandpartners.com/wp-content/uploads/2022/02/NZAM-report-2022.pdf>

[https://sarasinandpartners.com/wp-content/uploads/2022/09/00238\\_Climate-Voting-Net-Zero.pdf](https://sarasinandpartners.com/wp-content/uploads/2022/09/00238_Climate-Voting-Net-Zero.pdf)

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 43	CORE	N/A	N/A	PUBLIC	Climate change	General

**Has your organisation assessed the resilience of its investment strategy in different climate scenarios, including one in which the average temperature rise is held to below 2 degrees Celsius (preferably to 1.5 degrees Celsius) above pre-industrial levels?**

(A) Yes, using the Inevitable Policy Response Forecast Policy Scenario (FPS) or Required Policy Scenario (RPS)

(B) Yes, using the One Earth Climate Model scenario

**(C) Yes, using the International Energy Agency (IEA) Net Zero scenario**

**(D) Yes, using other scenarios**

Specify:

We are clear that, despite the inherent uncertainties, climate change represents a structural shift to the world's economic condition. The main way we seek to ensure our investment process takes account of climate risks is through bottom-up stress testing of our most exposed holdings to reflect both decarbonisation and the physical impacts from climate change. Our approach was described in PGS 41. In brief, we consider downside risks to companies' outlooks from accelerated decarbonisation aligned with a below 2C (preferably 1.5C pathway) as well as exposure to physical risks from worsening climate change using a combination of qualitative and quantitative metrics, including a Climate Value at Risk scenario analysis.

(E) No, we have not assessed the resilience of our investment strategy in different climate scenarios, including one that holds temperature rise to below 2 degrees

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
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PGS 44	CORE	N/A	N/A	PUBLIC	Climate change	General
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**Does your organisation have a process to identify, assess, and manage the climate-related risks (potentially) affecting your investments?**

**(A) Yes, we have a process to identify and assess climate-related risks**

(1) Describe your process

Our process for managing climate-related risks is detailed in our NZAM Action Plan, published in February 2022 and described in PGS 41.1. This involves three core elements:

- Top-down thematic analysis to identify investment opportunities relating to climate mitigation and adaptation;
- Bottom-up company specific climate risk analysis; and
- Stewardship: engagements to drive net zero alignment in companies and also the broader market.

Critically, we do not view a divestment policy as the singular mechanism for reducing climate risk. While we will divest where we perceive capital to be at risk, we believe it is important to combine investment tools with robust engagement with companies and policy makers to drive action on climate change. In the end what will provide the greatest protection to climate change is reducing real-world emissions not just investing in carbon-free portfolios.

To target our climate work, we focus on those holdings we consider to be more carbon-intensive. We follow NZIF guidance to include: TPI high-risk sectors. In addition, we consider entities in the following sectors to be high risk: financial sector, food & agriculture, real estate and companies identified on the CA100+ focus list not covered elsewhere.

For the materially-held securities that are high risk, we apply the following strategies:

- Net-zero alignment assessment: we examine plans for transition to net zero, targets for reduction and a feasibility / credibility assessment (e.g., considering validated Science Based Targets and capex allocation)

- Climate stress-testing assessment: we use qualitative and quantitative metrics to evaluate how these risks might translate into economic impacts for a company using our internal climate value at risk (CVAR – please see previous question) modelling. This examines how a company's outlook would be impacted by a transition to a below 2C (ideally 1.5C) pathway, and may include evaluating changes in carbon pricing, stranded assets, physical asset risk, cost of capital assumptions amongst others.

- Stewardship activities: our climate investment analysis gives us a company-specific understanding which provides a strong foundation for company engagement and voting work to promote net zero alignment. For entities exposed to material climate risks, we apply our net-zero voting policy.

(2) Describe how this process is integrated into your overall risk management

We are continuing to develop metrics to enable us to monitor portfolio and firm-wide carbon risks.

As noted elsewhere, we are tracking scope 1, 2 and 3 data (where available), but we do not see carbon footprint data as an accurate measure of climate risks. At an investee level we are using qualitative and quantitative measures. We build this into portfolio level risk management, such that it forms part of reports used in the monthly CIO/Risk Review Meetings and Investment Risk Committee.

Alongside our bespoke climate risk metrics, we will track portfolio carbon footprints, and establish alerts where financed emissions move away from the expected downward trajectory, or where specific commitments (e.g. thermal coal or tar sands exposure) are breached. In these cases, explanations would be sought from the investment team, and if engagements were underway, evidence presented on adherence to the NZAM.

**(B) Yes, we have a process to manage climate-related risks**

(1) Describe your process

See response to (A) above. We manage identified climate risks using two core tools:

- Investment decision – reducing exposure where capital is at risk, and in certain cases divesting entirely from holdings; and
- Stewardship – engaging with exposed entities to press for more urgent action to decarbonise.

We also view our outreach to policy makers and key market influencers, such as auditors, rating agencies and proxy agencies, as a key part of our risk reduction effort. Climate change is a system-wide challenge and thus requires a systemic shift in market behaviours. This will ultimately be best achieved by broad-based policy action..

(2) Describe how this process is integrated into your overall risk management

Please see response (A)(2) above

- o (C) No, we do not have any processes to identify, assess, or manage the climate-related risks affecting our investments

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 45	CORE	N/A	N/A	PUBLIC	Climate change	General

During the reporting year, which of the following climate risk metrics or variables affecting your investments did your organisation use and publicly disclose?

- (A) Exposure to physical risk**
  - (1) Indicate whether this metric or variable was used and disclosed, including the methodology
    - (1) Metric or variable used**
    - (2) Metric or variable used and disclosed
    - (3) Metric or variable used and disclosed, including methodology
- (B) Exposure to transition risk**
  - (1) Indicate whether this metric or variable was used and disclosed, including the methodology
    - (1) Metric or variable used
    - (2) Metric or variable used and disclosed
    - (3) Metric or variable used and disclosed, including methodology**
  - (2) Provide link to the disclosed metric or variable, including the methodology followed, as applicable
    - <https://sarasinandpartners.com/wp-content/uploads/2024/06/TCFD-Entity-Report-2025.pdf>
- (C) Internal carbon price**
  - (1) Indicate whether this metric or variable was used and disclosed, including the methodology
    - (1) Metric or variable used**
    - (2) Metric or variable used and disclosed
    - (3) Metric or variable used and disclosed, including methodology
- (D) Total carbon emissions**
  - (1) Indicate whether this metric or variable was used and disclosed, including the methodology
    - (1) Metric or variable used
    - (2) Metric or variable used and disclosed
    - (3) Metric or variable used and disclosed, including methodology**
  - (2) Provide link to the disclosed metric or variable, including the methodology followed, as applicable
    - <https://sarasinandpartners.com/wp-content/uploads/2024/06/TCFD-Entity-Report-2025.pdf>
- (E) Weighted average carbon intensity**
  - (1) Indicate whether this metric or variable was used and disclosed, including the methodology
    - (1) Metric or variable used
    - (2) Metric or variable used and disclosed
    - (3) Metric or variable used and disclosed, including methodology**
  - (2) Provide link to the disclosed metric or variable, including the methodology followed, as applicable
    - <https://sarasinandpartners.com/wp-content/uploads/2024/06/TCFD-Entity-Report-2025.pdf>
- (F) Avoided emissions**
  - (1) Indicate whether this metric or variable was used and disclosed, including the methodology
    - (1) Metric or variable used**
    - (2) Metric or variable used and disclosed
    - (3) Metric or variable used and disclosed, including methodology
- (G) Implied Temperature Rise (ITR)**
  - (1) Indicate whether this metric or variable was used and disclosed, including the methodology
    - (1) Metric or variable used
    - (2) Metric or variable used and disclosed
    - (3) Metric or variable used and disclosed, including methodology**
  - (2) Provide link to the disclosed metric or variable, including the methodology followed, as applicable
    - <https://sarasinandpartners.com/wp-content/uploads/2024/06/TCFD-Entity-Report-2025.pdf>
- (H) Non-ITR measure of portfolio alignment with UNFCCC Paris Agreement goals**

- (1) Indicate whether this metric or variable was used and disclosed, including the methodology
  - (1) Metric or variable used
  - (2) Metric or variable used and disclosed
  - (3) Metric or variable used and disclosed, including methodology
- (I) Proportion of assets or other business activities aligned with climate-related opportunities

- (1) Indicate whether this metric or variable was used and disclosed, including the methodology
  - (1) Metric or variable used
  - (2) Metric or variable used and disclosed
  - (3) Metric or variable used and disclosed, including methodology

(J) Other metrics or variables

Specify:

Company Climate Value at Risk (CVaR)

- (1) Indicate whether this metric or variable was used and disclosed, including the methodology
  - (1) Metric or variable used
  - (2) Metric or variable used and disclosed
  - (3) Metric or variable used and disclosed, including methodology
- (K) Our organisation did not use or publicly disclose any climate risk metrics or variables affecting our investments during the reporting year

**Additional context to your response(s): (Voluntary)**

B) Scenario analysis on pages 38-39 of the 2024 TCFD report. <https://sarasinandpartners.com/wp-content/uploads/2024/06/TCFD-Entity-Report-2025.pdf>

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 46	CORE	N/A	N/A	PUBLIC	Climate change	General

**During the reporting year, did your organisation publicly disclose its Scope 1, Scope 2, and/or Scope 3 greenhouse gas emissions?**

(A) Scope 1 emissions

- (1) Indicate whether this metric was disclosed, including the methodology
  - (1) Metric disclosed
  - (2) Metric and methodology disclosed
- (2) Provide links to the disclosed metric and methodology, as applicable

<https://sarasinandpartners.com/wp-content/uploads/2024/06/TCFD-Entity-Report-2025.pdf>

(B) Scope 2 emissions

- (1) Indicate whether this metric was disclosed, including the methodology
  - (1) Metric disclosed
  - (2) Metric and methodology disclosed
- (2) Provide links to the disclosed metric and methodology, as applicable

<https://sarasinandpartners.com/wp-content/uploads/2024/06/TCFD-Entity-Report-2025.pdf>

(C) Scope 3 emissions (including financed emissions)

- (1) Indicate whether this metric was disclosed, including the methodology
  - (1) Metric disclosed
  - (2) Metric and methodology disclosed
- (2) Provide links to the disclosed metric and methodology, as applicable

<https://sarasinandpartners.com/wp-content/uploads/2024/06/TCFD-Entity-Report-2025.pdf>

- (D) Our organisation did not publicly disclose its Scope 1, Scope 2, or Scope 3 greenhouse gas emissions during the reporting year

## SUSTAINABILITY OUTCOMES

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 47	CORE	N/A	Multiple indicators	PUBLIC	Sustainability outcomes	1, 2

**Has your organisation identified the intended and unintended sustainability outcomes connected to its investment activities?**

- (A) Yes, we have identified one or more specific sustainability outcomes connected to our investment activities
- (B) No, we have not yet identified the sustainability outcomes connected to any of our investment activities

**Additional context to your response(s): (Voluntary)**

We track adverse impacts of our investments in stocks and bonds via the Sarasin Sustainability Impact Matrix (SIM). Please see pages 51 and 56-59 of our 2024 Stewardship report for more information. We track outcomes of our engagement activities. For example, in 2024, 9% of our goal-linked engagement activities brought positive outcomes. Please see pages 69-70 for statistics and pages 71-80 and 84-89 for examples in our 2024 Stewardship report: Link: [https://sarasinandpartners.com/wp-content/uploads/2025/04/00102\\_Stewardship-Report\\_UK.pdf](https://sarasinandpartners.com/wp-content/uploads/2025/04/00102_Stewardship-Report_UK.pdf)

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 47.1	CORE	PGS 47	N/A	PUBLIC	Sustainability outcomes	1, 2

**Which widely recognised frameworks has your organisation used to identify the intended and unintended sustainability outcomes connected to its investment activities?**

- (A) The UN Sustainable Development Goals (SDGs) and targets
- (B) The UNFCCC Paris Agreement
- (C) The UN Guiding Principles on Business and Human Rights (UNGPs)
- (D) OECD frameworks: OECD Guidelines for Multinational Enterprises and Guidance on Responsible Business Conduct for Institutional Investors
- (E) The EU Taxonomy
- (F) Other relevant taxonomies
- (G) The International Bill of Human Rights
- (H) The International Labour Organization's Declaration on Fundamental Principles and Rights at Work and the eight core conventions
- (I) The Convention on Biological Diversity
- (J) Other international framework(s)
- (K) Other regional framework(s)
- (L) Other sectoral/issue-specific framework(s)
- (M) Our organisation did not use any widely recognised frameworks to identify the intended and unintended sustainability outcomes connected to its investment activities

**Additional context to your response(s): (Voluntary)**

In our ESG assessments of stocks and bonds via the Sarasin Sustainability Impact Matrix (SIM), we try to make sure that our investee companies do not violate these principles, guidelines or conventions. Where we have doubts or concerns, we engage.

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 47.2	CORE	PGS 47	PGS 48	PUBLIC	Sustainability outcomes	1, 2

What are the primary methods that your organisation has used to determine the most important intended and unintended sustainability outcomes connected to its investment activities?

- (A) Identify sustainability outcomes that are closely linked to our core investment activities
- (B) Consult with key clients and/or beneficiaries to align with their priorities
- (C) Assess which actual or potential negative outcomes for people are most severe based on their scale, scope, and irremediable character
- (D) Identify sustainability outcomes that are closely linked to systematic sustainability issues
- (E) Analyse the input from different stakeholders (e.g. affected communities, civil society, trade unions or similar)
- (F) Understand the geographical relevance of specific sustainability outcome objectives
- (G) Other method
- (H) We have not yet determined the most important sustainability outcomes connected to our investment activities

Additional context to your response(s): (Voluntary)

We take a long-term, global perspective, looking beyond business cycles to focus on societal trends that are likely to endure for decades. Our approach is built on three core pillars: • A global thematic investment process that focuses on long-term value drivers. This includes ESG analysis (Sarasin Sustainability Impact Matrix, SIM) to determine ESG risks and opportunities. • Active ownership to encourage more sustainable company behaviour, supporting long-term investor returns. • Thought leadership and policy outreach to drive positive market-wide change.

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 48	CORE	PGS 47.2	PGS 48.1, SO 1	PUBLIC	Sustainability outcomes	1, 2

Has your organisation taken action on any specific sustainability outcomes connected to its investment activities, including to prevent and mitigate actual and potential negative outcomes?

- (A) Yes, we have taken action on some of the specific sustainability outcomes connected to our investment activities
- (B) No, we have not yet taken action on any specific sustainability outcomes connected to our investment activities

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 48.1	PLUS	PGS 48	N/A	PUBLIC	Sustainability outcomes	1, 2

Why has your organisation taken action on specific sustainability outcomes connected to its investment activities?

- (A) We believe that taking action on sustainability outcomes is relevant to our financial risks and returns over both short- and long-term horizons
- (B) We believe that taking action on sustainability outcomes, although not yet relevant to our financial risks and returns, will become so over a long-time horizon
- (C) We have been requested to do so by our clients and/or beneficiaries
- (D) We want to prepare for and respond to legal and regulatory developments that are increasingly addressing sustainability outcomes

- (E) We want to protect our reputation, particularly in the event of negative sustainability outcomes connected to investments
- (F) We want to enhance our social licence-to-operate (i.e. the trust of beneficiaries, clients, and other stakeholders)
- (G) We believe that taking action on sustainability outcomes in parallel to financial return goals has merit in its own right
- (H) Other

## HUMAN RIGHTS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 49	PLUS	PGS 47	PGS 49.1	PUBLIC	Human rights	1, 2

**During the reporting year, what steps did your organisation take to identify and take action on the actual and potential negative outcomes for people connected to your investment activities?**

- (A) We assessed the country level context of our potential and/or existing investments to understand how this could connect our organisation to negative human rights outcomes

Explain how these activities were conducted:

We track and analyse country-level risks regarding human rights through media, data providers, and human rights reports by NGOs.

- (B) We assessed the sector context of our potential and/or existing investments to understand how this could connect our organisation to negative human rights outcomes

Explain how these activities were conducted:

We track and analyse sector-specific risks regarding human rights through media, data providers, and human rights reports by NGOs.

- (C) We assessed the human rights performance of our potential and/or existing investments to understand how this could connect our organisation to negative human rights outcomes

Explain how these activities were conducted:

We review company human rights due diligence disclosures, Modern Slavery reports, grievance reporting, and external benchmarks (such as World Benchmarking Alliance's Corporate Human Rights Benchmark, CCLA's Modern Slavery Benchmark, KnowTheChain benchmarks).

- (D) We monitored severe and emerging human rights controversies to understand how this could connect our organisation to negative human rights outcomes

Explain how these activities were conducted:

We monitor MSCI's controversies data, as well as media reports.

- (E) We took other steps to assess and manage the actual and potentially negative outcomes for people connected to our investment activities

Specify:

We evaluate social factors (human rights, employees, supply chains, customers, wider society) using our proprietary methodology as part of our Sustainability Impact Matrix, and engaging on issues. This analysis contributes to our engagements and voting on human rights concerns.

Explain how these activities were conducted:

- (F) We did not identify and take action on the actual and potentially negative outcomes for people connected to any of our investment activities during the reporting year

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 49.1	PLUS	PGS 49	N/A	PUBLIC	Human rights	1, 2

**During the reporting year, which stakeholder groups did your organisation include when identifying and taking action on the actual and potential negative outcomes for people connected to your investment activities?**

**(A) Workers**

Sector(s) for which each stakeholder group was included

- (1) Energy
- (2) Materials
- (3) Industrials
- (4) Consumer discretionary
- (5) Consumer staples
- (6) Healthcare
- (7) Finance
- (8) Information technology
- (9) Communication services
- (10) Utilities
- (11) Real estate

**(B) Communities**

Sector(s) for which each stakeholder group was included

- (1) Energy
- (2) Materials
- (3) Industrials
- (4) Consumer discretionary
- (5) Consumer staples
- (6) Healthcare
- (7) Finance
- (8) Information technology
- (9) Communication services
- (10) Utilities
- (11) Real estate

**(C) Customers and end-users**

Sector(s) for which each stakeholder group was included

- (1) Energy
- (2) Materials
- (3) Industrials
- (4) Consumer discretionary
- (5) Consumer staples
- (6) Healthcare
- (7) Finance
- (8) Information technology
- (9) Communication services
- (10) Utilities
- (11) Real estate

**(D) Other stakeholder groups**

Specify:

Suppliers

Sector(s) for which each stakeholder group was included

- (1) Energy
- (2) Materials
- (3) Industrials
- (4) Consumer discretionary
- (5) Consumer staples

- (6) Healthcare
- (7) Finance
- (8) Information technology
- (9) Communication services
- (10) Utilities
- (11) Real estate

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 49.2	PLUS	PGS 47	N/A	PUBLIC	Human rights	1, 2

**During the reporting year, what information sources did your organisation use to identify the actual and potential negative outcomes for people connected to its investment activities?**

**(A) Corporate disclosures**

Provide further detail on how your organisation used these information sources:

We review corporate disclosures on workforce data, health and safety data, human rights due diligence reporting, Modern Slavery reports where available.

**(B) Media reports**

Provide further detail on how your organisation used these information sources:

We review media reports of controversies.

**(C) Reports and other information from NGOs and human rights institutions**

Provide further detail on how your organisation used these information sources:

We review reports, attend events/webinars, consult with experts from NGOs and human rights organisations.

**(D) Country reports, for example, by multilateral institutions, e.g. OECD, World Bank**

**(E) Data provider scores or benchmarks**

Provide further detail on how your organisation used these information sources:

We review MSCI data as well as benchmarks including: World Benchmarking Alliance's Corporate Human Rights Benchmark, CCLA's Modern Slavery Benchmark, KnowTheChain benchmarks.

**(F) Human rights violation alerts**

**(G) Sell-side research**

**(H) Investor networks or other investors**

Provide further detail on how your organisation used these information sources:

We participate in investor networks such as Interfaith Centre on Corporate Responsibility, ShareAction's Good Work Coalition, World Benchmarking Alliance, Global Network Initiative, Ranking Digital Rights, and Investor Alliance for Human Rights.

**(I) Information provided directly by affected stakeholders or their representatives**

Provide further detail on how your organisation used these information sources:

We consult worker representatives as part of due diligence, as well as attending webinars with worker speakers.

**(J) Social media analysis**

**(K) Other**

# LISTED EQUITY (LE)

## OVERALL APPROACH

### MATERIALITY ANALYSIS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
LE 1	CORE	OO 21	N/A	PUBLIC	Materiality analysis	1

**Does your organisation have a formal investment process to identify and incorporate material ESG factors across your listed equity strategies?**

	(3) Active - fundamental	(4) Other strategies
(A) Yes, our investment process incorporates material governance factors	(1) for all of our AUM	(1) for all of our AUM
(B) Yes, our investment process incorporates material environmental and social factors	(1) for all of our AUM	(1) for all of our AUM
(C) Yes, our investment process incorporates material ESG factors beyond our organisation's average investment holding period	(1) for all of our AUM	(1) for all of our AUM
(D) No, we do not have a formal process. Our investment professionals identify material ESG factors at their discretion	○	○
(E) No, we do not have a formal or informal process to identify and incorporate material ESG factors	○	○

## MONITORING ESG TRENDS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
LE 2	CORE	OO 21	N/A	PUBLIC	Monitoring ESG trends	1

**Does your organisation have a formal process for monitoring and reviewing the implications of changing ESG trends across your listed equity strategies?**

	(3) Active - fundamental	(4) Other strategies
(A) Yes, we have a formal process that includes scenario analyses	(1) for all of our AUM	(1) for all of our AUM
(B) Yes, we have a formal process, but it does not include scenario analyses		
(C) We do not have a formal process for our listed equity strategies; our investment professionals monitor how ESG trends vary over time at their discretion	○	○
(D) We do not monitor and review the implications of changing ESG trends on our listed equity strategies	○	○

**(A) Yes, we have a formal process that includes scenario analysis - Specify: (Voluntary)**

**CVAR**

CVaR is our in-house approach to quantifying the potential valuation impact of a 1.5°C pathway for higher-risk equity holdings identified in our CAL. This analysis enhances our understanding of portfolio exposure to transition risks, enabling us to manage them more effectively. Our CVaR calculation is based on a discounted cash flow model, comparing two scenarios:

A 1.5°C scenario, aligned with the Paris Agreement.

A business-as-usual scenario, assuming no significant climate action.

This analysis seeks to quantify how a company's financial prospects might change under a Paris-aligned transition:

If the 1.5°C scenario results in a lower valuation than the base case, the CVaR is negative, indicating a potential financial risk.

If the 1.5°C scenario results in a higher valuation, the CVaR is positive, suggesting a potential opportunity (see figure 7.3).

Our CVaR model assumes that a company's response to climate risks aligns with its publicly stated commitments – and no more. This provides a baseline assessment of downside risk based on current plans, while also highlighting the potential upside from engagement to drive further climate action.

Crucially, CVaR moves beyond a simplistic assumption that a higher carbon footprint always translates to downside risk. Instead, it incorporates the potential effects of:

Government policies, such as carbon taxes or product bans.

Shifts in consumption patterns, such as declining demand for international travel.  
 Market dynamics, including changes to revenue growth, margins, capital expenditure requirements, and asset values.  
 This more nuanced approach offers deeper insight into both economic risks and opportunities, making it a valuable tool for investment decision-making.  
 In 2024, we conducted 25 CVaR stress tests on CAL companies, further refining our understanding of transition risk and potential investment implications.  
 NZAM alignment - see additional context

**Additional context to your response(s): (Voluntary)**

The NZAA is our internal qualitative assessment of an entity’s exposure to climate-related risks under a 1.5°C pathway, as well as the steps taken to mitigate these.  
 We consider: ● Backward-looking data, such as historical emissions. ● Forward-looking indicators, such as efforts to align with a low-carbon pathway, governance of climate-related risks, disclosure to shareholders and incentive alignment through remuneration policies. Based on this assessment, companies are rated as not aligned, partly aligned or aligned (see page 53 of our 2024 stewardship report).

**PRE-INVESTMENT**

**ESG INCORPORATION IN RESEARCH**

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
LE 3	CORE	OO 21	N/A	PUBLIC	ESG incorporation in research	1

**How does your financial analysis and equity valuation or security rating process incorporate material ESG risks?**

	(2) Active - fundamental	(3) Other strategies
(A) We incorporate material governance-related risks into our financial analysis and equity valuation or security rating process	(1) in all cases	(1) in all cases
(B) We incorporate material environmental and social risks into our financial analysis and equity valuation or security rating process	(1) in all cases	(1) in all cases
(C) We incorporate material environmental and social risks related to companies' supply chains into our financial analysis and equity valuation or security rating process	(1) in all cases	(1) in all cases

(D) We do not incorporate material ESG risks into our financial analysis, equity valuation or security rating processes

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Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
LE 4	CORE	OO 21	N/A	PUBLIC	ESG incorporation in research	1

**What information do you incorporate when you assess the ESG performance of companies in your financial analysis, benchmark selection and/or portfolio construction process?**

**(3) Active - fundamental**

**(4) Other strategies**

(A) We incorporate qualitative and/or quantitative information on current performance across a range of material ESG factors

(1) in all cases

(1) in all cases

(B) We incorporate qualitative and/or quantitative information on historical performance across a range of material ESG factors

(1) in all cases

(1) in all cases

(C) We incorporate qualitative and/or quantitative information on material ESG factors that may impact or influence future corporate revenues and/or profitability

(1) in all cases

(1) in all cases

(D) We incorporate qualitative and/or quantitative information enabling current, historical and/or future performance comparison within a selected peer group across a range of material ESG factors

(1) in all cases

(1) in all cases

(E) We do not incorporate qualitative or quantitative information on material ESG factors when assessing the ESG performance of companies in our financial analysis, equity investment or portfolio construction process

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## ESG INCORPORATION IN PORTFOLIO CONSTRUCTION

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
LE 5	PLUS	OO 21	N/A	PUBLIC	ESG incorporation in portfolio construction	1

**Provide an example of how you incorporated ESG factors into your equity selection and research process during the reporting year.**

### Case Study: Reckitt Benckiser

The Issue In 2024, Reckitt Benckiser faced significant operational and legal challenges, which had a material impact on its financial performance. An internal investigation uncovered that a small group of employees in two Middle Eastern markets had under-reported trade expenses, leading to a £55 million revenue shortfall. This raised concerns over accounting controls within the company.

At the same time, Reckitt suffered a major legal setback in the US related to its infant nutrition brand, Enfamil. A court ruling awarded \$60 million in damages against the company<sup>1</sup>, marking the first of potentially hundreds of lawsuits alleging that its milk formula increases the risk of necrotizing enterocolitis in premature babies, a potentially fatal condition. The lawsuit accused Reckitt, alongside Abbott, of failing to warn consumers of the risks.

While Reckitt's annual report acknowledged the litigation, it did not estimate potential costs. With 400 cases reportedly in federal court and others in state and district courts, the potential financial liabilities could be substantial. A rough estimate of \$50 million per case suggests that total liabilities for Reckitt and Abbott combined could reach \$20 billion.

What We Did In early March 2024, following a call with management, we found their explanation regarding accounting controls in the Middle East unconvincing. Given the company's poor track record in corporate culture, we were not satisfied with management's assurances that such issues were in the past.

As a result, we downgraded the reporting and audit rating on our SIM from green to amber.

This downgrade led to an increase in the ESG 'penalty' within our weighted average cost of capital by 0.25%, which in turn reduced our fair value estimate of the share price from £64 to £58, and resulted in an investment rating downgrade from 2 to 3.

On 15 March 2024, following the infant nutrition litigation in the US, we maintained Reckitt's ESG rating but downgraded the investment rating from 3 to 4 (Sell). The scale of the lawsuits introduced significant financial risk and prolonged uncertainty, eroding confidence in the investment thesis, which had been based on a potential re-rating of the stock.

Outcomes We reduced and eventually sold positions across several strategies. Reckitt's share price underperformed in 2024, declining 14% from 1 January to 31 December<sup>2</sup>.

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
LE 6	CORE	OO 21	N/A	PUBLIC	ESG incorporation in portfolio construction	1

**How do material ESG factors contribute to your stock selection, portfolio construction and/or benchmark selection process?**

	(3) Active - fundamental	(4) Other strategies
(A) Material ESG factors contribute to the selection of individual assets and/or sector weightings within our portfolio construction and/or benchmark selection process	(1) for all of our AUM	(1) for all of our AUM
(B) Material ESG factors contribute to the portfolio weighting of individual assets within our portfolio construction and/or benchmark selection process	(1) for all of our AUM	(1) for all of our AUM
(C) Material ESG factors contribute to the country or region weighting of assets within our portfolio construction and/or benchmark selection process	(1) for all of our AUM	(1) for all of our AUM
(D) Other ways material ESG factors contribute to your portfolio construction and/or benchmark selection process		
(E) Our stock selection, portfolio construction or benchmark selection process does not include the incorporation of material ESG factors	o	o

# POST-INVESTMENT

## ESG RISK MANAGEMENT

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
LE 9	CORE	OO 17.1 LE, OO 21	N/A	PUBLIC	ESG risk management	1

What compliance processes do you have in place to ensure that your listed equity assets subject to negative exclusionary screens meet the screening criteria?

- (A) We have internal compliance procedures that ensure all funds or portfolios that are subject to negative exclusionary screening have pre-trade checks
- (B) We have an external committee that oversees the screening implementation process for all funds or portfolios that are subject to negative exclusionary screening
- (C) We have an independent internal committee that oversees the screening implementation process for all funds or portfolios that are subject to negative exclusionary screening
  - (D) We do not have compliance processes in place to ensure that we meet our stated negative exclusionary screens

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
LE 10	CORE	OO 21	N/A	PUBLIC	ESG risk management	1

For the majority of your listed equity assets, do you have a formal process to identify and incorporate material ESG risks and ESG incidents into your risk management process?

(2) Active - fundamental

(3) Other strategies

(A) Yes, our formal process includes reviews of quantitative and/or qualitative information on material ESG risks and ESG incidents and their implications for individual listed equity holdings

(B) Yes, our formal process includes reviews of quantitative and/or qualitative information on material ESG risks and ESG incidents and their implications for other listed equity holdings exposed to similar risks and/or incidents

(C) Yes, our formal process includes reviews of quantitative and/or qualitative information on material ESG risks and ESG incidents and their implications for our stewardship activities

(D) Yes, our formal process includes ad hoc reviews of quantitative and/or qualitative information on severe ESG incidents

(E) We do not have a formal process to identify and incorporate material ESG risks and ESG incidents into our risk management process; our investment professionals identify and incorporate material ESG risks and ESG incidents at their discretion

(F) We do not have a formal process to identify and incorporate material ESG risks and ESG incidents into our risk management process

## PERFORMANCE MONITORING

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
LE 11	PLUS	OO 21	N/A	PUBLIC	Performance monitoring	1

**Provide an example of how the incorporation of ESG factors in your listed equity valuation or portfolio construction affected the realised returns of those assets.**

ESG Integration Our ESG analysis and stewardship efforts play a direct role in shaping stock purchases, sales and client outcomes. Our analysis has consistently found a positive correlation between our ESG assessments and stock performance. Companies with an ESG rating of A have generally outperformed those rated D, reinforcing our belief that strong ESG performance supports financial resilience. We have also seen evidence that buying or selling securities due to ESG considerations has helped protect and enhance client capital. While these findings are reassuring, we recognise the statistical limitations of the analysis and interpret the results with caution. To assess the impact of ESG factors on investment decisions, we track key metrics across our process, such as from changes in ESG ratings leading to security rating adjustments, and eventual investment actions. This includes decisions to increase, reduce, buy or sell holdings. For example, in 2024, we removed FEMSA, Equinor and Service Corp from our portfolios due to ESG concerns, among other considerations. Our analysis has shown that during 12 months after divestment, these stocks declined by an average of 14% . This suggests that exiting these positions enhanced and helped protect clients' capital.

We included a specific example of Service Corp International on pg58 of our stewardship report. - [https://sarasinandpartners.com/wp-content/uploads/2025/04/00102\\_Stewardship-Report\\_UK.pdf](https://sarasinandpartners.com/wp-content/uploads/2025/04/00102_Stewardship-Report_UK.pdf).

We also conducted analysis of value added from our ESG rating changes (see p. 34 of our 2024 Stewardship Report). The results covering the last two years demonstrate that when changes in fair value and portfolio actions are influenced by ESG factors (often alongside other considerations), subsequent stock performance tends to align with our expectations.

Thematic investing naturally leads us to companies with strong social or environmental opportunities, as we aim to align with societal trends that drive long-term value. A clear example of this is our climate change theme, where all included stocks benefit from strong climate-related value drivers. As of 31 December 2024, these stocks accounted for 11% of our global equity buy list by value.

## DISCLOSURE OF ESG SCREENS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
LE 12	CORE	OO 17 LE, OO 21	N/A	PUBLIC	Disclosure of ESG screens	6

**For all your listed equity assets subject to ESG screens, how do you ensure that clients understand ESG screens and their implications?**

- (A) We share a list of ESG screens
- (B) We share any changes in ESG screens
- (C) We explain any implications of ESG screens, such as their deviation from a benchmark or impact on sector weightings
- (D) We do not share the above information for all our listed equity assets subject to ESG screens

# FIXED INCOME (FI)

## OVERALL APPROACH

### MATERIALITY ANALYSIS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
FI 1	CORE	OO 21	N/A	PUBLIC	Materiality analysis	1

**Does your organisation have a formal investment process to identify and incorporate material ESG factors across your fixed income assets?**

	(1) SSA	(2) Corporate
(A) Yes, our investment process incorporates material governance factors	(1) for all of our AUM	(1) for all of our AUM
(B) Yes, our investment process incorporates material environmental and social factors	(1) for all of our AUM	(1) for all of our AUM
(C) Yes, our investment process incorporates material ESG factors depending on different investment time horizons	(1) for all of our AUM	(1) for all of our AUM
(D) No, we do not have a formal process; our investment professionals identify material ESG factors at their discretion	○	○
(E) No, we do not have a formal or informal process to identify and incorporate material ESG factors	○	○

## MONITORING ESG TRENDS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
FI 2	CORE	OO 21	N/A	PUBLIC	Monitoring ESG trends	1

**Does your organisation have a formal process for monitoring and reviewing the implications of changing ESG trends across your fixed income assets?**

	(1) SSA	(2) Corporate
(A) Yes, we have a formal process that includes scenario analyses		(2) for a majority of our AUM
(B) Yes, we have a formal process, but does it not include scenario analyses	(1) for all of our AUM	
(C) We do not have a formal process for our fixed income assets; our investment professionals monitor how ESG trends vary over time at their discretion	○	○
(D) We do not monitor and review the implications of changing ESG trends on our fixed income assets	○	○

**(A) Yes, we have a formal process that includes scenario analyses - Specify: (Voluntary)**

We have developed a top-down climate risk premium scenario analysis for non-financial corporates. In addition, we have the ability to incorporate a bottom-up Black-Scholes Merton (BSM) stress test for publicly listed non-financials corporates.

## PRE-INVESTMENT

### ESG INCORPORATION IN RESEARCH

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
FI 3	CORE	OO 21	N/A	PUBLIC	ESG incorporation in research	1

**For the majority of your fixed income investments, does your organisation incorporate material ESG factors when assessing their credit quality?**

	(1) SSA	(2) Corporate
(A) We incorporate material environmental and social factors	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(B) We incorporate material governance-related factors	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(C) We do not incorporate material ESG factors for the majority of our fixed income investments	<input type="checkbox"/>	<input type="checkbox"/>

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
FI 4	CORE	OO 21	N/A	PUBLIC	ESG incorporation in research	1

**Does your organisation have a framework that differentiates ESG risks by issuer country, region and/or sector?**

	(1) SSA	(2) Corporate
(A) Yes, we have a framework that differentiates ESG risks by country and/or region (e.g. local governance and labour practices)	(1) for all of our AUM	(1) for all of our AUM
(B) Yes, we have a framework that differentiates ESG risks by sector	(1) for all of our AUM	(1) for all of our AUM
(C) No, we do not have a framework that differentiates ESG risks by issuer country, region and/or sector	<input type="checkbox"/>	<input type="checkbox"/>

(D) Not applicable; we are not able to differentiate ESG risks by issuer country, region and/or sector due to the limited universe of our issuers

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Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
FI 6	CORE	OO 21	N/A	PUBLIC	ESG incorporation in research	1

**How do you incorporate significant changes in material ESG factors over time into your fixed income asset valuation process?**

**(1) SSA**

**(2) Corporate**

(A) We incorporate it into the forecast of financial metrics or other quantitative assessments

(1) for all of our AUM

(1) for all of our AUM

(B) We make a qualitative assessment of how material ESG factors may evolve

(1) for all of our AUM

(1) for all of our AUM

(C) We do not incorporate significant changes in material ESG factors

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## ESG INCORPORATION IN PORTFOLIO CONSTRUCTION

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
FI 8	CORE	OO 21	N/A	PUBLIC	ESG incorporation in portfolio construction	1

**How do material ESG factors contribute to your security selection, portfolio construction and/or benchmark selection process?**

	(1) SSA	(2) Corporate
(A) Material ESG factors contribute to the selection of individual assets and/or sector weightings within our portfolio construction and/or benchmark selection process	(1) for all of our AUM	(1) for all of our AUM
(B) Material ESG factors contribute to determining the holding period of individual assets within our portfolio construction and/or benchmark selection process	(1) for all of our AUM	(1) for all of our AUM
(C) Material ESG factors contribute to the portfolio weighting of individual assets within our portfolio construction and/or benchmark selection process	(1) for all of our AUM	(1) for all of our AUM
(D) Material ESG factors contribute to the country or region weighting of assets within our portfolio construction and/or benchmark selection process	(1) for all of our AUM	(1) for all of our AUM
(E) Material ESG factors contribute to our portfolio construction and/or benchmark selection process in other ways		
(F) Our security selection, portfolio construction or benchmark selection process does not include the incorporation of material ESG factors	o	o

## POST-INVESTMENT

### ESG RISK MANAGEMENT

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
FI 11	CORE	OO 21	N/A	PUBLIC	ESG risk management	1

**How are material ESG factors incorporated into your portfolio risk management process?**

	(1) SSA	(2) Corporate
(A) Investment committee members, or the equivalent function or group, can veto investment decisions based on ESG considerations	(1) for all of our AUM	(1) for all of our AUM
(B) Companies, sectors, countries and/or currencies are monitored for changes in exposure to material ESG factors and any breaches of risk limits	(1) for all of our AUM	(1) for all of our AUM
(C) Overall exposure to specific material ESG factors is measured for our portfolio construction, and sizing or hedging adjustments are made depending on the individual issuer or issue sensitivity to these factors	(3) for a minority of our AUM	(3) for a minority of our AUM
(D) We use another method of incorporating material ESG factors into our portfolio's risk management process	(2) for a majority of our AUM	(2) for a majority of our AUM
(E) We do not have a process to incorporate material ESG factors into our portfolio's risk management process	○	○
<b>(D) We use another method of incorporating material ESG factors into our portfolio's risk management process - Specify:</b>		

We apply a six-step process to calculate ESG credit ratings for the issuers. We only invest in securities from issuers rated ESG investment grade (BBB or above), which equates to an ESG score of 3 or higher.

1. Creating a materiality map
2. Determining sector weightings
3. Setting guidance ranges for ESG scores
4. Conducting SIM assessment using double materiality and quantitative
5. Aligning ESG score with letter ratings and colour codes
6. Ensuring consistency and supporting evidence

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
FI 12	CORE	OO 21	N/A	PUBLIC	ESG risk management	1

**For the majority of your fixed income assets, do you have a formal process to identify and incorporate material ESG risks and ESG incidents into your risk management process?**

	(1) SSA	(2) Corporate
(A) Yes, our formal process includes reviews of quantitative and/or qualitative information on material ESG risks and ESG incidents and their implications for individual fixed income holdings	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(B) Yes, our formal process includes reviews of quantitative and/or qualitative information on material ESG risks and ESG incidents, and their implications for other fixed income holdings exposed to similar risks and/or incidents	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(C) Yes, our formal process includes reviews of quantitative and/or qualitative information on material ESG risks and ESG incidents, and their implications for our stewardship activities	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(D) Yes, our formal process includes ad hoc reviews of quantitative and/or qualitative information on severe ESG incidents	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

(E) We do not have a formal process to identify and incorporate ESG risks and ESG incidents; our investment professionals identify and incorporate ESG risks and ESG incidents at their discretion

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○

(F) We do not have a formal process to identify and incorporate ESG risks and ESG incidents into our risk management process

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## THEMATIC BONDS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
FI 16	CORE	OO 17 FI, OO 21	N/A	PUBLIC	Thematic bonds	1

**What pre-determined criteria does your organisation use to identify which non-labelled thematic bonds to invest in?**

- (A) The bond's use of proceeds
- (B) The issuers' targets
- (C) The issuers' progress towards achieving their targets
- (D) The issuer profile and how it contributes to their targets
- (E) We do not use pre-determined criteria to identify which non-labelled thematic bonds to invest in
- (F) Not applicable; we do not invest in non-labelled thematic bonds

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
FI 17	CORE	Multiple, see guidance	N/A	PUBLIC	Thematic bonds	1, 2, 6

**During the reporting year, what action did you take in the majority of cases when you felt that the proceeds of a thematic bond were not allocated appropriately or in accordance with the terms of the bond deal or prospectus?**

- (A) We engaged with the issuer
- (B) We alerted thematic bond certification agencies
- (C) We sold the security
- (D) We blacklisted the issuer
- (E) Other action
- (F) We did not take any specific actions when the proceeds of a thematic bond were not allocated according to the terms of the bond deal during the reporting year
- (G) Not applicable; in the majority of cases, the proceeds of thematic bonds were allocated according to the terms of the bond deal during the reporting year

## DISCLOSURE OF ESG SCREENS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
FI 18	CORE	OO 17 FI, OO 21	N/A	PUBLIC	Disclosure of ESG screens	6

**For all your fixed income assets subject to ESG screens, how do you ensure that clients understand ESG screens and their implications?**

- (A) We share a list of ESG screens
- (B) We share any changes in ESG screens
- (C) We explain any implications of ESG screens, such as any deviation from a benchmark or impact on sector weightings
- (D) We do not share the above information for all our fixed income assets subject to ESG screens

# CONFIDENCE-BUILDING MEASURES (CBM)

## CONFIDENCE-BUILDING MEASURES

### APPROACH TO CONFIDENCE-BUILDING MEASURES

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
CBM 1	CORE	N/A	Multiple indicators	PUBLIC	Approach to confidence-building measures	6

#### How did your organisation verify the information submitted in your PRI report this reporting year?

- (A) We conducted independent third-party assurance of selected processes and/or data related to the responsible investment processes reported in our PRI report, which resulted in a formal assurance conclusion
- (B) We conducted a third-party readiness review and are making changes to our internal controls or governance processes to be able to conduct independent third-party assurance next year
- (C) We conducted an internal audit of selected processes and/or data related to the responsible investment processes reported in our PRI report
- (D) Our board, trustees (or equivalent), senior executive-level staff (or equivalent), and/or investment committee (or equivalent) signed off on our PRI report
- (E) Our responses in selected sections and/or the entirety of our PRI report were internally reviewed before submission to the PRI
- (F) We did not verify the information submitted in our PRI report this reporting year

## INTERNAL REVIEW

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
CBM 6	CORE	CBM 1	N/A	PUBLIC	Internal review	6

#### Who in your organisation reviewed the responses submitted in your PRI report this year?

- (A) Board, trustees, or equivalent
- (B) Senior executive-level staff, investment committee, head of department, or equivalent
  - Sections of PRI report reviewed
    - (1) the entire report
    - (2) selected sections of the report
  - (C) None of the above internal roles reviewed selected sections or the entirety of the responses submitted in our PRI report this year