eastspring investments

A Prudential plc company

Eastspring Investments Group

Responsible Investment Policy

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1. Introduction

1.1 OUR FIRM

Eastspring Investments Group Private Limited ("Eastspring Investments" or the "Firm"), part of Prudential plc, is a leading Asia-based asset manager that manages over USD 222 billion (as at 30 June 2022) of assets on behalf of institutional and retail clients. Operating since 1994, Eastspring Investments has one of the widest footprints across Asia. We provide investment solutions across a broad range of strategies including equities, fixed income, multi asset, quantitative solutions, and alternatives. We are committed to delivering high-quality investment outcomes for our clients over the long term.

1.2 ESG PHILOSOPHY

At Eastspring Investments, responsible investing principles are an integral part of our asset management activities. Responsible Investment includes the explicit incorporation of material Environment, Social, and Governance ("ESG") issues into our investment decisions – both before we make investment decisions and during the period an investment is held. Our investment beliefs as they relate to Responsible Investment are:

1. **Integrating ESG results in better investment decisions.** We believe that incorporating material ESG considerations into the investment process can add value which can result in higher risk-adjusted returns for our clients over the long term.

2. **Engaging with investee entities can be constructive.** We recognise that responsible investing requires a patient approach and an understanding that improvement in corporate behaviour can support investor value over time. We believe that companies that adopt sustainable business practices are more likely to deliver superior value in the long-term.

3. **Active ownership is preferable to exclusion.** We believe that hard exclusions from our investment universe should be utilised as a last resort, where ESG risks are insurmountable or where continued engagement is considered ineffective. Rather, seeking change in corporate behaviour through engagement is more likely to have real-world impacts.

4. **Transparency to our clients is important.** We believe that providing transparency on our ESG activities helps our clients understand our priorities and impact.

2. Policy scope

The Eastspring Investments Group Responsible Investment Policy ("RI Policy") is applicable to all strategies that we directly manage and in all markets that our Local Business Units ("LBUs") operate. In the case of third-party client mandates and funds delegated to third parties, we look to meet client requirements with a close alignment to expectations outlined in this RI Policy.

ALIGNMENT WITH MARKET-SPECIFIC REGULATORY GUIDELINES

We monitor and actively participate in the ongoing regulatory developments in the markets in which we operate. Our interpretation of regulatory guidelines informs our operational response to sustainability in our businesses. We consider, but are not limited to, the following regulatory guidelines:

Singapore: Monetary Authority of Singapore ("MAS") Environmental Risk Management Guidelines ("EnRM")

Malaysia: Securities Commission Malaysia ("SC Malaysia") Guidance Note on Managing Environmental, Social and Governance Risks for Fund Management Companies ("FMCs")

Taiwan: The Securities Investment Trust and Consulting Association ("SITCA") Guidelines for Operational Procedures of ESG Investment and Risk Management and ESG Information Disclosure

European Union: Sustainable Finance Disclosure Regulation ("SFDR")

3. Policy governance

3.1 GOVERNANCE STRUCTURE

The Eastspring Investments Board of Directors ("Board") oversees senior management represented on the Eastspring Executive Management Committee ("EMC"), which drives the day-to-day operations of the Firm globally, and therefore have ownership and bear ultimate responsibility in the setting of the Firm's Responsible Investment strategy.

The Eastspring Investments Sustainability Committee, chaired by the Chief Executive Officer of Eastspring Investments, is a management committee of the EMC and is delegated responsibility by the Board to oversee the execution of the Firm's Responsible Investment activities. This includes serving as a forum for decision making and as a sponsor of resource allocation to strategic Sustainability and Responsible Investment priorities.

The Sustainability Committee oversees five Sustainability workstreams, comprising of cross-functional representation across our business, that collaborate to build capacity, make progress in priority areas, and facilitate ongoing continuous improvement towards our sustainability ambitions.

3.2 OWNERSHIP AND REVISIONS

Eastspring Investments is committed to an ongoing process of improving its approach to Responsible Investment. As our internal strategies evolve, or where we notice shifts in external expectations in line with industry best practices, or where we observe unexpected investment consequences, we expect that the RI Policy will evolve over time to reflect changes in business practices, structures, technology, and the law.

The Head of Sustainability, who sits on the EMC and Sustainability Committee, is the delegated owner of the RI Policy and is responsible for conducting an annual review to ensure that the RI Policy remains updated. All changes will be approved via the Sustainability Committee.

3.3 CONFLICTS OF INTEREST

Eastspring Investments follows the Prudential Group Conflicts of Interest Policy and Standards. Accordingly, all Eastspring Investments LBUs are required to put in place a Conflict of Interest programme to meet the requirements of Prudential Group. This ensures that the interests of clients and beneficiaries are the highest priority and if conflicts of interest arise, they are appropriately managed.

3.4 RISK MANAGEMENT

The management of risk and risk oversight are embedded in the first and second lines of risk defence respectively, and independent assurance is embedded in the third line of risk defence of Eastspring Investments' 'Three Lines of Defence' model.

The first line of defense consists of the respective LBU Chief Investment Officers or Head of Investments, who are responsible for ensuring the proper implementation of the RI policy in investment processes and ensuring consistent representations are made to clients. The second line of defense consists of Risk Management and Compliance, who are responsible for policy compliance and ESG risk monitoring and reporting. The third line of the defense is the Prudential Group-wide Internal Audit ("GwIA"), which provides independent assurance for the Board and shareholders.

4. Thematic ESG considerations

At Eastspring Investments, we have identified ESG themes that are particularly relevant to our responsible investment approach, given our predominant focus on investments in Asia and Emerging Markets, and our global focus in the alternatives space.

The relevance and magnitude of impact of each theme in relation to any holding, indirect or direct, across its investment horizon is assessed as part of an ESG-integrated investment decision making process by investment teams. Please refer to **Section 5** for more information. Directly-held companies within the investment portfolio that are exposed to these themes may be further engaged by using the following strategies:

- **Active Ownership:** We seek to engage with identified companies through our Central Engagement programme and encourage improvement towards industry best-practice standards. In parallel with the Central Engagement programme, we would also engage where the theme is identified as material to a company's valuation, business model or credit profile, and where the company is assessed as having inadequate mitigants in managing the associated ESG risk. We also utilise other modes of engagements and proxy voting to encourage a company to change its behaviour. The Sustainability team will conduct an annual evaluation of these themes and recommend further actions for approval at the Sustainability Committee. Please refer to **Section 6** for more information.

- **Exclusions:** We consider exclusion as a last resort that may be deployed when engagement has failed or where we believe unaddressed material financial risks are best mitigated through exclusions. Companies are considered for exclusions in accordance with **Section 7** and a list of excluded companies can be found in **Appendix B1**.

The following list details the current identified thematic considerations and will be expanded as this RI Policy evolves alongside developments in industry standards and in alignment with our parent company's Prudential Group Responsible Investment Policy.

4.1 CLIMATE CHANGE AND JUST TRANSITION

Climate change is a sustainability challenge facing us all. The transition towards a low carbon economy is a global challenge, requiring global solutions. For investors, climate change and the need for a rapid transition to a low-carbon economy present significant financial risks as well as investment opportunities. Eastspring Investments believes in the need for a just and inclusive transition, in a way that actively places the considerations of emerging and frontier market economies at the forefront of discussions. We are focusing our support on accelerating the clean energy transition through engagement and opportunities for financing, rather than divestment. In addition, we consider environmental risks, including climate risks, and opportunities in the assessment of current and potential investee companies.

Environmental Risk Management

Environmental risk arises from the potential adverse impact of changes in the environment on economic activities and human well-being. We recognise that environmental risk, and specifically climate risk, has the potential to financially impact the assets we manage through physical and transition risk dimensions. We acknowledge our fiduciary duty to investors to put in place appropriate risk management to ensure that material environmental risks are identified, assessed, monitored, and managed. We utilise internal and third-party frameworks to help inform judgements. In our assessment, we seek to consider material risks, including but not limited to current and potential regulatory changes, physical impacts, and technology developments relating to climate change, into our decision-making processes.

Implementation Strategy
We accept the science of climate change, and we acknowledge the global efforts to limit global warming to well below two degrees Celsius. We also recognise that thermal coal remains one of the most carbon-intensive yet substitutable elements of the global energy mix, and therefore may face material policy and taxation risks, limitations in relation to access to and cost of debt and equity capital, increased competition, more near-term remediation and closure costs, and other headwinds that increase the risk of asset stranding which may not be fully appreciated by the market.

As such, our approach combines both engagement with carbon intensive companies and exclusions with respect to coal. For engagements, we encourage companies to develop, implement and disclose a credible strategy to transition to a low-carbon future. For exclusions, we apply a revenue threshold on coal companies as outlined in **Section 7.2**.

4.2 PALM OIL

Palm oil is the world's most produced, consumed, and traded vegetable oil. Palm oil is a very efficient crop and contributes to rural poverty alleviation and rural development in many regions. The irresponsible production of palm oil, however, has caused widespread rainforest destruction and biodiversity loss, exacerbated climate change, and impacted the human rights of local communities. Notwithstanding, palm oil production does not have to be destructive to the environment and communities and can be produced responsibly.

Implementation Strategy
While we acknowledge the role local certifications such as the Indonesian Sustainable Palm Oil ("ISPO") and the Malaysian Sustainable Palm Oil ("MSPO") play in encouraging the production of Certified Sustainable Palm Oil ("CSPO"), we will use the degree of Roundtable on Sustainable Palm Oil ("RSPO") certification to identify companies producing unsustainable palm oil in directly-held portfolios.

When properly applied, these criteria can help to minimise the negative impact of palm oil cultivation. We will focus on palm oil producers and engage with the palm oil value chain as all actors have a responsibility to encourage sustainable palm oil. The following table classifies palm oil producers within the portfolio according to the percentage of its palm oil holdings or estates that are certified by the RSPO.

% RSPO Certification	Categorisation
0% – 20%	Worst Performers
20% – 80%	Improvement Needed
80% – 100%	Best in Class

We will conduct engagement with palm oil producers labelled as "Worst Performers" and "Improvement Needed," and with other actors in the value chain such as buyers and standard setters.

4.3 HUMAN RIGHTS

Eastspring Investments recognises the International Bill of Human Rights[1] and the International Labour Organisation's Declaration on Fundamental Principles and Rights at Work as cornerstone legal instruments that establish the minimum standards for internationally recognised human rights. In addition to the duty of individual states to protect human rights, we believe that companies have a responsibility to respect human rights and, where applicable, support remediation to communities affected as a result its activities. We commit to applying these standards and will consider the United Nations Guiding Principles and Human Rights ("UN Guiding Principles") and Organisation for Economic Co-operation and Development's Guidelines for Multinational Enterprises ("OECD Guidelines") when monitoring the assets that we manage.

Implementation Strategy
The United Nations Global Compact ("UNGC") is a non-binding pact to encourage businesses to adopt sustainable and socially responsible policies, and to report on their implementation. The ten universally accepted principles of

Source: [1]The Universal Declaration of Human Rights sets the international standard on human rights; the International Covenant on Economic, Social and Cultural Rights and the International Covenant on Civil and Political Rights codify this standard; all three documents constitute the International Bill of Human Rights.

the UNGC are derived from international agreements on four topics: human rights, labour, environment, and anti-corruption.

We seek to identify violators of the UNGC within directly-held portfolios to commence engagement to improve their conduct and comply with international agreements brought together in the UNGC. We utilise a third-party data vendor to independently classify companies according to the following table.

Assessment	Definition
Fail	Violating one or more of the ten UNGC principles
Watch List	Close to violating one or more of the ten UNGC principles
Pass	Not violating the ten UNGC principles

Subsequently, we conduct engagement with companies labelled as "Fail" and will continue to monitor companies labelled as "Watch List" when making investment decisions for both existing and new holdings.

4.4 BUSINESS ETHICS & GOVERNANCE

Eastspring Investments acknowledges the importance of business ethics in ensuring that investee companies' operations are conducted with integrity. As such, we expect investee companies to uphold a high level of ethical business conduct in their corporate behaviour, and that this is led from the most senior levels of the organisation. Where controversies in business ethics are identified in companies in directly-held portfolios, investment teams monitor the issue and nominate companies for engagement for remediation.

Implementation Strategy

We rely on company reports, market intelligence, news agencies, or other third-party research to identify companies that may have outstanding or new controversies in business ethics. Such controversies in business ethics include but are not limited to fraud, executive misconduct, corruption scandals, money laundering, anti-trust violations, or insider trading. Where engagement yields no improvement, we may choose to escalate our active ownership response.

5. ESG integration

At Eastspring Investments, investment professionals are responsible for incorporating all factors deemed to materially impact the investment decision making process. ESG integration is an essential component of our investment analysis process. We recognise that opportunities to integrate material ESG issues into investment decisions may differ across LBUs and asset classes and will adjust for flexibility where market or asset class specific considerations impact how a given ESG issue is considered as part of the analysis process. This may include differences in local regulatory developments and data availability. Where there may be deviations, we will adopt a 'comply or explain' approach to be detailed in the respective process documents and approved via the Sustainability Committee. The ESG integration guidelines adopted by Eastspring Investments are outlined below:

5.1 INTEGRATION GUIDELINES

Eastspring Investments acknowledges the importance of business ethics in ensuring that investee companies' operations are conducted with integrity. As such, we expect investee companies to uphold a high level of ethical business conduct in their corporate behaviour, and that this is led from the most senior levels of the organisation. Where controversies in business ethics are identified in companies in directly-held portfolios, investment teams monitor the issue and nominate companies for engagement for remediation.

1. **Focus on materiality:** The ESG landscape comprises many issues. The issues that are the subject of focus at the analysis phase are those that are assessed to have a material impact on an investment's valuation, credit worthiness, or license to operate.

   The relevance and magnitude of impact pertaining to each material ESG issue across a given investment horizon may be considered in the context of the market, sector, level of ownership, and track record of operation. Consideration of the potential impact of the issue should incorporate management's willingness and ability to mitigate material ESG risks and exploit profitable ESG opportunities on a forward-looking basis. Assessments should be monitored and periodically reviewed.

2. **Active ownership:** As active investors, assessments of the impact of material ESG issues on a particular direct holding will be monitored and periodically reviewed. Eastspring Investments may play a role in encouraging and motivating changes that improve the material ESG characteristics or mitigating material ESG risks of investments and portfolios. Please refer to **Section 6** for further detail on how we approach Active Ownership.

In addition, we apply the following asset type specific guidelines.

Listed companies and corporates

We seek to identify, assess, and monitor material ESG risks and opportunities. Investment teams integrate ESG issues with material impact on a company's valuation, credit worthiness, and license to operate within the investment analysis, investment decision, and active monitoring of holdings. This process also considers the impact of a company's readiness to position itself positively to exploit future ESG opportunities in its specific market and sector. Through the ESG integration process, investment teams develop an informed and holistic assessment of a company's exposure to and management of ESG risks and opportunities. This includes incorporation of third party ESG data, materiality metrics, as well as company and market specific data. Notwithstanding, we are mindful of data quality issues and will factor this into our assessment of materiality. Where possible, we will monitor and engage with data providers to address data quality issues.

Quantitative strategies
ESG is incorporated as a formal stream in our research program, where we conduct significant research on alpha signals, including those related to material ESG issues, using available historical data. We look to identify and validate ESG alpha factors that improve the returns of our strategies and ESG risk factors that may mitigate risk in our strategies. We aim to enhance our data-driven approaches over time to strengthen our environmental and broader ESG capabilities, with a goal to effect meaningful and tangible change and generate alpha or reduce proven risks for clients.

Private assets
ESG factors are assessed during due diligence while considering any prospective investment and at each stage of the investment process, from origination to exit. It is the fiduciary duty of the alternative asset investment team to seek to maximise returns on investments, and ESG factors are intrinsic to that objective. To ensure the integration of ESG issues in the pre-investment phase, an appropriate ESG rating is assigned to each prospective opportunity based on an assessment against certain criteria within a proprietary ESG Risk Assessment process. Where it is determined that a prospective investment has an excessive ESG risk, or where there is no ESG policy or limited procedures in place, the opportunity will be declined. The investment team engages with underlying managers to promote ESG best practice and address material ESG issues, to manage and monitor ESG risks in the post-investment phase and until exit.

5.2 TOOLS AND RESOURCES

We utilise internal and external resources to assist in the analysis of material ESG issues which are incorporated into decision making and engagement activities. As part of the ongoing evolution of our approach, we continue to assess external sources of information to ensure our approach has the appropriate tools to aid in applying our best judgment. Investment teams may also consider other resources as research including, but not limited to, a company's own data, other sell side research, public databases, and proprietary tools. In addition, LBUs may make use of market-specific data providers that might provide a more comprehensive coverage of local data.

6. Active ownership

Our responsible investment approach is deeply aligned with active ownership activities for risk mitigation and value creation over the long term. As active owners, we leverage on our market expertise to foster long-term, collaborative relationships with directly-held investee companies to deepen collective understanding and tackle material issues including ESG risks and opportunities. As such, we consider engagement and proxy voting as key drivers of active ownership. Integral to the investment process, the responsibility of engagement and proxy voting is often led by our investment teams. Where engagement overlaps with our Thematic ESG Considerations, as detailed in **Section 4**, these may be performed collaboratively with Central Engagement specialists.

6.1 ENGAGEMENT

Company engagements

Engagement with investee companies is core to our active ownership responsibilities. We aim to encourage business and management practices that support positive enhancement of material ESG traits or mitigation of material ESG risks across our holdings through constructive engagement based on our in-depth knowledge of our investments in the context of their business environment.

Our investment teams evaluate material ESG risks, which may differ across companies, sectors, and asset classes. The level of engagement will therefore vary based on materiality, the size of investment, and the nature of the risks themselves. As long-term investors, we adopt a patient timeframe, as we believe that this can improve the probability of achieving value-added outcomes.

Engagement can be for a variety of purposes. These can be a fact-finding exercise or in response to specific ESG controversies. By better understanding an issuer's approach to material ESG risks and opportunities, we can incorporate these insights to create a holistic view of a company's investment profile.

Engagement can also be undertaken to encourage improvements within an issuer itself. Our process incorporates a range of milestones reflecting time-bound expectations regarding acknowledgement of issues, strategy development, implementation, as well as reporting and disclosures. The purpose of these engagements, which are long-term in nature, is to ensure that the issuer understands and manages material ESG risks in a suitable way and to a timeframe that meets our expectations, ultimately improving its valuation. Where appropriate, we will work with issuers to address material ESG risks, acknowledging a company management's speciality knowledge in their field.

Central engagement

As active owners, our Central Engagement programme serves as a platform to express our expectations on material ESG themes outlined in **Section 4** to targeted investee companies. The programme objectives are based on our judgment on materiality to investment portfolios managed on behalf of clients. For each identified material ESG theme, the Central Engagement team follows a six-step process to carry out the engagement programme.

An annual assessment of the Central Engagement programme is conducted, and findings will be shared in our Annual RI Report.

Collaborative engagement
We believe that collaboration among investors is an effective way to address ESG issues and maximise investor influence. We are active members of collaborative organisations. From time-to-time, we may participate in collaborative engagement initiatives where we believe it to be in our client's best interests to do so. We collaborate via member organisations including:

- Asian Corporate Governance Association ("ACGA") Working Groups for Japan and China
- Asia Investor Group on Climate Change ("AIGCC") Utilities collective engagement programme
- Carbon Disclosure Project ("CDP") Non-Disclosure Programme and Transition Champions Initiative
- Climate Action 100+ Collaborative Engagement programmes for target companies
- United Nations-supported Principles for Responsible Investment ("PRI") Sustainable Commodities Programme

6.2 ENGAGEMENT ESCALATION

Judgement is applied in all engagements and the strategy for escalation will be determined on a case-by-case basis due to each having unique circumstances. We do not apply a prescriptive or mechanistic approach to engagement escalation. The following are typical engagement escalation measures we may choose to employ for our direct holdings.

- **Direct dialogue with management:** We may highlight our concerns around the company's progress in direct dialogues with appropriate management representatives or non-executive directors. By leveraging on our ongoing communication channels, we seek to foster understanding and collaboration in addressing key concerns.
- **Collaborative engagement:** We may express our concerns to company management collectively with other investors, as part of a collaborative engagement exercise. By harnessing a collective voice with fellow investors, we seek to maximise investor influence to amplify concerns.
- **Proxy voting:** By exercising our votes, we seek both to add value and to protect our interests as shareholders. This may include voting against management-supported resolutions, supporting shareholder resolutions, or voting against or withholding votes in relation to director re-elections. Please refer to Section 6.4 for guidance on circumstances where we vote against management.
- **Shareholder resolutions:** We may signal our concerns to investee companies by submitting shareholder resolutions on specific issues where we believe engagement has failed, subject to the circumstances of the issue.
- **Divestment as last resort:** We may choose to exit from the investment as a last resort, where there is evidence to suggest that identified material risks sufficiently impact our conviction, and where we believe engagement is likely to fail. By exercising an exit as a last resort, we seek to uphold accountability and protect our clients' interests as investors.

6.3 PROXY VOTING POLICY

An active and informed voting policy is an integral part of our direct equity investment philosophy and forms a core part of our approach to active ownership. As a starting point to this policy, we are supportive of the boards and management of the companies in which we invest. However, when companies consistently fail to achieve our reasonable expectations, we will consider actively promoting changes via proxy voting. By exercising our votes, we seek both to add value and to protect our clients' interests as shareholders.

Principles-based approach
Eastspring Investments follows a principles-based approach, where all votes we exercise are considered in the context of the guidelines set out below. We consider the issues, meet with company leadership if necessary and applicable to the

investment strategy, and vote accordingly. Where possible, we would seek to discuss any contentious resolutions with investee companies before casting our votes to ensure that our objectives are understood and that our votes are cast in the best interests of our clients. We may decide to not vote proxies or abstain from voting in limited circumstances where the costs are prohibitive or would not serve our clients' interests.

Proxy advisor and guidelines

To aid the process of making proxy voting decisions we have internal processes and may use a proxy advisor. Specific policies and advice from the proxy advisor are not applied mechanically. We will apply our judgment and decide how to vote each resolution on its merits in the context of our guidelines.

- **Director elections:** Directors standing for election and re-election will be considered in conjunction with proxy advice. In general, we will support directors of good standing that are additive to elements of a high-quality board of directors, based on the relevance and calibre of their skills and industry or specialised experience, contribution to group diversity, and independence of both management and external audit functions.
- **Executive remuneration:** The process by which the senior executives of an investee company are motivated to perform is important for investor outcomes. In general, we will support remuneration practices of a quantum we consider reasonable in consideration of a company's operating market, business size, and complexity. We prefer remuneration to be aligned to shareholder outcomes, including financial outcomes, over the short and long term. Provisions that claw back payments in the event of poor behaviours or unsustainable practises are encouraged. In addition, incentives for environmental and social outcomes aligned to company objectives are also encouraged. All other things being equal, we support annual votes on remuneration practices.
- **Other remuneration:** Appropriate levels of non-executive director remuneration will likely be supported on the conditions that it does not affect the independence of these directors from executive management, and it does not unduly entrench the directors on the board. Employee share schemes are generally supported to encourage staff to behave like owners, however shareholder dilution will also be considered.
- **Anti-takeover measures:** Devices such as Pre-emptive Rights and Poison Pills are likely to be voted against, if deemed to be not in the interests of minority shareholders.
- **Auditor appointments:** The retention of quality, independent external auditors is an important protection for shareholders. Eastspring Investments will likely support auditors that have the size, geographic, and industry experience commensurate with that of the company, and where independence from management can be demonstrated.
- **Agenda items:** Any item that offers a broad scope of interpretation, including "Other Matters" or "Any Other Business" will be voted against. Administrative items such as acceptance of accounts and changes of name, changes to articles or constitutions, along with all other resolutions, will be considered on their merits and taking the interests Eastspring's investors into account.

We will review the voting policies and guidelines, including any changes, of the proxy advisor at least once a year.

Conflicts

From time to time, proxy voting proposals may raise conflicts between the interests of our clients and the interests of Eastspring Investments and its employees. We must take clear steps and demonstrate that those steps resulted in a decision to vote the proxies in the clients' best interest. The following details scenarios where conflicts of interest may arise.

- Proxy votes regarding non-routine matters are solicited by an issuer that has an institutional separate account relationship with the Company;

- A proponent of a proxy proposal has a meaningful business relationship with Company;
- The Company has business relationships with participants in proxy contests, corporate directors, or director candidates;
- A Company employee responsible for voting has a personal interest in the outcome of a particular matter before shareholders, e.g., through stock ownership, having a spouse working at the Company, etc.; or
- A Company employee responsible for voting has a meaningful business or personal relationship with participants in proxy contests, corporate directors, or director candidates.

Application of guidelines or voting in accordance with the proxy advisor recommendation should, in most cases, address any possible conflicts of interest. Where possible conflicts of interest remain, it will be escalated in accordance with the Prudential Group Conflicts of Interest Policy and local conflicts of interests handling procedures for resolution. In certain client arrangements, we may be required to disclose or consult with the client on resolving conflicts arising from the voting of proxies.

6.4 STEWARDSHIP CODES

We support the application of Stewardship Codes in markets where we operate. Where applicable, we have developed responses to inform how we fulfil our stewardship responsibilities in respect of a particular Stewardship Code.

1. Singapore Stewardship Principles
2. Japan Stewardship Code
3. Malaysian Code for Institutional Investors
4. Taiwan Stewardship Principles
5. Korea Stewardship Code
6. Thailand Investment Governance Code for Institutional Investors

6.5 ENGAGEMENT RECORDS AND REPORTING

We support the application of Stewardship Codes in markets where we operate. Where applicable, we have We maintain an engagement log relating to engagement conducted on material ESG issues in our directly-held portfolios. A summary of which will be made public on an annual basis. This reporting will include select case studies which demonstrate our process in action and how we execute our fiduciary duty.

7. Exclusions Policy

We acknowledge that certain businesses and their activities are of detriment to the communities and wider society that they operate in. We deem investments into these companies as incompatible with our RI Policy.

7.1 SCOPE

Specific to exclusions, the expectations on tobacco and controversial weapons detailed in this section will apply to comingled investment vehicles under the direct control of Eastspring Investments, including unit trusts and SICAVs. In the case of coal exclusions, this will apply, at a minimum, to all SICAVs registered under Article 8 or Article 9 of the SFDR.

Exclusions detailed in this section are in addition to exclusions required by law and as outlined in the Prudential Group Anti-Money Laundering & Sanctions Policy. In addition, this policy does not apply to the following:

- Funds delegated to third party managers, or investing into third party managed vehicles;
- Beta or low tracking error strategies where it is imprudent to diverge from a broad market benchmark;
- Indirect market exposures, including but not limited to ETFs and future contracts, where Eastspring Investments does not have direct control;
- Private assets which have exclusion criteria aligned to their own disclosure documents.

7.2 TYPES OF EXCLUSIONS

Controversial weapons

Eastspring Investments deems companies with a verified involvement to cluster munitions, anti-personnel mines, biological weapons, chemical weapons, and nuclear weapons outside of the UN Treaty on the Non-Proliferation of Nuclear Weapons ("NPT") as companies to be excluded for controversial weapons.

We identify and exclude these companies in accordance with definitions set by international conventions and treaties. To ensure this alignment, we utilise independent third-party data for identifying companies for exclusion.

The following details our exclusions and their alignment to international standards and polices:

Category	Conventions / Treaties
Cluster Munitions	The Convention on Cluster Munitions ("Oslo Treaty")
Anti-Personnel Mines	UN Convention on the Prohibition of the Use, Stockpiling, Production and Transfer of Anti-Personnel Mines and on their Destruction 2997 ("Ottawa Convention")
Biological Weapons	UN Convention on the Prohibition of the Development, Production and Stockpiling of Bacteriological (Biological) and Toxin Weapons and on their Destruction
Chemical Weapons	UN Convention on the Prohibition of the Development, Production, Stockpiling and Use of Chemical Weapons and on Their Destruction
Nuclear Weapons Non-NPT	UN Treaty on the Non-Proliferation of Nuclear Weapons ("NPT")

Tobacco

We acknowledge the detrimental effects that tobacco has on the health of consumers. Globally, tobacco use is responsible for over five million deaths each year, making it the largest cause of preventable death in the world. We identify and exclude companies that are classified under the Tobacco Sub-Industry by Global Industry Classification Methodology ("GICS"). This includes manufacturers of cigarettes and other tobacco products. We utilise independent third-party data in combination with GICS classifications for identifying companies for exclusions.

Thermal coal
We deem companies that are significantly involved in the production of and energy generation from thermal coal as exhibiting excessive climate risk to our portfolios unless they have credible transition plans. We identify and exclude companies that derive greater than 30% of their revenues from coal mining and/or electricity generated from thermal coal. We utilise independent third-party data on company coal emissions and revenues.

We also recognise the importance of coordinated efforts as we transition towards a net-zero world in a manner that is inclusive and just. A just transition includes consideration of emerging markets and their earlier stage of development, as well as the importance of access to energy for the populations of these regions. Companies and entire industries will require time and financing to transition towards cleaner energy alternatives. Therefore, appeals for exemptions will be considered when an issuer meets or demonstrates credible progress towards meeting the following criteria, with requisite documentation, and presented in accordance with **Section 7.3.**

Category		Conventions / Treaties
Labelled bonds	An investee company issues a debt instrument that finances its decarbonisation targets and is certified by a globally recognised standard. This includes green, sustainability, transition bonds, among other labelled bonds.	Produce documentation that funding provided by the debt instrument solely funds sustainable alternatives.
Progress towards alignment to industry frameworks: **(i) Nationally-Determined Contributions ("NDCs") under the Paris Agreement; or** **(ii) 1.5°C emission pathway under the Intergovernmental Panel on Climate Change ("IPCC"); or** **(iii) Science Based Targets initiative ("SBTi")**	An investee company establishes publicly disclosed commitments that contribute to a transition plan demonstrating that they are making progress toward or are consistent with or better than the issuer country's NDCs, the 1.5°C emission pathway defined by IPCC, or SBTi.	Produce documentation of the investee company's publicly disclosed commitments that demonstrate that they are making progress towards or are consistent with or better than the issuer country's NDCs, the 1.5°C emission pathway as defined by IPCC, or SBTi.
Alignment to best practice guidelines	An investee company aligns with best practices by demonstrating alignment to transition plan and credibility in enacting transition plan.	Produce documentation that the investee company demonstrates alignment to transition plan and credibility in enacting transition plan.

7.3 EXEMPTIONS

Appeals for exemptions, including those where the independent third-party data can be shown to be inaccurate, will be made to the Sustainability Committee for consideration. Portfolio managers will provide requisite documentation detailed in **Section 7.2** for appeals to be considered. All appeals for exemptions will be documented internally and successful appeals will be disclosed annually. Reviews on exemptions will be set on a case-by-case basis and documented accordingly.

Engagement plays an essential role in upholding accountability and ensuring policy-aligned behaviour in exempted companies. Where exemptions have been granted, engagement with clearly defined goals will be set in consult with the Sustainability team, in agreement with the Sustainability Committee, and undertaken by portfolio managers and/or the Sustainability team accordingly. Outcomes will be taken into consideration during reviews on exemptions.

7.4 REVIEW AND DISCLOSURES

We conduct an annual review on the types of exclusions, third-party data vendor used for tagging, and the exclusions and exemptions list. Please refer to **Appendix B1** for the exclusions and exemptions list.

8. Transparency and Reporting

We strive for transparency to clients and other interested stakeholders in our implementation of this policy. In addition to our annual reporting to the PRI, we will publish an annual Responsible Investment report, comprising all other updates. All publicly available information can be found on our dedicated Responsible Investment website.

9. Memberships and Affiliations

Organisations

1. Asian Corporate Governance Association
2. Asia Investor Group on Climate Change
3. Carbon Disclosure Project
4. Climate Action 100+
5. United Nations-supported Principles for Responsible Investment

Initiatives

1. ACGA Working Groups for Japan and China
2. AIGCC Utilities collective engagement programme
3. CDP Non-Disclosure Programme and Transition Champions Initiative
4. Climate Action 100+ Collaborative Engagement programmes for target companies
5. NZAOA Engagement Track, alongside Prudential plc.
6. PRI Sustainable Commodities Programme

Investor Statements

1. 2022 Global Investor Statement to Governments on the Climate Crisis

Appendix A1:

Eastspring Investments (Singapore) Ltd response to MAS Environmental Risk Management ("EnRM") Guidelines, applicable to our Eastspring operations in Singapore.

Environmental risk arises from the potential adverse impact of changes in the environment on economic activities and human well-being. We recognise that environmental risk has the potential to financially impact our funds and mandates through physical and transition risk channels. We acknowledge our fiduciary duty to investors to put in place appropriate risk management to ensure that material environmental risks in discretionary funds or mandates are identified, assessed, monitored, and managed.

We work in tandem with our clients and stakeholders, to understand their requirements and ensure that our approach to environmental risk is considered, managed, and disclosed accordingly. This could include product disclosures and customised reporting, in line with regulatory guidelines and client requirements.

We monitor developments in industry best practices, regulatory requirements, and third-party vendor data availability as we commit to an ongoing and long-term process of improving our approach to managing environmental risk.

Consistent with the investment approach, the investment teams monitor financially material Environmental, Social, and Governance ("ESG") factors as part of the research, portfolio construction, and ongoing portfolio risk review processes. Investment teams utilise desktop tools, combining a range of ESG data sources and frameworks, to monitor for changes that may impact the portfolio and apply judgement in assessing the portfolio. Where applicable, company engagement is also used to monitor for progress and to promote sustainable business practices. The investment risk function utilises the same desktop tools and aligns with the investment teams' approach to monitor portfolio and aggregate-level ESG risk exposures.

The investment risk function incorporates qualitative and quantitative measures and approaches in the monitoring of ESG factor exposures in portfolios and has in place risk oversight forums to support dialogues with investment teams on ESG risk exposures and factors, as well as governance processes to periodically report ESG exposures to management forums.

Various desktop tools, third-party vendor data, and frameworks are used, where available and relevant, to identify and monitor material ESG issues and metrics. Third-party vendor data informs our exclusions and proxy voting activities, as described in corresponding polices. Where data is limited, incomplete, or deemed inaccurate, investment teams use their judgment and qualitative knowledge of the company and sector to estimate impact of material environmental risks on the business. We continuously look to monitor and report metrics and targets in line with clients' expectations, and regulatory or industry developments.

Effective Date: June 2022

Appendix A2:

Eastspring Investments (Singapore) Limited accepts the "Principles for Responsible Institutional Investors (Japan's Stewardship Code)" regarding our management of Japanese equities.

A second revision of Japan's Stewardship Code ("the Code") was drafted by the Financial Services Agency in March 2020 as a guide for institutional investors to "promote sustainable growth of investee companies and enhance the medium- and long-term investment return for clients and beneficiaries". The Financial Services Agency explains the Code as follows.

> In this Code, "stewardship responsibilities" refers to the responsibilities of institutional investors to enhance the medium-to long-term investment returns for their clients and beneficiaries (including ultimate beneficiaries; the same shall apply hereafter) by improving and fostering the investee companies' corporate value and sustainable growth through constructive engagement, or purposeful dialogue, based on in-depth knowledge of the companies and their business environment and consideration of sustainability (medium- to long-term sustainability including ESG factors) consistent with their investment management strategies. This Code defines principles considered to be helpful for institutional investors who behave as responsible institutional investors in fulfilling their stewardship responsibilities with due regard both to their clients and beneficiaries and to investee companies. By fulfilling their stewardship responsibilities properly in line with this Code, institutional investors will also be able to contribute to the growth of the economy as a whole.[2]

Eastspring Investments' primary responsibility is to fulfil our fiduciary duty to our clients and beneficiaries and in respect to this, we accept the Code.

We aim to generate long-term capital growth on the assets investors entrust to us by pursuing an active investment policy through portfolio management decisions, through voting on resolutions at general meetings, and by maintaining a continuing dialogue with company management.

We adopt a value approach to investment, where all portfolios are managed consistently around a single investment philosophy and a common research platform. Our approach is research intensive. It requires a detailed understanding of the fundamentals of each investee company to determine the sustainable earnings of the business.

Policies on the Stewardship Code

The following are the seven principles of the Code, including our policy on how we fulfil stewardship responsibilities.

1. **Institutional investors should have a clear policy on how they fulfill their stewardship responsibilities, and publicly disclose it.**
   We invest significant effort into conducting a thorough qualitative due diligence on each investee company. As part of stewardship activities, we focus on company analysis, ongoing engagement, and exercising of voting rights based on publicly available information.
2. **Institutional investors should have a clear policy on how they manage conflicts of interest in fulfilling their stewardship responsibilities and publicly disclose it.**
   Eastspring Investments has established appropriate risk management and compliance frameworks to ensure that the interests of clients and beneficiaries are the highest priority and if conflicts of interest arise, they are appropriately managed.
3. **Institutional investors should monitor investee companies so that they can appropriately fulfill their stewardship responsibilities with an orientation towards the sustainable growth of the companies.**
   Eastspring Investments invests significant effort into conducting a thorough, qualitative due diligence on each investee company. We conduct meetings with company management in order to understand how companies are

Source: [2]Financial Services Agency, Japan.

using their capital and conducting their business. We may engage company management around matters concerning improving sustainable shareholder returns and matters that present a potential material risk to a company's financial performance, including Environmental, Social, and Governance issues.

4. **Institutional investors should seek to arrive at an understanding in common with investee companies and work to solve problems through constructive engagement with investee companies. Companies should have as their objective the maximisation of shareholder wealth. Shareholders, as providers of equity capital, are the ultimate owners of companies.**
   Eastspring Investments seeks to promote an objective of maximising shareholder wealth for its clients by pursuing an active investment policy through portfolio management decisions, through voting on resolutions at general meetings and by maintaining a continuing dialogue with company management. Integral to our approach is the active engagement of companies to promote shareholder value. Where appropriate, we will play an active role in seeking to effect changes to maximise shareholder value. From time to time, we may participate in collaborative engagement initiatives where we believe it to be in our client's best interests to do so.
5. **Institutional investors should have a clear policy on voting and disclosure of voting activity. The policy on voting should not be comprised only of a mechanical checklist; it should be designed to contribute to the sustainable growth of investee companies.**
   Eastspring Investments follow a principles-based approach. All votes we exercise are considered in the context of the principles as set out in this policy. When companies consistently fail to achieve our reasonable expectations, we will actively promote changes. These changes might range from the formulation of a new strategy to the appointment of new management or non-executive directors.
   An active and informed voting policy is an integral part of our investment philosophy. Voting should never be divorced from the underlying investment activity. By exercising our votes, we seek both to add value and to protect our interests as shareholders. We consider the issues, meet the management if necessary and vote accordingly. We would always seek to discuss any contentious resolutions before casting our votes in order to ensure that our objectives are understood, and our votes will be cast in the best interests of our clients.
   To aid the process of making proxy voting decisions we use a proxy advisor. We review, from time to time, the policies and guidelines of the proxy advisor to understand the nature of their recommendations and test their compatibility with our requirements. However, specific policies and advice from the proxy advisor are not applied mechanically. We always apply our judgment and decide how to vote each resolution on its merits in the context of principles of our proxy policy. Proxy voting results are made publicly available. To find out more about our approach, please refer to **Section 6.3** of our Eastspring Investments Group RI Policy.
6. **Institutional investors in principle should report periodically on how they fulfil their stewardship responsibilities, including their voting responsibilities, to their clients and beneficiaries.**
   Eastspring Investments considers the exercise of proxy voting rights as well as engagement with investee companies to be an important means of fulfilling our stewardship responsibilities. In meeting our clients' expectations, an ongoing dialogue with our clients builds their understanding of how our investment process is aligned with fulfilling our stewardship responsibilities. Proxy voting results are made publicly available. To find out more about our approach, please refer to **Section 6.3** of our Eastspring Investments Group RI Policy.
7. **To contribute positively to the sustainable growth of investee companies, institutional investors should develop skills and resources needed to appropriately engage with the companies and to make proper judgments in fulfilling their stewardship activities based on in-depth knowledge of the investee companies and their business environment and consideration of sustainability consistent with their investment management strategies.**
   Our approach is aligned with promoting increased long-term value creation and sustainable business practices by

companies. We place a high level of importance on an ongoing dialogue with investee companies, primarily based on what we believe will maximise shareholder value as long-term investors. As a signatory of the PRI, we disclose examples of our stewardship activities, engagement case studies, and proxy voting record through the PRI Transparency Report.

8. **Service providers for institutional investors should endeavour to contribute to the enhancement of the functions of the entire investment chain by appropriately providing services for institutional investors to fulfil their stewardship responsibilities.**

   We utilise internal and external resources to assist in the analysis of material issues which are incorporated into decision making and engagement activities. As part of the ongoing evolution of our approach, we continue to assess external sources of information to ensure our approach has the appropriate tools to aid in applying our best judgment.

Effective Date: July 2020

Appendix B1:
Exclusions and Exemption List

A. Exclusions (As of 15 March 2023)

Controversial weapons exclusions

A.P. LMEC Systems
Abhinav Yantrik Udyog Pvt Ltd.
Advanced Weapons & Equipment India Ltd.
Aerospace Long-March International Trade Co., Ltd.
Alcast Pressure Dies Private Limited
American Ordnance LLC
Ammunition & Metallurgy Industries Group
Anhui Dongfeng Electromechanical Technology Co. Ltd.
Anhui GreatWall Military Industry Co., Ltd.
Anhui Military Industry Group Holding Co. Ltd.
Arab Organization for Industrialization
Armament Research & Development Establishment
Aryt Industries Ltd.
Ashoka Manufacturing Ltd
Ashoka Moulders Pvt Ltd
Avibras Industria Aeroespacial SA
Bharat Dynamics Ltd.
CAMS (India) Pvt. Ltd.
Castiplast Pvt Ltd
China Academy of Launch Vehicle Technology
China Aerospace Science & Industry Group Corp.
China Aerospace Science & Technology Group Co., Ltd.
China National Precision Machinery Import & Export Corp.
China New Era Technology Co., Ltd.
China North Industries Corp.
China North Industries Group Corp. Ltd.
China North Industries Investment Ltd.
China Poly Group Co., Ltd.
CNC Components Pvt Ltd
Corporation Moscow Institute for Heat Technology JSC
Defence Industries Organization
Defence Research & Development Laboratory
Defense K Corp.
Dhruv Containers Pvt Ltd
Dinex Machines Pvt Ltd
Economic Explosives Ltd.
Engem Technologies Pvt Ltd.
Federal State Unitary Enterprise State Research and Production Enterprise Bazalt
GBS Industries
Heliopolis Chemical Industries
Hyderabad Precisions Manufacturing Co. Pvt Ltd.
IFB Automotive Pvt Ltd.
Inavit Systems India Private Limited
India Defence Research & Development Organisation
J K Engineering Works Ltd
JBJ Technologies Ltd.
JMV LPS Ltd.
K-Max Technologies Pvt Ltd.
Korea Defense Industry Corp.
Koryo Pyrotechnics Co. Ltd.
Krishna Enterprises (Okhla)
LIG Corp.
LIG Nex1 Co., Ltd.
Lockheed Martin Corporation
Lords Vanijya Pvt Ltd
Lucky Engineering Company
Makina VE Kimya Endustrisi Kurumu Genel Mudurlugu
Manufacturing Engineering Scientific Industrial Concern OJSC
Matharu Engineers
Mech Components Pvt Ltd
Mechanical Engineering Research Institute named after V.V. Bahirev JSC
Micro India Engineering
Milan Steel & Metal Enterprises
Miltech Industries Pvt Ltd.
Motovilicha Plants PJSC
MTAR Technologies Ltd.
Munitions India Ltd.
Myanmar Defence Products Industries / Ka Pa Sa
Narendra and Company Pvt Ltd
National Chung-Shan Institute of Science and Technology
Naveen Tools Manufacturing Co Pvt Ltd
Nityanand Udyog Pvt Ltd
NPO High Precision Systems JSC
Open Joint Stock Company NPO "Mashinostroitel"
Ordtech Military Industries
Pakistan Ordnance Factories
Parasramka Engineering Pvt Ltd.
Patange Industries Pvt Ltd
Pemraj Industries
Poly International Holdings Co., Ltd.
Poly Technologies, Inc.
Poongsan Corp.
Poongsan FNS Co., Ltd.
POONGSAN HOLDINGS Corp.
Pragati Industries Pvt Ltd
Premier Explosives Ltd.
Priya Preci-Comp Pvt Ltd
Renuka Auto Crank
Research & Production Corp. Konstruktorskoye Byuro Mashy
Reshef Technologies Ltd.
Rosoboronexport JSC
Rostec Corp.
RPA Splav named after A.N. Ganichev JSC
Sakr Factory for Developed Industries
Sandeep Metalcraft Private Limited
Sandhar Technologies Ltd.
Scientific Production Association Bazalt JSC
Scientific-Research Engineering Institute JSC

Shanti Arms-Tech Pvt Ltd
Sharayu Engineering Pvt Ltd.
Shivswati Enterprises Pvt Ltd.
Shyam Udyog
Sichuan Aerospace Industrial Group Co., Ltd.
Smart Munitions Expert Solutions, Inc.
SNT DYNAMICS Co., Ltd.
SNT Holdings Co., Ltd.
Solar Industries India Limited
Sri Ganesh Microsystems Pvt Ltd.
State Space Corp. Roscosmos
State-Owned Foreign Trade Unitary Enterprise Belspetsvneshtech
Synthetic Moulders Ltd.
Tarang Kinetics Pvt Ltd.
Teff Plast India Pvt Ltd.
The Day & Zimmermann Group, Inc.
Tirupati Components Pvt Ltd.
Union de Industria Militares
Votkinsky Zavod JSC
Walchandnagar Industries Ltd.
Wojskowy Instytut Techniczny Uzbrojenia
Wood Preservers Pvt Ltd.
Yantra India Ltd.
Yuzhnoye Design Office

Tobacco exclusions

22ND CENTURY GROUP INC
ALTRIA GROUP INC
AMERICAN HERITAGE INTERNATIO
ANHUI GENUINE NEW MATERIAL-A
ARCIS RESOURCES CORP
ASBERRY 22 HOLDINGS INC
BADECO ADRIA JSC SARAJEVO
BENTOEL INTL INVESTAMA PT
BRITISH AMERICAN TOBACCO BAN
BRITISH AMERICAN TOBACCO BHD
BRITISH AMERICAN TOBACCO PLC
BRITISH AMERICAN TOBACCO UGA
BRITISH AMERICAN TOBACCO ZAM
BRITISH AMERICAN TOBACCO ZIM
BRITISH AMERICAN TOBACCO-KEN
BULGARTABAK HOLDING
CAT LOI JSC
CEYLON TOBACCO CO PLC
CHARLIE'S HOLDINGS INC
CHINA DE XIAO QUAN CARE GROU
COKA DUVANSKA INDUSTRIJA AD
EASTERN CO SAE
GODFREY PHILLIPS INDIA LTD
GOLDEN TOBACCO LTD
GOTSE DELCHEV TABAC AD-GOTSE
GUDANG GARAM TBK PT
HEALTHIER CHOICES MANAGEMENT
HEMPACCO CO INC
HM SAMPOERNA TBK PT
IMPERIAL BRANDS PLC
INDONESIAN TOBACCO TBK PT
IONIC BRANDS CORP
ITC LTD
JAPAN TOBACCO INC
JERUSALEM CIGARETTE CO LTD
KARELIA TOBACCO CO. S.A.
KHYBER TOBACCO CO LTD
KT&G CORP
NGAN SON JSC
NIKOTIANA-BT HOLDING AD-SOFI
NTC INDUSTRIES LTD
PAKISTAN TOBACCO CO LTD
PHILIP MORRIS CR AS
PHILIP MORRIS INTERNATIONAL
PHILIP MORRIS OPERATIONS AD
PHILIP MORRIS PAKISTAN LTD
RCMW GROUP INC
RED LIGHT HOLLAND CORP
RLX TECHNOLOGY INC-ADR
SCANDINAVIAN TOBACCO GROUP A
SHUMEN-TABAC AD-SHUMEN
SINNAR BIDI UDYOG LTD
SLANTSE STARA ZAGORA- BT AD
SMOORE INTERNATIONAL HOLDING
SOC IVOIRIENNE DES TABACS
STARFLEET INNOTECH INC
TANZANIA CIGARETTE CO LTD
TURNING POINT BRANDS INC
UNION INVESTMENT CORP
UNION TOBACCO & CIGARETTE
UNIVERSAL CORP/VA
VECTOR GROUP LTD
VPR BRANDS LP
VST INDUSTRIES LTD
WEE-CIG INTERNATIONAL CORP
WEST INDIAN TOBACCO CO LTD
WISMILAK INTI MAKMUR TBK PT

Coal exclusions

ADANI POWER LIMITED
AES Andes S.A.
Alabama Power Company
ALLETE, INC.
ALLIANCE RESOURCE PARTNERS, L.P.
AN HUI WENERGY COMPANY LIMITED
Appalachian Power Company
ARCH RESOURCES, INC.
Banpu Power Public Company Limited
BANPU PUBLIC COMPANY LIMITED
BASIN ELECTRIC POWER COOPERATIVE
Bukit Asam Tbk PT
CAPITAL POWER CORPORATION
CESC LTD
China Power International Development Limited
China Shenhua Energy Company Limited
CHNENERGY Investment Group Co., LTD
CLECO POWER LLC
COAL INDIA LTD
CONSOL ENERGY INC.
Datang International Power Generation Co., Ltd.
DMCI HOLDINGS INC.
DTE ELECTRIC COMPANY
DUKE ENERGY INDIANA, LLC
Electric Power Development Co., Ltd.
ELECTRICITY GENERATING PUBLIC COMPANY LIMITED
ENEA SPOLKA AKCYJNA

ENEVA S.A
ENGIE Energia Chile S.A.
ESKOM HOLDINGS SOC LIMITED
EVERGY KANSAS CENTRAL, INC.
Evergy Metro, Inc.
EXXARO RESOURCES LIMITED
GD POWER DEVELOPMENT CO., LTD.
GEO ENERGY RESOURCES LIMITED
GOLDEN ENERGY AND RESOURCES LIMITED
Great River Energy
Guanghui Energy Co., Ltd.
GUJARAT MINERAL DEVELOPMENT CORPORATION LIMITED
HK ELECTRIC INVESTMENTS LIMITED
Hokuriku Electric Power Company
Huadian Power International Corporation Limited
HUANENG POWER INTERNATIONAL, INC.
Indo Tambangraya Megah Tbk PT
INNER MONGOLIA DIAN TOU ENERGY CORPORATION LIMITED
INNER MONGOLIA YITAI COAL CO., LTD
IPALCO ENTERPRISES INC
JAIPRAKASH POWER VENTURES LIMITED
Jizhong Energy Resources Co., Ltd.
KENTUCKY UTILITIES COMPANY
Korea East-West Power Co., Ltd.
Korea Midland Power Co., Ltd
Korea South-East Power Co., Ltd
Korea Southern Power Co., Ltd.
Korea Western Power Co., Ltd
LOUISVILLE GAS AND ELECTRIC COMPANY
MALAKOFF CORPORATION BERHAD
MGE ENERGY, INC.
MONONGAHELA POWER COMPANY
NEW HOPE CORPORATION LIMITED
NLC INDIA LIMITED
NOVA SCOTIA POWER INCORPORATED
NTPC LIMITED
PEABODY ENERGY CORPORATION
PGE POLSKA GRUPA ENERGETYCZNA SPOLKA AKCYJNA
PPL CORPORATION
PT ABM Investama Tbk
PT Adaro Energy Indonesia Tbk
PT Bumi Resources Tbk
PT Delta Dunia Makmur Tbk
PT Harum Energy Tbk
PT Indika Energy Tbk
PT Perusahaan Listrik Negara (Persero)
PT United Tractors Tbk
PUBLIC SERVICE COMPANY OF NEW MEXICO
RELIANCE POWER LIMITED
SDIC Power Holdings Co., Ltd.
Semirara Mining and Power Corporation
Shaanxi Coal and Chemical Industry Group Co., Ltd.
Shaanxi Coal Industry Company Limited
SHAN XI HUA YANG GROUP NEW ENERGY CO., LTD.
SHANGHAI ELECTRIC POWER CO., LTD.
Shanxi Coal International Energy Group Co., Ltd.
Shanxi Coking Coal Energy Group Co., Ltd.
Shanxi Lu'an Environmental Energy Dev. Co., Ltd
Shenergy Company Limited
Shenzhen Energy Group Co., Ltd.
Shikoku Electric Power Company, Incorporated
SMC GLOBAL POWER HOLDINGS CORP.
SOUTHWESTERN ELECTRIC POWER COMPANY
STATE POWER INVESTMENT CORPORATION LIMITED
TAQA MOROCCO SA
TENAGA NASIONAL BERHAD
THE HUB POWER COMPANY LIMITED
The Okinawa Electric Power Company, Incorporated
THE TATA POWER COMPANY LIMITED
Thungela Resources Ltd
Tohoku Electric Power Company, Incorporated
TPI Polene Power Public Company Limited
TRI-STATE GENERATION AND TRANSMISSION ASSOCIATION, INC.
TUCSON ELECTRIC POWER COMPANY
UNION ELECTRIC COMPANY
WASHINGTON H. SOUL PATTINSON AND COMPANY LIMITED
WHITEHAVEN COAL LIMITED
WINTIME ENERGY CO.,LTD.
Yankuang Energy Group Company Limited
Zhejiang Zheneng Electric Power CO., LTD

B. Exemption

Type of Exclusion	Company	Exemption Reason	Review by	Outcome
Coal	RP Hydro (Kelantan) Sdn. Bhd., specific to Islamic Medium Term Notes	Green bond	31 March 2024	Pending
Controversial Weapons	Larsen & Toubro Ltd.	Uncertainty on continuing involvement; further information presented by investment team	15 September 2023	Pending
Coal	China Resources Power Holdings Company Limited	Credible decabonisation plan	31 December 2023	Pending
Coal	ACEN Finance Ltd.	Green bond	19 September 2023	Pending
Controversial Weapons	Larsen & Toubro Ltd.	Uncertainty on continuing involvement	31 December 2022	Decision to divest by end Q1 2023