

Eastspring Investments Group

Responsible Investment Policy

May 2025





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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 258 billion (as at 31 December 2024) 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 Sustainability 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 Sustainability results in better investment decisions. We believe that incorporating material Sustainability 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 Sustainability 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 Sustainability 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 or sub-delegate, and in all markets in which our Local Business Units (“LBUs”) operate. In the case of third-party client mandates, we agree to meet clients’ ESG requirements in consultation with Eastspring.

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 for Asset Managers (“EnRM”)

MAS CFC 02/2022 Disclosure and Reporting Guidelines for Retail ESG Funds



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:

European Commission’s Sustainable Finance Disclosure Regulation (“SFDR”) and respective Regulatory Technical Standards (“RTS”)

European Securities and Markets Authority (“ESMA”) Guidelines on funds’ names using ESG or sustainability-related terms

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 comprises of cross-functional representation across our business, that collaborate to collectively uphold Eastspring’s sustainability practices across Eastspring Group. The Sustainability Committee’s focus also includes oversight on sustainability capacity building, progress in priority areas, and facilitation of 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 ESG Investments, Director, 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 Policy on Conflict of Interest. Accordingly, all Eastspring Investments LBUs have been 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 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 consists of the Risk and Compliance Teams, who are responsible for ESG risk monitoring as well as checking and challenging ESG policies and their implementation. The third line 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 Sustainability 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. Please refer to **Section 6** for more information.
- **Exclusions:** We consider exclusion as a last resort that may be implemented 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 BIODIVERSITY

Eastspring Investments recognises that safeguarding and restoring biodiversity is fundamental for preserving the ecosystems that allow for long-term sustainability of our natural environment. We acknowledge that human activities drive changes to our natural environment, impacting whole ecosystems and their resilience. As such, it is imperative that we reduce continued loss and degradation of nature to safeguard against climate vulnerabilities.

4.2.1 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

Whilst 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.

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.

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

4.2.2 TIMBER

Timber is an important source of heat energy and is a valuable natural resource that has seen an increase in global demand. However, unsustainable production of timber can have a catastrophic impact on the world's natural forests, especially in areas with illegal logging activities. The deforestation that comes from timber production results in the loss of biodiversity and wildlife, which may subsequently compromise the stability of global ecosystems that support the supply to food, clean water, essential medicine.

Implementation Strategy

As there exists a wide variability of practices in this industry relating to responsible forestry, conservation and ethical biodiversity practises, we focus on timber production due to its direct impact on deforestation. We will seek to identify companies in directly-held portfolios that produce, are dependent on, or use commodities that contribute to

Source: '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.

deforestation, particularly via timber extraction. We conduct engagement with these companies to work towards recognition of biodiversity issues, credible deforestation policy, and a commitment towards responsible timber or paper sourcing with an explicit reference to biodiversity.

4.3 HUMAN RIGHTS

Eastspring Investments recognises the International Bill of Human Rights 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 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

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.

Sub-delegated Managers

In cases where Eastspring sub-contracts the management of assets to third-party managers, ESG due diligence is performed on the manager's ESG credentials. This includes an assessment of the manager's Responsible Investment Policies, practices, alignment to industry and/or market best practice Responsible Investment standards as well as alignment to Eastspring's Responsible Investment Policy.

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 or in conjunction with the Central Engagement Programme.

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 judgement on materiality to investment portfolios managed on behalf of clients. For each identified material ESG theme, engagement under the Central Engagement Programme follows a six-step process.



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:

- ▶ Asia Investor Group on Climate Change ("AIGCC") Utilities collective engagement programme
- ▶ Climate Action 100+ Collaborative Engagement programmes for target companies
- ▶ United Nations-supported Principles for Responsible Investment ("PRI") Spring Advisory Committee

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

Exercising our voting rights for all equities for which our clients have given us voting authority, subject to barriers in certain markets 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, 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.

The proxy voting process, including the governance, approvals, and execution of proxy voting, is the responsibility of each equity investment team.

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.
- ▶ **Board diversity:** Board diversity in terms of skills, experience, knowledge, and gender, among others, are important considerations that contribute to sustaining a well-functioning company. We will generally vote in encouragement of a diverse board, in terms of skills and gender representation, given the increased representation of skilled men and women in the workforce globally, with the ultimate lens of

bringing long-term value to the company. Our voting will take local market regulations and practices into consideration.

➤ **Climate change and climate transition**

We recognize the importance of promoting a transition towards mitigating, and adapting to, the impacts of Climate Change in a manner that is practical, inclusive and just. We will generally vote in encouragement of companies making credible, action-based progress towards climate transition. We vote in consideration of market development, the importance of access to energy and recognising that specific sectors will require time and continued access to finance to transition and adapt to a Paris-Aligned and climate changed world. Given the complexity of the climate transition, we evaluate climate-related votes on a case-by-case basis.

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 Firm;
- A proponent of a proxy proposal has a meaningful business relationship with the Firm;
- The Firm has business relationships with participants in proxy contests, corporate directors, or director candidates;
- Employee(s) 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
- Employee(s) 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 Policy on Conflict of Interest 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 (Appendix A2).

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 AND VOTING RECORDS

Eastspring's proxy voting records are made public on an annual basis. We may also report selected Engagement case studies which demonstrate our process in action and how we execute our fiduciary duty within our Annual Responsible Investment Report.

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, all exclusions outlined in this section will apply to active and passive Prudential non-Investment Linked Policy ("non-ILP") segregated mandates, Prudential Investment Linked Policy ("ILP") segregated mandates that are classified as Responsible Investment mandates, and SICAVs registered under Article 8 or Article 9 of the SFDR. For private assets that we manage on behalf of Prudential, all exclusions outlined in this section will apply, in addition to exclusions on direct private investments to companies/ projects that are involved in new coal assets and oil & gas fields.

The expectations on tobacco and controversial weapons exclusions detailed in this section will apply to active investment vehicles under the direct control of Eastspring Investments, including comingled investment vehicles. These expectations will also apply to sub-delegated investment vehicles.

In addition, this policy does not apply to the following investment vehicles under the direct control of Eastspring Investments:

- ▶ Funds that are managed fully by third party managers and that are not managed on Eastspring Investments' platform², for example Eastspring Investment third-party "wrapper" funds;
- ▶ Passive (Beta) and Smart Beta strategies where it is imprudent to diverge from a broad market benchmark;
- ▶ Indirect or look-through market exposures, such as external third-party funds, ETFs, Derivative and Money

Market funds. In the case where these exposures form a component of a broader mandate where ESG exclusions are eligible for application, only the external third-party funds, ETFs, Derivative and Money Market fund component will be exempt from ESG exclusions;

- ▶ Segregated institutional mandates. ESG exclusions to be governed as agreed between the Client and Eastspring;
- ▶ Private funds where Eastspring's investment forms an LP agreement where Eastspring is one of many LPs. These funds will apply exclusions in line with their own GP Agreement.

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. The list of excluded companies and companies exempted from exclusions is included as Appendix B1.

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

²This exception does not apply to funds where Eastspring Investment has an advisory relationship, such as funds jointly managed and advised between Eastspring Investments LBUs and with Eastspring Investment joint-venture ("JV") entities like Ilici-Pru and Citic-Pru, and third-party funds which are directly managed on Eastspring Investments' platform.

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 policies:

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 1997 ("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 classification 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	<p>An investee company issues a debt instrument that finances its decarbonisation targets and is certified by a globally recognised standard.</p> <p>This includes green, sustainability, transition bonds, among other labelled bonds.</p>	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 are conducted on an annual basis (refer to Appendix B1 for the exclusions and exemptions list).

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

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 Eastspring's website.



9. Memberships and Affiliations



Organisations

1. Asia Investor Group on Climate Change
2. Climate Action 100+
3. United Nations-supported Principles for Responsible Investment
4. Institutional Investors Council Malaysia (IICM)³

Initiatives

1. AIGCC Utilities collective engagement programme
2. AIGCC Just Transition Working Group
3. Climate Action 100+ Collaborative Engagement programmes for target companies
4. PRI Nature Stewardship Advisory Committee

³This membership pertains only to Eastspring Investments Malaysia.

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 policies. 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 using their capital and conducting their business. We may

Source: ²Financial Services Agency, Japan.

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 May 2025)

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 Limited
 CAMS (India) Pvt. Ltd.
 Castiplast Pvt Ltd
 China Academy of Launch Vehicle Technology
 China Aerospace Science & Industry Corp. Ltd.
 China Aerospace Science & Technology Corp.
 China National Precision Machinery Import & Export Corp.
 China New Era Technology Co., Ltd.
 China North Industries Corp.
 China North Industries Group Corp. Ltd.
 China Poly Group Corp. 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)
 KSB Limited
 KSB SE & Co. KGaA
 LIG Corp.
 LIG Nex1 Co., Ltd.
 Lockheed Martin Corporation
 Lords Vanijya Pvt Ltd
 Lucky Engineering Company
 Makine ve Kimya Endustrisi AS
 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.
 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
 NPO Splav named after A.N. Ganichev 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.
 Sakr Factory for Developed Industries
 Sandeep Metalcraft Pvt Ltd.
 Sandhar Technologies Limited
 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
 Special Machine Building & Metallurgy PJSC
 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

1606 Corp
 22nd Century Group Inc
 Al-Eqbal Investment Company Plc
 Altria Group Inc
 Anhui Genuine New Materials Co Ltd
 Arcis Resources Corp
 Asberry 22 Holdings Inc
 Badeco Adria dd Sarajevo
 British American Tobacco (Malaysia) Bhd
 British American Tobacco (Zambia) PLC
 British American Tobacco Bangladesh Co Ltd
 British American Tobacco Kenya Plc
 British American Tobacco plc
 British American Tobacco Uganda
 British American Tobacco Zimbabwe (Holdings) Ltd
 Bulgartabac Holding AD
 Cat Loi JSC
 Ceylon Tobacco Company PLC
 Charlie's Holdings Inc
 China De Xiao Quan Care Group Co Ltd
 Coka Duvanska Industrija ad Coka
 Eastern Company SAE
 Fyolo Technology Corp
 Godfrey Phillips India Ltd
 Golden Tobacco Ltd
 Gotse Delchev Tabac AD
 Gudang Garam Tbk PT
 Hanjaya Mandala Sampoerna Tbk PT
 Harm Reduction Group AB
 Hempacco Co Inc
 Imperial Brands PLC
 Indonesian Tobacco Tbk PT
 Ispire Technology Inc
 ITC Ltd
 Japan Tobacco Inc
 Jerusalem Cigarette Co Ltd
 Karelia Tobacco Company Inc

Khyber Tobacco Company Ltd
 KT&G Corp
 Ngan Son JSC
 Nicotiana BT Holding AD
 NTC Industries Ltd
 Pakistan Tobacco Company Ltd
 Philip Morris (Pakistan) Ltd
 Philip Morris CR as
 Philip Morris International Inc
 Philip Morris Operations ad Nis
 Pyxus International Inc
 Red Light Holland Corp
 RLX Technology Inc
 Scandinavian Tobacco Group A/S
 Shumen Tabac AD
 Sinnar Bidi Udyog Ltd
 Slantse Stara Zagora Tabak AD
 Smoore International Holdings Ltd
 Societe Ivoirienne des Tabacs SA
 Starfleet Innotech Inc
 TAAT Global Alternatives Inc
 Tanzania Cigarette PLC
 Turning Point Brands Inc
 Union Investment Corp PLC
 Union Tobacco & Cigarette Industries Company PSC
 Universal Corp
 VPR Brands LP
 VST Industries Ltd
 Wee-Cig International Corp
 West Indian Tobacco Company Ltd
 Wismilak Inti Makmur Tbk PT

Coal exclusions

ABOITIZ EQUITY VENTURES INC.
 ADANI POWER (JHARKHAND) LIMITED
 ADANI POWER LIMITED
 AES Andes S.A.
 AEV INTERNATIONAL PTE. LTD.
 Alabama Power Company
 ALLIANCE COAL, LLC
 ALLIANCE RESOURCE OPERATING PARTNERS, L.P.
 ALLIANCE RESOURCE PARTNERS, L.P.
 Alto Maipo SpA
 AN HUI WENERGY COMPANY LIMITED
 Appalachian Power Company
 ARCH RESOURCES, INC.
 Banpu Power Public Company Limited
 BANPU PUBLIC COMPANY LIMITED
 BASIN ELECTRIC POWER COOPERATIVE
 BOCO ROCK WIND FARM PTY LTD
 Bukit Asam Tbk PT
 Can2 Termik AS
 CAPITAL POWER CORPORATION
 CESC LTD
 China Coal Energy Company Limited
 CHINA ENERGY CAPITAL HOLDINGS CO.,LTD
 China Power International Development Limited
 China Power International Holding Limited
 China Resources Power Holdings Company Limited
 China Resources Power Investment Co., Ltd
 China Shenhua Energy Company Limited
 China Shenhua Overseas Capital Company Limited

CHN ENERGY Renewable Co., Ltd
 CHNENERGY Investment Group Co., LTD
 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
 EMPRESA ELECTRICA ANGAMOS SPA
 Empresa Electrica Cochran SpA
 ENEA SPOLKA AKCYJNA
 ENGIE Energia Chile S.A.
 ESKOM HOLDINGS SOC LIMITED
 EVERGY KANSAS CENTRAL, INC.
 EVERGY KANSAS SOUTH, INC.
 Evergy Metro, Inc.
 EXXARO RESOURCES LIMITED
 Fujian Huadian Furui Energy Development Co Ltd
 GD POWER DEVELOPMENT CO., LTD.
 GEO ENERGY RESOURCES LIMITED
 GOLDEN ENERGY AND RESOURCES PTE. LTD.
 Guacolda Energia SpA
 GUJARAT MINERAL DEVELOPMENT CORPORATION LIMITED
 Guoneng Financing Lease Co.,Ltd.
 Hallador Energy Company
 Hokkaido Electric Power Co., Inc.
 Hokkaido Electric Power Network, Inc.
 Hokuriku Electric Power Company
 Huachen Energy Co., Ltd
 Huadian New Energy Group Corporation Limited
 Huadian Power International Corporation Limited
 Huaneng International Power Jiangsu Energy Development Co., Ltd.
 HUANENG POWER INTERNATIONAL, INC.
 HUNTER RIDGE HOLDINGS, INC.
 INNER MONGOLIA DIAN TOU ENERGY CORPORATION LIMITED
 INNER MONGOLIA YITAI COAL CO., LTD
 JACKSON GENERATION, LLC
 JAIPRAKASH POWER VENTURES LIMITED
 JIMAH EAST POWER SDN. BHD.
 Jizhong Energy Resources Co., Ltd.
 JSW ENERGY LIMITED
 Kaiyuan Securities Co., Ltd.
 KAPAR ENERGY VENTURES SDN. BHD.
 KENTUCKY UTILITIES COMPANY
 Kinetic Development Group Ltd
 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
 Linyi Mining Group Co.,LTD
 LOUISVILLE GAS AND ELECTRIC COMPANY
 MAITHON POWER LIMITED
 Majapahit Holding B.V.
 MALAKOFF CORPORATION BERHAD
 MALAKOFF POWER BERHAD
 MONONGAHELA POWER COMPANY
 MYTRAH AADHYA POWER PRIVATE LIMITED
 MYTRAH AAKASH POWER PRIVATE LIMITED
 MYTRAH ABHINAV POWER PRIVATE LIMITED

MYTRAH ADARSH POWER PRIVATE LIMITED
 MYTRAH AGRIYA POWER PRIVATE LIMITED
 MYTRAH AKSHAYA ENERGY PRIVATE LIMITED
 MYTRAH VAYU (INDRAVATI) PRIVATE LIMITED
 MYTRAH VAYU (SABARMATI) PRIVATE LIMITED
 MYTRAH VAYU (SOM) PRIVATE LIMITED
 National Energy Group Jiangsu Electric Power Co., Ltd
 NAVA LIMITED
 NEW HOPE CORPORATION LIMITED
 NLC INDIA LIMITED
 NLC TAMIL NADU POWER LIMITED
 NORTH EASTERN ELECTRIC POWER CORPN LTD
 NOVA SCOTIA POWER INCORPORATED
 NTPC LIMITED
 ODAS ELEKTRIK URETIM SANAYI TICARET ANONIM SIRKETI
 PEABODY ENERGY CORPORATION
 PGE POLSKA GRUPA ENERGETYCZNA SPOLKA AKCYJNA
 PGE Sweden AB (publ)
 PORT DICKSON POWER BERHAD
 PPL CAPITAL FUNDING, INC.
 PPL CORPORATION
 PT ABM Investama Tbk
 PT Adaro Energy Indonesia Tbk
 PT Bukit Makmur Mandiri Utama
 PT Bumi Resources Tbk
 PT Delta Dunia Makmur Tbk
 PT Harum Energy Tbk
 PT Indika Energy Tbk
 PT Indo Tambangraya Megah Tbk
 PT Perusahaan Listrik Negara (Persero)
 PT Sumberdaya Sewatama
 PT United Tractors Tbk
 RATTANINDIA POWER LIMITED
 RELIANCE NATURAL RESOURCES LIMITED
 RELIANCE POWER LIMITED
 ROSA POWER SUPPLY COMPANY LIMITED
 SAN MIGUEL GLOBAL POWER HOLDINGS CORP.
 SDIC Power Holdings Co., Ltd.
 SE Green Energy Co., Ltd.
 SEGARI ENERGY VENTURES SDN. BHD.
 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.
 SHANDONG ENERGY GROUP CO., LTD
 Shandong Energy Group Construction Group Co Ltd
 Shandong Energy Group Equipment Manufacturing (Group) Co.,LTD
 Shandong Nuclear Power Company 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.
 SINOSING SERVICES PTE. LTD.
 SPIC 2016 US Dollar Bond Company Limited
 SPIC MTN COMPANY LTD.
 SPIC PREFERRED COMPANY NO.2 LTD.
 SPIC PREFERRED COMPANY NO.4 LTD.
 STATE POWER INVESTMENT CORPORATION LIMITED
 Sumiseki Holdings,Inc.
 TANJUNG BIN ENERGY SDN. BHD.

TANJUNG BIN O&M BERHAD
TANJUNG BIN POWER SDN. BHD.
TAQA MOROCCO SA
TATA POWER DELHI DISTRIBUTION LIMITED
TATA POWER RENEWABLE ENERGY LIMITED
TEMPLE GENERATION I, LLC
TERRACOM LIMITED
THDC INDIA LIMITED
THE HUB POWER COMPANY LIMITED
THE NARRAGANSETT ELECTRIC COMPANY
The Okinawa Electric Power Company, Incorporated
THE TATA POWER COMPANY LIMITED
Thungela Resources Ltd
TNB GLOBAL VENTURES CAPITAL BERHAD
TNB WESTERN ENERGY BERHAD
Tohoku Electric Power Company, Incorporated
TPI Polene Power Public Company Limited

TRI-STATE GENERATION AND TRANSMISSION ASSOCIATION, INC.
WALWHAN WIND RJ LIMITED
WASHINGTON H. SOUL PATTINSON AND COMPANY LIMITED
WHITEHAVEN COAL LIMITED
WINTIME ENERGY GROUP CO.,LTD.
Wuling Power Corporation Ltd.
XINWEN MINING GROUP CO., LTD.
YALONG RIVER HYDROPOWER DEVELOPMENT COMPANY, LTD.
YANCOAL AUSTRALIA LTD
Yankuang Energy Group Company Limited
YANKUANG GROUP (CAYMAN) LIMITED
Zaozhuang Bank Co., Ltd.
ZAOZHUANG MINING GROUP CO., LTD.
Zhejiang Zheneng Electric Power CO., LTD
Zibo Mining Group Co., Ltd.

B. Exemption

Type of Exclusion	Company	Exemption Reason
Coal	PT Indonesia Asahan Aluminium Industries ("Inalum")	Data inaccuracy
Coal	PT Alamtri Resources Indonesia Tbk	Data inaccuracy
Controversial Weapons	Larsen & Toubro Ltd.	Data inaccuracy

*Exemptions will be reviewed on an annual basis to determine continued validity (refer to Section 7.3.).