

Brussels, 6.4.2022 C(2022) 1931 final

ANNEX 1

# **ANNEX**

to the

Commission Delegated Regulation (EU) .../...

supplementing Regulation (EU) 2019/2088 of the European Parliament and of the Council with regard to regulatory technical standards specifying the details of the content and presentation of the information in relation to the principle of 'do no significant harm', specifying the content, methodologies and presentation of information in relation to sustainability indicators and adverse sustainability impacts, and the content and presentation of the information in relation to the promotion of environmental or social characteristics and sustainable investment objectives in precontractual documents, on websites and in periodic reports

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### **ANNEX I**

## Template principal adverse sustainability impacts statement

For the purposes of this Annex, the following definitions shall apply:

- (1) 'scope 1, 2 and 3 GHG emissions' means the scope of greenhouse gas emissions referred to in points (1)(e)(i) to (iii) of Annex III to Regulation (EU) 2016/1011 of the European Parliament and of the Council<sup>1</sup>;
- (2) 'greenhouse gas (GHG) emissions' means greenhouse gas emissions as defined in Article 3, point (1), of Regulation (EU) 2018/842 of the European Parliament and of the Council<sup>2</sup>;
- (3) 'weighted average' means a ratio of the weight of the investment by the financial market participant in an investee company in relation to the enterprise value of the investee company;
- (4) 'enterprise value' means the sum, at fiscal year-end, of the market capitalisation of ordinary shares, the market capitalisation of preferred shares, and the book value of total debt and non-controlling interests, without the deduction of cash or cash equivalents;
- (5) 'companies active in the fossil fuel sector' means companies that derive any revenues from exploration, mining, extraction, production, processing, storage, refining or distribution, including transportation, storage and trade, of fossil fuels as defined in Article 2, point (62), of Regulation (EU) 2018/1999 of the European Parliament and of the Council<sup>3</sup>;
- (6) 'renewable energy sources' means renewable non-fossil sources, namely wind, solar (solar thermal and solar photovoltaic) and geothermal energy, ambient energy, tide, wave and other ocean energy, hydropower, biomass, landfill gas, sewage treatment plant gas, and biogas;
- (7) 'non-renewable energy sources' means energy sources other than those referred to in point (6);

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Regulation (EU) 2016/1011 of the European Parliament and of the Council of 8 June 2016 on indices used as benchmarks in financial instruments and financial contracts or to measure the performance of investment funds and amending Directives 2008/48/EC and 2014/17/EU and Regulation (EU) No 596/2014 (OJ L 171, 29.6.2016, p. 1).

Regulation (EU) 2018/842 of the European Parliament and of the Council of 30 May 2018 on binding annual greenhouse gas emission reductions by Member States from 2021 to 2030 contributing to climate action to meet commitments under the Paris Agreement and amending Regulation (EU) No 525/2013 (OJ L 156, 19.6.2018, p. 26).

Regulation (EU) 2018/1999 of the European Parliament and of the Council of 11 December 2018 on the Governance of the Energy Union and Climate Action, amending Regulations (EC) No 663/2009 and (EC) No 715/2009 of the European Parliament and of the Council, Directives 94/22/EC, 98/70/EC, 2009/31/EC, 2009/73/EC, 2010/31/EU, 2012/27/EU and 2013/30/EU of the European Parliament and of the Council, Council Directives 2009/119/EC and (EU) 2015/652 and repealing Regulation (EU) No 525/2013 of the European Parliament and of the Council (OJ L 328, 21.12.2018, p. 1).

- (8) 'energy consumption intensity' means the ratio of energy consumption per unit of activity, output or any other metric of the investee company to the total energy consumption of that investee company;
- (9) 'high impact climate sectors' means the sectors listed in Sections A to H and Section L of Annex I to Regulation (EC) No 1893/2006 of the European Parliament and of the Council<sup>4</sup>;
- (10) 'protected area' means designated areas in the European Environment Agency's Common Database on Designated Areas (CDDA);
- (11) 'area of high biodiversity value outside protected areas' means land with high biodiversity value as referred to in Article 7b(3) of Directive 98/70/EC of the European Parliament and of the Council<sup>5</sup>;
- (12) 'emissions to water' means direct emissions of priority substances as defined in Article 2(30) of Directive 2000/60/EC of the European Parliament and of the Council<sup>6</sup> and direct emissions of nitrates, phosphates and pesticides;
- (13) 'areas of high water stress' means regions where the percentage of total water withdrawn is high (40-80%) or extremely high (greater than 80%) in the World Resources Institute's (WRI) Water Risk Atlas tool "Aqueduct";
- (14) 'hazardous waste and radioactive waste' means hazardous waste and radioactive waste;
- (15) 'hazardous waste' means hazardous waste as defined in Article 3(2) of Directive 2008/98/EC of the European Parliament and of the Council<sup>7</sup>;
- (16) 'radioactive waste' means radioactive waste as defined in Article 3(7) of Council Directive 2011/70/Euratom<sup>8</sup>;
- (17) 'non-recycled waste' means any waste not recycled within the meaning of 'recycling' in Article 3(17) of Directive 2008/98/EC;

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Regulation (EC) No 1893/2006 of the European Parliament and of the Council of 20 December 2006 establishing the statistical classification of economic activities NACE Revision 2 and amending Council Regulation (EEC) No 3037/90 as well as certain EC Regulations on specific statistical domains Text with EEA relevance (OJ L 393, 30.12.2006, p. 1–39).

Directive 98/70/EC of the European Parliament and of the Council of 13 October 1998 relating to the quality of petrol and diesel fuels and amending Council Directive 93/12/EEC (OJ L 350, 28.12.1998, p. 58).

Directive 2000/60/EC of the European Parliament and of the Council of 23 October 2000 establishing a framework for Community action in the field of water policy (OJ L 327, 22.12.2000, p. 1).

Directive 2008/98/EC of the European Parliament and of the Council of 19 November 2008 on waste and repealing certain Directives (OJ L 312, 22.11.2008, p. 3).

Council Directive 2011/70/Euratom of 19 July 2011 establishing a Community framework for the responsible and safe management of spent fuel and radioactive waste (OJ L 199, 2.8.2011, p. 48).

- (18) 'activities negatively affecting biodiversity-sensitive areas' means activities that are characterised by all of the following:
- (a) those activities lead to the deterioration of natural habitats and the habitats of species and disturb the species for which a protected area has been designated;
- (b) for those activities, none of the conclusions, mitigation measures or impact assessments adopted pursuant to any of the following Directives or national provisions or international standards that are equivalent to those Directives have been implemented:
  - (i) Directive 2009/147/EC of the European Parliament and of the Council<sup>9</sup>;
  - (ii) Council Directive 92/43/EEC<sup>10</sup>;
  - (iii) an Environmental Impact Assessment (EIA) as defined in Article 1(2), point (g), of Directive 2011/92/EU of the European Parliament and of the Council<sup>11</sup>;
  - (iv) for activities located in third countries, conclusions, mitigation measures or impact assessments adopted in accordance with national provisions or international standards that are equivalent to the Directives and impact assessments listed in points (i), (ii) and (iii);
- (19) 'biodiversity-sensitive areas' means Natura 2000 network of protected areas, UNESCO World Heritage sites and Key Biodiversity Areas ('KBAs'), as well as other protected areas, as referred to in Appendix D of Annex II to Commission Delegated Regulation (EU) 2021/2139<sup>12</sup>;
- (20) 'threatened species' means endangered species, including flora and fauna, listed in the European Red List or the IUCN Red List, as referred to in Section 7 of Annex II to Delegated Regulation (EU) 2021/2139;
- (21) 'deforestation' means the temporary or permanent human-induced conversion of forested land to non-forested land;
- (22) 'UN Global Compact principles' means the ten Principles of the United Nations Global Compact;

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Directive 2009/147/EC of the European Parliament and of the Council of 30 November 2009 on the conservation of wild birds (OJ L 20, 26.1.2010, p. 7).

Council Directive 92/43/EEC of 21 May 1992 on the conservation of natural habitats and of wild fauna and flora (OJ L 206, 22.7.1992, p. 7).

Directive 2011/92/EU of the European Parliament and of the Council of 13 December 2011 on the assessment of the effects of certain public and private projects on the environment (OJ L 026, 28.1.2012, p. 1).

<sup>12</sup> Commission Delegated Regulation (EU) 2021/2139 of 4 June 2021 supplementing Regulation (EU) 2020/852 of the European Parliament and of the Council by establishing the technical screening criteria for determining the conditions under which an economic activity qualifies as contributing substantially to climate change mitigation or climate change adaptation and for determining whether that economic activity causes no significant harm to any of the other environmental objectives (OJ L 442, 9.12.2021, p. 1).

- (23) 'unadjusted gender pay gap' means the difference between average gross hourly earnings of male paid employees and of female paid employees;
- (24) 'board' means the administrative, management or supervisory body of a company;
- (25) 'human rights policy' means a policy commitment approved at board level on human rights that the economic activities of the investee company shall be in line with the UN Guiding Principles on Business and Human Rights;
- (26) 'whistleblower' means 'reporting person' as defined in Article 5(7) of Directive (EU) 2019/1937 of the European Parliament and of the Council 13;
- 'inorganic pollutants' means emissions within or lower than the emission levels associated with the best available techniques (BAT-AEL) as defined in Article 3, point (13) of Directive 2010/75/EU of the European Parliament and of the Council<sup>14</sup>, for the Large Volume Inorganic Chemicals- Solids and Others industry;
- (28) 'air pollutants' means direct emissions of sulphur dioxides (SO<sub>2</sub>), nitrogen oxides (NO<sub>x</sub>), non-methane volatile organic compounds (NMVOC), and fine particulate matter (PM<sub>2,5</sub>) as defined in Article 3, points (5) to (8), of Directive (EU) 2016/2284 of the European Parliament and of the Council<sup>15</sup>, ammonia (NH<sub>3</sub>) as referred to in that Directive and heavy metals (HM) as referred to in Annex I to that Directive;
- (29) 'ozone depletion substances' mean substances listed in the Montreal Protocol on Substances that Deplete the Ozone Layer.

For the purposes of this Annex, the following formulas shall apply:

(1) 'GHG emissions' shall be calculated in accordance with the following formula:

$$\sum_{n=1}^{i} \left( \frac{\text{current value of investment}_{i}}{\text{investee company's enterprise value}_{i}} \times \text{investee company's Scope}(x) \text{ GHG emissions}_{i} \right)$$

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Directive (EU) 2019/1937 of the European Parliament and of the Council of 23 October 2019 on the protection of persons who report breaches of Union law (OJ L305, 26.11.2019, p. 17).

Directive 2010/75/EU of the European Parliament and of the Council of 24 November 2010 on industrial emissions (integrated pollution prevention and control) (OJ L 334, 17.12.2010, p. 17).

Directive (EU) 2016/2284 of the European Parliament and of the Council of 14 December 2016 on the reduction of national emissions of certain atmospheric pollutants, amending Directive 2003/35/EC and repealing Directive 2001/81/EC (Text with EEA relevance), *OJ L 344*, *17.12.2016*, *p. 1–31* 

(2) 'carbon footprint' shall be calculated in accordance with the following formula:

$$\frac{\sum_{n}^{i} \left(\frac{current\ value\ of\ investment_{i}}{investee\ company's\ enterprise\ value_{i}} \times investee\ company's\ Scope\ 1, 2\ and\ 3\ GHG\ emissions_{i}\right)}{current\ value\ of\ all\ investments\ (\notin M)}$$

(3) 'GHG intensity of investee companies' shall be calculated in accordance with the following formula:

$$\sum_{n}^{i} \left( \frac{current \ value \ of \ investment_{i}}{current \ value \ of \ all \ investments} ( \in M ) \times \frac{investee \ company's \ Scope \ 1, 2 \ and \ 3 \ GHG \ emissions_{i}}{investee \ company's \ \in M \ revenue_{i}} \right)$$

(4) 'GHG intensity of sovereigns' shall be calculated in accordance with the following formula:

$$\sum_{n}^{i} \left( \frac{current \ value \ of \ investment_{i}}{current \ value \ of \ all \ investments} ( \in \! M ) \times \frac{The \ country's \ Scope \ 1, 2 \ and \ 3 \ GHG \ emissions_{i}}{Gross \ Domestic \ Product_{i}( \in \! M )} \right)$$

(5) 'inefficient real estate assets' shall be calculated in accordance with the following formula:

((Value of real estate assets built before 31/12/2020 with EPC of C or below) + (Value of real estate assets built after 31/12/2020 with PED below NZEB in Directive 2010/31/EU)) Value of real estate assets required to abide by EPC and NZEB rules

For the purposes of the formulas, the following definitions shall apply:

- (1) 'current value of investment' means the value in EUR of the investment by the financial market participant in the investee company;
- (2) 'enterprise value' means the sum, at fiscal year-end, of the market capitalisation of ordinary shares, the market capitalisation of preferred shares, and the book value of total debt and non-controlling interests, without the deduction of cash or cash equivalents;
- (3) 'current value of all investments' means the value in EUR of all investments by the financial market participant;

(4) 'nearly zero-energy building (NZEB)', 'primary energy demand (PED)' and 'energy performance certificate (EPC)' shall have the meanings given to them in paragraphs 2, 5 and 12 of Article 2 of Directive 2010/31/EU of the European Parliament and of the Council<sup>16</sup>.

#### Table 1

## Statement on principal adverse impacts of investment decisions on sustainability factors

Financial market participant, PAYDEN USD LOW DURATION CREDIT FUND, 549300NYCG2Q5B5KVW94

#### Summary

PAYDEN USD LOW DURATION CREDIT FUND, LEI: 549300NYCG2Q5B5KVW94, considers principal adverse impacts of its investment decisions on sustainability factors.

This statement on principal adverse impacts on sustainability factors covers the reference period from 29 November 2022 to 31 December 2022. From 1 January 2022 to 28 November 2022 the Fund did not consider adverse impacts of investment decisions on sustainability factors within the framework of SFDR. During that period, the Fund was undertaking preparatory work in consultation with Payden & Rygel, the Sub-Investment Manager, to consider these impacts, to devise and implement associated due diligence policies and to report on the same. The Fund considered it prudent to monitor the evolution in the implementation of SFDR and to evaluate developments in the availability of data and evaluation methodologies with the aim of implementing the consideration of adverse impacts in conjunction with application regulatory deadlines. With effect from 29 November 2022, the Fund considered principal adverse impacts of its investment decisions on sustainability factors. As such, the assessment of the impact for 31 December 2022 is not based on the average of four calculations for this reference period, but based solely on information available at 31 December 2022.

The following report contains information relating to all mandatory principal adverse impacts together with two further principal adverse impacts namely: Investments in companies without carbon emission reduction initiatives and Average corruption score. This report is based on available data or metrics from MSCI related to the relevent holdings as of 31 December 2022. Data coverage may vary by PAI topic based on methodology, disclosures and time periods.

Directive 2010/31/EU of the European Parliament and of the Council of 19 May 2010 on the energy performance of buildings (recast) (OJ L 153, 18.6.2010, p. 13)

|                             |                       | Indicato                 | rs applicable to investi | ments in inves           | tee companies   |  |
|-----------------------------|-----------------------|--------------------------|--------------------------|--------------------------|---|--|
| Adverse sus                 | tainability indicator | Metric                   | Impact<br>[year n]       | Impact<br>[year n-<br>1] | Explanation   | Actions taken, and actions planned and targets set for the nex reference period  |
|                             |                       | CLIMATE                  | AND OTHER ENVIRON        | IMENT-RELATE             | ED INDICATORS   |  |
| Greenhouse gas<br>emissions | 1. GHG emissions      | Scope 1 GHG<br>emissions | 3,807.78                 | N/A                      | Sum of portfolio companies' Carbon Emissions - Scope 1 (tCO2e) weighted by the portfolio's value of investment in a company and by the company's most recently available enterprise value including cash. Emissions are grossed up to represent 100% of the Fund's relevant holdings. | The Fund has sought and continues to seek to maintain a greenhouse gas intensity of investee companies that is at less than the Corporat GHG Intensity of the  |
|                             |                       | Scope 2 GHG emissions    | 1,644.32                 | N/A                      | Sum of portfolio companies' Carbon Emissions - Scope 2 (tCO2e) weighted by the portfolio's value of investment in a company and by the company's most recently available enterprise value including cash. Emissions are grossed up to represent 100% of the Fund's relevant holdings. | ESG Universe. GHG emissions is defined a scope 1, 2 and 3 normalized by sales in euros. Please find additional details in the Fund's Annex II disclosure here: |
|                             |                       | Scope 3 GHG<br>emissions | 66,642.35                | N/A                      | Sum of portfolio companies' Scope 3 – Total Emission Estimated (tCO2e) weighted by the portfolio's value of investment in a company and by the  | Payden & Rygel<br>Investment<br>Management   |

|                        |                     |           | 1    | 1 1 1 11 11 11                             |                          |
|------------------------|---------------------|-----------|------|--|--------------------------|
|                        |                     |           |      | company's most recently available          |                          |
|                        |                     |           |      | enterprise value including cash.           |                          |
|                        |                     |           |      | Emissions are grossed up to represent      |                          |
|                        |                     |           |      | 100% of the Fund's relevant holdings.      |                          |
|                        | Total GHG           | 72,094.45 | N/A  | The total annual Scope 1, Scope 2, and     |                          |
|                        | emissions           | 72,034.43 | 11/7 | estimated Scope 3 GHG emissions            |                          |
|                        |                     |           |      | associated with the market value of the    |                          |
|                        |                     |           |      | portfolio. Companies' carbon emissions     |                          |
|                        |                     |           |      | are apportioned across all outstanding     |                          |
|                        |                     |           |      | shares and bonds (based on the most        |                          |
|                        |                     |           |      | recently available enterprise value        |                          |
|                        |                     |           |      | including cash). Emissions are grossed up  |                          |
|                        |                     |           |      | to represent 100% of the Fund's relevant   |                          |
|                        |                     |           |      | holdings.                                  |                          |
| 2. Carbon footprint    | Carbon footprint    | 400.50    |      | The total annual Scope 1, Scope 2, and     |                          |
| ·                      |                     | 430.52    | N/A  | estimated Scope 3 GHG emissions            |                          |
|                        |                     |           |      | associated with 1 million EUR invested in  |                          |
|                        |                     |           |      | the portfolio. Companies' carbon           |                          |
|                        |                     |           |      | emissions are apportioned across all       |                          |
|                        |                     |           |      | outstanding shares and bonds (Scope 1,     |                          |
|                        |                     |           |      | Scope 2 and estimated Scope 3 GHG          |                          |
|                        |                     |           |      | emissions/ the most recently available     |                          |
|                        |                     |           |      | enterprise value including cash).          |                          |
| 3. GHG intensity of    | GHG intensity of    |           | _    | The portfolio's weighted average of its    |                          |
| investee companies     | investee companies  | 766.75    | N/A  | holding issuers' GHG Intensity (Scope 1,   |                          |
|                        | paes                |           |      | Scope 2 and estimated Scope 3 GHG          |                          |
|                        |                     |           |      | emissions/EUR million revenue).            |                          |
| 4. Exposure to         | Share of            |           |      | The percentage of the portfolio's market   |                          |
| companies active in    | investments in      | 10.86%    | N/A  | value exposed to issuers with fossil fuels | The Fund has sought      |
| the fossil fuel sector | companies active in |           |      | related activities, including extraction,  | and continues to seek    |
| the rossil ruer sector | the fossil fuel     |           |      | processing, storage and transportation     | to attain E/S            |
|                        | sector              |           |      | of petroleum products, natural gas, and    | Characteristics through  |
|                        | 30001               |           |      | thermal and metallurgical coal.            | restrictions and         |
|                        |                     |           |      | thermal and metallargical coal.            | exclusions on activities |
|                        |                     |           |      |  | that could be deemed     |

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|                       |                    |               |      |                                       | harmful to society or  |
|-----------------------|--------------------|---------------|------|---------------------------------------|------------------------|
|                       |                    |               |      |                                       | the environment. The   |
|                       |                    |               |      |                                       | ESG Investment         |
|                       |                    |               |      |                                       | Exclusions Policy      |
|                       |                    |               |      |                                       | includes securities    |
|                       |                    |               |      |                                       | relating to oil & gas  |
|                       |                    |               |      |                                       | and thermal coal based |
|                       |                    |               |      |                                       | on revenue thresholds. |
|                       |                    |               |      |                                       | Please find more       |
|                       |                    |               |      |                                       | information here:      |
|                       |                    |               |      |                                       | Payden & Rygel         |
|                       |                    |               |      |                                       | <u>Investment</u>      |
|                       |                    |               |      |                                       | <u>Management</u>      |
| 5. Share of non-      | Share of non-      | 67.04%        | N/A  | The portfolio's weighted average of   | The Investment         |
| renewable energy      | renewable energy   | 07.0476       | IN/A | issuers' energy consumption and/or    | Manager has            |
| consumption and       | consumption and    |               |      | production from non-renewable sources | undertaken and         |
| production            | non-renewable      |               |      | as a percentage of total energy used  | continues to undertake |
|                       | energy production  |               |      | and/or generated.                     | targeted engagements   |
|                       | of investee        |               |      |                                       | that seek specific     |
|                       | companies from     |               |      |                                       | outcomes related to    |
|                       | non-renewable      |               |      |                                       | ESG objectives. These  |
|                       | energy sources     |               |      |                                       | objectives align with  |
|                       | compared to        |               |      |                                       | behaviour's the        |
|                       | renewable energy   |               |      |                                       | Investment Manager     |
|                       | sources, expressed |               |      |                                       | believes support long- |
|                       | as a percentage of |               |      |                                       | term value             |
|                       | total energy       |               |      |                                       | creation/protection    |
|                       | sources            |               |      |                                       | and/or reflect the     |
| 6. Energy consumption | Energy             | NACE Code A   | N/A  | The portfolio's weighted average of   | values of those on     |
| intensity per high    | consumption in     | (Agriculture, | 11/7 | Energy Consumption Intensity          | whose behalf the Fund  |
| impact climate        | GWh per million    | Forestry and  |      | (GwH/million EUR revenue) for issuers | invests. As of 29      |
| sector                | EUR of revenue of  | Fishing)      |      | classified within NACE Code A         | November 2022          |
|                       | investee           | N/A           |      | (Agriculture, Forestry and Fishing)   | Payden formalized it's |
|                       | companies, per     |               |      |                                       | engagement policy      |

| high impact climate | NACE Code B           |      | The portfolio's weighted average of    | here: Payden & Rygel |
|---------------------|-----------------------|------|--|----------------------|
| sector              | (Mining and           | N/A  | Energy Consumption Intensity           | Investment           |
|                     | Quarrying)            |      | (GwH/million EUR revenue) for issuers  | Management           |
|                     | 1.56                  |      | classified within NACE Code B (Mining  |                      |
|                     | 2.00                  |      | and Quarrying)                         | A summary of 2022    |
|                     |                       |      | 3.12 Q33.1 (1.1.B)                     | engagements by PAI   |
|                     |                       |      | The portfolio's weighted average of    | topic can be found   |
|                     | NACE Code C           | N/A  | Energy Consumption Intensity           | <u>here.</u>         |
|                     | (Manufacturing)       |      | (GwH/million EUR revenue) for issuers  |                      |
|                     | 0.38                  |      | classified within NACE Code C          |                      |
|                     |                       |      | (Manufacturing)                        |                      |
|                     |                       |      | The portfolio's weighted average of    |                      |
|                     | NACE Code D           |      | Energy Consumption Intensity           |                      |
|                     | (Electricity, Gas,    | NA   | (GwH/million EUR revenue) for issuers  |                      |
|                     | Steam and             |      | classified within NACE Code D          |                      |
|                     | Air Conditioning      |      | (Electricity, Gas, Steam and Air       |                      |
|                     | Supply)               |      | Conditioning Supply)                   |                      |
|                     | 3.63                  |      |  |                      |
|                     | NACE Code E           | N/A  | The portfolio's weighted average of    |                      |
|                     | NACE Code E           | IN/A | Energy Consumption Intensity           |                      |
|                     | (Water Supply;        |      | (GwH/million EUR revenue) for issuers  |                      |
|                     | Sewerage,<br>Waste    |      | classified within NACE Code E (Water   |                      |
|                     |                       |      | Supply; Sewerage, Waste                |                      |
|                     | Management and        |      | Management and Remediation             |                      |
|                     | Remediation           |      | Activities)                            |                      |
|                     | Activities)           |      |  |                      |
|                     | 0.72                  |      |  |                      |
|                     | NACE Code F           | N/A  | The portfolio's weighted average of    |                      |
|                     |                       | ,,,  | Energy Consumption Intensity           |                      |
|                     | (Construction)<br>N/A |      | (GwH/million EUR revenue) for issuers  |                      |
|                     | IN/A                  |      | classified within NACE Code F          |                      |
|                     |                       |      | (Construction)                         |                      |
|                     |                       |      |  |                      |
|                     |                       | N/A  | The fund's weighted average of Energy  |                      |
|                     |                       | ,    | Consumption Intensity (GwH/million EUR |                      |

|              |   |  | NACE Code G (Wholesale and Retail Trade; Repair of Motor Vehicles and Motorcycles) 0.07  NACE Code H (Transportation and Storage) 10.44  NACE Code L (Real Estate Activities) 0.46 | N/A<br>N/A | revenue) for issuers classified within NACE Code G (Wholesale and Retail Trade; Repair of Motor Vehicles and Motorcycles)  The portfolio's weighted average of Energy Consumption Intensity (GwH/million EUR revenue) for issuers classified within NACE Code H (Transportation and Storage)  The portfolio's weighted average of Energy Consumption Intensity (GwH/million EUR revenue) for issuers classified within NACE Code L (Real Estate Activities) |  |
|--------------|---|--|--|------------|---|--|
| Biodiversity | 7. Activities negatively affecting biodiversity-sensitive areas | Share of investments in investee companies with sites/operations located in or near to biodiversity-sensitive areas where activities of those investee companies negatively affect those areas | 0.26%  | N/A        | The percentage of the portfolio's market value exposed to issuers' that reported having operations in or near biodiversity sensitive areas and have been implicated in controversies with severe or very severe impacts on the environment.   |  |
| Water        | 8. Emissions to water   | Tonnes of emissions to water generated by  | 0.00   | N/A        | The total annual wastewater discharged (metric tons reported) into surface waters as a result of industrial or  |  |

|                             |  | investee companies<br>per million EUR<br>invested, expressed<br>as a weighted<br>average  |                   |            | manufacturing activities associated with 1 million EUR invested in the portfolio. Companies' water emissions are apportioned across all outstanding shares and bonds (based on the most recently available enterprise value including cash).                               |   |
|-----------------------------|--|---|-------------------|------------|--|---|
| Waste                       | 9. Hazardous waste and radioactive waste ratio   | Tonnes of hazardous waste and radioactive waste generated by investee companies per million EUR invested, expressed as a weighted average | 0.51              | N/A        | The total annual hazardous waste (metric tons reported) associated with 1 million EUR invested in the portfolio. Companies' hazardous waste is apportioned across all outstanding shares and bonds (based on the most recently available enterprise value including cash). |   |
| INDICATORS F                | FOR SOCIAL AND EMPLOYEE,   |   | RIGHTS, ANTI-CORR | JPTION AND |  |   |
| Social and employee matters | 10. Violations of UN Global Compact principles and Organisation for Economic Cooperation and Development | Share of investments in investee companies that have been involved in violations of the UNGC principles or OECD Guidelines                | 0.00%             | N/A        | The percentage of the portfolio's market value exposed to issuers with very severe controversies related to the company's operations and/or products.  | The Fund's Governance Assessment has evaluated and continues to evaluate corporate issuers based on available, quantitative information in order to |

|                       |                     |        | l .  |  | 1                      |
|-----------------------|---------------------|--------|------|--|------------------------|
|                       |                     |        |      |  | investable universe.   |
|                       |                     |        |      |  | Companies in violation |
|                       |                     |        |      |  | are excluded based on  |
|                       |                     |        |      |  | the Payden Good        |
|                       |                     |        |      |  | Governance Policy.     |
|                       |                     |        |      |  | Please find more       |
|                       |                     |        |      |  | information here:      |
|                       |                     |        |      |  | Payden & Rygel         |
|                       |                     |        |      |  | <u>Investment</u>      |
|                       |                     |        |      |  | <u>Management</u>      |
| 11. Lack of processes | Share of            | 63.00% | N/A  | The percentage of the portfolio's market | The Investment         |
| and compliance        | investments in      | 03.00% | IN/A | value exposed to issuers that are not    | Manager has            |
| mechanisms to         | investee companies  |        |      | signatories in the UN Global Compact.    | undertaken and         |
| monitor compliance    | without policies to |        |      |  | continues to undertake |
| with UN Global        | monitor             |        |      |  | targeted engagements   |
| Compact principles    | compliance with     |        |      |  | that seek specific     |
| and OECD              | the UNGC            |        |      |  | outcomes related to    |
| Guidelines for        | principles or OECD  |        |      |  | ESG objectives. These  |
| Multinational         | Guidelines for      |        |      |  | objectives align with  |
| Enterprises           | Multinational       |        |      |  | behaviour's the        |
|                       | Enterprises or      |        |      |  | Investment Manager     |
|                       | grievance           |        |      |  | believes support long- |
|                       | /complaints         |        |      |  | term value             |
|                       | handling            |        |      |  | creation/protection    |
|                       | mechanisms to       |        |      |  | and/or reflect the     |
|                       | address violations  |        |      |  | values of those on     |
|                       | of the UNGC         |        |      |  | whose behalf the Fund  |
|                       | principles or OECD  |        |      |  | invests. As of 29      |
|                       | Guidelines for      |        |      |  | November 2022          |
|                       | Multinational       |        |      |  | Payden formalized it's |
|                       | Enterprises         |        |      |  | engagement policy      |
| 12. Unadjusted gender | Average unadjusted  | 23.31% | NI/A | The portfolio holdings' weighted average | here: Payden & Rygel   |
| pay gap               | gender pay gap of   | 23.31% | N/A  | of the difference between the average    | <u>Investment</u>      |
|                       | investee companies  |        |      | gross hourly earnings of male and female | <u>Management</u>      |

|   |   |        |     | employees, as a percentage of male gross earnings.   | A summary of 2022<br>engagements by PAI   |
|---|---|--------|-----|--|---|
| 13. Board gender diversity  | Average ratio of female to male board members in investee companies, expressed as a percentage of all board members | 33.32% | N/A | The portfolio holdings' weighted average of the ratio of female to male board members.   | topic can be found here here.   |
| 14. Exposure to controversial weapons (antipersonnel mines, cluster munitions, chemical weapons and biological weapons) | Share of investments in investee companies involved in the manufacture or selling of controversial weapons          | 0.00%  | N/A | The percentage of the portfolio's market value exposed to issuers with an industry tie to landmines, cluster munitions, chemical weapons or biological weapons. Note: Industry ties includes ownership, manufacturing and investments. Ties to landmines do not include related safety products. | Fund has sought and continues to seek to attain E/S Characteristics through restrictions and exclusions on activities that could be deemed harmful to society or the environment. The ESG Investment Exclusions Policy includes securities relating to controversial weapons. Please find more information here: Payden & Rygel Investment Management |

|               | Indicators applicable to investments in sovereigns and supranationals |   |                 |                          |  |  |
|---------------|---|---|-----------------|--------------------------|--|--|
| Adverse su    | stainability indicator  | Metric                                  | Impact [year n] | Impact<br>[year n-<br>1] | Explanation  | Actions taken, and actions planned and targets set for the next reference period   |
| Environmental | 15. GHG intensity   | GHG intensity of investee countries     | N/A             | N/A                      | The portfolio's weighted average of sovereign issuers' GHG Emissions Intensity (Scope 1, 2 and 3 emissions/EUR M GDP). | The Fund has sought and continues to seek to maintain a greenhouse gas intensity of investee countries that is no greater than the Sovereign GHG Intensity of the ESG Universe. GHG emissions is defined as relative to gross domestic product (GHG/GDP) with emissions encompassing scope 1, 2 and 3. Please find additional details in the Fund's Annex II disclosure here: Payden & Rygel Investment Management |
| Social        | 16. Investee countries subject to social violations                   | Number of investee countries subject to | N/A<br>N/A      | N/A<br>N/A               | The portfolio's number of unique sovereign issuers with European External Action Service (EEAS) restrictive            | The Investment<br>Manager has<br>undertaken and  |

| social violations | measures (sanctions) on imports and | continues to undertake  |
|-------------------|-------------------------------------|-------------------------|
| (absolute number  | exports.                            | targeted engagements    |
| and relative      | exports.                            | that seek specific      |
| number divided by |                                     | outcomes related to     |
| all investee      |                                     | ESG objectives. These   |
| countries), as    |                                     | objectives align with   |
| referred to in    |                                     | behaviour's the         |
| international     |                                     | Investment Manager      |
| treaties and      |                                     | believes support long-  |
| conventions,      |                                     | term value              |
| United Nations    |                                     | creation/protection     |
| principles and,   |                                     | and/or reflect the      |
| where applicable, |                                     | values of those on      |
| national law      |                                     | whose behalf the Fund   |
| Hational law      |                                     | invests. As of 29       |
|                   |                                     | November 2022           |
|                   |                                     | Payden formalized it's  |
|                   |                                     | engagement policy       |
|                   |                                     | here: Payden & Rygel    |
|                   |                                     | Investment              |
|                   |                                     | <u>Management</u>       |
|                   |                                     |                         |
|                   |                                     | A summary of 2022       |
|                   |                                     | engagements by PAI      |
|                   |                                     | topic can be found here |
|                   |                                     | <u>here.</u>            |
|                   |                                     |                         |
|                   |                                     |                         |
|                   |                                     |                         |
|                   |                                     |                         |

|                   | Indicators applicable to investments in real estate assets   |  |                 |                          |             |  |
|-------------------|--|--|-----------------|--------------------------|-------------|--|
| Adverse           | sustainability indicator                                     | Metric   | Impact [year n] | Impact<br>[year n-<br>1] | Explanation | Actions taken, and actions planned and targets set for the next reference period |
| Fossil fuels      | 17. Exposure to fossil fuels through real estate assets      | Share of investments in real estate assets involved in the extraction, storage, transport or manufacture of fossil fuels | N/A             | N/A                      | N/A         | N/A  |
| Energy efficiency | 18. Exposure to energy-<br>inefficient real<br>estate assets | Share of investments in energy-inefficient real estate assets  | N/A             | N/A                      | N/A         | N/A  |

## Other indicators for principal adverse impacts on sustainability factors

Other adverse impacts on sustainability factors used to identify and assess additional principal adverse impacts on a sustainability factors:

In addition to the set of mandatory indicators above, the Fund considers two additional indicators subject to data availability.

**Table 2, Indicator 4**: Investments in companies without carbon emission reduction initiatives. This indicator measures the share of investments in investee companies without carbon emission reduction initiatives aimed at aligning with the Paris Agreement. It is mitigated through the application of the Payden ESG Engagement Policy (ESG Engagement.pdf (payden.com).

**Table 3, indicator 21**: Average corruption score. This indicator measures the perceived level of public sector corruption using a quantitative indicator. It is mitigated through the application of the Payden ESG Engagement Policy (<u>ESG\_Engagement.pdf (payden.com)</u>.

## Description of policies to identify and prioritise principal adverse impacts on sustainability factors:

Where information relating to any of the indictors used is not readily available, the Company uses third party data providers or external experts for making reasonable assumptions.

Payden Global Funds Plc (the "Company") implemented a Principle Adverse Impact ("PAI") Statement as of 29 November 2022. The Statement to identify and prioritise PAIs on sustainability factors was approved by KBA Consulting Management Limited (the "Manager") the manager of the Company, on 29 November 2022. The ESG committee (the "ESG Committee") of Payden & Rygel, the sub-investment manager of the Company ("Payden") is responsible for oversight of the implementation of this ESG Principal Adverse Impact Statement working in conjunction with all of Payden's investment research and strategy teams. Payden's ESG-Compliance Sub-Committee is responsible for the monitoring and testing of this ESG Principal Adverse Impact Statement. The managing committee of Payden reviews and updates the ESG Principal Adverse Impact Statement at least annually and periodically as appropriate upon the advice of the ESG Committee and compliance group. Please find more information at ESG PAI Statement.pdf (payden.com).

The Company identifies and addresses the principal adverse impacts and indicators and set parameters on a sub-fund-by-sub-fund basis for how principal adverse impacts are considered in the investment process. Payden seeks to manage the risks connected with potential adverse impacts from the Company's investments as outlined by SFDR regulation. Payden mitigates these risks in various ways, including (i) the application of the Payden ESG Investment Exclusion Policy (ESG Exclusions.pdf (payden.com)), (ii) promotion of E/S characteristics and (iii) the application of the Payden ESG Engagement Policy (ESG Engagement.pdf (payden.com)). In addition, Payden periodically reviews this disclosure and the data sources and methodologies used to assess and mitigate principal adverse impacts. The Principal Adverse Impact Statement takes a quantitative and data driven approach and is used globally across relevant products. Payden places reliance on third party data for this analysis and periodically evaluates the data and service providers through due diligence. For a list of data providers that the Company uses, please find more information at http://www.payden.com/SFDRPolicies/ESG Data.pdf.

One of the challenges faced by the investment management industry when integrating sustainability risks, Principal Adverse Impacts, or ESG considerations in the investment process is the limited availability of relevant data for that purpose. For some areas of the market, data is not yet systematically disclosed by issuers or, when disclosed by issuers, may be incomplete or may follow different methodologies. Information used to establish Payden's ESG Policies or determine applicable ESG factors for any portfolio is typically based on historical data, which may not be complete or may not fully reflect the future ESG performance or risks of the investments.

Principle Adverse Impact data is sourced and calculated by MSCI.

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warranties. No MSCI Party shall have any liability for any errors or omissions in connection with any Information herein, or any liability for any direct, indirect, special, punitive, consequential or any other damages (including lost profits) even if notified of the possibility of such damages.

### **Engagement policies**

The Company believes environmental, social and governance ("ESG") factors can impact the long-term financial performance of an issuer and to the performance of its securities. Payden deems engagement, as described in its ESG engagement policy (the "ESG Engagement Policy") to be a tool to understanding how issuers intend to deal with ESG issues over time. In addition, Payden views engagement as an opportunity to learn about an issuer's response to the evolving ESG landscape.

Payden, on behalf of the Company, uses targeted engagements to seek specific outcomes related to ESG objectives. These objectives align with initiatives Payden believes support long-term value creation/protection and/or reflect the values of those on whose behalf the Company invests. Payden utilizes several methods for conducting targeted engagements in its stewardship efforts. The method and frequency of engagement are determined by several factors including Payden's history of engagement with the issuer, the relevant issue, and asset class. More information can be found at <a href="ESG\_ENgagement.pdf">ESG\_ENgagement.pdf</a> (payden.com). Examples of enterprise-wide initiatives which are integrated into the targeted engagement process include Principal Adverse Impacts. The Company seeks to manage the risks connected with potential adverse impacts from its investments in various ways, including engagement. More information can be found at <a href="https://www.payden.com/SFDRPolices/ESG\_PAI\_Statement.pdf">www.payden.com/SFDRPolices/ESG\_PAI\_Statement.pdf</a>.

#### References to international standards

The Company adheres to responsible business conduct codes and internationally recognised standards for due diligence and reporting and evaluations the degree of issuers alignment objectives of the Paris Agreement. Where relevant, alignment with global norms is evaluated by Payden's ESG Good Governance Policy. The policy is applicable in the evaluation of corporate issuers based on available, quantitative information in order to define a broad and global investment universe. This includes the requirement that corporate issuers must not be in violation of the United Nations Global Compact. Issuers with controversies due to situations such as regulatory action or violations of commonly accepted international norms, are judged to have operations or products that may have a negative ESG impact. These issuers are not eligible for funds designated Article 8 financial products pursuant to the Sustainable Finance Disclosure Regulation (EU 2019/2088) and are reference above under PAI 10: Violations of UN Global Compact principles and Organisation for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises .

The Company addresses Climate Change Mitigation ("Climate Change Mitigation") as a binding element. The Company promotes certain environmental characteristics focusing on climate change mitigation Climate Change Mitigation. This is measured via greenhouse gas intensity data and climate score of the underlying securities of each sub-fund. Each sub-fund's portfolio's greenhouse gas intensity is compared to the relevant comparable investment universe which is representative of the broad portfolio allocation for the sub-fund. Below are the sustainability indicators used by the Company to measure Climate Change Mitigation where data is available:

I. Corporate Investments: The Company will seek to maintain a greenhouse gas intensity of investee companies ("Corporate GHG Intensity") that is lower than the Corporate GHG Intensity of the ESG Universe calculated as described above. Each sub-fund's Corporate GHG Intensity is measured as the weighted average carbon emissions in-line with Principal Adverse Impacts ("PAIs") pursuant to Article 7 under SFDR (PAI 3: Green House Gas (GHG) emissions – scope 1, 2 and 3 normalized by sales in euros). More information can be found at 549300NYCG2Q5B5KVW94.pdf (payden.com).

One of the challenges faced by the investment management industry when integrating sustainability risks, Principal Adverse Impacts, or ESG considerations in the investment process is the limited availability of relevant data for that purpose. For some areas of the market, data is not yet systematically disclosed by issuers or, when disclosed by issuers, may be incomplete or may follow different methodologies. Information used to establish Payden's ESG Policies or determine applicable ESG factors for any portfolio is typically based on historical data, which may not be complete or may not fully reflect the future ESG performance or risks of the investments. A forward looking climate scenario is not used in measuring the E/S Characteristics of the fund given the variability of assumptions in underlying models. Data is sourced from MSCI and ICE Climate. For a list of data providers used by Payden, please find more information at <a href="http://www.payden.com/SFDRPolicies/ESG">http://www.payden.com/SFDRPolicies/ESG</a> Data.pdf

### **Historical comparison**

The assessment of the impact for 31 December is not based on the average of four calculations for this reference period, but based only on information available at 31 December 2022.

Table 2
Additional climate and other environment-related indicators

| Adverse<br>sustainability<br>impact | Adverse impact on sustainability factors (qualitative or quantitative) | Metric  |
|-------------------------------------|--|---|
|                                     | Indicators applicable to investments in investee companies             |   |
|                                     | CLIMATE AND OTHER ENVIRONMENT-RELATED INDICATORS                       |   |
| Emissions                           | 1. Emissions of inorganic pollutants                                   | Tonnes of inorganic pollutants equivalent per million EUR invested, expressed as a weighted average       |
|                                     | 2. Emissions of air pollutants   | Tonnes of air pollutants equivalent per million EUR invested, expressed as a weighted average             |
|                                     | 3. Emissions of ozone-depleting substances                             | Tonnes of ozone-depleting substances equivalent per million EUR invested, expressed as a weighted average |

|                                     |   | ,   |
|-------------------------------------|---|---|
|                                     | 4. Investments in companies without carbon emission reduction initiatives     | Share of investments in investee companies without carbon emission reduction initiatives aimed at aligning with the Paris Agreement   |
| Energy<br>performance               | 5. Breakdown of energy consumption by type of non-renewable sources of energy | Share of energy from non-renewable sources used by investee companies broken down by each non-renewable energy source   |
| Water, waste and material emissions | 6. Water usage and recycling  | <ol> <li>Average amount of water consumed by the investee companies (in cubic meters) per million EUR of revenue of investee companies</li> <li>Weighted average percentage of water recycled and reused by investee companies</li> </ol> |
|                                     | 7. Investments in companies without water management policies                 | Share of investments in investee companies without water management policies  |

| 8. Exposure to areas of high water stress                                   | Share of investments in investee companies with sites located in areas of high water stress without a water management policy          |
|---|--|
| 9. Investments in companies producing chemicals                             | Share of investments in investee companies the activities of which fall under Division 20.2 of Annex I to Regulation (EC) No 1893/2006 |
| 10. Land degradation, desertification, soil sealing                         | Share of investments in investee companies the activities of which cause land degradation, desertification or soil sealing             |
| 11. Investments in companies without sustainable land/agriculture practices | Share of investments in investee companies without sustainable land/agriculture practices or policies                                  |
| 12. Investments in companies without sustainable oceans/seas practices      | Share of investments in investee companies without sustainable   |

|   | , .   |
|---|---|
|   | oceans/seas practices or  |
|   | policies  |
| 13. Non-recycled waste ratio            | Tonnes of non-recycled waste generated by investee companies per million EUR invested,  |
|   | expressed as a weighted average   |
| 14. Natural species and protected areas | 1.Share of investments in investee companies whose operations affect threatened species   |
|   | 2.Share of investments in investee companies without a biodiversity protection policy covering operational                      |
|   | sites owned, leased, managed in, or adjacent to, a protected area or an area of high biodiversity value outside protected areas |

|                          | 15. Deforestation   | Share of investments in companies without a policy to address deforestation                                |
|--------------------------|---|--|
| Green securities         | 16. Share of securities not issued under Union legislation on environmentally sustainable bonds | Share of securities in investments not issued under Union legislation on environmentally sustainable bonds |
|                          | Indicators applicable to investments in sovereigns and supranationals                           |  |
| Green securities         | 17. Share of bonds not issued under Union legislation on environmentally sustainable bonds      | Share of bonds not issued under Union legislation on environmentally sustainable bonds                     |
|                          | Indicators applicable to investments in real estate assets                                      |  |
| Greenhouse gas emissions | 18. GHG emissions   | Scope 1 GHG emissions generated by real estate assets  |

|                         |  | Scope 2 GHG emissions generated by real estate assets  |
|-------------------------|--|--|
|                         |  | Scope 3 GHG emissions generated by real estate assets  |
|                         |  | Total GHG emissions generated by real estate assets  |
| Energy<br>consumption   | 19. Energy consumption intensity   | Energy consumption in GWh of owned real estate assets per square meter   |
| Waste                   | 20. Waste production in operations                                       | Share of real estate assets not equipped with facilities for waste sorting and not covered by a waste recovery or recycling contract   |
| Resource<br>consumption | 21. Raw materials consumption for new construction and major renovations | Share of raw building materials (excluding recovered, recycled and biosourced) compared to the total weight of building materials used |

|              |                            | in new construction and major renovations  |
|--------------|----------------------------|--|
| Biodiversity | 22. Land artificialisation | Share of non-vegetated surface area (surfaces that have not been vegetated in ground, as well as on roofs, terraces and walls) compared to the total surface area of |
|              |                            | the plots of all assets  |

 Table 3

 Additional indicators for social and employee, respect for human rights, anti-corruption and anti-bribery matters

| INDICATO                            | RS FOR SOCIAL AND EMPLOYEE, RESPECT FOR HUMAN RIGHTS, ANTI-CORRUPTION AND  | ANTI-BRIBERY MATTERS                                       |
|-------------------------------------|--|--|
| Adverse<br>sustainability<br>impact | Adverse impact on sustainability factors (qualitative or quantitative)     | Metric   |
|                                     | Indicators applicable to investments in investee companies                 |  |
| Social and employee matters         | 1. Investments in companies without workplace accident prevention policies | Share of investments investee companie without a workplace |

|  | accident prevention policy   |
|--|--|
| 2. Rate of accidents   | Rate of accidents in investee companies expressed as a weighted average  |
| 3. Number of days lost to injuries, accidents, fatalities or illness           | Number of workdays lost<br>to injuries, accidents,<br>fatalities or illness of<br>investee companies<br>expressed as a weighted<br>average                           |
| 4. Lack of a supplier code of conduct  | Share of investments in investee companies without any supplier code of conduct (against unsafe working conditions, precarious work, child labour and forced labour) |
| 5. Lack of grievance/complaints handling mechanism related to employee matters | Share of investments in investee companies without any grievance/complaints handling mechanism related to employee matters   |

| 6. Insufficient whistleblower protection | Share of investments in entities without policies on the protection of whistleblowers   |
|--|---|
| 7. Incidents of discrimination           | 1. Number of incidents of discrimination reported in investee companies expressed as a weighted average   |
|  | 2. Number of incidents of discrimination leading to sanctions in investee companies expressed as a weighted average   |
| 8. Excessive CEO pay ratio               | Average ratio within investee companies of the annual total compensation for the highest compensated individual to the median annual total compensation for all employees (excluding the highest- |

| Human Rights | 9. Lack of a human rights policy   | Share of investments in entities without a human rights policy  |
|--------------|--|---|
|              | 10. Lack of due diligence  | Share of investments in entities without a due diligence process to identify, prevent, mitigate and address adverse human rights impacts  |
|              | 11. Lack of processes and measures for preventing trafficking in human beings                | Share of investments in investee companies without policies against trafficking in human beings   |
|              | 12. Operations and suppliers at significant risk of incidents of child labour                | Share of investments in investee companies exposed to operations and suppliers at significant risk of incidents of child labour in terms of geographic areas or type of operation |
|              | 13. Operations and suppliers at significant risk of incidents of forced or compulsory labour | Share of the investments in investee companies exposed to operations  |

|                  |  | and suppliers at           |
|------------------|--|----------------------------|
|                  |  | significant risk of        |
|                  |  | incidents of forced or     |
|                  |  | compulsory labour in       |
|                  |  | terms in terms of          |
|                  |  | geographic areas and/or    |
|                  |  | the type of operation      |
|                  | 14. Number of identified cases of severe human rights issues and incidents                 | Number of cases of         |
|                  |  | severe human rights        |
|                  |  | issues and incidents       |
|                  |  | connected to investee      |
|                  |  | companies on a             |
|                  |  | weighted average basis     |
| Anti-corruption  | 15. Lack of anti-corruption and anti-bribery policies                                      | Share of investments in    |
| and anti-bribery |  | entities without policies  |
|                  |  | on anti-corruption and     |
|                  |  | anti-bribery consistent    |
|                  |  | with the United Nations    |
|                  |  | Convention against         |
|                  |  | Corruption                 |
|                  | 16. Cases of insufficient action taken to address breaches of standards of anti-corruption | Share of investments in    |
|                  | and anti-bribery   | investee companies with    |
|                  |  | identified insufficiencies |
|                  |  | in actions taken to        |
|                  |  | address breaches in        |
|                  |  | procedures and             |
|                  |  | standards of anti-         |

|        |  | corruption and anti-<br>bribery  |
|--------|--|--|
|        | 17. Number of convictions and amount of fines for violation of anti-corruption and anti-bribery laws | Numbers of convictions and amount of fines for violations of anticorruption and antibribery laws by investee companies   |
|        | Indicators applicable to investments in sovereigns and supranationals                                |  |
| Social | 18. Average income inequality score  | The distribution of income and economic inequality among the participants in a particular economy including a quantitative indicator explained in the explanation column |
|        | 19. Average freedom of expression score  | Measuring the extent to which political and civil society organisations can operate freely including a quantitative indicator explained in the explanation column        |

|              | 20. Average human rights performance    |                            |
|--------------|---|----------------------------|
| Human rights | 5 - 1 - 1 - 1 - 1 - 1 - 1 - 1 - 1 - 1 - | Measure of the average     |
|              |   | human right                |
|              |   | performance of investee    |
|              |   | countries using a          |
|              |   | quantitative indicator     |
|              |   | explained in the           |
|              |   | explanation column         |
| Governance   | 21. Average corruption score            | Measure of the             |
| Covernance   |   | perceived level of public  |
|              |   | sector corruption using a  |
|              |   | quantitative indicator     |
|              |   | explained in the           |
|              |   | explanation column         |
|              | 22. Non-cooperative tax jurisdictions   |                            |
|              | 22. Non cooperative tax jurisdictions   | Investments in             |
|              |   | jurisdictions on the EU    |
|              |   | list of non-cooperative    |
|              |   | jurisdictions for tax      |
|              |   | purposes                   |
|              | 23. Average political stability score   | Measure of the             |
|              |   | likelihood that the        |
|              |   | current regime will be     |
|              |   | overthrown by the use of   |
|              |   | force using a quantitative |
|              |   | indicator explained in the |
|              |   | explanation column         |
|              | 24. Average rule of law score           |                            |
|              | 27. Average rate or law score           | Measure of the level of    |
|              |   | corruption, lack of        |

|  | fundamental rights, and    |
|--|----------------------------|
|  | the deficiencies in civil  |
|  | and criminal justice using |
|  | a quantitative indicator   |
|  | explained in the           |
|  | explanation column         |