



## **PUBLIC TRANSPARENCY REPORT**

**2024**

**IBERCAJA AM**

Generated 25-11-2024

# About this report

PRI reporting is the largest global reporting project on responsible investment. It was developed with investors, for investors.

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

The public Transparency Reports, which are produced using signatories' reported information, provide accountability and support signatories to have internal discussions about their practices and to discuss these with their clients, beneficiaries, and other stakeholders.

This public Transparency Report is an export of the signatory's responses to the PRI Reporting Framework during the 2024 reporting period. It includes the signatory's responses to core indicators, as well as responses to plus indicators that the signatory has agreed to make public.

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

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

## Disclaimers

### Legal Context

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

### Responsible investment definitions

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

### Data accuracy

This document presents information reported directly by signatories in the 2024 reporting cycle. This information has not been audited by the PRI or any other party acting on its behalf. While this information is believed to be reliable, no representations or warranties are made as to the accuracy of the information presented. The PRI has taken reasonable action to ensure that data submitted by signatories in the reporting tool is reflected in their official PRI reports accurately. However, it is possible that small data inaccuracies and/or gaps remain, and the PRI shall not be responsible or liable for such inaccuracies and gaps.

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# SENIOR LEADERSHIP STATEMENT (SLS)

## SENIOR LEADERSHIP STATEMENT

### SENIOR LEADERSHIP STATEMENT

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

#### Section 1. Our commitment

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

Since its origins, Ibercaja has been an entity with a clear social commitment in the development of its activity, focused on supporting the territory and the business fabric.

Along this path, it continues to make progress in order to respond to the growing needs linked to sustainability. In the development of its financial activity, Ibercaja considers that its actions should promote the balance between economic growth, social cohesion and environmental preservation, in accordance with its corporate purpose. Therefore, Ibercaja is firmly committed to the Sustainable Development Goals of the 2030 Agenda, with Ibercaja AM being a signatory of the United Nations Principles for Responsible Investment.

Ibercaja AM is the name given to Ibercaja Gestión and Ibercaja Pensión, as companies of the Ibercaja Group dedicated to asset management.

In 2011, Ibercaja AM began to integrate socially responsible investment criteria by implementing the UNPRI in its management, due to Ibercaja Pensión's adherence to this alliance and the launch of Ibercaja Pensión Sostenible y Solidario, managed by Ibercaja Gestión.

In November 2018, the Ibercaja Gestión launched the Ibercaja Sostenible y Solidario fund, being this the first product of the sustainable range of the entity, causing a great interest in our investors, reaching more than 700 million euros. Since then and progressively, Ibercaja AM has been completing the range of products until all the investment vocations observed in our investors have been fulfilled.

On this basis and as part of the Ibercaja Group, the Ibercaja AM's challenge is to ensure that its business objectives drive sustainable development, preserving natural resources and promoting a fairer and more inclusive society. To this end, it is making progress in the integration of ESG aspects (environmental, social and good governance) in its strategy and decision-making.

As a result of all the development that Sustainability has undergone at a regulatory and sectorial level, Ibercaja AM currently has a robust governance framework thanks to its ESG Policy, Sustainability risk integration policy, policies and manuals on main adverse incidents, Exclusions or Involvement Policy, among others. In addition, Ibercaja AM is a signatory of UNPRI, NZAMi, CDP, Access to Medicine, Climate Action 100+, as well as a member of Spainsif.

Social responsible investment is a fundamental aspect in the exercise of carrying out our professional activity. Our objective as a Group is to help our clients achieve their goals, as well as to return to society all the benefits obtained from our economic activity, through the four foundations that own the Ibercaja Group. Ibercaja AM allocates, through the Ibercaja Group and through the distribution of profits to the four foundations, all its profits to the performance of such activities, thus promoting social, economic and cultural activity in all the regions where it is installed, in addition to carrying out social actions with the most disadvantaged or for the care of the planet.

Ibercaja AM is aware of the relevance of the financial sector as a driver of the transition to a green economy and the defense of the rights and human dignity. In this sense, the decarbonization of portfolios has become an essential aspect when integrating sustainability risks and impacts into investment decision-making, as represented by the commitments made through the Net Zero Asset Managers Initiative.

Another fundamental aspect in the creation and development of sustainability strategies is the respect for human rights, trying to ensure that the aforementioned transition takes place in a fair manner and respecting people's dignity.

To this end, Ibercaja AM has identified the following key issues:

a) Environmental:

1. Increased costs linked to putting a price on the negative impact of CO2 emissions or imposing plant closures or taxes on dirty technologies.
2. Increased costs derived from the lack of adaptation of processes and/or facilities to water efficiency or pollution regulations.

b) Social:

1. Low productivity, production delays and low product quality resulting from poor management and/or lack of training and involvement of the labor force.
2. Costs and penalties derived from bad practices in Health and Safety at work.
3. Loss of growth opportunities, market share or pricing power due to reputational damage inherent in poor labor practices in the supply chain.
4. Loss of revenue due to reputational damage linked to the use of private data or litigation costs due to poor data security management.

c) Governance:

1. Aspects related to the composition and structure of the Boards of Directors that may result in difficulties for the correct oversight function.
2. Lack of alignment of the interests of capital providers with those of the management team, extending to other stakeholders (consumers, employees, suppliers, society).
3. Practices that indicate a lack of business ethics.

## Section 2. Annual overview

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

The evolution of sustainability in recent years has promoted Ibercaja AM to continuously monitor current trends, as well as to update the way it makes its investment decisions, always seeking the best interest of investors and their preferences in terms of sustainability. At present, Ibercaja AM has a portfolio of assets that responds to the main trends in the sector, as well as to the themes most in demand by our clients.

The investment fund portfolio of Ibercaja AM is presented to the client as an opportunity to satisfy their risk profile with equity, fixed income and mixed funds, where we have been able to observe a wide range of investment opportunities.

Thus, it has private fixed income and sustainable fixed income products, equity products, marked by thematic investment in access to healthcare in less developed countries, sustainable infrastructures, megatrends or renewable energies, as well as mixed funds and investment funds in third-party CIIs.

2023 has been a year marked by the growth of fixed income in the target return mode, marked by the increase in investment in public debt. In this regard, Ibercaja AM, although it currently has a procedure for measuring the promotion of environmental and/or social characteristics of public debt, considers that this type of product should not have art. 8 status according to SFDR. However, the entity monitors the ESG metrics of the countries, carrying out a comparative analysis with the countries with the highest level of development according to the World Bank classification.

For the valuation of this type of emissions, Ibercaja AM analyzes both the ESG rating granted by the supplier of these countries, as well as the evolutionary metrics of environmental, social and governance indicators. This methodology was reviewed in 2023.

One of the factors that have allowed the rapid integration of responsible investment criteria in the financial sector is collaboration between all actors. In this sense, Ibercaja AM tries to contribute and collaborate through the different channels and platforms, seeking to align the criteria for socially responsible investment and forge alliances that allow results to be optimised.

Ibercaja AM, within the framework of UNPRI, has participated in engagement actions of both the Advanced initiative and Climate Action 100+. These dialogues with invested companies have allowed us to obtain greater detail on the strategies of companies in terms of decarbonization and respect for Human Rights, as well as to take advantage of the knowledge shared through these channels, not only from other investors, but also thanks to professionals from international organizations and experts invited to talk about the different topics. In addition, Ibercaja AM is a signatory of CDP, an initiative that seeks to promote the breakdown of information in relation to climate and biodiversity aspects.

In 2024, Ibercaja AM has joined the Human Rights and Social Issues Reference Group within the UNPRI collaboration platform, with the aim of sharing with other asset managers and asset owners what are the main trends in companies' strategies in the care of human rights.

Ibercaja AM publishes on its corporate website (one publication for Ibercaja Gestión ([ibercajagestion.com](http://ibercajagestion.com)) and another for Ibercaja Pensión ([ibercajapension.com](http://ibercajapension.com))) the main results of its active dialogue with companies, as well as the votes cast at the shareholders' meetings attended.

For Ibercaja AM, active dialogue is an integral part of the circular process of integrating ESG risks into investment management, based on a medium and long-term ownership context, aligning with the investment thesis based on fundamental analysis.

The exercise of the vote in turn implies the possibility of expressing the opinion of Ibercaja AM on the different areas of strategic vocation and management of the company, seeking the benefit of the environment, the economy and society as a whole.

In line with the Group's Sustainability Policy, the voting orientation will support, among other things, actions aimed at achieving:

- environmental protection
- the promotion of equal opportunities, non-discrimination and the protection of human rights within the company
- Corporate governance capable of establishing and strengthening the economic value of the company

### Section 3. Next steps

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

Since Sustainability began to be integrated into investment decision-making, Ibercaja AM has renewed its processes and measurements in this matter, making great efforts to maximize its contributions and reduce its impacts. In this scenario, improving data quality has always been one of the main challenges.

In recent times it has been seen how Regulation has evolved at high speed with regulations such as Taxonomy, CSRD, SFDR, ESG funds names guidelines and other regulations that have had an impact on this matter. Given this situation, a scenario of opportunities has been identified, which together with the work of collaboration initiatives and development of socially responsible investment, as the first drivers in this matter; it could not be wasted.

Participating in an increasingly sustainable world and transforming our economy placed us in a privileged place as participants in financial markets. Thus, it has been understood that the just transition must be promoted along two main lines of action.

Firstly, the decarbonization of investment portfolios, which will be reported on in this questionnaire after the signing of NZAMi in 2022. The management of environmental aspects has the main focus on reducing these emissions. More and more companies have emissions reduction objectives, as well as a plan to develop in the coming years, with the objective of net zero emissions in the year 2050. In this sense, carbon emissions are being monitored, as well as as other intensity and carbon footprint metrics, with the aim of locating those companies with the greatest impacts and establishing the appropriate mechanisms to reduce the impact of our investments. Currently, Ibercaja AM also measures those companies that have a science-based emissions reduction objective (SBTi), considering it a substantial contribution to sustainability objectives.

Secondly, the need for this transition to be a just transition is highlighted. To achieve this, respect for Human Rights becomes a crucial issue. In addition to what was mentioned above regarding the UNPRI Advanced initiative, Ibercaja AM is a signatory of Access to Medicine, which promotes access to medicines for those people in countries at risk of exclusion. in access to medicines.

In addition, to the developments described, Ibercaja AM wants its processes and mechanisms to be rigorous and take advantage of the greatest possible knowledge on the subject. In this sense, in 2022, Ibercaj AM launched the Sustainable Finance Chair with the University of Zaragoza with the aim of strengthening ties with local academic institutions. Thanks to this agreement, Ibercaja AM can strengthen its methodologies with the input of experts from the academic field, as well as develop dialogue with companies supported by the collaboration of university professors and students.

In addition, with the intention of continuing to disseminate in the field of sustainable finance, studies and specialized work have been carried out, supporting the completion of TFG and TFM, and facilitating internships at Ibercaja AM. In the development of the Chair, and despite its short period of life, various communication and training sessions have already been held in the world of finance and sustainability.

Along these lines, Ibercaja AM expects to continue supporting academic studies such as doctoral theses, the awarding of prizes and the provision of grants to study for the Master's Degree in Accounting and Finance, among other studies. The Chair was also created with the aim of promoting financial education among society in order to improve the understanding of financial concepts and products.

For Ibercaja AM, it is very important that all its employees have knowledge of SRI.

Ibercaja Gestión currently has 40% of its employees certified by EFFAS as CESGA analysts. This drive for training in Sustainability was promoted in 2021. Additionally, one of our managers holds the CFA ESG qualification and another employee ESG Essentials. The employees who have obtained these certifications are located within the Asset Managers, Business and General Management departments.

Since then, our staff has been increasing its training in these aspects with the entire workforce. Firstly, and as mentioned in the previous question, through the sessions driven by our data providers, but also by the analysts, increasing the knowledge of the employees involved in the development of ESG in the different sectors.

In 2024, a new training action will be developed for workers not covered by CESGA, belonging to a greater extent to the accounting and control areas of the entity. Over 30 employees in will take the course and the exam to obtain the ESG Essential in November.

This new training drive is expected to complete the ESG knowledge of our staff, covering all areas of the management company and all employees with sustainability functions assigned to their role.

#### Section 4. Endorsement

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

Name

María Lili Corredor Corredor and José Carlos Vizarraga Catalán

Position

CEO Ibercaja Gestión and CEO Ibercaja Pensión

Organisation's Name

IBERCAJA AM

A

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

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# ORGANISATIONAL OVERVIEW (OO)

## ORGANISATIONAL INFORMATION

### REPORTING YEAR

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

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

|  | Date | Month | Year |
|--|------|-------|------|
| Year-end date of the 12-month period for PRI reporting purposes: | 31   | 12    | 2023 |

## SUBSIDIARY INFORMATION

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

Does your organisation have subsidiaries?

- (A) Yes
- (B) No

# ASSETS UNDER MANAGEMENT

## ALL ASSET CLASSES

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

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

USD

(A) AUM of your organisation, including subsidiaries, and excluding the AUM subject to execution, advisory, custody, or research advisory only

US\$ 31,862,662,487.00

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

US\$ 0.00

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

US\$ 0.00

### Additional information on the exchange rate used: (Voluntary)

Exchange rate: 1,06860 ( Exchange rate of their currency to USD on the International Monetary Fund website)

## ASSET BREAKDOWN

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

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

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

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

"Other" includes liquidity, as well as all monetary assets used for their management (currency) and derivatives.

## ASSET BREAKDOWN: EXTERNALLY MANAGED ASSETS

| Indicator | Type of indicator | Dependent on | Gateway to | Disclosure | Subsection                                       | PRI Principle |
|-----------|-------------------|--------------|------------|------------|--|---------------|
| OO 5.1    | CORE              | OO 5         | Multiple   | PUBLIC     | Asset breakdown:<br>Externally managed<br>assets | GENERAL       |

Provide a further breakdown of your organisation's externally managed listed equity and/or fixed income AUM.

|                | (1) Listed equity | (2) Fixed income -<br>SSA | (3) Fixed income -<br>corporate | (4) Fixed income -<br>securitised | (5) Fixed income -<br>private debt |
|----------------|-------------------|---------------------------|---------------------------------|-----------------------------------|------------------------------------|
| (A) Active     | >75%              | >0-10%                    | >75%                            | 0%                                | 0%                                 |
| (B)<br>Passive | >10-50%           | >0-10%                    | >0-10%                          |                                   |                                    |

| Indicator | Type of indicator | Dependent on | Gateway to      | Disclosure | Subsection                                       | PRI Principle |
|-----------|-------------------|--------------|-----------------|------------|--|---------------|
| OO 5.2    | CORE              | OO 5, OO 5.1 | SAM 3,<br>SAM 8 | PUBLIC     | Asset breakdown:<br>Externally managed<br>assets | GENERAL       |

Provide a breakdown of your organisation's externally managed AUM between segregated mandates and pooled funds or investments.

|                             | (1) Segregated mandate(s) | (2) Pooled fund(s) or pooled<br>investment(s) |
|-----------------------------|---------------------------|---|
| (A) Listed equity - active  | >0-10%                    | >75%  |
| (B) Listed equity - passive | 0%                        | >75%  |
| (C) Fixed income - active   | 0%                        | >75%  |
| (D) Fixed income - passive  | 0%                        | >75%  |

## ASSET BREAKDOWN: INTERNALLY MANAGED LISTED EQUITY

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

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

(A) Passive equity 0%

(B) Active – quantitative 0%

(C) Active – fundamental >75%

(D) Other strategies 0%

## ASSET BREAKDOWN: INTERNALLY MANAGED FIXED INCOME

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

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

(A) Passive – SSA 0%

(B) Passive – corporate 0%

(C) Active – SSA >10-50%

(D) Active – corporate >50-75%

(E) Securitised 0%

(F) Private debt 0%

## MANAGEMENT BY PRI SIGNATORIES

| Indicator | Type of indicator | Dependent on | Gateway to | Disclosure | Subsection                    | PRI Principle |
|-----------|-------------------|--------------|------------|------------|-------------------------------|---------------|
| OO 6      | CORE              | OO 5         | N/A        | PUBLIC     | Management by PRI signatories | GENERAL       |

What percentage of your organisation's externally managed assets are managed by PRI signatories?

>75%

## GEOGRAPHICAL BREAKDOWN

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

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

### AUM in Emerging Markets and Developing Economies

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

## STEWARDSHIP

### STEWARDSHIP

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

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

|                                    | (1) Listed equity - active          | (2) Listed equity - passive         | (3) Fixed income - active           | (4) Fixed income - passive          | (11) Other                       |
|------------------------------------|-------------------------------------|-------------------------------------|-------------------------------------|-------------------------------------|----------------------------------|
| (A) Yes, through internal staff    | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/>         |
| (B) Yes, through service providers | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/>         |
| (C) Yes, through external managers | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/>         |
| (D) We do not conduct stewardship  | <input type="radio"/>               | <input type="radio"/>               | <input type="radio"/>               | <input type="radio"/>               | <input checked="" type="radio"/> |

### STEWARDSHIP: (PROXY) VOTING

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

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

|                                      | (1) Listed equity - active          | (2) Listed equity - passive         |
|--------------------------------------|-------------------------------------|-------------------------------------|
| (A) Yes, through internal staff      | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| (B) Yes, through service providers   | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| (C) Yes, through external managers   | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| (D) We do not conduct (proxy) voting | <input type="radio"/>               | <input type="radio"/>               |

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

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

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

|                             |                   |
|-----------------------------|-------------------|
| (A) Listed equity – active  | (11) >90 to <100% |
| (B) Listed equity - passive | (1) 0%            |

## STEWARDSHIP NOT CONDUCTED

| Indicator | Type of indicator | Dependent on | Gateway to | Disclosure | Subsection                | PRI Principle |
|-----------|-------------------|--------------|------------|------------|---------------------------|---------------|
| OO 10     | CORE              | OO 8, OO 9   | N/A        | PUBLIC     | Stewardship not conducted | 2             |

**Describe why your organisation does not currently conduct stewardship and/or (proxy) voting.**

Stewardship, excluding (proxy) voting  
(K) Other

"Other" includes liquidity, as well as all monetary assets used for their management, and cash and cash equivalents and derivatives. For these products, there are no voting rights on which shareholder meetings can be attended. In addition, there are no guidelines or initiatives developed for active dialogue with this type of instruments.

# ESG INCORPORATION

## INTERNALLY MANAGED ASSETS

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

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

|   | (1) Yes, we incorporate ESG factors into our investment decisions | (2) No, we do not incorporate ESG factors into our investment decisions |
|---|---|---|
| (C) Listed equity - active - fundamental  | <input checked="" type="radio"/>                                  | <input type="radio"/>   |
| (E) Fixed income - SSA  | <input checked="" type="radio"/>                                  | <input type="radio"/>   |
| (F) Fixed income - corporate  | <input checked="" type="radio"/>                                  | <input type="radio"/>   |
| (V) Other: "Other" includes liquidity, as well as all monetary assets used for their management (currency) and derivatives. | <input type="radio"/>   | <input checked="" type="radio"/>  |

## EXTERNAL MANAGER SELECTION

| Indicator | Type of indicator | Dependent on | Gateway to          | Disclosure | Subsection                 | PRI Principle |
|-----------|-------------------|--------------|---------------------|------------|----------------------------|---------------|
| OO 12     | CORE              | OO 5, OO 5.1 | Multiple indicators | PUBLIC     | External manager selection | 1             |

For each externally managed asset class, does your organisation incorporate ESG factors, to some extent, when selecting external investment managers?

|                             | (1) Yes, we incorporate ESG factors when selecting external investment managers | (2) No, we do not incorporate ESG factors when selecting external investment managers |
|-----------------------------|---|---|
| (A) Listed equity - active  | <input checked="" type="radio"/>  | <input type="radio"/>   |
| (B) Listed equity - passive | <input checked="" type="radio"/>  | <input type="radio"/>   |
| (C) Fixed income - active   | <input checked="" type="radio"/>  | <input type="radio"/>   |
| (D) Fixed income - passive  | <input checked="" type="radio"/>  | <input type="radio"/>   |

## EXTERNAL MANAGER APPOINTMENT

| Indicator | Type of indicator | Dependent on | Gateway to          | Disclosure | Subsection                   | PRI Principle |
|-----------|-------------------|--------------|---------------------|------------|------------------------------|---------------|
| OO 13     | CORE              | OO 5, OO 5.1 | Multiple indicators | PUBLIC     | External manager appointment | 1             |

For each externally managed asset class, does your organisation incorporate ESG factors, to some extent, when appointing external investment managers?

|                             | (1) Yes, we incorporate ESG factors when appointing external investment managers | (2) No, we do not incorporate ESG factors when appointing external investment managers |
|-----------------------------|--|--|
| (A) Listed equity - active  | <input checked="" type="radio"/>   | <input type="radio"/>  |
| (B) Listed equity - passive | <input checked="" type="radio"/>   | <input type="radio"/>  |
| (C) Fixed income - active   | <input checked="" type="radio"/>   | <input type="radio"/>  |
| (D) Fixed income - passive  | <input checked="" type="radio"/>   | <input type="radio"/>  |

## EXTERNAL MANAGER MONITORING

| Indicator | Type of indicator | Dependent on | Gateway to          | Disclosure | Subsection                  | PRI Principle |
|-----------|-------------------|--------------|---------------------|------------|-----------------------------|---------------|
| OO 14     | CORE              | OO 5, OO 5.1 | Multiple indicators | PUBLIC     | External manager monitoring | 1             |

For each externally managed asset class, does your organisation incorporate ESG factors, to some extent, when monitoring external investment managers?

|                             | (1) Yes, we incorporate ESG factors when monitoring external investment managers | (2) No, we do not incorporate ESG factors when monitoring external investment managers |
|-----------------------------|--|--|
| (A) Listed equity - active  | <input checked="" type="radio"/>   | <input type="radio"/>  |
| (B) Listed equity - passive | <input checked="" type="radio"/>   | <input type="radio"/>  |
| (C) Fixed income - active   | <input checked="" type="radio"/>   | <input type="radio"/>  |
| (D) Fixed income - passive  | <input checked="" type="radio"/>   | <input type="radio"/>  |

## ESG NOT INCORPORATED

| Indicator | Type of indicator | Dependent on    | Gateway to | Disclosure | Subsection           | PRI Principle |
|-----------|-------------------|-----------------|------------|------------|----------------------|---------------|
| OO 16     | CORE              | OO 11, OO 12–14 | N/A        | PUBLIC     | ESG not incorporated | 1             |

Describe why your organisation does not currently incorporate ESG factors into your investment decisions and/or in the selection, appointment and/or monitoring of external investment managers.

Internally managed  
(O) Other

"Other" includes liquidity, as well as all monetary assets used for their management (currency) and derivatives. It is considered that to date the necessary metrics have not been developed for the valuation of the exposure of derivatives to sustainability risks, although it is true that most derivatives have exposure to indices or portfolio companies and on which sustainability risks and SRI criteria are measured.

# ESG STRATEGIES

## LISTED EQUITY

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

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

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

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

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

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

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

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

## FIXED INCOME

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

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

|                               | (1) Fixed income - SSA | (2) Fixed income - corporate |
|-------------------------------|------------------------|------------------------------|
| (A) Screening alone           | 0%                     | 0%                           |
| (B) Thematic alone            | 0%                     | 0%                           |
| (C) Integration alone         | 0%                     | 0%                           |
| (D) Screening and integration | >75%                   | 0%                           |
| (E) Thematic and integration  | 0%                     | 0%                           |
| (F) Screening and thematic    | 0%                     | 0%                           |

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

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

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

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

## ESG/SUSTAINABILITY FUNDS AND PRODUCTS

### LABELLING AND MARKETING

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

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

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

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

>10-50%

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

**Additional information: (Voluntary)**

The company currently has 11 investment funds and 5 individual pension plans that take sustainability risks into account when making investment decisions.

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

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

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

## THEMATIC BONDS

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

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

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

|                                      |         |
|--------------------------------------|---------|
| (A) Green or climate bonds           | >50-75% |
| (B) Social bonds                     | >0-10%  |
| (C) Sustainability bonds             | >0-10%  |
| (D) Sustainability-linked bonds      | >10-50% |
| (E) SDG or SDG-linked bonds          | 0%      |
| (F) Other                            | 0%      |
| (G) Bonds not labelled by the issuer | 0%      |

# SUMMARY OF REPORTING REQUIREMENTS

## SUMMARY OF REPORTING REQUIREMENTS

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

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

| Applicable modules   | (1) Mandatory to report (pre-filled based on previous responses) | (2.1) Voluntary to report. Yes, I want to opt-in to reporting on the module | (2.2) Voluntary to report. No, I want to opt-out of reporting on the module |
|--|--|---|---|
| Policy, Governance and Strategy  | <input checked="" type="radio"/>                                 | <input type="radio"/>   | <input type="radio"/>   |
| Confidence Building Measures   | <input checked="" type="radio"/>                                 | <input type="radio"/>   | <input type="radio"/>   |
| (C) Listed equity – active – fundamental   | <input checked="" type="radio"/>                                 | <input type="radio"/>   | <input type="radio"/>   |
| (E) Fixed income – SSA   | <input checked="" type="radio"/>                                 | <input type="radio"/>   | <input type="radio"/>   |
| (F) Fixed income – corporate   | <input checked="" type="radio"/>                                 | <input type="radio"/>   | <input type="radio"/>   |
| (T) External manager selection, appointment and monitoring (SAM) – listed equity - active  | <input type="radio"/>  | <input type="radio"/>   | <input checked="" type="radio"/>  |
| (U) External manager selection, appointment and monitoring (SAM) – listed equity - passive | <input type="radio"/>  | <input type="radio"/>   | <input checked="" type="radio"/>  |
| (V) External manager selection, appointment and monitoring (SAM) – fixed income - active   | <input type="radio"/>  | <input type="radio"/>   | <input checked="" type="radio"/>  |
| (W) External manager selection, appointment and monitoring (SAM) – fixed income - passive  | <input type="radio"/>  | <input type="radio"/>   | <input checked="" type="radio"/>  |

## SUBMISSION INFORMATION

### REPORT DISCLOSURE

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

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

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

# POLICY, GOVERNANCE AND STRATEGY (PGS)

## POLICY

### RESPONSIBLE INVESTMENT POLICY ELEMENTS

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

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

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

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

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

- (A) Specific guidelines on climate change (may be part of guidelines on environmental factors)
- (B) Specific guidelines on human rights (may be part of guidelines on social factors)
- (C) Specific guidelines on other systematic sustainability issues

Specify:

For Ibercaja AM, sustainability management encompasses environmental, social and governance aspects, all of which must be taken into account. On the website you can find the entity's methodological document that includes the main aspects of how these aspects are taken into consideration. (<https://media3.ibercaja.net/ibercajagestion-com/procedimiento-calculo-sostenible-porcentaje-inversion.pdf>)

In addition, our Sustainability risk inclusion policy includes the identification, *numerus apertus*, of the risks identified for each of the three ESG pillars. While it is true that climate issues and human rights are fundamental in ESG management, other aspects such as wage equality, independence in corporate governance bodies, supply chains, aspects related to the composition and structure of Boards of Directors that may result in difficulties for the proper oversight function, agency costs associated with the lack of alignment of the interests of capital providers with those of the management team, extendable to other stakeholders (consumers, employees, suppliers, society) or practices that indicate a lack of business ethics, are equally relevant.

Thus, ESG aspects are promoted in all our policies in a transversal manner, focusing on risks, adverse incidents or engagement and voting actions as appropriate. In this way, Ibercaja expects to carry out 360° Sustainability management, promoting a green and fair transition, thanks to investment in companies with good governance.

In this sense, ESG risk integration process in the Management Companies is based on:

- 1) The identification of material sustainability risks.
- 2) Analysis and assessment of sustainability risks through ESG scores, reports and metrics provided by our data providers.
- 3) Incorporating the results of sustainability risk analysis and assessment into investment decision-making.
- 4) Active exercise of ownership through voting and dialogue processes, extending to the ESG risk analysis and integration process.

- (D) Our formal responsible investment policy(ies) does not include guidelines on systematic sustainability issues

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

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

(A) Overall approach to responsible investment

Add link:

<https://media3.ibercaja.net/ibercajagestion-com/politica-integracion-riesgos-ibercaja-gestion.pdf>

(B) Guidelines on environmental factors

Add link:

<https://media.ibercaja.net/ibercajagestion-com/procedimiento-calculo-sostenible-porcentaje-inversion.pdf>

(C) Guidelines on social factors

Add link:

<https://media3.ibercaja.net/ibercajagestion-com/politica-de-pias-gestion.pdf>

(D) Guidelines on governance factors

Add link:

<https://media.ibercaja.net/ibercajagestion-com/politica-integracion-riesgos-ibercaja-gestion.pdf>

(E) Guidelines on sustainability outcomes

Add link:

<https://media3.ibercaja.net/ibercajagestion-com/informe-implicacion-ibercaja-gestion-2022.pdf>

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

Add link:

<https://media.ibercaja.net/ibercajagestion-com/procedimiento-calculo-sostenible-porcentaje-inversion.pdf>

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

Add link:

<https://media.ibercaja.net/ibercajagestion-com/procedimiento-calculo-sostenible-porcentaje-inversion.pdf>

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

Add link:

<https://media.ibercaja.net/ibercajagestion-com/procedimiento-calculo-sostenible-porcentaje-inversion.pdf>

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

Add link:

<https://media.ibercaja.net/ibercajagestion-com/procedimiento-calculo-sostenible-porcentaje-inversion.pdf>

(J) Guidelines on exclusions

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

Add link:

<https://media3.ibercaja.net/ibercajagestion-com/informe-implicacion-ibercaja-gestion-2022.pdf>

**(L) Stewardship: Guidelines on engagement with investees**

Add link:

<https://media3.ibercaja.net/ibercajagestion-com/informe-implicacion-ibercaja-gestion-2022.pdf>

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

**(O) Stewardship: Guidelines on (proxy) voting**

Add link:

<https://media3.ibercaja.net/ibercajagestion-com/informe-implicacion-ibercaja-gestion-2022.pdf>

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

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

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

**(A) Overall stewardship objectives**

**(B) Prioritisation of specific ESG factors to be advanced via stewardship activities**

**(C) Criteria used by our organisation to prioritise the investees, policy makers, key stakeholders, or other entities on which to focus our stewardship efforts**

**(D) How different stewardship tools and activities are used across the organisation**

**(E) Approach to escalation in stewardship**

**(F) Approach to collaboration in stewardship**

**(G) Conflicts of interest related to stewardship**

**(H) How stewardship efforts and results are communicated across the organisation to feed into investment decision-making and vice versa**

(I) Other

(J) None of the above elements is captured in our policy(ies) or guidelines on stewardship

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

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

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

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

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

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

## RESPONSIBLE INVESTMENT POLICY COVERAGE

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

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

### Combined AUM coverage of all policy elements

(A) Overall approach to responsible investment

(B) Guidelines on environmental factors

(C) Guidelines on social factors

(D) Guidelines on governance factors

(7) 100%

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

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

### AUM coverage

(A) Specific guidelines on climate change

(1) for all of our AUM

(B) Specific guidelines on human rights

(1) for all of our AUM

(C) Specific guidelines on other systematic sustainability issues

(1) for all of our AUM

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

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

(A) Listed equity

(1) Percentage of AUM covered

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

(11) 100%

(B) Fixed income

(1) Percentage of AUM covered

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

(11) 100%

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

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

(A) Actively managed listed equity

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

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

● (10) >90% to <100%

○ (11) 100%

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

Voting rights are held on all shares with the exception of the Ibercaja Blackrock China fund, in which case Blackrock exercises these voting rights and transfers the result to Ibercaja. Throughout the year there may be some shares which, due to their nature, do not have assigned voting rights.

## GOVERNANCE

### ROLES AND RESPONSIBILITIES

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

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

- (A) Board members, trustees, or equivalent  
 (B) Senior executive-level staff, or equivalent

Specify:

Sustainability is addressed by the Steering Committee, which includes the CEO, the Business Director (the area responsible for Sustainability), the Control Director, the Investment Director and the CFO. Senior Management will be responsible for approving the procedures manuals for the development of SRI in asset management. Also, the ESG Committee composed the CEOs of Ibercaja AM and the Ibercaja's Chief Sustainability Officer, together with other directors and others has functions assigned

- (C) Investment committee, or equivalent  
 (D) Head of department, or equivalent  
 (E) None of the above bodies and roles have oversight over and accountability for responsible investment

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

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

(1) Board members, trustees, or equivalent

(2) Senior executive-level staff, investment committee, head of department, or equivalent

(A) Overall approach to responsible investment

(B) Guidelines on environmental, social and/or governance factors

|   |                                     |                                     |
|---|-------------------------------------|-------------------------------------|
| (C) Guidelines on sustainability outcomes   | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| (D) Specific guidelines on climate change (may be part of guidelines on environmental factors)  | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| (E) Specific guidelines on human rights (may be part of guidelines on social factors)   | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| (F) Specific guidelines on other systematic sustainability issues   | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |
| (G) Guidelines tailored to the specific asset class(es) we hold   | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| (H) Guidelines on exclusions  | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| (I) Guidelines on managing conflicts of interest related to responsible investment  | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| (J) Stewardship: Guidelines on engagement with investees  | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |
| (L) Stewardship: Guidelines on engagement with other key stakeholders   | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |
| (M) Stewardship: Guidelines on (proxy) voting   | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |
| (N) This role has no formal oversight over and accountability for any of the above elements covered in our responsible investment policy(ies) | <input type="radio"/>               | <input type="radio"/>               |

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

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

- (A) Yes
- (B) No

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

| Indicator | Type of indicator | Dependent on | Gateway to | Disclosure | Subsection | PRI Principle |
|-----------|-------------------|--------------|------------|------------|------------|---------------|
|-----------|-------------------|--------------|------------|------------|------------|---------------|

|        |      |     |     |        |                            |   |
|--------|------|-----|-----|--------|----------------------------|---|
| PGS 12 | CORE | N/A | N/A | PUBLIC | Roles and responsibilities | 1 |
|--------|------|-----|-----|--------|----------------------------|---|

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

(A) Internal role(s)

Specify:

Sustainability integration has functions assigned to senior management, the control area, the investment area, and the business and strategy area, the latter being responsible for its implementation. The person in charge of Sustainability is located in this area.

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

Specify:

Ibercaja AM has a mandated fund that applies the exclusions of Ibercaja AM. In addition, Ibercaja AM takes into consideration its commitment to sustainability when contracting its suppliers.

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

| Indicator | Type of indicator | Dependent on | Gateway to | Disclosure | Subsection | PRI Principle |
|-----------|-------------------|--------------|------------|------------|------------|---------------|
|-----------|-------------------|--------------|------------|------------|------------|---------------|

|        |      |        |     |        |                            |   |
|--------|------|--------|-----|--------|----------------------------|---|
| PGS 13 | CORE | PGS 11 | N/A | PUBLIC | Roles and responsibilities | 1 |
|--------|------|--------|-----|--------|----------------------------|---|

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

(A) Yes, we use responsible investment KPIs to evaluate the performance of our board members, trustees, or equivalent

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

Explain why: (Voluntary)

| Indicator | Type of indicator | Dependent on | Gateway to | Disclosure | Subsection | PRI Principle |
|-----------|-------------------|--------------|------------|------------|------------|---------------|
|-----------|-------------------|--------------|------------|------------|------------|---------------|

|        |      |        |     |        |                            |   |
|--------|------|--------|-----|--------|----------------------------|---|
| PGS 14 | CORE | PGS 11 | N/A | PUBLIC | Roles and responsibilities | 1 |
|--------|------|--------|-----|--------|----------------------------|---|

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

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

Indicate whether these responsible investment KPIs are linked to compensation

(1) KPIs are linked to compensation

(2) KPIs are not linked to compensation as these roles do not have variable compensation

(3) KPIs are not linked to compensation even though these roles have variable compensation

Describe: (Voluntary)

Ibercaja AM's remuneration policy, set out on the website, reinforces the internal culture of teamwork, individual assumption of responsibility and risk management and the rewarding of talent, dedication, professional career and individual performance, ensuring that the overall remuneration of each employee and its structure is competitive. Among other aspects, it includes the linkage to results and the achievement of previously established objectives, reflecting a sustainable and risk-adjusted performance.

In practice, two major groups have their variable remuneration linked to sustainability indicators. The investment team has been assigned a compensation linked to quantitative variables that allow Ibercaja AM to measure the integration of sustainability carried out by staff members, especially with regard to active dialogue actions. In addition, the variable remuneration of the sustainability manager is fully linked to the development of sustainability at Ibercaja AM.

Thus, the objective of the remuneration of the identified group is "to be consistent with the Sustainability Policy and with the principles and values of the Entity in the management of environmental, social and corporate governance risks, insofar as it establishes a remuneration system based on equal opportunities and non-discrimination. opportunities and non-discrimination". It also aims to "contribute to the good corporate governance of the Entity, by being aligned with the internal code of conduct and mitigating excessive risk-taking, in particular through the practice of deferring the receipt of part of the variable component of remuneration, the possibility of applying malus clauses and ex post adjustments, among other measures."

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

## EXTERNAL REPORTING AND DISCLOSURES

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

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

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

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

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

- (A) Yes, including all governance-related recommended disclosures
- (B) Yes, including all strategy-related recommended disclosures

- (C) Yes, including all risk management–related recommended disclosures
  - (D) Yes, including all applicable metrics and targets-related recommended disclosures
  - (E) None of the above
- Add link(s):
- <https://media.ibercaja.net/www-ibercaja-com/2023/ccaa2023-cc-cnmv.pdf>  
<https://media3.ibercaja.net/ibercajagestion-com/politicas-incidencias-adversas-2023.pdf>  
<https://media3.ibercaja.net/ibercajagestion-com/politica-integracion-riesgos-ibercaja-gestion.pdf>

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

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

- (A) Yes, we publicly disclosed our membership in and support for trade associations, think tanks, or similar bodies that conduct any form of political engagement
- Add link(s):
- <https://www.spainsif.es/acerca-de-spainsif/miembros-asociados/>  
<https://www.inverco.es/11/0/60>
- (B) No, we did not publicly disclose our membership in and support for trade associations, think tanks, or similar bodies that conduct any form of political engagement
  - (C) Not applicable, we were not members in or supporters of any trade associations, think tanks, or similar bodies that conduct any form of political engagement during the reporting year

## STRATEGY

### CAPITAL ALLOCATION

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

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

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

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

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

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

Select from dropdown list:

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

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

Select from dropdown list:

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

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

Select from dropdown list:

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

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

Select from dropdown list:

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

Specify: (Voluntary)

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

## STEWARDSHIP: OVERALL STEWARDSHIP STRATEGY

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

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

|   | (1) Listed equity                | (2) Fixed income                 |
|---|----------------------------------|----------------------------------|
| (A) Maximise our portfolio-level risk-adjusted returns. In doing so, we seek to address any risks to overall portfolio performance caused by individual investees' contribution to systematic sustainability issues.                | <input checked="" type="radio"/> | <input checked="" type="radio"/> |
| (B) Maximise our individual investments' risk-adjusted returns. In doing so, we do not seek to address any risks to overall portfolio performance caused by individual investees' contribution to systematic sustainability issues. | <input type="radio"/>            | <input type="radio"/>            |

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

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

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

## STEWARDSHIP: (PROXY) VOTING

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

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

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

Select from the below list:

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

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

Select from the below list:

- (1) in all cases**
- (2) in a majority of cases
- (3) in a minority of cases
- (D) We do not review external service providers' voting recommendations
- (E) Not applicable; we do not use external service providers to give voting recommendations

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

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

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

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

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

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

- (D) We vote in favour of the investee company management's recommendations by default
- (E) Not applicable; we do not vote on shareholder resolutions

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

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

- (A) We pre-declared our voting intentions publicly through the PRI's vote declaration system on the Resolution Database
- (B) We pre-declared our voting intentions publicly by other means, e.g. through our website
- (C) We privately communicated our voting decision to investee companies prior to the AGM/EGM
- (D) **We did not privately or publicly communicate our voting intentions prior to the AGM/EGM**
- (E) Not applicable; we did not cast any (proxy) votes during the reporting year

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

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

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

Add link(s):

<https://media3.ibercaja.net/ibercajagestion-com/resumen-implicacion-voto-engagement-ibercaja-gestion-2023.pdf>

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

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

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

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

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

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

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

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

<https://media3.ibercaja.net/ibercajagestion-com/resumen-implicacion-voto-engagement-ibercaja-gestion-2023.pdf>

## STEWARDSHIP: ESCALATION

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

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

### (1) Listed equity

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



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



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



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



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



(F) Divesting



(G) Litigation



(H) Other



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



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

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

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

## STEWARDSHIP: ENGAGEMENT WITH POLICY MAKERS

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

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

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

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

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

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

Describe:

In the event that the regulator or even different associations, such as the Spanish association of collective investment institutions (INVERCO), ask us about the technical approach provided or convene a meeting with different actors in the sector, Ibercaja AM attends with the aim of providing its impression and experience of the issues discussed. In addition, we deal with the national supervisor, the CNMV and DGSFP, responding to all the questions raised through calls, e-mails, etc.

- (D) We engaged policy makers on our own initiative
- (E) Other methods

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

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

- (A) We publicly disclosed all our policy positions
- (B) We publicly disclosed details of our engagements with policy makers
- (C) **No, we did not publicly disclose details of our engagement with policy makers conducted as part of our responsible investment approach during the reporting year**

Explain why:

Ibercaja AM doesn't disclose the dialogue actions carried out with policy makers, although it actively participates with them when requested to do so through various initiatives and consultations with the aim of fostering collaboration in the development of SRI and sustainability in the sector. This collaboration takes place both within Ibercaja AM and at the level of the Ibercaja Group, which also collaborates in this regard.

## CLIMATE CHANGE

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

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

- (A) **Yes, within our standard planning horizon**

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

Ibercaja AM is aware of the relevance of climate change and the need to drive climate change mitigation and adaptation. Through NZAM, Ibercaja AM is committed to becoming carbon neutral by 2050 and thus contributing to the transition to a green economy. Recognising the materiality of climate change for the financial sector, Ibercaja Group follows the recommendations of the Task Force on Climate-Related Disclosures (TCFD) to achieve transparent climate disclosure and promotes financial decision-making linked to sustainable factors.

In this regard, Ibercaja AM takes measures to reduce its exposure to controversial sectors that do not favour carbon emissions. Through its exclusions policy, it avoids or reduces exposure to some controversial or particularly polluting sectors. In addition, Ibercaja AM, through extra-financial information providers and sustainability ratings, measures the exposure of invested companies to physical and transition risks.

In this regard, two sectors have been concentrated on which different levels of exclusion apply. On the one hand, mining, with the extraction of thermal coal and the extraction of uranium (the latter approved in 2024), and energy generation, through exclusions in the generation of electricity with thermal coal, the extraction of oil or gas and the extraction of oil and natural gas in the Arctic.

In addition, there are thematic investment funds linked to climate change mitigation and the decarbonisation of our economy, such as Ibercaja Infraestructuras, Ibercaja New Energy and Ibercaja Megatrends.

In addition, to mitigate the negative impacts of investments, through the procedures for measuring and managing the principal adverse incidents (PAIs).

- (B) Yes, beyond our standard planning horizon
- (C) No, we have not identified climate-related risks and/or opportunities affecting our investments

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

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

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

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

Ibercaja AM, in its commitment to the transition to a green economy, is aware of the fundamental role played by financial companies, especially asset managers, in this transition.

Thus, the observance of codes of responsible business conduct and the integration of climate risks and opportunities, in line with the fiduciary duty of entities towards their investors, aims to support the achievement of zero net greenhouse gas emissions by 2050, in line with global efforts to limit global warming to 1.5 degrees.

In this sense, Ibercaja AM seeks, through different investment solutions, to respond to these preferences of our investors. Thematic investment has become a fundamental strategy in the search for new solutions that allow and promote these aspects.

Thus, Ibercaja New Energy will invest in clean and renewable energy, i.e. in companies that are committed to the use of clean and renewable energies thanks to the modernisation of infrastructures and the promotion of energy and ecological efficiency, sustainable industry that seeks energy efficiency and stimulates circular production (waste management and recycling and efficient water management), renovation and construction for the improvement of energy efficiency and sustainable mobility (cleaner and more efficient transport).

Ibercaja Infraestructuras will invest in major current trends linked to infrastructure, construction and engineering, real estate development and transport, as one of the main sectors in the transition to a green economy.

Lastly, Ibercaja Megatrends will invest in major current trends for improvement, including the decarbonisation of the economy, among others.

Furthermore, in terms of fixed income, Ibercaja AM will continue to invest in green, social and sustainable bonds according to ICMA criteria, with the aim of financing projects whose funds are destined to environmentally sustainable activities and favour decarbonisation, as well as bonds linked to sustainability.

In the promotion of the mitigation of climate change as one of the main pillars in the integration of sustainability risks, it is also developed through ESG integration and screening strategies, seeking to promote the achievement of the carbon-neutral economy and compliance with the objectives of the Paris Agreement.

With regard to Sustainable investing, Ibercaja AM considers that an investment makes a substantial contribution when the company has objectives certified by SBTi 1.5C in the short/medium term.

In addition, Ibercaja AM has set a series of exclusions already mentioned in terms of uranium and coal extraction, unconventional oil and gas extraction, Arctic oil and gas extraction or coal-fired power generation.

Another relevant aspect is the management of the impacts of our investments leads us to the monitoring and monitoring of different metrics, among which climate change metrics such as GHG emissions, emissions intensity or energy consumption intensity by sector with a high climate impact stand out.

Finally, it is worth highlighting the importance of voting and active dialogue, where Ibercaja AM carries out dialogues individually, as well as other collaborative dialogues with UNPRI Advance, Climate Action 100+, CDP or Access to Medicine.

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

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

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

- (A) Yes, using the Inevitable Policy Response Forecast Policy Scenario (FPS) or Required Policy Scenario (RPS)
- (B) Yes, using the One Earth Climate Model scenario
- (C) Yes, using the International Energy Agency (IEA) Net Zero scenario
- (D) Yes, using other scenarios
- (E) No, we have not assessed the resilience of our investment strategy in different climate scenarios, including one that holds temperature rise to below 2 degrees

| Indicator | Type of indicator | Dependent on | Gateway to | Disclosure | Subsection     | PRI Principle |
|-----------|-------------------|--------------|------------|------------|----------------|---------------|
| PGS 44    | CORE              | N/A          | N/A        | PUBLIC     | Climate change | General       |

**Does your organisation have a process to identify, assess, and manage the climate-related risks (potentially) affecting your investments?**

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

(1) Describe your process

When it comes to identifying the priorities in the integration of ESG risks, the Sustainability Risk Integration Policy is presented as the main element. To this end, the Financial Group's Sustainability Committee tried to set the main guidelines in this area, climate change being one of them. Since then, Ibercaja AM has been increasing its concern about these aspects, strengthening its commitments through initiatives such as Climate Action 100+, CDP or the Net Zero Asset Managers Initiative (NZAMi), in addition to the TCFD reporting carried out by the Ibercaja Group.

When taking sustainability metrics, the following aspects are taken into account for the calculation of the quartiles, considering in turn those that are more material for each specific company: Carbon – Own Operations, Carbon – products and services, Emissions, Effluents and Waste, Environmental impact of products and services, resource use, resource use – supply chain, land use and biodiversity, and land use and biodiversity – supply chain.

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

When making investment decisions, Ibercaja AM takes into consideration both the information that refers to the measurement of risk, as well as the adverse incidents classified by the data provider as high or severe. In addition, both for the consideration of investments as sustainable investment (art. 2.17 SFDR), and for the reduction of the main adverse impacts at the level of the entire entity, the main adverse impacts in terms of sustainability.

For both risks and the main adverse impacts, quartiles are prepared where, depending on the indicator, but in a generalized way, each data is compared with those companies in its sector, drawing up quartiles that allow identifying those companies with a greater risk or with a greater impact. This distinction allows favoring those companies that, despite carrying out a polluting activity, are making efforts aimed at the transition to a green economy.

In addition to these issues related to investment decision-making, Ibercaja AM, with respect to the integration of ESG risks in the collective investment schemes managed by Ibercaja AM, the control carried out currently includes the periodic calculation of two internal market risk metrics, pending approval, where appropriate, by the corresponding Governing Bodies and subsequent inclusion in the Management Company's procedures. These metrics, which apply to investments in fixed income and equity instruments in portfolios, are as follows:

-The degree of concentration in financial exposures by analysing the intensity of emissions, rating them at 5 degrees, between "Very Low" and "Very High", in order to limit concentration in carbon-intensive sectors that may be subject to a greater transition risk. An alert is established when exposure to "Very Low" + "Low" level issuances is less than 70% of the portfolio. Section 1 of the document "Summary of the RM ESG Ibercaja Gestión Report".

-The average Sustainalytics rating of the portfolios, where the rating assigned to the tool to the fixed income and equity instruments of all Ibercaja Gestión funds is monitored. This rating classifies ESG risk from "No Appreciable Risk" to "Severe Risk", in 5 gradation brackets, generating an alert from the "Medium Risk" as the weighted risk of each fund. Section 2 of the document "Summary of the RM ESG Report Ibercaja Gestión".

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

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

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

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

- (A) Exposure to physical risk
- (B) Exposure to transition risk
- (C) Internal carbon price
- (D) Total carbon emissions**
  - (1) Indicate whether this metric or variable was used and disclosed, including the methodology
    - (1) Metric or variable used
    - (2) Metric or variable used and disclosed**
    - (3) Metric or variable used and disclosed, including methodology
  - (2) Provide link to the disclosed metric or variable, including the methodology followed, as applicable
    - <https://media.ibercaja.net/ibercajagestion-com/politicas-incidencias-adversas-2023.pdf>
- (E) Weighted average carbon intensity**
  - (1) Indicate whether this metric or variable was used and disclosed, including the methodology
    - (1) Metric or variable used
    - (2) Metric or variable used and disclosed**
    - (3) Metric or variable used and disclosed, including methodology
  - (2) Provide link to the disclosed metric or variable, including the methodology followed, as applicable
    - <https://media.ibercaja.net/ibercajagestion-com/politicas-incidencias-adversas-2023.pdf>
- (F) Avoided emissions
- (G) Implied Temperature Rise (ITR)
- (H) Non-ITR measure of portfolio alignment with UNFCCC Paris Agreement goals
- (I) Proportion of assets or other business activities aligned with climate-related opportunities
- (J) Other metrics or variables
  - (K) Our organisation did not use or publicly disclose any climate risk metrics or variables affecting our investments during the reporting year

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

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

- (A) Scope 1 emissions**
  - (1) Indicate whether this metric was disclosed, including the methodology
    - (1) Metric disclosed**
    - (2) Metric and methodology disclosed
  - (2) Provide links to the disclosed metric and methodology, as applicable
    - <https://media3.ibercaja.net/ibercajagestion-com/politicas-incidencias-adversas-2023.pdf>
- (B) Scope 2 emissions**
  - (1) Indicate whether this metric was disclosed, including the methodology
    - (1) Metric disclosed**
    - (2) Metric and methodology disclosed
  - (2) Provide links to the disclosed metric and methodology, as applicable

<https://media3.ibercaja.net/ibercajagestion-com/politicas-incidencias-adversas-2023.pdf>

**(C) Scope 3 emissions (including financed emissions)**

(1) Indicate whether this metric was disclosed, including the methodology

**(1) Metric disclosed**

(2) Metric and methodology disclosed

(2) Provide links to the disclosed metric and methodology, as applicable

<https://media3.ibercaja.net/ibercajagestion-com/politicas-incidencias-adversas-2023.pdf>

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

## SUSTAINABILITY OUTCOMES

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

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

**(A) Yes, we have identified one or more specific sustainability outcomes connected to our investment activities**

(B) No, we have not yet identified the sustainability outcomes connected to any of our investment activities

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

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

**(A) The UN Sustainable Development Goals (SDGs) and targets**

**(B) The UNFCCC Paris Agreement**

**(C) The UN Guiding Principles on Business and Human Rights (UNGPs)**

**(D) OECD frameworks: OECD Guidelines for Multinational Enterprises and Guidance on Responsible Business Conduct for Institutional Investors**

(E) The EU Taxonomy

(F) Other relevant taxonomies

(G) The International Bill of Human Rights

**(H) The International Labour Organization's Declaration on Fundamental Principles and Rights at Work and the eight core conventions**

(I) The Convention on Biological Diversity

(J) Other international framework(s)

(K) Other regional framework(s)

(L) Other sectoral/issue-specific framework(s)

(M) Our organisation did not use any widely recognised frameworks to identify the intended and unintended sustainability outcomes connected to its investment activities

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

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

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

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

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

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

# LISTED EQUITY (LE)

## OVERALL APPROACH

### MATERIALITY ANALYSIS

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

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

**(3) Active - fundamental**

(A) Yes, our investment process incorporates material governance factors

(1) for all of our AUM

(B) Yes, our investment process incorporates material environmental and social factors

(1) for all of our AUM

(C) Yes, our investment process incorporates material ESG factors beyond our organisation's average investment holding period

(1) for all of our AUM

(D) No, we do not have a formal process. Our investment professionals identify material ESG factors at their discretion

o

(E) No, we do not have a formal or informal process to identify and incorporate material ESG factors

o

## MONITORING ESG TRENDS

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

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

**(3) Active - fundamental**

(A) Yes, we have a formal process that includes scenario analyses

(B) Yes, we have a formal process, but it does not include scenario analyses

(1) for all of our AUM

(C) We do not have a formal process for our listed equity strategies; our investment professionals monitor how ESG trends vary over time at their discretion

o

(D) We do not monitor and review the implications of changing ESG trends on our listed equity strategies

o

## PRE-INVESTMENT

### ESG INCORPORATION IN RESEARCH

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

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

#### (2) Active - fundamental

(A) We incorporate material governance-related risks into our financial analysis and equity valuation or security rating process

(1) in all cases

(B) We incorporate material environmental and social risks into our financial analysis and equity valuation or security rating process

(1) in all cases

(C) We incorporate material environmental and social risks related to companies' supply chains into our financial analysis and equity valuation or security rating process

(1) in all cases

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

o

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

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

**(3) Active - fundamental**

|  |                  |
|--|------------------|
| (A) We incorporate qualitative and/or quantitative information on current performance across a range of material ESG factors   | (1) in all cases |
| (B) We incorporate qualitative and/or quantitative information on historical performance across a range of material ESG factors  | (1) in all cases |
| (C) We incorporate qualitative and/or quantitative information on material ESG factors that may impact or influence future corporate revenues and/or profitability   | (1) in all cases |
| (D) We incorporate qualitative and/or quantitative information enabling current, historical and/or future performance comparison within a selected peer group across a range of material ESG factors                     | (1) in all cases |
| (E) We do not incorporate qualitative or quantitative information on material ESG factors when assessing the ESG performance of companies in our financial analysis, equity investment or portfolio construction process | o                |

## ESG INCORPORATION IN PORTFOLIO CONSTRUCTION

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

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

### (3) Active - fundamental

(A) Material ESG factors contribute to the selection of individual assets and/or sector weightings within our portfolio construction and/or benchmark selection process

(1) for all of our AUM

(B) Material ESG factors contribute to the portfolio weighting of individual assets within our portfolio construction and/or benchmark selection process

(1) for all of our AUM

(C) Material ESG factors contribute to the country or region weighting of assets within our portfolio construction and/or benchmark selection process

(1) for all of our AUM

(D) Other ways material ESG factors contribute to your portfolio construction and/or benchmark selection process

(E) Our stock selection, portfolio construction or benchmark selection process does not include the incorporation of material ESG factors

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# POST-INVESTMENT

## ESG RISK MANAGEMENT

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

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

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

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

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

### (2) Active - fundamental

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

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

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

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

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

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

## DISCLOSURE OF ESG SCREENS

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

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

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

# FIXED INCOME (FI)

## OVERALL APPROACH

### MATERIALITY ANALYSIS

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

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

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

## MONITORING ESG TRENDS

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

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

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

## PRE-INVESTMENT

### ESG INCORPORATION IN RESEARCH

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

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

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

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

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

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

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

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

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

**(1) SSA**

**(2) Corporate**

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

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

(1) for all of our AUM

(1) for all of our AUM

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

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## ESG INCORPORATION IN PORTFOLIO CONSTRUCTION

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

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

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

# POST-INVESTMENT

## ESG RISK MANAGEMENT

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

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

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

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

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

|   | (1) SSA                             | (2) Corporate                       |
|---|-------------------------------------|-------------------------------------|
| (A) Yes, our formal process includes reviews of quantitative and/or qualitative information on material ESG risks and ESG incidents and their implications for individual fixed income holdings                                       | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| (B) Yes, our formal process includes reviews of quantitative and/or qualitative information on material ESG risks and ESG incidents, and their implications for other fixed income holdings exposed to similar risks and/or incidents | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| (C) Yes, our formal process includes reviews of quantitative and/or qualitative information on material ESG risks and ESG incidents, and their implications for our stewardship activities  | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| (D) Yes, our formal process includes ad hoc reviews of quantitative and/or qualitative information on severe ESG incidents  | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| (E) We do not have a formal process to identify and incorporate ESG risks and ESG incidents; our investment professionals identify and incorporate ESG risks and ESG incidents at their discretion                                    | <input type="checkbox"/>            | <input type="checkbox"/>            |
| (F) We do not have a formal process to identify and incorporate ESG risks and ESG incidents into our risk management process  | <input type="checkbox"/>            | <input type="checkbox"/>            |

## THEMATIC BONDS

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

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

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

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

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

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

## DISCLOSURE OF ESG SCREENS

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

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

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

# CONFIDENCE-BUILDING MEASURES (CBM)

## CONFIDENCE-BUILDING MEASURES

### APPROACH TO CONFIDENCE-BUILDING MEASURES

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

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

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

## INTERNAL AUDIT

| Indicator | Type of indicator | Dependent on | Gateway to | Disclosure | Subsection     | PRI Principle |
|-----------|-------------------|--------------|------------|------------|----------------|---------------|
| CBM 4     | CORE              | OO 21, CBM 1 | N/A        | PUBLIC     | Internal audit | 6             |

#### What responsible investment processes and/or data were audited through your internal audit function?

- (A) Policy, governance and strategy
  - Select from dropdown list:
    - (1) Data internally audited
    - (2) Processes internally audited
    - (3) Processes and data internally audited
- (C) Listed equity
  - Select from dropdown list:
    - (1) Data internally audited
    - (2) Processes internally audited
    - (3) Processes and data internally audited
- (D) Fixed income
  - Select from dropdown list:
    - (1) Data internally audited

- (2) Processes internally audited
- (3) Processes and data internally audited

## INTERNAL REVIEW

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

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

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