

Schroders



Schroder Investment Management (Europe) S.A.

LEI: 8AFAYMK90I2QVGLMLS34

**Statement on Principal Adverse Impacts of Investment Decisions on
Sustainability Factors**

30 June 2024

Summary

Schroder Investment Management (Europe) S.A. (8AFAYMK90I2QVGLMLS34) considers the principal adverse impacts of its investment decisions on sustainability factors. The present statement is the consolidated statement on principal adverse impacts on sustainability factors considered by Schroder Investment Management (Europe) S.A. in its investment decisions. This statement covers the reference period from 1 January 2023 to 31 December 2023 (Q1 2023 – Q4 2023). For the avoidance of doubt, the data and analysis included in this statement excludes those financial products which do not consider principal adverse impacts on sustainability factors at the product level under Article 7 SFDR and any other assets under management which are not in-scope of the definition of 'financial product' under SFDR.

The table below sets out the principal adverse impact (PAI) indicators that we have considered, further details of which are provided in the section titled '*Description of the principal adverse impacts on sustainability factors*' below. Policies relating to these PAI indicators including those relating to engagement and details on adherence to responsible business conduct codes and internationally recognised standards for due diligence and reporting are also detailed in the appropriate sections below.

Summary of Principal Adverse Impact Indicators				
Applicable to	Themes	PAI indicator	SFDR Annex Table	Number
Investee companies	Climate and other environment-related indicators	GHG emissions	1	1
		Carbon Footprint	1	2
		GHG intensity of investee company	1	3
		Exposure to companies active in the fossil fuel sector	1	4
		Share of non-renewable energy consumption and production	1	5
		Energy consumption intensity per high impact climate sector	1	6
		Activities negatively affecting biodiversity-sensitive areas	1	7
		Emissions to water	1	8
		Hazardous waste and radioactive waste ratio	1	9
		Investments in companies without carbon emission reduction initiatives	2	4
	Social and employee, respect for human rights, anti-corruption and anti-bribery matters	Violations of UN Global Compact principles and Organisation for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises	1	10

		Lack of processes and compliance mechanisms to monitor compliance with UN Global Compact principles and OECD Guidelines for Multinational Enterprises	1	11
		Unadjusted gender pay gap	1	12
		Board gender diversity	1	13
		Exposed to controversial weapons (anti-personnel mines, cluster munitions, chemical weapons and biological weapons)	1	14
		Lack of a supplier code of conduct	3	4
Sovereigns and supranationals	Environmental and social-related indicators	GHG Intensity	1	15
		Investee countries subject to social violations	1	16
Real estate assets	Fossil fuels and energy efficiency related indicators	Exposure to fossil fuels through real estate assets	1	17
		Exposure to energy-inefficient real estate assets	1	18

Description of the principal adverse impacts on sustainability factors

Indicators applicable to investments in investee companies

Climate and other environment-related indicators

Adverse Sustainability Indicator	Metric	Impact 2023	Impact 2022	Explanation	Actions taken, and actions planned and targets set for the next reference period
Greenhouse Gas Emissions					
1. GHG Emissions	Scope 1 GHG emissions	3,823,284.55 (metric tons CO ₂ e)	4,057,665.51 (metric tons CO ₂ e)	Sum of portfolio companies' Carbon Emissions – Scope 1 (tCO ₂ e) weighted by the portfolio's value of investment in a company and by the company's most recently available enterprise value including cash.	<p>General Approach</p> <p>Schroders is a founding member of the Net Zero Asset Managers initiative, committing to achieve net zero emissions by 2050 or sooner. Our net zero commitment spans across both the investments we manage on behalf of our clients and our operations. We have committed to aligning all our managed, in scope, assets to a 1.5C degree world by 2040, through the Science Based Targets Initiative (SBTi). At present, this includes all mandatory asset classes required by SBTi, listed equity (common and preferred stock exposure), corporate bond, real estate investment trust (REIT) and exchange-traded fund (ETF) exposure. Our mid and long-term targets, which were verified by SBTi in 2022, are to reduce the implied temperature of our clients' portfolios from a baseline of 2.9°C in 2019, to 1.5°C across Scope 1, 2 and 3 emissions in 2040, with an interim target of 2.2°C across Scope 1 and 2 emissions by 2030. Schroders further commits to include 100% of AUM, including private assets, within the SBTi target by 2040.</p> <p>Active Ownership</p> <p>Schroders recognises the importance of all companies assessing and understanding climate risk and the impact it may have on their business. In 2021, Schroders committed to transitioning the implied temperature rise of its in-scope managed portfolios toward a 1.5°C aligned pathway, based on the CDP-WWF methodology. At the point of validation in 2022, this includes all mandatory asset classes required by the Science Based Targets initiative (SBTi), which consist of our listed equity (our common and preferred stock exposure), corporate bond, real estate investment trust (REIT) and exchange-traded fund (ETF) exposure.</p> <p>We define five key areas of focus for our climate engagements, each representing one of the key responses to climate change:</p> <ol style="list-style-type: none"> 1. Climate risk and oversight 2. Decarbonising and minimising emissions 3. Just transition 4. Climate adaptation 5. Climate solutions <p>Our proxy voting approach is to support resolutions that ask the company to align its financing activities with the goals of the Paris Agreement.</p> <p>Actions taken during 2023</p> <p>As at 31 December 2023, our managed portfolios were aligned to a 2.5°C pathway (across scope 1 and 2), and a 2.8°C pathway (across scope 1, 2 and 3).</p> <p>Actions taken during the year included integrating the explicit consideration of climate risks and opportunities into our ESG Integration Accreditation Framework. In addition, we launched the Decarbonisation Working Group to help clients establish and manage their decarbonisation commitments. We engaged with 743 companies on</p>
	Scope 2 GHG emissions	1,391,783.25 (metric tons CO ₂ e)	1,378,126.56 (metric tons CO ₂ e)	Sum of portfolio companies' Carbon Emissions – Scope 2 (tCO ₂ e) weighted by the portfolio's value of investment in a company and by the company's most recently available enterprise value including cash.	
	Scope 3 GHG emissions	34,021,680.48 (metric tons CO ₂ e)	35,781,662.73 (metric tons CO ₂ e)	Sum of portfolio companies' Scope 3 – Total Emission Estimated (tCO ₂ e) weighted by the portfolio's value of investment in a company and by the company's most recently available enterprise value including cash.	
	Total GHG emissions	39,124,905.31 (metric tons CO ₂ e)	41,176,696.39 (metric tons CO ₂ e)	The total annual Scope 1, Scope 2, and estimated Scope 3 GHG emissions associated with the market value of the portfolio. Companies' carbon emissions are apportioned across all outstanding shares and bonds (based on the most recently available enterprise value including cash).	
2. Carbon Footprint	Carbon Footprint	423.76 (tons CO ₂ e/€m invested)	374.77 (tons CO ₂ e/€m invested)	The total annual Scope 1, Scope 2, and estimated Scope 3 GHG emissions associated with 1 million EUR invested in the portfolio. Companies' carbon emissions are apportioned across all outstanding shares and bonds (based on the most recently available enterprise value including cash).	
		849.26 (tons CO ₂ e/€m revenue)	1014.03 (tons CO ₂ e/€m revenue)	The portfolio's weighted average of its holding issuers' GHG Intensity (Scope 1, Scope 2 and estimated Scope 3 GHG emissions/EUR million revenue).	
3. GHG intensity of investee company	GHG Intensity of investee companies				
4. Exposure to companies active in the fossil fuel sector	Share of investments in companies active in the fossil fuel sector	6.31% (ratio %)	6.59% (ratio %)	The percentage of the portfolio's market value exposed to issuers with fossil fuels related activities, including extraction, processing, storage and transportation of petroleum products, natural gas, and thermal and metallurgical coal.	
		77.42% (ratio %)	80.99% (ratio %)	The portfolio's weighted average of issuers' energy consumption and/or production from non-renewable sources as a percentage of total energy used and/or generated.	
5. Share of non-renewable energy consumption and production	Share of non-renewable energy consumption and non-renewable energy production of investee companies from non-renewable energy sources compared to renewable energy sources, expressed as a percentage of total energy sources				
6. Energy consumption intensity per high impact climate sector	Energy consumption in GWh per million EUR of revenue of investee companies, per high impact climate sector	92.41 (GWh/EUR million)	29.22 (GWh/EUR million)	Portfolio weighted average of company Energy consumption intensity (GWh / EUR million sales) (ENERGY_CONSUMP_INTEN_EUR) per high impact climate sector (NACE section code (NACE_SECTION_CODE) A, B, C, D, E, F, G, H, and L). Portfolio weights are normalized when Energy consumption intensity coverage is less than 100%.	

Adverse Sustainability Indicator	Metric	Impact 2023	Impact 2022	Explanation	Actions taken, and actions planned and targets set for the next reference period
climate change, of which 500 were identified to be priority companies. In addition, we participated in 119 collaborative engagement events.					
Biodiversity					
7. Activities negatively affecting biodiversity-sensitive areas	Share of investments in investee companies with sites/operations located in or near to biodiversity sensitive areas where activities of those investee companies negatively affect those areas	0.18% (ratio %)	0.06% (ratio %)	The percentage of the portfolio's market value exposed to issuers' that reported having operations in or near biodiversity sensitive areas and have been implicated in controversies with severe or very severe impacts on the environment.	<p>General approach</p> <p>Schroders recognises the importance of all companies assessing and reporting on their exposure to Nature-related dependencies, impacts, risks, and opportunities.</p> <p>Our Plan for Nature is our statement of intent in managing nature-related risks and impacts, in tandem with our Nature and Biodiversity Position Statement which describes our strategy, actions and commitments in more detail. This includes, but is not limited to, our commitment to use best efforts to eliminate agricultural commodity-driven deforestation by 2025, as a signatory to the Financial Sector Commitment Letter on Eliminating Commodity-driven Deforestation.</p> <p>Active Ownership</p> <p>Our engagement is focused on improving disclosure and performance across four key themes:</p> <ol style="list-style-type: none"> 1. Natural capital-related risk and management 2. Circular economy, pollution, and waste 3. Sustainable food and water 4. Deforestation <p>Our proxy voting approach is to generally support resolutions that promote greater disclosure on how managers consider biodiversity.</p> <p>Actions taken during 2023</p> <p>We engaged with 399 companies on natural capital and biodiversity in 2023, including 293 engagements on deforestation, delivering on our commitment to use best efforts to eliminate commodity-driven deforestation.</p> <p>Our approach to this engagement included an exposure analysis of our holdings to four main forest-risk commodities: beef, timber, soy, and palm oil. This analysis categorised companies into three risk tiers based on their likelihood of exposure to commodity-driven deforestation and a materiality threshold based on Schroders' holding size at the time of assessment:</p> <ul style="list-style-type: none"> - Tier 1: Producers and processors of forest risk commodities - Tier 2: Companies likely exposed to commodity driven deforestation through their supply chain - Tier 3: Companies with deforestation risk that don't meet the materiality thresholds for Tiers 1 or 2. <p>Through our engagements, we identified areas where companies need to take further action to manage deforestation risks, including regulatory risks, risks to consumer and investor sentiment, and operational and supply chain risks.</p>
Water					
8. Emissions to water	Tonnes of emissions to water generated by investee companies per million EUR invested, expressed as a weighted average	0.11 (metric tons/EUR million)	2.29 (metric tons/EUR million)	The total annual wastewater discharged (metric tons reported) into surface waters as a result of industrial or manufacturing activities associated with 1 million EUR invested in the portfolio. Companies' water emissions are apportioned across all outstanding shares and bonds (based on the most recently available enterprise value including cash).	
Waste					
9. Hazardous waste and radioactive waste ratio	Tonnes of hazardous waste and radioactive waste generated by investee companies per million EUR invested, expressed as a weighted average	0.22 (metric tons/EUR million)	3.52 (metric tons/EUR million)	The total annual hazardous waste (metric tons reported) associated with 1 million EUR invested in the portfolio. Companies' hazardous waste is apportioned across all outstanding shares and bonds (based on the most recently available enterprise value including cash).	

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

Adverse Sustainability Indicator	Metric	Impact 2023	Impact 2022	Explanation	Actions taken, and actions planned and targets set for the next reference period
Social and employee matters					

Adverse Sustainability Indicator	Metric	Impact 2023	Impact 2022	Explanation	Actions taken, and actions planned and targets set for the next reference period
10. Violations of UN Global Compact principles and Organisation for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises	Share of investments in investee companies that have been involved in violations of the UNGC principles or OECD Guidelines for Multinational Enterprises	0.79% (ratio %)	1.03% (ratio %)	The percentage of the portfolio's market value exposed to issuers with very severe controversies related to the company's operations and/or products.	<p>General approach</p> <p>In line with most of the financial services industry, Schroders' definition of Global Norms considers widely recognised principles such as the UN Global Compact (UNGC) principles the OECD Guidelines for Multinational Enterprises, the International Labor Organization's (ILO) core conventions and the UN Guiding Principles on Business and Human Rights.</p> <p>We have created a proprietary framework to identify, assess and engage companies that have potentially breached Global Norms. The ultimate output of this framework is a 'Global Norms Breach List' comprised of companies that have: been identified as causing significant damage; not sufficiently addressed the issue in question through transparent communications and action; and not provided sufficient remedy for affected stakeholders. This list is then used as an exclusion criteria for our sustainable funds.</p> <p>Active Ownership</p> <p>Schroders' engagement approach on human rights covers three core stakeholders across a company's business, including its value chain:</p> <ol style="list-style-type: none"> 1. Workers 2. Communities 3. Customers and consumers <p>When companies join the UNGC violators list, our analysts and fund managers engage with the company to understand and monitor the risk to the business, the 'harm' to its stakeholders and the remedial action being taken.</p> <p>Our proxy voting approach is to support resolutions that ask the company to report on its human rights' due diligence process.</p> <p>Actions taken during 2023</p> <p>In 2023, we undertook 145 engagements related to human rights. This is driven by growing regulation and trade ban regimes affecting companies, as well as a growing focus on the risks associated with value chains in conflict-affected and high-risk areas – topics that have been a focus of many human rights-related engagements. Additionally, in 2023 we updated our Engagement Blueprint to include a greater focus on the 'just transition' and have sought to reflect this in our engagement activity when we consider the human rights and social impacts of the energy transition. We continue to develop internal resources to guide analysts undertaking engagements on social themes. Last year this included a toolkit to provide analysts with guidance on objective setting and best practice for engaging companies on community rights.</p>
11. Lack of processes and compliance mechanisms to monitor compliance with UN Global Compact principles and OECD Guidelines for Multinational Enterprises	Share of investments in investee companies without policies to monitor compliance with the UNGC principles or OECD Guidelines for Multinational Enterprises or grievance/complaints handling mechanisms to address violations of the UNGC principles or OECD Guidelines for Multinational Enterprises	45.70% (ratio %)	48.15% (ratio %)	The percentage of the portfolio's market value exposed to issuers that are not signatories in the UN Global Compact.	
12. Unadjusted gender pay gap	Average unadjusted gender pay gap of investee companies	17.10% (ratio %)	12.74% (ratio %)	The portfolio holdings' weighted average of the difference between the average gross hourly earnings of male and female employees, as a percentage of male gross earnings.	<p>General approach</p> <p>Schroders believes that companies should strive to create diverse, equitable and inclusive cultures in their organisations. Gender is one of our diversity lenses that is core to our engagement and voting principles. In this regard, we set clear expectations for companies, such as greater disclosure on board gender diversity and processes that ensure products and services do not risk perpetuating biases.</p> <p>Active Ownership</p> <p>Schroders' engagement approach on diversity and inclusion covers three key areas of focus:</p> <ol style="list-style-type: none"> 1. Leadership and oversight of diversity and inclusion 2. Workforce diversity and inclusion 3. Value chain diversity and inclusion
13. Board gender diversify	Average ratio of female to male board members in investee companies, expressed as a percentage of all board members	50.19% (ratio %)	35.39% (ratio %)	The portfolio holdings' weighted average of the ratio of female to male board members.	

Adverse Sustainability Indicator	Metric	Impact 2023	Impact 2022	Explanation	Actions taken, and actions planned and targets set for the next reference period
					<p>Improving disclosure on Board Diversity and the gender pay gap are two of the priority objectives outlined in our Engagement Blueprint. We request that companies implement a policy that requires each board vacancy to consider at least one or more diverse candidates.</p> <p>In the UK, Europe and North America, we expect larger companies to have at least 33% female board directors and for smaller companies we expect at least 20% female board representation. We will vote against the nominations committee chair or longest tenured director where we have concerns about insufficient gender diversity on the board. In the UK and North America, we will also expect companies to have at least one non-white director.</p> <p>Actions taken during 2023</p> <p>In 2023 we undertook 99 engagements with companies on the topic of diversity and inclusion. A key focus of our engagement on this topic continues to be encouraging organisations to be representative of the societies in which they operate throughout their workforces.¹ In 2023 we expanded our voting policies on diversity and inclusion beyond the boardroom to reflect this, requiring that FTSE 100 companies have at least one woman on their executive committees; this is in line with the recommendations of the FTSE Women's Leaders Report.</p> <p>Moreover, we continued to expand our voting policies on board ethnic diversity, requiring that all US companies appoint at least one ethnically diverse director to the board, where possible.</p> <p><small>1. https://hbr.org/2020/11/getting-serious-about-diversity-enough-already-with-the-business-case</small></p>
14. Exposure to controversial weapons (anti-personnel mines, cluster munitions, chemical weapons and biological weapons)	Share of investments in investee companies involved in the manufacture or selling of controversial weapons	0% (ratio %)	0% (ratio %)	The percentage of the portfolio's market value exposed to issuers with an industry tie to landmines, cluster munitions, chemical weapons or biological weapons. Note: Industry ties includes ownership, manufacturing and investments. Ties to landmines do not include related safety products.	<p>General Approach</p> <p>Schroders fully supports the following international conventions:</p> <ul style="list-style-type: none"> The Convention on Cluster Munitions (2008): prohibits the production, stockpiling, transfer and use of cluster munitions. The Anti-Personnel Landmines Treaty (1997), also known as The Ottawa Treaty (1997): prohibits the production, stockpiling, transfer and use of antipersonnel landmines. The Chemical Weapons Convention (1997): prohibits the use, stockpiling, production and transfer of chemical weapons. Biological Weapons Convention (1975): prohibits the use, stockpiling, production and transfer of biological weapons. <p>Accordingly, we exclude companies that we identify as being involved in the production, stockpiling, transfer and use of these weapons. These restrictions apply across Schroders' managed funds.</p> <p>On occasion there may be additional securities recognised by clients or local governments; these will be added to the Schroders group exclusion list for those relevant jurisdictions or specific mandates. The list of excluded companies is available here.</p>

Indicators applicable to investments in sovereigns and supranationals

Adverse Sustainability Indicator	Metric	Impact 2023	Impact 2022	Explanation	Actions taken, and actions planned and targets set for the next reference period
Environmental					
15. GHG Intensity	GHG intensity of investee countries	322.062 (t/EUR million)	362.68 (t/EUR million)	The portfolio's weighted average of sovereign issuers' GHG Emissions Intensity (Scope 1, 2 and 3 emissions/EUR M GDP).	<p>General approach</p> <p>In the context of climate change for our Fixed Income portfolios which invest in sovereign securities, where appropriate, Schroders' approach includes reviewing whether a government has made a net zero pledge contained in an official policy document.</p>

Adverse Sustainability Indicator	Metric	Impact 2023	Impact 2022	Explanation	Actions taken, and actions planned and targets set for the next reference period
					<p>Active Ownership</p> <p>Where appropriate and applicable, our approach to active ownership with sovereigns is to engage with securities such as sovereign debt, where we can engage with a range of different Government stakeholders including the issuing Debt Management Offices, Central Banks and different Government departments. Our engagement with sovereigns spans across multiple dimensions to seek transparency on the ESG information which will inform our investment outlook, to share our insights on how they are managing sustainability risks and what this means for our view on the investment quality of their debt and the environment they are providing for investee companies to deliver value. Our work on climate change includes engaging on topics to gain a better understanding of how governments plan to finance the transition to a more sustainable economy, including assessing the objectives of sustainability issuances,</p> <p>Actions taken during 2023</p> <p>In 2023 we engaged with 20 sovereign bond issuers on sustainability related topics, including how governments are aligning their policies to support a transition to net zero. These engagements allow us to understand how governments are working to prepare their economies for a changing climate and to develop policies that support businesses across sectors and other assets to decarbonise. In 2023, we published internal guidance for investors to support them to identify relevant sovereign stakeholders to engage with on sustainability matters.</p>

Social

16. Investee countries subject to social violations	Number of investee countries subject to social violations (absolute number and relative number divided by all investee countries), as referred to in international treaties and conventions, United Nations principles and, where applicable, national law	3 (Number of investee countries)	2 (Number of investee countries)	The portfolio's number of unique sovereign issuers with European External Action Service (EEAS) restrictive measures (sanctions) on imports and exports.	<p>General approach</p> <p>In respect of investee countries subject to social violations (PAI 16), we exclude countries on the UN sanctions list. However, the data shown is received from a third party and is based on the EU sanctions list. As a result, there may be exposure to sanctioned countries where they are sanctioned by the EU but not the UN.</p> <p>Active Ownership</p> <p>Where appropriate and applicable, our approach to active ownership with sovereigns is to engage with securities such as sovereign debt, where we can engage with a range of different Government stakeholders including the issuing Debt Management Offices, Central Banks and different Government departments. Our engagement with sovereigns' spans across multiple dimensions to seek transparency on the ESG information which will inform our investment outlook, to share our insights on how they are managing sustainability risks and what this means for our view on the investment quality of their debt and the environment they are providing for investee companies to deliver value. Our work on climate change includes engaging on topics to gain a better understanding of how governments plan to finance the transition to a more sustainable economy, including assessing the objectives of sustainability issuances.</p>
--	--	--	--	--	---

Indicators applicable to investments in real estate assets

Adverse Sustainability Indicator	Metric	Impact 2023	Impact 2022	Explanation	Actions taken, and actions planned and targets set for the next reference period
Fossil Fuels					

17. Exposure to fossil fuels through real estate assets	Share of investments in real estate assets involved in the extraction, storage, transport or manufacture of fossil fuels	0%	N/A	For funds comprising both listed and non-listed investments, the listed investments are not applicable for mandatory real estate PAI reporting. For the non-listed investments, Schroders is working on collecting data to report against PAI 17 which includes exploring solutions to address the challenges in obtaining the required data from various investment vehicles, funds, and assets.	<p>General approach</p> <p>We have reported mandatory real estate PAI for the two direct real estate funds in the PAI statement 2024:</p> <ul style="list-style-type: none"> Schroders Capital European Leased Hotel Fund Schroders Capital European Operating Hotels Fund <p>The Schroders Capital Semi-Liquid Global Real Estate Total Return Fund is comprised of listed and non-listed investments. The listed investments are not applicable for reporting under the mandatory principal adverse impacts for real estate. For the non-listed investments, the fund is working on collecting data to report against PAI 17 and 18 and is exploring ways to overcome the challenges associated with obtaining data from the investment vehicles, funds and assets it invests in and which may include underlying assets located in jurisdictions where there is no Energy Performance Certificate (EPC) rating or Primary Energy Demand (PED) data available.</p>
Energy efficiency					
18. Exposure to energy-inefficient real estate assets	Share of investments in energy-inefficient real estate assets	81.29%	N/A	For funds comprising both listed and non-listed investments, the listed investments are not applicable for mandatory real estate PAI reporting. For the non-listed investments, Schroders is working on collecting data to report against PAI 18 which includes exploring solutions to address the challenges in obtaining data from various investment vehicles, funds, and assets, particularly those in jurisdictions lacking Energy Performance Certificate (EPC) ratings or Primary Energy Demand (PED) data.	

Other indicators for principal adverse impacts on sustainability factors

Additional climate and other environment-related indicators

Indicators applicable to investments in investee companies

Climate and other environment-related indicators Adverse Sustainability Impact - Emissions	Metric	Impact 2023	Impact 2022	Explanation	Actions taken, and actions planned and targets set for the next reference period
Adverse impact on sustainability factors (qualitative or quantitative)					
19. Investments in companies without carbon emission reduction initiatives	Share of investments in investee companies without carbon emission reduction initiatives aimed at aligning with the Paris Agreement	29.81% (ratio %)	41.40% (ratio %)	The percentage of the portfolio's market value exposed to issuers without a carbon emissions reduction target aligned with the Paris Agreement.	<p>General Approach</p> <p>Schroders is a founding member of the Net Zero Asset Managers initiative, committing to achieve net zero emissions by 2050 or sooner. Our net zero commitment spans across both the investments we manage on behalf of our clients and our operations. We have committed to aligning all our managed, in scope, assets to a 1.5C degree world by 2040, through the Science Based Targets Initiative (SBTi). At present, this includes all mandatory asset classes required by SBTi, listed equity (common and preferred stock exposure), corporate bond, real estate investment trust (REIT) and exchange-traded fund (ETF) exposure. Our mid and long-term targets, which were verified by SBTi in 2022, are to reduce the implied temperature of our clients' portfolios from a baseline of 2.9°C in 2019, to 1.5°C across Scope 1, 2 and 3 emissions in 2040, with an interim target of 2.2°C across Scope 1 and 2 emissions by 2030. Schroders further commits to include 100% of AUM, including private assets, within the SBTi target by 2040.</p> <p>Active Ownership</p> <p>Schroders recognises the importance of all companies assessing and understanding climate risk and the impact it may have on their business. In 2021, Schroders committed to transitioning the implied temperature rise of its in-scope managed portfolios toward a 1.5°C aligned pathway. At the point of validation in 2022, this includes all mandatory asset classes required by the Science Based Targets initiative (SBTi), which consist of our listed equity (our common and preferred stock exposure), corporate bond, real estate investment trust (REIT) and exchange-traded fund (ETF) exposure.</p> <p>We define five key areas of focus for our climate engagements, each representing one of the key responses to climate change:</p>

Climate and other environment-related indicators Adverse Sustainability Impact - Emissions	Metric	Impact 2023	Impact 2022	Explanation	Actions taken, and actions planned and targets set for the next reference period
					<ol style="list-style-type: none"> 1. climate risk and oversight 2. Decarbonising and minimising emissions 3. Just transition 4. Climate adaptation 5. Climate solutions <p>Our proxy voting approach is to support resolutions that ask the company to align its financing activities with the goals of the Paris Agreement.</p> <p>Actions taken during 2023</p> <p>As at 31 December 2023, our managed portfolios were aligned to a 2.5°C pathway (across scope 1 and 2), and a 2.8°C pathway (across scope 1, 2 and 3).</p> <p>Actions taken during the year included integrating the explicit consideration of climate risks and opportunities into our ESG Integration Accreditation Framework. In addition, we launched the Decarbonisation Working Group to help clients establish and manage their decarbonisation commitments.</p> <p>We engaged with 743 companies on climate change, of which 500 were identified to be priority companies. In addition, we participated in 119 collaborative engagement events.</p>

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

Indicators applicable to investments in investee companies

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

Adverse Sustainability Impact – Social and employee matters	Metric	Impact 2023	Impact 2022	Explanation	Actions taken, and actions planned and targets set for the next reference period
Adverse impact on sustainability factors (qualitative or quantitative)					
20. Lack of a supplier code of conduct	Share of investments in investee companies without any supplier code of conduct (against unsafe working conditions, precarious work, child labour and forced labour)	N/A	N/A	Not currently available	<p>Actions taken during 2023</p> <p>In 2022 and 2023, we engaged with our third-party data provider to understand the efforts being undertaken to improve the coverage on the 'Lack of supplier code of conduct' measure.</p> <p>We were advised that this was due to a lack of reported data and the challenges with estimating such a measure. As the coverage did not improve, we decided to switch to a new measure – 'Number of identified cases of severe human rights issues and incidents'.</p> <p>As we are in the process of building this metric in our systems, we must continue to report against the 'Lack of supplier Code of Conduct' measure for our 2023 report but aim to replace this next year.</p>

Description of policies to identify and prioritize principal adverse impacts on sustainability factors

As a global asset manager, we believe that the Schroders group can play an important role in understanding the relationship between the social and environmental challenges the world faces and the potential impact that these could have on the investments that we make on behalf of our clients. Through the inclusion of Sustainability risks and opportunities, we apply an investment framework that our investment teams can integrate into their investment process.

Our approach to considering principal adverse impacts (PAI) on sustainability factors involves classifying the indicators into three categories:

1. Set exclusionary thresholds: these involve very explicit thresholds for considering an investment to be a "sustainable investment". For example, PAI 10 on violations of UNGC principles.
2. Active ownership: these involve indicators on which we have a plan to engage with the underlying holding as set out in the Schroders Group document, accessed for public assets [here](#) and for private assets [here](#), outlining our approach to active ownership. For example, PAI 1, 2 and 3 covering GHG emissions and PAI 13 on board gender diversity.
3. Improve coverage: these involve indicators where we consider data coverage to be too sparse to properly consider them and our focus is primarily on engaging with the underlying holdings to increase reporting. For example, PAI 7 on biodiversity, PAI 9 on hazardous waste ratio and PAI 12 on the gender pay gap. Our approach is subject to ongoing review, particularly as the availability, and quality, of PAI data evolves.

Wherever the investment manager deems it appropriate, in the context of an incomplete and developing data landscape, the investment manager sets levels or principles representing its views of what would constitute significant harm in respect of the indicators for the principal adverse impacts. Investee companies deemed not to satisfy these levels or principles would not be eligible to be considered as a sustainable investment. This framework is subject to ongoing review, particularly as the availability, and quality, of the data evolves.

The [Integration of Sustainability Risk Considerations](#) policy (approved in April 2024) in our investment processes describes how sustainability risks are factored into the investment management processes of Schroders' entities that are directly subject to the SFDR's requirements. It demonstrates how our Investment teams seek to deliver long-term risk-adjusted returns, whilst incorporating the consideration of sustainability risks consistent with client preferences.

Our purpose is to provide excellent investment performance to our clients through active decision making. In our view, sustainability risks and industrial trends are intrinsically linked to the performance of many investments over the long term. Investee companies and assets face competitive pressures from a wide range of sources, on a larger scale and at a faster pace than ever before. Investment teams no longer have a choice over whether to seek exposure to sustainability risks and opportunities; all portfolios may be impacted. We believe that considering sustainability factors across the investment strategies we manage, in line with those strategies' investment objectives, can help us to deliver our investment objectives. Where appropriate, we also engage with investee management teams and/or their key stakeholders, vote on our clients' shareholdings, or otherwise seek to use our influence, with the objective of improving investee company or asset performance in sustainability-related areas, their long-term financial health, and resilience.

The Sustainability Executive Committee (ExCo) is responsible for governing and driving the Group's sustainability strategy. The central Sustainable Investment team is responsible for advising on the most appropriate mechanism for the implementation of sustainability policies, both by the business for entity level activities, and at product level for investment products. At product level, the investment teams are responsible for the consideration of PAIs in their investment decision-making process.

As noted above, exclusionary thresholds are established for PAIs on sustainability factors where a level, or 'threshold' of significant harm can be defined by the investment manager. An assessment of the severity of each PAI (including its potentially irremediable character) is undertaken by the central Sustainable Investment team to determine where such thresholds for harm could be established, and these thresholds are agreed with the impacted investment teams and ratified by the Sustainability ExCo. For instance, companies deriving any revenue exposure to controversial weapons, as defined under PAI 14, are believed to cause harm and are excluded. Conversely, for PAIs 1, 2 and 3, we currently focus thresholds based on the sector of operations, with our Article 8 and 9 funds excluding companies that generate >10% of revenue from thermal coal mining, or >30% of revenue from thermal coal energy generation. This is because the production of GHG emissions as a by-product of company operations is a certainty and so the severity of the exclusions cannot be treated in the same manner as exposure to controversial weapons. Accordingly, the probability of occurrence for each PAI is a factor that is used to determine whether:

- A- Exposure to the PAI can constitute 'Harm,' and, if so;
- B- The threshold for calculating 'harm.'

Where the investment manager establishes a threshold for the exclusion of sustainability factors, an exceptions process exists for companies that breach the threshold by a small margin, accounting for the margin of error that may exist in the calculation of the PAIs.

The investment manager draws information on investee companies from publicly available corporate information and company meetings, from broker reports, industry bodies, and research organisations, think tanks, legislators, consultants, Non-Governmental Organisations and academics. Third party research may be used, however our analysts form a proprietary view on each of the companies we analyse. Schroders subscribes to external ESG research providers including; MSCI ESG research, Bloomberg, Refinitiv, Sustainalytics and Morningstar, which is subject to periodic review and change.

Whilst the third parties that deliver the vast majority of the data used have been chosen carefully, data errors may occur. To address this, a dedicated ESG Data Governance team proactively monitors for errors and resolves data queries. This involves close collaboration with the third-party data providers and managing and tracking data corrections.

There may be limitations to the Investment Manager's data availability, specifically a lack of company reported data. Where data is not available, Schroders will engage with companies to encourage them to disclose the missing data points. Some of our proprietary tools infer missing values where applicable. Our models typically employ a range of techniques to estimate missing values, where this approach is appropriate, and the methodology is robust. Where data for a metric is not sufficiently available to form robust conclusions, that metric is not included in the proprietary tools.

As offered in some of our UCITS and AIF sub-funds that are Article 8 or 9 funds under SFDR, and for certain client mandates, we use a range of proprietary tools to support the consideration of Sustainability Risks along with supplementary metrics from external data providers and our own due diligence. This analysis forms a view of the potential impact of Sustainability Risk Considerations on an overall investment portfolio and, alongside other risk considerations, the possible financial returns of the portfolio.

Proprietary Tools

CONTEXT™ and **SustainEx™** are among the main tools currently available for our investment teams that help them consider the potential sustainability risks and opportunities of our investments. Through these tools we aim to focus on the material issues facing the companies in which we invest.

CONTEXT™ uses a selection of data to assess a company's relationship with its stakeholders such as customers, suppliers, regulators and employees. This tool is interactive and customisable, enabling our investment analysts to select and weigh material sustainability trends for each sector and select the most relevant metrics for assessment in any given case. The tool gives our analysts the flexibility to make company-specific adjustments to reflect their specialist knowledge. It incorporates both mandatory and selected voluntary principal adverse impact data points alongside other data.

SustainEx™ provides an estimate of the potential social and environmental 'costs' or 'benefits' that an issuer may create on a net basis. It does this by using certain metrics with respect to that issuer and quantifying them positively (for example when a company pays 'fair wages') and negatively (for example when a company emits carbon), to produce an aggregate notional measure of the effect that the relevant underlying issuer may have on society and the environment.

SustainEx™ utilises and is reliant on third party data as well as Schroders' own proprietary research and analysis. Like any model, **SustainEx™** will evolve and develop over time as we continue to assess, refine and add to the metrics and their relative contributions.

Engagement policies

We believe that constructive and committed engagement with management teams at the companies and assets we invest in is a key element of our responsibilities as investors and a clear demonstration of the value we can bring to our clients' investment returns over time. That is why we have a firm-wide commitment to active ownership, with many of our analysts and fund managers undertaking engagements directly.

Our [Engagement Blueprint for listed assets \(schroders-engagement-blueprint.pdf\)](#), originally published in 2022, outlines the six priority themes for our engagement: climate change, natural capital and biodiversity, human rights, human capital management, diversity and inclusion, and corporate governance. The document sets out the long-term outcomes we expect will be important to the success of the companies and assets in which we invest.

Our [Engagement Blueprint for private assets \(schroders-capital-private-markets-engagement-blueprint.pdf\)](#), published in 2024, aligns to the wider Group priority themes while highlighting asset class and strategy specificities, notably taking into account our level of influence and the illiquid nature of private assets.

We have aligned each of the PAIs to one of Schroders' six core engagement themes. We summarise below the thresholds that apply and the engagement actions we have for each:

Climate Change:

PAIs 1, 2, 3, 4, 5, 6 and 19 (voluntary indicator no. 4 from Annex I Table 2) relate to the Engagement Blueprint theme of Climate Change. Details of our Engagement Blueprint can be found here: (Link <https://mybrand.schroders.com/m/3222ea4ed44a1f2c/original/schroders-engagement-blueprint.pdf>)

We engage to understand how companies are responding to the challenges climate change may pose to their long-term financial position. Through our engagement activity we seek to understand different areas, such as the speed and scale of emission reduction targets and steps being taken to meet climate goals.

Biodiversity and Natural Capital:

PAIs 7, 8 and 9 relate to the Engagement Blueprint theme of Biodiversity and Natural Capital. We recognise the importance of all companies assessing and reporting on their exposure to natural capital and biodiversity risk. We focus our engagement on improving disclosure around a number of themes such as deforestation and sustainable food and water.

Human Rights:

PAIs 10 and 14 relate to the Engagement Blueprint theme of Human Rights. There is increasing pressure on the role that businesses can and should play to respect human rights. We understand the higher operational and financial risks, and the reputational risk that human rights controversies cause. Our engagement focuses on three core stakeholders: workers, communities and customers.

Human Capital Management:

PAIs 11, 12 and 13 relate to the Engagement Blueprint theme of Human Capital Management. We identify human capital management as a priority issue for engagement, noting that people in an organisation are a significant source of competitive advantage and that effective human capital management is essential to drive innovation and long-term value creation. We also recognise a number of links between high standards of human capital management and the achievement of the Sustainable Development Goals (SDGs). Our engagement activities address themes such as health and safety, corporate culture and investment into the workforce.

Diversity and Inclusion:

PAIs 12 and 13 relate to the Engagement Blueprint theme of Diversity and Inclusion. Improving disclosure on board diversity and gender pay gap are two of the priority objectives outlined in our Engagement Blueprint. We request that companies implement a policy that requires each board vacancy to consider at least one or more diverse candidates. Our engagement approach also addresses diversity of the executive management, the workforce and in the value chain.

Corporate Governance:

PAIs 20 (voluntary indicator no. 4 from Annex I Table 3), 12 and 13 relate to the Engagement Blueprint theme of Corporate Governance. We engage with companies to seek to ensure businesses act in the best interest of shareholders and other key stakeholders. We also recognise that, in most cases, in order to see progress and performance on other material ESG issues, strong governance structures need to first be in place. We therefore engage on a number of corporate governance aspects such as executive remuneration, boards and management, and strategy.

Our Shareholder Rights Directive II (SRD II) (Article 3g of Directive 2007/36/EC) statement is published [here](#).

Schroders firmly believes that companies that are well-governed and operate transparently, responsibly and sustainably are more likely to benefit from the long-term financial health and increase stakeholder value. Our engagement activities are undertaken by our portfolio managers and the Sustainable Investment team.

The following four attributes are critical to the success of our engagement approach:

- **Knowledge:** We leverage the knowledge of our analysts and portfolio managers in order to understand which sustainability issues matter to a company's long-term performance
- **Relationships:** We have built strong, long-standing relationships with a significant proportion of the companies in which we invest and aim to record and track our engagement with them
- **Impact:** The insight gained through engagement can directly influence the investment case
- **Incentive:** We may reduce or sell out of a holding if engagement is unsuccessful, or avoid investing in the first place

Our engagement activities help to drive our overall sustainability agenda. Reporting on the outcome of our engagement activities is therefore key.

We recognise our responsibility to make considered use of voting rights. The overriding principle governing our approach to voting is to act in line with what we deem to be the interests of our clients. We aim to support company management of investee companies, but we may oppose management if we believe that it is in the best interests of our clients.

Transparency is key and we report to our clients the actions we have undertaken across both our engagement and voting activities.

Voting disclosures: In 2022 and before we disclosed voting decisions at resolution level on a monthly basis. In 2023, we chose to disclose our vote records one day post meeting date, a progressive move from monthly disclosure, our disclosure includes our rationale for any vote against the board recommendations and is available [here](#).

Engagement disclosures: Each quarter and annually we publicly disclose details of our engagement activities this includes a list of companies engaged, their geographic location and who at Schroders undertook the engagement. Case studies of individual engagements are also included in our quarterly reports. These are available to download [here](https://www.schroders.com/en/sustainability/active-ownership/sustainability-analysis-in-practice/).

References to international standards

In the below section we provide details of the internationally recognised standards to assist with our assessment of our principal adverse impacts:

Climate Change (PAI 1-6):

We are a founding member of the Net Zero Asset Managers initiative where we commit to supporting the goal of net zero greenhouse gas emissions by 2050 or sooner, in line with global efforts to limit warming to 1.5°C. Schroders was one of the initial 30 global asset managers to join the initiative. Schroders has also had its greenhouse gas emission reduction goals formally validated by the Science Based Targets initiative (SBTi). The SBTi has confirmed that Schroders' Scope 1 and 2 targets are in line with a 1.5°C trajectory. Our relevant assets under management are also targeted to be aligned with a 1.5°C pathway by 2040. To achieve this objective, Schroders aims to engage with up to 1,000 companies by 2030. The climate engagement programme involves an annual prioritisation process whereby, amongst other data points, Schroders forecasts the transition risk of its issuers to identify an engagement focus list. This process aligns with the production of our annual TCFD report whereby we assess the exposure of our listed equity and credit assets to climate-related risks under three different climate change scenarios, a 1.5°C pathway, a below 2.0°C pathway, and an above 3.0°C pathway. This data is provided by a third-party vendor, which draws on analysis undertaken by the Network for Greening the Financial System (NGFS) in an attempt to map the transition and physical risk impacts of climate change to future company valuations.

Schroders subscribes to external ESG research providers to inform its climate research and proprietary climate tool; including MSCI, CDP, Refinitiv and FactSet.

Biodiversity and Human Capital (PAI 7-9):

We recognise the importance of all companies assessing and reporting on their exposure to natural capital and biodiversity risk. Schroders has committed to eliminate exposure to commodity-driven deforestation from our managed assets by 2025. This is codified in the statement on the Financial Sector Commitment on Eliminating Commodity-Driven Deforestation released during COP26.

UNGC violators (PAI 10, 11 and 20):

We became a signatory to the UN Global Compact (UNGC) principles on 6 January 2020. This excludes companies in violation of the UNGC principles, as Schroders considers violators cause significant harm to one or more environmental or social sustainable investment objectives. The areas determining whether an issuer is an UNGC violator include issues that are covered by the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights, such as human rights, bribery and corruption, labour rights, child labour, discrimination, health and safety, and collective bargaining. The list of UNGC violators is provided by a third party and compliance with the list is monitored via our automated compliance controls. Exceptions may apply, if there is evidence to demonstrate that the company has addressed the violation and is not causing significant harm.

Human Right (PAI 10 and 14):

Respect for human rights is fundamental to contributing to society. Our Group Human Rights Statement describes the governance, policies and processes we have in place to actively manage our human rights risks as an employer, as a buyer of goods and services, and as a provider of financial services and an investor in companies. Our Slavery and Human Trafficking Statement details how we assess and manage modern slavery risks within our business operations and supply chain, including company engagement activities.

More information can be found in our [Group Human Rights Statement](#) and in [our latest Slavery and Human Trafficking Statement](#).

Schroders fully supports the following international conventions:

- The Convention on Cluster Munitions (2008): prohibits the production, stockpiling, transfer and use of cluster munitions.
- The Anti-Personnel Landmines Treaty (1997), also known as The Ottawa Treaty (1997): prohibits the production, stockpiling, transfer and use of antipersonnel landmines.
- The Chemical Weapons Convention (1997): prohibits the use, stockpiling, production and transfer of chemical weapons.
- Biological Weapons Convention (1975): prohibits the use, stockpiling, production and transfer of biological weapons.

We will not knowingly hold any security in an issuer that is involved in the production, stockpiling, transfer and use of these weapons. On occasion there may be additional securities recognised by clients or local governments; these will be added to the Schroders group exclusion list for those relevant jurisdictions or specific mandates. Schroders uses third party data providers, MSCI and Sustainalytics, to inform the list is and is reviewed annually. The list of excluded companies is available [here](#).

Historical comparison

Historical comparisons, and actions taken during 2023, are provided within the “Description of the principal adverse impacts on sustainability factors” section of this document above.

We continue to improve the quality and accuracy of our PAI disclosures as the data availability improves and expect this to continue going forwards, enhancing the future historical comparisons.

Important information

This document is intended to satisfy Schroder Investment Management (Europe) S.A.'s regulatory disclosure obligations and should be used for information purposes only. Nothing in this material should be construed as advice or a recommendation to buy or sell. The material is not intended as an offer or solicitation for the purchase or sale of any financial instrument. Information herein is believed to be reliable, but Schroders does not warrant its completeness or accuracy. Any data has been sourced by us and is provided without any warranties of any kind. It should be independently verified before further publication or use. The material is not intended to provide, and should not be relied on for accounting, legal or tax advice. Reliance should not be placed on any views or information in the material when taking individual investment and/or strategic decisions. Any references to securities, sectors, regions and/or countries are for illustrative purposes only. Schroders has expressed its own views and opinions in this document and these may change.

The value of investments and the income from them may go down as well as up and investors may not get back the amounts originally invested. Exchange rate changes may cause the value of any overseas investments to rise or fall. Past performance is not a guide to future performance and may not be repeated.

Issued by Schroder Investment Management (Europe) S.A., 5, rue Höhenhof, L-1736 Senningerberg, Luxembourg. Registration No B 37.799.

Certain information contained herein (the "Information") is sourced from/copyright of MSCI Inc., MSCI ESG Research LLC, or their affiliates ("MSCI"), or information providers (together the "MSCI Parties") and may have been used to calculate scores, signals, or other indicators. The Information is for internal use only and may not be reproduced or disseminated in whole or part without prior written permission. The Information may not be used for, nor does it constitute, an offer to buy or sell, or a promotion or recommendation of, any security, financial instrument or product, trading strategy, or index, nor should it be taken as an indication or guarantee of any future performance. Some funds may be based on or linked to MSCI indexes, and MSCI may be compensated based on the fund's assets under management or other measures. MSCI has established an information barrier between index research and certain Information. None of the Information in and of itself can be used to determine which securities to buy or sell or when to buy or sell them. The Information is provided "as is" and the user assumes the entire risk of any use it may make or permit to be made of the Information. No MSCI Party warrants or guarantees the originality, accuracy and/or completeness of the Information and each expressly disclaims all express or implied warranties. No MSCI Party shall have any liability for any errors or omissions in connection with any Information herein, or any liability for any direct, indirect, special, punitive, consequential or any other damages (including lost profits) even if notified of the possibility of such damages.

No responsibility can be accepted for errors of fact or opinion whether on MSCI or Schroders' part. Please note that onward use of the data contained within this document is subject to applicable MSCI licensing requirements. Please note that if you wish to disclose this data for your own purposes, you will need to agree an appropriate licence with MSCI.

Schroders Investment Management (Europe) S.A. (SIM EU) is committed to integrating sustainability risks and considering principal adverse impacts (PAIs) in our investment decision-making process. This commitment is aligned with the broader sustainability objectives of the Schroders Group, leveraging the Group's comprehensive frameworks and methodologies, including how we engage with companies.

Social violations:

In respect of investee countries subject to social violations (PAI 16), Schroder Investment Management (Europe) S.A. excludes countries on the UN sanctions list. However, the data shown is received from a third party and is based on the EU sanctions list. As a result, there may be exposure to sanctioned countries where they are sanctioned by the EU but not the UN.

UNGC violators:

In respect of Violations of UN Global Compact principles and Organisation for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises (PAI 10), Schroder Investment Management (Europe) S.A. uses a proprietary approach to exclude companies that are assessed by Schroders to have breached one or more 'global norms'. It draws on the UN Global Compact (UNGC) principles, the OECD Guidelines for Multinational Enterprises, and the UN Guiding Principles on Business and Human Rights, as well as other sources, to inform the exclusion list. This approach differs from the approach taken by our third-party data provider. Consequently, opinions on exposure to UNGC violators may vary.