

Responsible Investment Policy

Conning's¹ RI Policy broadly encompasses the core assets managed on behalf of institutional clients in North America, Europe and Bermuda. These assets comprise the majority of assets managed by Conning in North America and Europe. The Policy defines those areas where we actively incorporate processes and procedures designed to improve both economic and non-economic outcomes for our clients while meeting our fiduciary responsibilities to achieve each client's investment objectives within established guidelines and constraints.

This Policy also outlines our philosophy of a collaborative approach to achieving these objectives in partnership with our clients, how we engage with the investment community and the issuers of securities managed on behalf of our clients, the governance practice and structure designed to provide oversight and review, and how we communicate these efforts to the investment community and our clients.

Where conflicts arise between this RI Policy and a client's stated investment policy or objectives, we engage with our clients to reconcile those conflicts within the regulatory and business framework whilst fulfilling our fiduciary responsibilities to our clients.

This Policy is reviewed annually by senior management and the Operating Committee of Conning Holdings Limited ('CHL'), and approved by the CEO of CHL

Governance

- The Sustainability Leadership Group comprises members from across Conning Group entities and its affiliates, and includes several members of the CHL Operating Committee; it is ultimately accountable to the CHL Board of Directors. Its remit includes meeting the firm's Corporate sustainability goals and responsibilities as well as driving the firm's progress to delivering sustainable investment and risk offerings to meet its clients' needs whilst remaining aligned with industry practice and regulation.
- Oversight and Governance of Conning's RI Policy are the responsibility of the Sustainability Leadership Group.
- Regional business heads and the Chair of Conning's Investment Policy Committee are responsible for implementation of the RI Policy.
- An ESG Working Group provides guidance on, and monitors implementation of, Conning's RI and ESG initiatives. In addition, it is responsible for external engagement including PRI reporting.
- The continued development of our capabilities and direction in responsible investing includes both sponsorship of senior management and open feedback mechanisms including input from investment teams, clients, Compliance Team and our peers.
- Conning's Chief Risk Officer and Compliance Team are responsible for oversight of, and compliance with, client guidelines related to RI and ESG issues. The CRO periodically reports to the Risk Committee of the CHL Board of Directors and senior management as appropriate.

Philosophy and Process

- Transparency and the communication of the financial and ESG factors driving the expected performance of the issuers or securities that we manage, and the portfolios that we construct for our clients, are core building blocks of our RI framework.
- **ESG indicators**² enhance our view of the fundamental creditworthiness and the relative pricing of investments. We have specific asset-class guidelines on how ESG is implemented and these are an integral factor in the assessment of the long-term viability and/or valuation of an issuer or security.
- Our processes and systems provide both Conning and our clients the ability to identify, measure, and monitor their exposures to ESG and climate risks and the capability to manage, control and report on these risks..
- By taking the initiative in providing this capability, we aim to collaborate with our clients in having a more robust understanding of the overall risks in their portfolios as well as to assist our clients in achieving their desired sustainability objectives..
- ESG and climate data from external providers is used across our investment process, but we also assign our own proprietary ratings which may validate or challenge market opinions when conducting our investment research.
- We do not exclude investments from client portfolio's based solely on ESG indicators or climate data, however binding investment restrictions may be included subject to agreement with each client.

Engagement

- As a signatory to the Principles for Responsible Investment (PRI), Conning is committed to upholding the six **principles**³ that govern responsible investment. In addition to reporting our annual progress to PRI, we believe that increasing our engagement with the PRI expands our communications with the broader investment community. In addition, the reporting framework reinforces Conning's internal oversight and governance.
- Conning strives to contribute to the broader improvement of responsible investment practices by working with clients to achieve sustainable economic outcomes and increase the understanding and identification of threats and opportunities presented by the issuers of the securities that we manage.
- At Conning we engage, to the extent possible, with the issuers of the securities that we manage to establish official direction and philosophy on ESG factors which we believe have a direct impact on the sustainability of an issuer's financial performance. ESG indicators enhance our view of the fundamental creditworthiness or the pricing of investments, and they are an integral factor in the long-term financial stability of an issuer.

External Communication

- Conning is committed to the PRI framework of annual reporting and review. We view this as a key mechanism for both internal and public examination and communication. We target strong ratings across all relevant areas and continue to use this as a mechanism to both measure our progress across relevant areas and communicate it with our clients and peers.

ABOUT CONNING

Conning (www.conning.com) is a leading investment management firm with a long history of serving the insurance industry. Conning supports institutional investors, including insurers and pension plans, with investment solutions, risk modeling software, and industry research. Founded in 1912, Conning has investment centers in Asia, Europe and North America.

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ESG Disclosures

Clients utilizing ESG investing strategies and/or factors may underperform strategies which do not utilize ESG considerations. ESG strategies may operate by either excluding the investments of certain issuers or by selecting investments based on their compliance with factors such as ESG. These strategies may exclude certain sectors or industries from a client's portfolio, potentially negatively affecting the client's investment performance if the excluded sector or industry outperforms. ESG evaluations are subjective by nature, and Conning may rely on analysis and scores provided by third parties in determining whether an issuer meets Conning's standards for inclusion or exclusion. A client's perception may differ from Conning's or a third party's on how to judge an issuer's adherence to responsible investing principles.

Environmental, Social, Corporate Governance Considerations – Conning is a signatory to the United Nations Principles for Responsible Investing (“UN PRI”), and seeks to align its investment activities with the tenets of the UN PRI. However, Conning does not automatically negatively screen investments based on ESG, unless specified by client guidelines and does not represent that services are “ESG Compliant” or similar. Clients can continue to hold securities or industries that pose ESG risks.

FOOTNOTES

1. Conning Inc., Goodwin Capital Advisers Inc. and Conning Asset Management Limited – collectively “Conning”.
2. “The Role of ESG in the Investment Research Process” Conning (January 2020) <https://www.conning.com/-/media/marketing/site/documents/connings-esg-process.pdf>
3. <https://www.unpri.org/pri/what-are-the-principles-for-responsible-investment> (retrieved February 2023)