

15 November 2022

## **Principal Adverse Sustainable Impact Policy** PineBridge Investments Ireland Limited

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Approver	
Owner	Legal
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## 1. Introduction

This document sets out disclosures by Pinebridge Investments Ireland Limited (the “**Firm**”), in respect of its obligation under Article 4 of the EU Sustainable Finance Disclosure Regulation (“**SFDR**”) to make a “comply or explain” statement as to whether it shall consider the principal adverse impacts of investment decisions on sustainability factors.

## 2. No Consideration of Sustainability Adverse Impacts

This is principally because of a lack of consistent, accessible and accurate data from the underlying portfolio companies, the Manager will maintain the position of not considering adverse impacts on sustainability factors until such time as it feels it has the necessary data and framework to be able to make these considerations meaningfully and report on them clearly.

The Firm is supportive of the aim of this requirement which is to improve transparency and investor understanding of how investment decisions impact sustainability factors across society and the environment.

At the current time, the Firm does not consider the adverse impacts of investment decisions on sustainability factors. This is principally because of a lack of consistent, accessible and accurate data from the underlying portfolio companies, the Manager will maintain the position of not considering principal adverse impacts on sustainability factors until such time as it feels it has the necessary data and framework to be able to make these considerations meaningfully and report on them clearly.

The Firm will review this position regularly and will update investors accordingly with relevant information, should the position change.

## 3. Global Policy Statement on Responsible Investment

The Firm has implemented a Global Policy Statement on Responsible Investment. Under this policy, the Firm sets out its overarching ESG Statement of Principle and how the Firm integrates ESG- and Sustainability-related considerations into its investment processes.

Details of this can be found at: <https://www.pinebridge.com/en/investor-types/default/about-us/esg-investing>

## 4. Stewardship & Active Ownership

[The Firm has implemented a shareholder engagement policy, for the purposes of the revised Shareholder Rights Directive (“SRD II”). Our engagement policy sets out how we integrate shareholder engagement in our investment strategy. This includes how we:

- monitor investee companies on relevant matters (including strategy, financial and non-financial performance and risk, capital structure, social and environmental impact and corporate governance)
- conduct dialogue with investee companies
- exercise voting rights and other rights attached to shares
- cooperate with other shareholders

- communicate with relevant stakeholders of the investee companies
- manage actual and potential conflicts of interests in relation to our engagement.

Our engagement policy is available on our website at: <https://www.pinebridge.com/en/investor-types/default/about-us/stewardship>

## 5. Adherence to responsible business codes and international standards

In connection with ESG, the Firm adheres to responsible business codes and internationally recognised standards for due diligence and reporting. For these purposes, the Firm refers to its adherence to the following codes and standards:

### Signatories of:

UN Principles of Responsible Investing (UNPRI) – A+ Rated for Governance  
[UK Stewardship Code]  
Japan Stewardship Code  
UK Local Government Pension Scheme Code

### Member of the:

Sustainability Accounting Standards Board's Standards Advisory Group (SASB)  
Advisory Council of the Green Bond Principles and Social Bond Principles  
Transition Pathway Initiative  
Swiss Sustainable Finance Initiative