



## Article 10 (SFDR) Website disclosure for an Article 8 fund

### Franklin Templeton Investment Funds – Templeton Global Bond (Euro) Fund (the “Fund”)

Version	Date of publication	Date of update (if any)	Explanation (if any)
1.0	27 December 2022	19 January 2023	
2.0	25 August 2023		
3.0	8 January 2024		

<b>Product name: Franklin Templeton</b> <b>Investment Funds – Templeton Global</b> <b>Bond (Euro) Fund</b>		<b>Legal entity identifier:</b> <b>GVEB5FR7K0S8BJ1KRI44</b>
<b>Does this financial product have a sustainable investment objective?</b>		
<input type="checkbox"/> Yes		<input checked="" type="checkbox"/> No
<input type="checkbox"/> It will make a minimum of <b>sustainable investments with an environmental objective: ___%</b> <input type="checkbox"/> in economic activities that qualify as environmentally sustainable under the EU Taxonomy  <input type="checkbox"/> in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy	<input checked="" type="checkbox"/> It <b>promotes Environmental/Social (E/S) characteristics</b> and while it does not have as its objective a sustainable investment, it will have a minimum proportion of 5% of sustainable investments  <input type="checkbox"/> with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy  <input checked="" type="checkbox"/> with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy  <input type="checkbox"/> with a social objective	
<input type="checkbox"/> It will make a minimum of <b>sustainable investments with a social objective: ___%</b>	<input type="checkbox"/> It promotes E/S characteristics, but <b>will not make any sustainable investments</b>	



## A. Summary

The Fund promotes environmental and social characteristics in accordance with Article 8 of the Sustainable Finance Disclosure Regulation (the “SFDR”).

In its implementation of the Fund’s environmental, social and governance (“ESG”) considerations, the Investment Manager typically favors issuers with either higher ESG scores or those projected to have neutral to improving ESG scores over the medium term (the next two to three years), as captured by its proprietary ESG methodology. For supranational issuers, the Investment Manager utilizes ESG ratings provided by MSCI. In addition, the Fund refrains from investing in issuers deemed to be among the poorest performers under certain sustainability metrics.

The Fund’s environmental or social characteristics are assessed both quantitatively and qualitatively, by means of sustainability indicators as well as of the Investment Manager’s proprietary ESG ratings system and its research process further described in the Website disclosure’s dedicated sections. As part of its investment decision making process, the Fund’s ESG strategy also uses binding criteria for the selection of underlying assets and applies specific ESG exclusions.

Finally, the Fund has a minimum allocation of 5% of its portfolio to sustainable investments. The Fund ensures that its sustainable investments do not cause significant harm to any environmental or social sustainable investment objective.



## B. No sustainable investment objective

This financial product promotes environmental or social characteristics but does not have as its objective a sustainable investment.

However at least 5% of the Fund's portfolio will be allocated to sustainable investments.

**What are the objectives of the sustainable investments that the financial product partially intends to make and how does the sustainable investment contribute to such objectives?**

The Fund invests at least 5% of its portfolio in green bonds, where the use of proceeds has been specified by the issuer, and verified by a third party or the Investment Manager, to benefit underlying environmental projects such as but not limited to:

- the efficient use of energy, raw materials, water, and land;
- the production of renewable energy;
- the reduction of waste, greenhouse gas emissions and lower impact of economic activities on biodiversity; and
- the development of circular economy.

**How do the sustainable investments that the financial product partially intends to make, not cause significant harm to any environmental or social sustainable investment objective?**

For sovereign issuers, the relevant principal adverse impacts (the “PAIs”) on social violations are assessed through a proprietary responsibility index that incorporates indicators on global cooperation, human rights, and civil liberties among others. For every sustainable investment targeted by the Investment Manager, an assessment of the materiality of PAIs to the underlying investment is made, documented and the probability of adverse impact is estimated. After this assessment, the Investment Manager determines whether an investment has no, low, moderate, severe, or very severe adverse impact. The Investment Manager does not make investments that fall in the severe/very severe category, and if an existing investment falls into the severe/very severe category, the Investment Manager takes all reasonable means to divests of the security within 6 months. Where divestment of such a position is not feasible within this timeframe due to legal or regulatory restrictions or exceptional market circumstances, the Investment Manager shall aim to reduce the position as soon as reasonably practicable or legally permissible, as the case may be.

**How have the indicators for adverse impacts on sustainability factors been taken into account?**

When assessing compliance of the Fund’s investments with the Do No Significant Harm principles, the Investment Manager takes into account all mandatory PAI indicators of Table 1 of Annex I of the SFDR Regulatory Technical Standards (“RTS”), to the extent they are relevant for the investments contemplated by the Fund and other data points deemed by the Investment Manager as proxies for adverse impact. The Investment Manager performs this analysis at the level of each sustainable investment so that the relevance and materiality of the PAI indicators may vary across investments. Issuers deemed to be in breach of these indicators will not qualify as sustainable investments. While assessing eligible green bonds, the Investment Manager reviews and documents the materiality of PAIs for the project. For example, while investing in a green bond whose use of proceeds targets the roll out of renewable energy sources, the Investment Manager ascertains that financed projects are likely to have a positive impact on greenhouse gas intensity of a national economy.

**Are the sustainable investments aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights?**

The sustainable investments in the Fund’s portfolio are solely bonds issued by sovereign countries and supranational organizations. The Organisation for Economic Cooperation and Development Guidelines for Multination Enterprises and the UN Guiding Principles on Business and Human Rights are not applicable to such investments.



**C. Environmental or social characteristics of the financial product**

**What are the environmental or social characteristics promoted by this financial product?**

The Fund promotes broad environmental and/or social characteristics, which vary by composition of the portfolio and includes *inter alia* actions around resource insecurity, extreme weather risk, unsustainable environmental practices, social cohesion & stability, infrastructure, health security, labor, human capital, and demographics. The Investment Manager seeks to attain these characteristics by using a proprietary ESG rating methodology, the Templeton Global Macro ESG Index (“TGM-ESGI”) to:

- screen out government bonds of the poorest performing countries in each of the ESG categories until the exclusions reach 10% of the Fund’s investment universe dedicated to sovereign bonds; and
- commit to a weighted average base ESG score of the sovereign bonds (including supranational bonds and also the notional value of net long positions in related derivatives) in the Fund’s portfolio to be higher than the average base ESG score of the investment universe dedicated to sovereign bonds.

The portion of the investment universe dedicated to sovereign bonds of the Fund’s portfolio has been constructed based on a universe of sovereign issuers with historic data of bond issuance, and excluding countries:

- with no current debt outstanding;
- recorded as sanctioned by the United States Office of Foreign Assets Control (the “US OFAC”), the European Union (the “EU”) or the United Nations (the “UN”);
- which do not have any debt in issuance denominated in euro or US dollar and does not have a local custodian entity meeting the legal and regulatory requirements applicable to the Fund and its custody partners; and
- any country where foreign ownership of sovereign bonds is not permitted or not reasonably practicable due to legal or regulatory restrictions.

The portion of the investment universe dedicated to supranational bonds of the Fund’s portfolio is constructed by supranational issuers that have MSCI ESG ratings.

In addition, the Fund promotes positive environmental and/or social outcomes by investing at least 5% of its portfolio in green bonds, where the use of proceeds has been specified by the issuer and verified by a third party or the Investment Manager, to benefit underlying environmental projects.

The Fund does not use a reference benchmark to which it aligns the environmental and/or social characteristics that the Fund promotes.



#### D. Investment strategy

**What investment strategy does this financial product follow and how is the strategy implemented in the investment process on a continuous basis?**

**For sovereign issuers**, the Fund employs a proprietary ESG rating methodology, the TGM-ESGI, to assess each country that issues sovereign bonds that are current or potential investments for the Fund. The Investment Manager’s methodology captures not only a country’s current ESG score based on a variety of subcategories but more importantly, any expected improvement or deterioration in the country’s ESG practices. The Investment Manager believes that this two-pronged test potentially best represents the investment worthiness of a country and also assists in potentially providing capital to countries that are expected to improve from an ESG perspective.

The TGM-ESGI contains environmental and social indices that measure resource insecurity, extreme weather risk, unsustainable practices, social cohesion and stability, human capital,

labor, and demographics among other factors, along with governance factors such as institutional strength and corruption and transparency.

As an initial step in its methodology, the Investment Manager scores each country that issues sovereign debt that may be potential investments for the Fund on a scale of 0–100 (100 being the highest) in various ESG subcategories that the Investment Manager has determined to have a significant impact on macroeconomic conditions.

Within the ESG subcategories, the methodology leverages baseline rankings from a set of recognized global data providers. After this, the subcategory scores are tallied into a total ESG score by grouping them into their respective ESG categories, and equal weighting those three overarching categories (i.e., a 33% weighting for environmental, 33% for social and 33% for governance).

The Investment Manager then uses internal proprietary research as a forward-looking overlay on those baseline current scores, to assess whether the Investment Manager expects countries to improve or deteriorate in each of the subcategories over the next two to three years. These conclusions form projected TGM-ESGI scores.

Projected scores in anticipation of how conditions change in the medium term are emphasized as part of the research process.

At time of purchase, issuers with current TGM-ESGI scores below the median of the investment universe must have projected neutral to improving ESG ratings. The Investment Manager is not allowed to make a new investment or actively add to an existing investment where the issuer has a TGM-ESGI score below the median and exhibits negative momentum.

Of the remaining investment universe, government bonds of the poorest performing countries in each of the ESG categories based on current scores are excluded from investment until the exclusions reach 10% of the respective investment universe.

The ESG methodology is applied to 100% of the sovereign debt holdings in the Fund's portfolio and is binding for the portfolio construction.

**For supranational issuers**, the Fund utilizes ESG ratings provided by MSCI and restates those ratings to correspond to a scale of 0–100 (100 being the highest).

The ESG methodology is applied to 100% of the supranational debt holdings in the Fund's portfolio and is binding for the portfolio construction.

The weighted average base ESG score of the Fund's portfolio is higher than the average base ESG score of investment universe. For the purpose of this calculation, the ESG scores for supranational issuers apply towards the Fund's weighted average sovereign ESG score.

The TGM-ESGI subcategories and global reference indices used for scoring are reviewed at least bi-annually and may change over time. However, the overall weightings remain one-third each for ESG category.

The Investment Manager monitors sovereign and supranational issuers of a bond, currency, or derivative thereof that present meaningful deteriorating current or projected scores, with a view to evaluate the potential divestment that demonstrate no improvement over time. The evaluation is done on a case-by-case basis.

If the sovereign issuer of a bond, currency, or derivative thereof, which is held in the portfolio, falls into the 10% list of excluded issuers, the Investment Manager takes all reasonable means to divest the security within 6 months. Where divestment of such a position is not feasible within this timeframe due to legal or regulatory restrictions or exceptional market circumstances, the Investment Manager shall aim to reduce the position as soon as reasonably practicable or legally permissible, as the case may be.

**What are the binding elements of the investment strategy used to select the investments to attain each of the environmental or social characteristics promoted by this financial product?**

The binding elements of the investment strategy, which are not at the discretion of the Investment Manager, can be summarized as follows:

- the exclusion of countries and issuers that are subject to international economic sanctions, including sanctions imposed by the UN, the EU, or the US OFAC;
- the exclusion of government bonds of the poorest performing countries in each of the ESG categories based on current proprietary country scores until the exclusions reach 10% of the Fund's investment universe dedicated to sovereign bonds;
- the commitment to have a weighted average base ESG score of the sovereign bonds (including supranational bonds and also the notional value of net long positions in related derivatives) in the Fund's portfolio higher than the average base ESG score of the investment universe dedicated to sovereign bonds.

For the purpose of restricting the investment universe, exclusions based on countries subject to international sanctions are applied first. The exclusion of countries with the weakest ESG scores is applied to the remaining investment universe.

Exclusions of the weakest scoring countries occurs sequentially, beginning with the removal of the poorest scoring country according to TGM-ESGI's environmental score, then the country within the remaining universe with the weakest social score, and finally the country with the weakest governance score is removed. This process is repeated until 10% of the universe has been excluded.

**What is the policy to assess good governance practices of the investee companies?**

Although the Fund primarily invests in government bonds, sovereign governance is assessed and monitored as part of the investment management process.

Issuers that are subject to international economic sanctions, including sanctions imposed by the UN, the EU or the US OFAC are excluded from the Fund's investment universe.

Remaining issuers are assessed according to their effectiveness of governance; policy mix and reform-mindedness; corruption and transparency; institutional strength; and business climate. These assessments are aggregated to provide an overall governance score for each issuer in the investible universe.

Thereafter, the investment process excludes the government bonds of the poorest performing countries in each of the ESG categories, based on proprietary scores. This ensures that countries with unacceptably weak governance processes are not considered for investment.

Sovereign governance is regularly assessed and monitored as part of the process. From time to time, the Investment Manager has discussions with governments, central banks, and other institutions at various levels. Certain of these discussions may include governance and economic best practices, and the Investment Manager may share its views while also trying to better understand government stances on economic policies and governance, as well as sustainability and social topics to facilitate the investment decision making.

**Is there a commitment to reduce by a minimum rate the scope of investments considered prior to the application of the strategy? (including an indication of the rate)**

Government bonds of the poorest performing countries in each of the ESG categories based on current scores are excluded from investment until the exclusions reach 10% of the Fund's investment universe dedicated to sovereign bonds.

**Does this financial product consider principal adverse impacts on sustainability factors?**



Yes

The following PAIs are considered for sovereign and supranational issuers: •  
**greenhouse gas emissions;** and  
• **social violations.**

**Greenhouse gas emissions** of investee countries are monitored through greenhouse gas intensity Scope 1 data points.

**Social violations** by the investee countries are monitored as part of the TGM-ESGI, where the Investment Manager reviews institutional strength, social cohesion and stability and income equality among others. This is in addition to explicitly excluding countries subject to international sanctions, including those imposed by the UN, EU, or US OFAC.

More information on how the Investment Manager considers its PAIs may be found in the periodic reporting of the Fund.

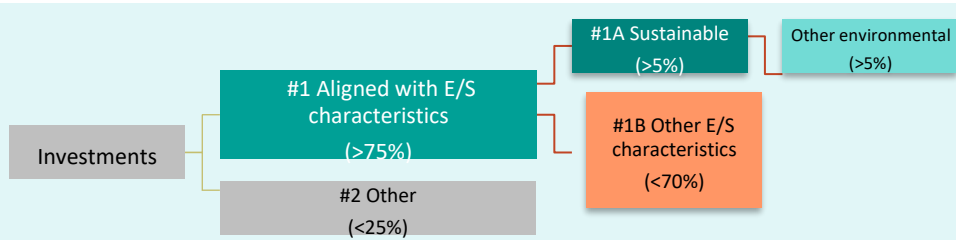
No



## E. Proportion of investments

### What is the planned asset allocation for this financial product?

The Investment Manager employs a binding proprietary ESG methodology which is applied to at least 75% of the portfolio of the Fund, including the 5% minimum investments in green bonds. Derivatives may also be used for investment, hedging, or efficient portfolio management. The ESG methodology applies to the notional value of the derivatives used to gain long exposures to interest rates (duration), currency positions, or credit exposures. At least 75% of the Fund's portfolio is aligned with environmental and/or social characteristics promoted by the Fund and at least 5% of this portion of the portfolio qualify as sustainable investment. A maximum of 25% of the Fund's portfolio may be set aside, as indicated in the following graph with "#2 Others". It includes liquid assets (ancillary liquid assets, bank deposits, money market instruments and money market funds) held for liquidity purposes that, by their nature, cannot be aligned with the environmental and/or social characteristics promoted by the Fund.



**#1 Aligned with E/S characteristics** includes the investments of the financial product used to attain the environmental or social characteristics promoted by the financial product.

**#2 Other** includes the remaining investments of the financial product which are neither aligned with the environmental or social characteristics, nor are qualified as sustainable investments.

The category **#1 Aligned with E/S characteristics** covers:

- The sub-category **#1A Sustainable** covers sustainable investments with environmental or social objectives.
- The sub-category **#1B Other E/S characteristics** covers investments aligned with the environmental or social characteristics that do not qualify as sustainable investments.

### How does the use of derivatives attain the environmental or social characteristics promoted by the financial product?

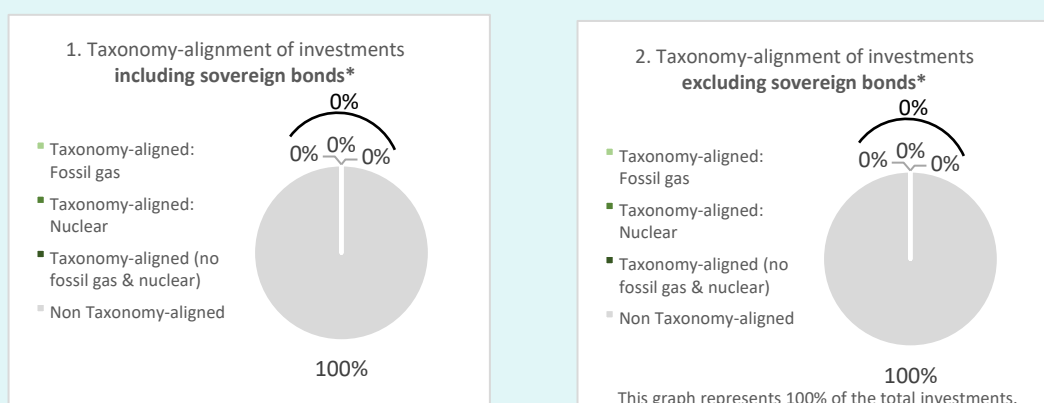
The ESG methodology is applied to the notional value of derivatives used to gain long exposure to interest rates (duration), currency positions, or credit spreads.

Notional value for long positions is counted towards the scoring.

### What is the minimum share of investments with an environmental objective aligned with the EU Taxonomy? (including what the minimum share of transitional and enabling activities is)

Not applicable.

*The two graphs below show in green the minimum percentage of investments that are aligned with the EU Taxonomy. As there is no appropriate methodology to determine the Taxonomy-alignment of sovereign bonds\*, the first graph shows the Taxonomy alignment in relation to all the investments of the financial product including sovereign bonds, while the second graph shows the Taxonomy alignment only in relation to the investments of the financial product other than sovereign bonds.*



\* For the purpose of these graphs, 'sovereign bonds' consist of all sovereign exposures.

**What is the minimum share of sustainable investments with an environmental objective that are not aligned with the EU Taxonomy?**

The Fund commits to having a minimum share of 5% of sustainable investments with an environmental objective not aligned with the EU Taxonomy in its portfolio. The Investment Manager is not currently in a position to specify the exact proportion of the Fund's underlying investments which take into account the EU criteria for environmentally sustainable economic activities. However, the position is kept under review as the underlying rules are finalized and the availability of reliable data increases over time.

**What investments are included under "#2 Other", what is their purpose and are there any minimum environmental or social safeguards?**

The "#2 Other" investments include investments in liquid assets (ancillary liquid assets, bank deposits, money market instruments and money market funds) held for the purposes of servicing the day-to-day requirements of the Fund and/or to serve as collateral for derivatives, undertakings for collective investment in transferable securities and undertakings for collective investment for liquidity management purposes.

No minimum safeguards have been put in place.



## F. Monitoring of environmental or social characteristics

### What sustainability indicators are used to measure the attainment of the environmental or social characteristics promoted by this financial product?

The sustainability indicators used to measure the attainment of the environmental and/or social characteristics promoted are:

- the share of sovereign issuers having exposure to, or ties with the sectors and the additional exclusions further described below;
- the ESG score difference between the Fund's portfolio and the investment universe; and
- the percentage of investments in green bonds.

### How are the environmental or social characteristics and the sustainability indicators monitored throughout the lifecycle of the financial product and the related internal/external control mechanism?

The environmental or social characteristics and the sustainability indicators (including PAI indicators) are monitored throughout the lifecycle of the product.

- **Initial investment phase**

ESG screenings of investments are performed during the initial acquisition phase.

Prior to investment, the Investment Manager screens all potential investments to confirm they meet the Fund's criteria and to confirm the portfolio remains in compliance with its policies. For sustainable investments, this includes PAIs and good governance assessment to ensure this portion of the portfolio does not cause significant harm to any environmental or social sustainable investment objective as described under the section "B. No sustainable investment objective". In addition, the Investment Manager ensures that the Fund does not invest in the Fund exclusion list.

More information on the exclusion list and on the ESG rating methodology can be found under the section "D. Investment Strategy".

- **Holding period**

Once investments have been made, ongoing monitoring and reporting are performed.

The Investment Manager conducts reviews to ensure ongoing compliance with the policies and analyses the investments exposure at a portfolio level for possible adverse impact. Exclusions/restrictions based on scoring are coded into our pre trade engine for compliance monitoring on a weekly basis. The Investment Manager is responsible for the correct execution of the ESG due diligence activities.

- **Divestment**

The Fund evaluates divestment in cases of meaningful deteriorating current or projected ESG scores and/or deteriorating adverse impact category (severe/very severe category) and/or issuers falling into the 10% list of excluded issuers.

In these last two cases, the Investment Manager takes all reasonable means to divest the security within 6 months. Where divestment of such a position is not feasible within this timeframe due to legal or regulatory restrictions or exceptional market circumstances, the Investment Manager shall aim to reduce the position as soon as reasonably practicable or legally permissible, as the case may be.

- **Control mechanisms**

The Investment Manager is responsible for supervising and improving the implementation of the ESG policies and responsible investment process across all investments.

All binding elements of the Fund's ESG commitments are regularly reviewed and monitored as part of our Investment Compliance process.

In addition, sustainability risk is integrated in the Fund's risk management processes since 1<sup>st</sup> August 2022, in line with the Commission Delegated Regulation (EU) 2021/1255 and Delegated Directive (EU) 2021/1270.



## G. Methodologies

### What is the methodology to measure the attainment of the environmental or social characteristics promoted by the financial product using the sustainability indicators?

The Fund measures the attainment of the environmental or social characteristics by using on an ongoing basis and reporting on an annual basis the sustainability indicators mentioned under the section “F. Monitoring of environmental or social characteristics” as well as the PAI indicators.

The Fund relies on the following criteria:

#### 1. ESG rating

The environmental and social characteristics promoted are considered as attained if the weighted average base ESG score of the sovereign bonds (including supranational bonds and also the notional value of net long positions in related derivatives) in the Fund's portfolio is higher than the average base ESG score of the investment universe dedicated to sovereign bonds.

The ESG rating methodology is described under the section “D. Investment Strategy”.

#### 2. Negative screens

The environmental and social characteristics promoted are considered as attained if the share of sovereign issuers having exposure to, or ties with, the sectors and the additional exclusions described under the section “D. Investment Strategy” equals 0%.

#### 3. Investments in bonds qualifying as sustainable investments

In addition to the environmental and social characteristics promoted, the Fund promotes positive outcomes by investing in bonds qualifying as sustainable investments. The bonds' assessment is described under the section “C. Environmental or social characteristics of the

financial product". These outcomes are considered as attained if the percentage of sustainable investments is equal to at least 5% of the Fund's portfolio.

The Fund ensures that its sustainable investments do not cause significant harm to any environmental or social sustainable investment objective. Assessment and monitoring through PAIs are described under the section "B. No sustainable investment objective".

The Investment Manager applies a "pass-fail" approach in determining whether an investment is sustainable, considering a position fully sustainable if it can be classified as a use-of-proceeds instrument financing sustainable projects, ranging from green bonds or social bonds towards more focused instruments (blue bonds, gender bonds etc.). The Investment Manager relies on the alignment of the use-of-proceeds instruments with the recognized international standards for green or social bonds, with a special consideration for the ICMA framework and other internationally recognized standards. The certification verification is complemented by an internal analysis to determine the eligibility of the instrument, particularly in cases where there is a lack of external assurance or third-party assessment. The complementary analysis focuses on the alignment of the instrument with the ICMA framework and other international standards, evaluating the instrument's use of proceeds, project evaluation and selection, management of proceeds and reporting as well as the contribution of the project to the relevant UN SDG(s). While assessing eligible bonds, the Investment Manager also reviews and document the materiality of the relevant PAIs for the project and how the project's implementation reduces the exposure to those PAIs.



## H. Data sources and processing

**What are the data sources used to attain each of the environmental or social characteristics including the measures taken to ensure data quality, how data is processed and the proportion of data that is estimated?**

- **Data sources**

For sovereign bonds, the Fund's TGM-ESGI leverages baseline rankings from a set of recognized global indexes providers and from a set of reputable sources including (not an exhaustive list):

- The World Bank
- The World Economic Forum
- The United Nations
- The Heritage Foundation
- Global Health Security Index (GHS Index)

For supranationals, the Fund leverages ESG Ratings from MSCI.

- **Measures to ensure data quality**

Data sources are comprehensive and transparent. The Fund makes enhancements and refinements to the methodology as warranted. In the event there is an unforeseen limitation with data, the Fund seeks to either refine the methodology or to recreate components to avoid a major methodological break.

- **Data processing**

Data is processed using a "three lines of defense" model.

First Line: data is put together by one ESG analyst based on index data from reputable institutions, which is then verified by another ESG analyst. All scores are scrutinized and questioned, and all methodology changes are discussed.

Second Line: when finalized, the data is stored with a timestamp in a secure investment manager database where country analysts have read only access and regular backups are made. For quality control, two ESG analysts separately verify the data, changes are discussed across indices at a high level, and country analysts scrutinize the data on a per country level.

Third Line: in addition to secure read only data storage, periodic oversight / high-level review of the ESG research is maintained for audit purposes. This includes the rationale to support the projected ESG score and the criteria/approach for determining whether a country is scored actively or passively. For actively scored countries, the analytical view of the research team on projected ESG scores is required. For passively scored countries, no additional active input from the research team is necessary. The passively scored countries are used for comparison and contextualization within the overall universe of TGM-ESGI scores.

- **Estimated data**

The Investment Manager does not estimate data, but in some instances, third party data may be based on estimates. The proportion of data estimated by third party data providers cannot be assessed.



### I. Limitations to methodologies and data

**What are the limitations to the methodologies and data sources? (including how such limitations do not affect the attainment of the environmental or social characteristics and the actions taken to address such limitations)**

- **Limitation to the methodology**

The Investment Manager ascribes TGM-ESGI projected scores for each country in the investment universe. These are determined by individual analysts with extensive experience looking at each country using a combination of quantitative and qualitative information. As such, TGM-ESGI projected scores are best-efforts estimates of the ESG momentum of a country and there is no guarantee the projected ESG scores will come to fruition.

- **Limitation to the data sources**

The Investment Manager continually monitors and reviews the process, with a view to refine as required. There is potential for a reference index to become discontinued, in which case the Investment Manager seeks to replicate or replace the reference index.



### J. Due diligence

**What is the due diligence carried out on the underlying assets and what are the internal and external controls in place?**

The Fund carries out due diligence on the underlying assets in the investment process on a regular basis as described under the section “F. Monitoring of environmental or social characteristics”.



### K. Engagement policies

**Is engagement part of the environmental or social investment strategy?**

Yes

No



**If so, what are the engagement policies? (including any management procedures applicable to sustainability-related controversies in investee companies)**

From time to time, the Investment Manager has discussions with governments, central banks, and other institutions at various levels. Certain of these discussions may include governance and economic best practices, and the Investment Manager may share its views while also trying to better understand government stances on economic policies and governance, as well as sustainability and social topics to facilitate the investment decision making.



**L. Designated reference benchmark**

**Has a reference benchmark been designated for the purpose of attaining these characteristics promoted by the financial product?**

Yes

No