



PUBLIC TRANSPARENCY REPORT

2025

Alphinity Investment Management Limited

Generated 24-11-2025

About this report

PRI reporting is the largest global reporting project on responsible investment.

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

The public Transparency Reports, which are produced using signatories' reported information, provide accountability and support signatories to have internal discussions about their practices and to discuss these with their clients, beneficiaries, and other stakeholders. This public Transparency Report is an export of the signatory's responses to the PRI Reporting Framework during the 2025 reporting period. It includes the signatory's responses to core indicators, as well as responses to plus indicators that the signatory has agreed to make public.

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

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

Disclaimers

Legal Context

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

Responsible investment definitions

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

Data accuracy

This document presents information reported directly by signatories in the 2025 reporting cycle. This information has not been audited by the PRI or any other party acting on its behalf. While this information is believed to be reliable, no representations or warranties are made as to the accuracy of the information presented.

The PRI has taken reasonable action to ensure that data submitted by signatories in the reporting tool is reflected in their official PRI reports accurately. However, it is possible that small data inaccuracies and/or gaps remain, and the PRI shall not be responsible or liable for such inaccuracies and gaps.

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SENIOR LEADERSHIP STATEMENT (SLS)

SENIOR LEADERSHIP STATEMENT

SENIOR LEADERSHIP STATEMENT

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

Section 1. Our commitment

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

Alphinity is committed to investing responsibly. We do this by considering ESG risks and opportunities in our financial analysis, supporting improved practices through active engagement with companies, and contributing to ESG leadership efforts through industry research and collaborative engagements. Alphinity has been a signatory to the Principles of Responsible Investment since 2011 and is also a member of the Responsible Investment Association of Australasia (RIAA). Alphinity's two Sustainable Funds are both certified by RIAA and have a Sustainable Plus rating. Alphinity believes that the integration of environmental, social, and corporate governance factors into our investment management processes, and ownership practices is essential for our success as investment managers.

We recognise that ESG considerations can have a material impact on the performance of companies (positively and/or negatively) and we, as active investment managers need to understand individual companies' ESG risks and opportunities. Where possible we seek to engage with company management and advocate for companies to mitigate potential risks and maximise opportunities from their ESG issues. This reflects our obligation to our clients to both maximise returns and manage risk. By improving our understanding of the way in which individual companies manage ESG issues, we aim to achieve our objective of generating above average, long term sustainable returns. The management of ESG issues is the responsibility of all members of the portfolio management team, with the support of three dedicated ESG resources. Our five pillars of responsible investing were established in 2021 and are relevant for all aspects of Alphinity's investment practices across all strategies.

They are summarised below.

1. ESG integration: We believe that ESG considerations can have a material impact on the performance of companies (positively and/or negatively) and as active investment managers we need to understand and integrate these risks appropriately. ESG research remains a fundamental input into our investment process and recognise that as our views on ESG and emerging themes mature, so will our integration of research efforts for material ESG issues that may influence the investment case.
2. Stewardship and active engagement: We are active managers and focus on using our influence to encourage better ESG outcomes and reduce risk. Stewardship efforts such as company engagement, proxy voting activities, research and thought leadership, and collaborative engagements are an important part of responsible investing. These activities have the potential to influence company behaviour, improve practices, reduce headwinds for a business and ultimately, improve returns over the long-term.
3. Thematic research : Thematic research and thought leadership are used to understand ESG risks and opportunities across the portfolio and are particularly important for emerging ESG themes like climate change, nature and biodiversity, and modern slavery. We believe that taking a broad approach to ESG risk management and communicating our views externally supports wider ESG management and helps companies understand investor expectations.
4. Sustainable strategies: We have two dedicated sustainability strategies structure around the United Nations Sustainable Development Goals (SDGs). The Global Sustainable Equity Fund and the Australian Sustainable Share Fund aim to invest in companies where their products and services are delivering sustainable solutions and have a net positive alignment with the SDGs.
5. Transparency: We have a public ESG Policy and Stewardship Policy in place and disclose our proxy activities and portfolio holdings. We publish an annual ESG and sustainability report and publish fact sheets on climate change, modern slavery, SDG analysis and ESG integration.

Section 2. Annual overview

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

We publish an annual ESG and Sustainability Report which outlines our progress and achievements against our 5 pillars of responsible investing. This report presents more than 100 case studies and company examples, and showcases our efforts in ESG integration, engagement, research, framework development, and proxy voting. Climate change is a material risk across the majority of our holdings. In 2024 we developed and implemented an updated risk assessment process for climate change which includes a bespoke Net Zero Alignment Framework. This assessment, coupled with company and portfolio-level emissions footprint analysis, helps us to better identify risks and opportunities and engagement priorities related to climate change.

Our Climate Change Statement presents more information about our approach and is aligned with the Task Force on Climate-related Financial Disclosures (TCFD). We also measure and disclose Alphinity's group-level financed emissions. These consist of all Alphinity's underlying individual funds. Other outcomes delivered through the reporting period are:

- published an annual ESG and Sustainability Report which presents information across 30 material ESG issues and 8 key thematics. This report also a dedicated Sustainable investing section with SDG alignment information for the Alphinity Australian Sustainable Share Fund and Alphinity Global Sustainable Equity Fund.

- Increased our ESG engagement with companies.

In 2024, we engaged approximately 120 companies across close to 200 individual meetings. Similar to past years, the common topics addressed through our engagements were climate change, data, privacy, responsible AI, health and safety, and governance. We have also progressed more than 40 active engagement objectives across 2024 holdings.

- Completed and implemented three new thematic frameworks to better analyse more complex issues such as Responsible AI

- Updated our ESG Framework to include assessment of more than 40 ESG topics and increased the total number of bespoke frameworks to five. We also enhanced our scoring assessment to assign a materiality score of 1 to 5, with 1 representing a high opportunity and 5 representing a high threat.

We now also assign a management score from 1 to 3, with 1 representing lagging management practices for the specific ESG issue and 3 representing leading management practices for the same issue. We use data inputs, information from company reporting, analyst knowledge and insights from engagement and bespoke frameworks (e.g. Responsible AI) to complete these assessments

- We voted on 100% of proxy items put to shareholders

- Undertook limited environmental data assurance for a third year in a row covering the SDG alignment data presented in our 2024 ESG and Sustainability Report.

- Completed 5 research trips to better understand thematic and ESG issues such as European regulation and the energy transition

- In 2024, Alphinity became an early adopter of the Task Force on Nature-related Disclosures (TNFD). We are committed to disclosing in line with the TNFD Recommendations within our next ESG and Sustainability Report, covering the 2025 calendar year.

Section 3. Next steps

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

In the next two years we will continue to prioritise research and analysis on material topics and thematic which are most relevant to our underlying holdings. This will include a project to build out a risk assessment process and tool to better assess nature risks and opportunities, and identify engagement priorities. We have committed to publish a TNFD alignment statement as part of our 2025 ESG and Sustainability Report in 2026. We are also prioritising work to update our assessment criteria to cyber risk, and undertake a research and engagement project. We are also completing a pilot of the Dhawura Ngilan Business and Investor Guides which will be complete by 30 June 2026. Lastly we are investigating additional data providers which can support our effort to complete detailed climate scenario analysis on an ongoing basis, including physical and transition risks.

We intend to update our Stewardship Policy in 2026 to be more aligned with the UK Stewardship Code and will adopt the code in our policy.

Section 4. Endorsement

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

Name

Stephane Andre

Position

CEO

Organisation's Name

Alphinity Investment Management Limited

A

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

B

OTHER RESPONSIBLE INVESTMENT REPORTING OBLIGATIONS (ORO)

OTHER RESPONSIBLE INVESTMENT REPORTING OBLIGATIONS

OTHER RESPONSIBLE INVESTMENT REPORTING OBLIGATIONS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
ORO 1	CORE	N/A	N/A	PUBLIC	Other Responsible Investment Reporting Obligations	6

During the reporting year, to which international or regional ESG-related legislation(s) and/or regulation(s) did your organisation report?

- (A) Corporate Sustainability Reporting Directive (CSRD) [European Union]
- (B) Directive on AIFM (2011/61/EU) [European Union]
- (C) Enhancing climate-related disclosures by asset managers, life insurers and FCA-regulated pension providers (PS21/24) [United Kingdom]
- (D) EU Taxonomy Regulation [European Union]
- (E) Improving shareholder engagement and increasing transparency around stewardship (PS19/13) [United Kingdom]
- (F) IORP II (Directive 2016/2341) [European Union]
- (G) Law on Energy and Climate (Article 29) [France]
- (H) MiFID II (2017/565) [European Union]
- (I) Modern Slavery Act [United Kingdom]
- (J) PEPP Regulation (2019/1238) [European Union]
- (K) PRIIPS Regulation (2016/2340 and 2014/286) [European Union]
- (L) Regulation on the Integration of Sustainability Risks in the Governance of Insurance and Reinsurance Undertakings (2021/1256) [European Union]
- (M) SFDR Regulation (2019/2088) [European Union]
- (N) SRD II (Directive 2017/828) [European Union]
- (O) The Occupational Pension Schemes Regulation on Climate Change Governance and Reporting [United Kingdom]
- (P) Climate Risk Management (Guideline B-15) [Canada]
- (Q) Continuous Disclosure Obligations (National Instrument 51-102) [Canada]
- (R) Disposiciones de Carácter General Aplicables a los Fondos de Inversión y a las Personas que les Prestan Servicios (SIEFORE) [Mexico]
- (S) Instrucciones para la Integración de Datores ASG en Los Mecanismos de Revelación de Información para FIC (External Circular 005, updated) [Colombia]
- (T) Provides for the creation, operation, and disclosure of information of investment funds, as well as the provision of services for the funds, and revokes the regulations that specifies (CVM Resolution No. 175) [Brazil]
- (U) SEC Expansion of the Names Rule [United States of America]
- (V) SEC Pay Ratio Disclosure Rule [United States of America]
- (W) ASIC RG65 Section 1013DA Disclosure Guidelines [Australia]
- (X) Circular to Licensed Corporations: Management and Disclosure of Climate-related Risks by Fund Managers [Hong Kong SAR]
- (Y) Financial Investment Services and Capital Markets Act (FSCMA) [Republic of Korea]
- (Z) Financial Instruments and Exchange Act (FIEA) [Japan]
- (AA) Financial Markets Conduct Act [New Zealand]
- (AB) Guiding Opinions on Regulating the Asset Management Business of Financial Institutions [China]
- (AC) Guidelines on Environmental Risk Management for Asset Managers [Singapore]
- (AD) Guidelines on Sustainable and Responsible Investment Funds [Malaysia]
- (AE) Modern Slavery Act (2018) [Australia]

- (AF) Stewardship Code for all Mutual Funds and All Categories of AIFs [India]
- (AG) ADGM Sustainable Finance Regulatory Framework [United Arab Emirates]
- (AH) JSE Limited Listings Requirements [South Africa]
- (AI) Other
- (AJ) Other
- (AK) Other
- (AL) Other
- (AM) Other
- (AN) Not applicable; our organisation did not report to any ESG-related legislation and/or regulation during the reporting year.**

Provide context:

Not applicable; our organisation did not report to any ESG-related legislation and/or regulation during the reporting year.

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
ORO 2	CORE	N/A	N/A	PUBLIC	Other Responsible Investment Reporting Obligations	6

During the reporting year, to which voluntary responsible investment/ESG frameworks did your organisation report?

- (A) Asset Owners Stewardship Code [Australia]
- (B) Código Brasileiro de Stewardship [Brazil]
- (C) New Zealand Stewardship Code
- (D) Principles for Responsible Institutional Investors (Stewardship Code) [Japan]
- (E) Stewardship Code [United Kingdom]
- (F) Stewardship Framework for Institutional Investors [United States of America]
- (G) CFA Institute ESG Disclosure Standards for Investment Products [Global]
- (H) Guidelines on Funds' Names using ESG or Sustainability-related Terms [European Union]
- (I) Luxflag ESG Label [Luxembourg]
- (J) RIAA Responsible Investment Certification Program [Australia]**
- (K) SRI Label [France]
- (L) ANBIMA Code of Regulation and Best Practices of Investment Funds [Brazil]
- (M) Code for Institutional Investors 2022 [Malaysia]
- (N) Code for Responsible Investing in South Africa (CRISA 2) [South Africa]
- (O) Corporate Governance Guidelines [Canada]
- (P) Defined Contribution Code of Practice [United Kingdom]
- (Q) European Association for Investors in Non-Listed Real Estate Vehicles (INREV) Guidelines [Global]
- (R) Global ESG Benchmark for Real Assets (GRESB) [Global]
- (S) Global Impact Investing Network (GIIN) Impact Reporting and Investment Standards (IRIS+) [Global]
- (T) OECD Guidelines for MNEs - Responsible Business Conduct for Institutional Investors [Global]
- (U) UN Guiding Principles (UNGP) on Business and Human Rights [Global]
- (V) Net Zero Asset Managers (NZAM) Initiative [Global]
- (W) Net-Zero Asset Owner Alliance (NZAOA) [Global]
- (X) Recommendations of the Taskforce for Climate-related Financial Disclosure (TCFD) [Global]**
- (Y) The Net Zero Investment Framework (NZIF) 2.0 [Global]**
- (Z) Recommendations of the Taskforce for Nature-related Financial Disclosure (TNFD) [Global]
- (AA) Global Reporting Initiative (GRI) Standards [Global]
- (AB) IFC Performance Standard [Global]
- (AC) International Sustainability Standards Board (ISSB) Standards [Global]
- (AD) Sustainability Accounting Standards Board (SASB) Standards [Global]
- (AE) Other
- (AF) Other
- (AG) Other
- (AH) Other
- (AI) Other

○ (AJ) Not applicable; our organisation did not report to any voluntary responsible investment/ESG frameworks during the reporting year.

ORGANISATIONAL OVERVIEW (OO)

ORGANISATIONAL INFORMATION

REPORTING YEAR

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

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

	Date	Month	Year
Year-end date of the 12-month period for PRI reporting purposes:	31	12	2024

Additional context to your response(s): (Voluntary)

This is aligned with the reporting period of our Annual ESG and Sustainability Report

SUBSIDIARY INFORMATION

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

Does your organisation have subsidiaries?

- (A) Yes
- (B) No

ASSETS UNDER MANAGEMENT

ALL ASSET CLASSES

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

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

USD

(A) AUM of your organisation, including subsidiaries not part of row (B), and excluding the AUM subject to execution, advisory, custody, or research advisory only

US\$ 42,600,000,000.00

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

US\$ 0.00

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

US\$ 0.00

ASSET BREAKDOWN

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

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

	(1) Percentage of Internally managed AUM	(2) Percentage of Externally managed AUM
(A) Listed equity	100%	0%
(B) Fixed income	0%	0%
(C) Private equity	0%	0%
(D) Real estate	0%	0%
(E) Infrastructure	0%	0%
(F) Hedge funds	0%	0%
(G) Forestry	0%	0%
(H) Farmland	0%	0%
(I) Other	0%	0%
(J) Off-balance sheet	0%	0%

ASSET BREAKDOWN: INTERNALLY MANAGED LISTED EQUITY

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

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

(A) Passive equity 0%

(B) Active – quantitative 0%

(C) Active – fundamental 100%

(D) Other strategies 0%

GEOGRAPHICAL BREAKDOWN

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

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

AUM in Emerging Markets and Developing Economies

(A) Listed equity (2) >0 to 10%

Additional context to your response(s): (Voluntary)

We do not have a dedicated emerging market fund. Exposure is through specific holdings in our global/Australian equity strategies.

STEWARDSHIP

STEWARDSHIP

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

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

(1) Listed equity - active

- (A) Yes, through internal staff
- (B) Yes, through service providers
- (C) Yes, through external managers
- (D) We do not conduct stewardship

STEWARDSHIP: (PROXY) VOTING

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

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

(1) Listed equity - active

- (A) Yes, through internal staff
- (B) Yes, through service providers
- (C) Yes, through external managers
- (D) We do not conduct (proxy) voting

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

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

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

(A) Listed equity – active

(4) >20 to 30%

ESG INCORPORATION

INTERNALLY MANAGED ASSETS

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

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

(1) Yes, we incorporate ESG factors into our investment decisions

(2) No, we do not incorporate ESG factors into our investment decisions

(C) Listed equity - active - fundamental

ESG STRATEGIES

LISTED EQUITY

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

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

Percentage out of total internally managed active listed equity

(A) Screening alone	0%
(B) Thematic alone	0%
(C) Integration alone	0%
(D) Screening and integration	95%
(E) Thematic and integration	0%
(F) Screening and thematic	0%
(G) All three approaches combined	5%
(H) None	0%

Additional context to your response(s): (Voluntary)

5% of FUM is managed through our 2 sustainable strategies. These strategies require that investee companies have a net positive alignment to the United Nations Sustainable Development Goals. ESG integration processes are consistent across all Alphinity strategies.

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

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

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

(A) Positive/best-in-class screening only	0%
(B) Negative screening only	95%
(C) A combination of screening approaches	5%

ESG/SUSTAINABILITY FUNDS AND PRODUCTS

LABELLING AND MARKETING

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

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

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

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

5%

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

Additional context to your response(s): (Voluntary)

Alphinity has two sustainable strategies - the Alphinity Global Sustainable Equity Strategy and the Alphinity Australian Sustainable Share Strategy.

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

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

(A) Yes, our ESG and/or sustainability-marketed products and/or funds hold formal labels or certifications

Provide the percentage of total AUM that your labelled and/or certified products and/or funds represent:

5%

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

Additional context to your response(s): (Voluntary)

RIAA certification

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 18.2	CORE	OO 18.1	N/A	PUBLIC	Labelling and marketing	1

Which ESG/RI certifications or labels do you hold?

- (A) Commodity type label (e.g. BCI)
- (B) GRESB
- (C) Austrian Ecolabel (UZ49)
- (D) B Corporation
- (E) BREEAM
- (F) CBI Climate Bonds Standard
- (G) DDV-Nachhaltigkeitskodex-ESG-Strategie
- (H) DDV-Nachhaltigkeitskodex-ESG-Impact
- (I) EU Ecolabel
- (J) EU Green Bond Standard
- (K) Febelfin label (Belgium)
- (L) Finansol
- (M) FNG-Siegel Ecolabel (Germany, Austria and Switzerland)
- (N) Greenfin label (France)
- (O) Grüner Pfandbrief
- (P) ICMA Green Bond Principles
- (Q) ICMA Social Bonds Principles
- (R) ICMA Sustainability Bonds Principles
- (S) ICMA Sustainability-linked Bonds Principles
- (T) Kein Verstoß gegen Atomwaffensperrvertrag
- (U) Le label ISR (French government SRI label)
- (V) Luxflag Climate Finance
- (W) Luxflag Environment
- (X) Luxflag ESG
- (Y) Luxflag Green Bond
- (Z) Luxflag Microfinance
- (AA) Luxflag Sustainable Insurance Products
- (AB) National stewardship code
- (AC) Nordic Swan Ecolabel

- (AD) Other SRI label based on EUROSIF SRI Transparency Code (e.g. Novethic)
- (AE) People's Bank of China green bond guidelines
- (AF) RIAA (Australia)
- (AG) Towards Sustainability label (Belgium)
- (AH) Other

SUMMARY OF REPORTING REQUIREMENTS

SUMMARY OF REPORTING REQUIREMENTS

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

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

Applicable modules	(1) Mandatory to report (pre-filled based on previous responses)	(2.1) Voluntary to report. Yes, I want to opt-in to reporting on the module	(2.2) Voluntary to report. No, I want to opt-out of reporting on the module
Policy, Governance and Strategy	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Confidence Building Measures	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
(C) Listed equity – active – fundamental	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

SUBMISSION INFORMATION

REPORT DISCLOSURE

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

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

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

POLICY, GOVERNANCE AND STRATEGY (PGS)

POLICY

RESPONSIBLE INVESTMENT POLICY ELEMENTS

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

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

- (A) Overall approach to responsible investment
- (B) Guidelines on environmental factors
- (C) Guidelines on social factors
- (D) Guidelines on governance factors
- (E) Guidelines on sustainability outcomes
- (F) Guidelines tailored to the specific asset class(es) we hold
- (G) Guidelines on exclusions
- (H) Guidelines on managing conflicts of interest related to responsible investment
- (I) Stewardship: Guidelines on engagement with investees
- (J) Stewardship: Guidelines on overall political engagement
- (K) Stewardship: Guidelines on engagement with other key stakeholders
- (L) Stewardship: Guidelines on (proxy) voting
- (M) Other responsible investment elements not listed here

Specify:

Sustainable investing

- (N) Our organisation does not have a formal responsible investment policy and/or our policy(ies) do not cover any responsible investment elements

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

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

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

Specify:

Our ESG policy addresses climate change, and human rights. Our published Workplace Culture and RAI Framework incl guidelines on other systemic sustainability issues. These are linked from our ESG Policy and are related to frameworks.

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

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

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

- (A) Overall approach to responsible investment**
Add link:
<https://www.alphinity.com.au/about-us/responsible-investment/>
- (B) Guidelines on environmental factors**
Add link:
<https://www.fidante.com/au/ALPH-ESGPolicy.pdf>
- (C) Guidelines on social factors**
Add link:
<https://www.fidante.com/au/ALPH-ESGPolicy.pdf>
- (D) Guidelines on governance factors**
Add link:
<https://www.fidante.com/au/ALPH-ESGPolicy.pdf>
- (E) Guidelines on sustainability outcomes**
Add link:
<https://www.fidante.com/au/ALPH-SustainableInvestingFactSheet.pdf>
- (F) Specific guidelines on climate change (may be part of guidelines on environmental factors)**
Add link:
<https://www.fidante.com/au/ALPH-ESGPolicy.pdf>
- (G) Specific guidelines on human rights (may be part of guidelines on social factors)**
Add link:
<https://www.fidante.com/au/ALPH-ESGPolicy.pdf>
- (H) Specific guidelines on other systematic sustainability issues**
Add link:
https://www.alphinity.com.au/wp-content/uploads/2022/10/2305_Alphinity-Workplace-Culture-Report.pdf
- (I) Guidelines tailored to the specific asset class(es) we hold**
Add link:
<https://www.alphinity.com.au/about-us/responsible-investment/>
- (J) Guidelines on exclusions**
Add link:
<https://www.fidante.com/au/ALPH-ESGPolicy.pdf>
- (L) Stewardship: Guidelines on engagement with investees**
Add link:
<https://www.fidante.com/au/ALPH-StewardshipPolicy.pdf>
- (N) Stewardship: Guidelines on engagement with other key stakeholders**

Add link:

<https://www.fidante.com/au/ALPH-StewardshipPolicy.pdf>

(O) Stewardship: Guidelines on (proxy) voting

Add link:

<https://www.fidante.com/au/ALPH-StewardshipPolicy.pdf>

(P) Other responsible investment aspects not listed here

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

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 4	PLUS	PGS 1	N/A	PUBLIC	Responsible investment policy elements	1 – 6

Does your formal responsible investment policy(ies) identify a link between your responsible investment activities and your fiduciary duties or equivalent obligations?

(A) Yes

Elaborate:

Our Responsible Investment Policy and ESG Policy clearly acknowledge that the integration of environmental, social, and corporate governance factors into our investment management processes and ownership practices is essential for our success as investment managers.

- Responsible Investment Policy: We integrate ESG considerations in our investment process because we believe ESG factors have an impact on the long-term performance of companies, markets and countries, and that the consideration of ESG in the investment process should improve risk-adjusted returns over time. For these reasons, we take ESG risks into consideration in our investment decision making and ownership practices. Incorporating ESG considerations into investment decision making and portfolio construction can also help to build a more resilient organisation and can protect both the business and our clients from financial and non-financial risks. We believe that incorporating ESG factors into investment analysis helps us to achieve our corporate mission by improving the long terms performance of our investee companies and the risk-return profile of our portfolios.

- ESG Policy: We believe that the integration of environmental, social, and corporate governance factors into our investment management processes and ownership practices is essential for our success as an investment manager and to deliver attractive long-term risk adjusted returns for our clients.

We recognise that ESG considerations can have a material impact on the performance of companies (positively and/or negatively) and we as active investment managers need to understand individual companies' ESG risks and opportunities to make informed investment decisions. Where possible we seek to engage with company management to better understand the company's ESG risks and opportunities and communicate expectations for improved practices. This reflects our obligation to our clients to both maximise returns and manage risk. By improving our understanding of the way in which individual companies manage ESG issues, we aim to achieve our objective of generating above average, long term sustainable returns. We believe the formal incorporation of ESG factors into our overall investment analysis is essential and, where possible, actively seek to reflect this when evaluating a company's worth.

(B) No

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

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

(A) Overall stewardship objectives

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

- (C) Criteria used by our organisation to prioritise the investees, policy makers, key stakeholders, or other entities on which to focus our stewardship efforts
- (D) How different stewardship tools and activities are used across the organisation
- (E) Approach to escalation in stewardship
- (F) Approach to collaboration in stewardship
- (G) Conflicts of interest related to stewardship
- (H) How stewardship efforts and results are communicated across the organisation to feed into investment decision-making and vice versa
- (I) Other
- (J) None of the above elements is captured in our policy(ies) or guidelines on stewardship

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

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

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

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

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

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

RESPONSIBLE INVESTMENT POLICY COVERAGE

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

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

Combined AUM coverage of all policy elements

(A) Overall approach to responsible investment						
(B) Guidelines on environmental factors					(7) 100%	
(C) Guidelines on social factors						
(D) Guidelines on governance factors						

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

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

AUM coverage

(A) Specific guidelines on climate change					(1) for all of our AUM	
(B) Specific guidelines on human rights					(1) for all of our AUM	
(C) Specific guidelines on other systematic sustainability issues					(1) for all of our AUM	

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

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

(A) Listed equity

(1) Percentage of AUM covered

- (1) >0% to 10%
- (2) >10% to 20%
- (3) >20% to 30%
- (4) >30% to 40%
- (5) >40% to 50%
- (6) >50% to 60%
- (7) >60% to 70%
- (8) >70% to 80%
- (9) >80% to 90%
- (10) >90% to <100%
- (11) 100%

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

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

(A) Actively managed listed equity

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

- (1) >0% to 10%
- (2) >10% to 20%
- (3) >20% to 30%
- (4) >30% to 40%
- (5) >40% to 50%
- (6) >50% to 60%
- (7) >60% to 70%
- (8) >70% to 80%
- (9) >80% to 90%
- (10) >90% to <100%
- (11) 100%

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

We do not vote on behalf of all clients. Some clients with mandates do their own voting.

GOVERNANCE

ROLES AND RESPONSIBILITIES

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

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

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

Alphinity founders, Alphinity Board.

- (C) Investment committee, or equivalent
- Specify:

Portfolio Managers

- (D) Head of department, or equivalent
- Specify department:

Head of ESG and Sustainability, Portfolio Managers

- (E) None of the above bodies and roles have oversight over and accountability for responsible investment

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

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

(1) Board members, trustees, or equivalent

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

(A) Overall approach to responsible investment

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

(C) Guidelines on sustainability outcomes

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

Additional context to your response(s): (Voluntary)

Our Board is made up of representatives from Fidante and the Alphinity founders/CEOs. Our CEOs are responsible for our overall approach to Responsible Investing and all associated policies / guidelines. Our Board signs off our Governance, Risk and Compliance Framework annually which includes our formal Responsible Investment Policy. All sub-policies, including our ESG and Stewardship Policies are also approved by the Board. Senior Management maintains oversight and approval of non-material changes to sub-policies and will refer the policies to the appropriate stakeholders for review.

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

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

- (A) Yes
- (B) No

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

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 12	CORE	N/A	N/A	PUBLIC	Roles and responsibilities	1

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

(A) Internal role(s)

Specify:

All members of the Alphinity team (incl investment analysts and portfolio managers) are responsible for implementing the approach to responsible investment. Recognising there is a need to conduct specific ESG research and analysis, and manage ESG engagements, Alphinity also has three dedicated resources for ESG and Sustainability.

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

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

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 13	CORE	PGS 11	N/A	PUBLIC	Roles and responsibilities	1

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

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

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

Explain why: (Voluntary)

Board members represent discrete shareholder groups. They are not remunerated and do not receive performance evaluations

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 14	CORE	PGS 11	N/A	PUBLIC	Roles and responsibilities	1

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

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

Indicate whether these responsible investment KPIs are linked to compensation

● (1) KPIs are linked to compensation

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

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

Describe: (Voluntary)

In addition to having a dedicated ESG and Sustainability team, Alphinity requires that all employees maintain a high degree of professional competency, which includes keeping up to date on ESG issues and associated thought leadership. This can include training sessions by the ESG team, attending conferences, talks by independent experts, online courses, relevant journal articles and independent specialist research.

Alphinity believes that the integration of environmental, social and corporate governance considerations into our investment management process and ownership practices is essential, as these factors can have a significant impact on financial performance. Non-adherence to Alphinity's investment and operational processes (including ESG and sustainability related processes) can lead to a reduction or removal of bonus and profit share payments in addition to performance management consequences. In accordance with SFDR Article 5, Alphinity integrates sustainability risks into its remuneration policy by:

-Ensuring that staff are not incentivised to take risks inconsistent with Alphinity's sustainability-related goals. -Ensuring adherence to Alphinity's investment processes and ESG policies as part of performance evaluations. -Ensuring remuneration practices do not encourage behaviour inconsistent with Alphinity's approach to managing sustainability risks. -Incorporating Alphinity's core values (Trust, Team, Perform) into performance assessments.

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

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 15	PLUS	PGS 11	N/A	PUBLIC	Roles and responsibilities	1

What responsible investment competencies do you regularly include in the training of senior-level body(ies) or role(s) in your organisation?

	(1) Board members, trustees or equivalent	(2) Senior executive-level staff, investment committee, head of department or equivalent
(A) Specific competence in climate change mitigation and adaptation	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(B) Specific competence in investors' responsibility to respect human rights	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(C) Specific competence in other systematic sustainability issues	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(D) The regular training of this senior leadership role does not include any of the above responsible investment competencies	<input type="checkbox"/>	<input type="checkbox"/>

EXTERNAL REPORTING AND DISCLOSURES

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

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

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

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

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

- (A) Yes, including governance-related recommended disclosures
- (B) Yes, including strategy-related recommended disclosures
- (C) Yes, including risk management-related recommended disclosures
- (D) Yes, including applicable metrics and targets-related recommended disclosures
- (E) None of the above

Add link(s):

<https://www.fidante.com/au/ALPH-ClimateChangeStatement.pdf>
<https://www.fidante.com/au/ALPH-ESGReport.pdf>

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 18	PLUS	N/A	N/A	PUBLIC	External reporting and disclosures	6

During the reporting year, to which international responsible investment standards, frameworks, or regulations did your organisation report?

- (A) Disclosures against the European Union's Sustainable Finance Disclosure Regulation (SFDR)
- (B) Disclosures against the European Union's Taxonomy
- (C) Disclosures against the CFA's ESG Disclosures Standard
- (D) Disclosures against other international standards, frameworks or regulations**

Specify:

TCFD

Link to example of public disclosures

<https://www.fidante.com/au/ALPH-ClimateChangeStatement.pdf>

- (E) Disclosures against other international standards, frameworks or regulations
- (F) Disclosures against other international standards, frameworks or regulations
- (G) Disclosures against other international standards, frameworks or regulations

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

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

- (A) Yes, we publicly disclosed all of our membership in and support for trade associations, think tanks, or similar bodies that conduct any form of political engagement**

Add link(s):

<https://www.alphinity.com.au/about-us/responsible-investment/>

- (B) Yes, we publicly disclosed some of our membership in and support for trade associations, think tanks, or similar bodies that conduct any form of political engagement
- (C) No, we did not publicly disclose our membership in and support for trade associations, think tanks, or similar bodies that conduct any form of political engagement
- (D) Not applicable, we were not members in or supporters of any trade associations, think tanks, or similar bodies that conduct any form of political engagement during the reporting year

Additional context to your response(s): (Voluntary)

IGCC conducts policy engagement.

STRATEGY

CAPITAL ALLOCATION

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

Which elements do your organisation-level exclusions cover?

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

Additional context to your response(s): (Voluntary)

See our ESG Policy for information on our exclusions.

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

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

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

Additional context to your response(s): (Voluntary)

We invest in one asset class - listed equities

STEWARDSHIP: OVERALL STEWARDSHIP STRATEGY

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

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

(1) Listed equity

(A) Maximise our portfolio-level risk-adjusted returns. In doing so, we seek to address any risks to overall portfolio performance caused by individual investees' contribution to systematic sustainability issues.

(B) Maximise our individual investments' risk-adjusted returns. In doing so, we do not seek to address any risks to overall portfolio performance caused by individual investees' contribution to systematic sustainability issues.

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 23	PLUS	OO 5, OO 8, OO 9	N/A	PUBLIC	Stewardship: Overall stewardship strategy	2

How does your organisation, or the external service providers or external managers acting on your behalf, prioritise the investees or other entities on which to focus its stewardship efforts?

As investors, we have the ability to influence the behaviour and actions of companies we are invested in. We take this responsibility very seriously and, where possible, we are committed to use this influence to reduce environmental, social and governance risks over the short, medium and longer terms to ultimately maximise shareholder value for our clients. We believe that environmental, social and governance factors can have a material influence on company performance and returns. As such, we believe that stewardship efforts like company engagement, proxy voting activities, research and thought leadership, and collaborative engagements have the potential to reduce headwinds for a business and improve returns over the longer term. Stewardship activities can be focussed on company specific ESG factors like executive remuneration, as well as issues with broader impacts like climate change. We are disciplined and focussed in our approach to stewardship. We therefore link our stewardship activities to our ESG materiality framework. This ensures that activities like engagement and proxy voting are focussed on the most material issues for each stock and are relevant to our view of each company. See our Stewardship Policy and Annual ESG and Sustainability Report for more information.

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

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

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

Additional context to your response(s): (Voluntary)

See our Stewardship policy and annual ESG and Sustainability Report for more information on our approach to collaborative engagements.

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 24.1	PLUS	OO 8, OO 9	N/A	PUBLIC	Stewardship: Overall stewardship strategy	2

Elaborate on your organisation's default position on collaborative stewardship, or the position of the external service providers or external investment managers acting on your behalf, including any other details on your overall approach to collaboration.

We collaborate with other investors where we believe a coordinated voice will be more effective in achieving an outcome that aligns with our investment and stewardship objectives. When considering participation in collaborative engagements, we look for alignment with our portfolio holdings and ESG priorities. We carefully consider the objectives of the engagement and whether it will create additional benefit beyond our existing engagement activities.

We are proud to support collaborative engagement initiatives organised by the UN PRI, the Investor Group on Climate Change (IGCC), FAIRR and HESTA's 40:40 Vision. Each membership requires approval from our senior management to ensure alignment with Alphinity's stakeholders, internal ESG philosophy, stakeholders and external commitments. Contribution to these initiatives is led by the ESG and sustainability team, with support from members of the portfolio management team.

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 25	PLUS	OO 5, OO 8, OO 9	N/A	PUBLIC	Stewardship: Overall stewardship strategy	2

Rank the channels that are most important for your organisation in achieving its stewardship objectives.

- (A) Internal resources, e.g. stewardship team, investment team, ESG team, or staff

Select from the list:

- 1
- 5

- (B) External investment managers, third-party operators and/or external property managers, if applicable

(C) External paid specialist stewardship services (e.g. engagement overlay services or, in private markets, sustainability consultants) excluding investment managers, real assets third-party operators, or external property managers

Select from the list:

- 4
- 5

(D) Informal or unstructured collaborations with investors or other entities

Select from the list:

- 3
- 5

(E) Formal collaborative engagements, e.g. PRI-coordinated collaborative engagements, Climate Action 100+, or similar

Select from the list:

- 2
- 5

(F) We do not use any of these channels

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 27	PLUS	OO 8, OO 9	N/A	PUBLIC	Stewardship: Overall stewardship strategy	2

How are your organisation’s stewardship activities linked to your investment decision making, and vice versa?

Management of ESG aspects through stewardship, including company engagement and proxy voting, is the responsibility of all members of the investment team and linked to our ESG materiality framework. We aim to engage on issues that are most material for a business determined using an in house assessment tool. Issues and engagement topics are identified by the ESG team in conjunction with the relevant analyst from the investment team. Where action on a material issue is required an engagement objective is defined and tracked. We record and track outcomes from all ESG engagement activities. This includes meetings with company Directors, meetings with CEOs and management where ESG is a focus of the meeting, and dedicated meetings with ESG specialists to discuss ESG risks in detail.

The outcomes and insights gained through engagement inform our ESG risk assessment process and therefore our fundamental analysis of a company. As we see engagement as a key part of our investment process, we endeavour to have the relevant member of the investment team attend all meetings. Decision making for each specific proxy vote is the responsibility of the relevant investment team member, with support from the ESG and sustainability team. We consider each proposal on its individual merits and will determine a voting position based on the specifics of each company, the specifics of each proposal and how this interfaces with the ESG materiality assessment. Over time, if a specific ESG objective is not being resolved through engagement, we will consider escalating the issue to Board and/or seek to execute our voting rights by voting against specific Directors or resolutions. As a small team all based in one office, we have very short communication lines and therefore share feedback on companies and engagements through regular team meetings and discussions.

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 28	PLUS	OO 8, OO 9	N/A	PUBLIC	Stewardship: Overall stewardship strategy	2

If relevant, provide any further details on your organisation's overall stewardship strategy.

The ESG and Sustainability team is responsible for coordinating stewardship activities, tracking engagement and proxy voting activities, and working with the investment team to identify engagement objectives. The ESG team is also responsible for external reporting of stewardship activities, primarily through the annual ESG and Sustainability Report.

The investment team is responsible for integrating engagement outcomes into the investment case where possible and managing the ultimate relationship with the company. Company meetings are jointly facilitated between the ESG and investment teams. The ESG team may not attend all company meetings, however, the relevant member of the investment team will generally be present at all company meetings.

The Sustainable Compliance Committees are made up of two external ESG and Sustainability experts plus the relevant portfolio managers. While the Committees are formally in place to support the global and domestic sustainable funds, the external Committee members will often be involved in discussions around stewardship more broadly.

Outcomes of our stewardship activities are reported in the Annual ESG and Sustainability Report, monthly and quarterly fund commentaries (where relevant) and proxy voting reports on the website for each Fund.

STEWARDSHIP: (PROXY) VOTING

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

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

- (A) Before voting is executed, we review external service providers' voting recommendations for controversial and high-profile votes
 - Select from the below list:
 - (1) in all cases
 - (2) in a majority of cases
 - (3) in a minority of cases
- (B) Before voting is executed, we review external service providers' voting recommendations where the application of our voting policy is unclear
 - Select from the below list:
 - (1) in all cases
 - (2) in a majority of cases
 - (3) in a minority of cases
 - (D) We do not review external service providers' voting recommendations
 - (E) Not applicable; we do not use external service providers to give voting recommendations

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

How is voting addressed in your securities lending programme?

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

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

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

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

Additional context to your response(s): (Voluntary)

We decide on our voting approach for each item proposed to shareholders on a case by case basis. We therefore may vote in favour of resolutions expected to advance progress on our stewardship priorities, including affirming a company's good practice or prior commitment.

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

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

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

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

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

(A) Yes, for all (proxy) votes

Add link(s):

<https://www.alphinity.com.au/about-us/responsible-investment/>

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

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

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

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

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

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

(1) In cases where we abstained or voted against management recommendations

(2) In cases where we voted against an ESG-related shareholder resolution

(A) Yes, we publicly disclosed the rationale

(2) for a majority of votes

(2) for a majority of votes

(B) Yes, we privately communicated the rationale to the company

(C) We did not publicly or privately communicate the rationale, or we did not track this information

o

o

(D) Not applicable; we did not abstain or vote against management recommendations or ESG-related shareholder resolutions during the reporting year

o

o

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

<https://www.alphinity.com.au/about-us/responsible-investment/>

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 35	PLUS	OO 9	N/A	PUBLIC	Stewardship: (Proxy) voting	2

How does your organisation ensure vote confirmation, i.e. that your votes have been cast and counted correctly?

For investment mandates where Alphinity has the authority to vote, our administration services provider Fidante is responsible for voting, however all votes are directed by Alphinity. We use proxy research for an external provider as a starting point but make the final decision based on our assessment of our client's best interest. We have controls and processes in place to minimise discrepancies and mismatches between eligible votes and those cast. We also have controls in place to ensure that all votes are cast by the appropriate deadlines. We have a centralised proxy voting inbox where all instructions are placed with oversight by multiple members of the Alphinity and Fidante teams. We do not have an example where this process has not been followed to use here.

STEWARDSHIP: ESCALATION

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

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

(1) Listed equity

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



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



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



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



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



(F) Divesting



(G) Litigation



(H) Other



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



STEWARDSHIP: ENGAGEMENT WITH POLICY MAKERS

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

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

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

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

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

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

Describe:

We participated in a CSIRO run-workshop about Responsible AI priorities and to provide feedback on regulation.

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

Describe:

We participated in a small group meeting with a strategic advisor to the Federal Govt on Nature and shared our opinions.

- (E) Other methods

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

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

- (A) We publicly disclosed all our policy positions
- (B) We publicly disclosed details of our engagements with policy makers

● (C) No, we did not publicly disclose details of our engagement with policy makers conducted as part of our responsible investment approach during the reporting year

Explain why:

We have included many examples of engagement in our annual ESG and Sustainability Report. Given policy engagement is through working groups we have not detailed this specifically.

STEWARDSHIP: EXAMPLES

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 40	PLUS	OO 8, OO 9	N/A	PUBLIC	Stewardship: Examples	2

Provide examples of stewardship activities that you conducted individually or collaboratively during the reporting year that contributed to desired changes in the investees, policy makers or other entities with which you interacted.

(A) Example 1:

Title of stewardship activity:

Deforestation risk and oversight

(1) Led by

- (1) Internally led
- (2) External service provider led
- (3) Led by an external investment manager, real assets third-party operator and/or external property manager

(2) Primary focus of stewardship activity

- (1) Environmental factors
- (2) Social factors
- (3) Governance factors

(3) Asset class(es)

- (1) Listed equity
- (2) Fixed income
- (3) Private equity
- (4) Real estate
- (5) Infrastructure
- (6) Hedge funds
- (7) Forestry
- (8) Farmland
- (9) Other

(4) Description of the activity and what was achieved. For collaborative activities, provide detail on your individual contribution.

We began engaging with a global provider of logistics solutions in 2021 in relation to its sourcing of timber for the production and maintenance of pallets. This provider is a service provider to other large global consumer companies who have targets and requirements in relation to deforestation. As such, we view good oversight and management of deforestation risk as a very material issue which presents risks related to reputation, customer service, and regulatory penalties. We have generally engaged at least once per year with the company on this topic and in 2024 noted an improvement to its audit program and oversight of the timber value chain. When we first started engaging this company did not conduct direct audits of its supply chain as it relied on the support of third party certification programs. In 2024, the company informed us they were introducing auditing and were undertaken further analysis to work towards full transparency and traceability of its timber supply chain.

(B) Example 2:

Title of stewardship activity:

Responsible AI policy disclosure

(1) Led by

- (1) Internally led

- (2) External service provider led
- (3) Led by an external investment manager, real assets third-party operator and/or external property manager
- (2) Primary focus of stewardship activity
 - (1) Environmental factors
 - (2) Social factors
 - (3) Governance factors
- (3) Asset class(es)
 - (1) Listed equity
 - (2) Fixed income
 - (3) Private equity
 - (4) Real estate
 - (5) Infrastructure
 - (6) Hedge funds
 - (7) Forestry
 - (8) Farmland
 - (9) Other
- (4) Description of the activity and what was achieved. For collaborative activities, provide detail on your individual contribution.

In 2023 we initiated a research and engagement project related to Responsible AI with Data61 CSIRO research team. We engaged with close to 30 companies and have continued these engagements throughout 2024. Through this project, we encouraged some early leaders in responsible AI to publish Responsible/Ethical AI policies and updates to their websites. In 2024, one of the companies we engaged with during the program did just that. This has provided a great reference for others in the Australian market.

(C) Example 3:
Title of stewardship activity:

Responsible gameplay strategy

- (1) Led by
 - (1) Internally led
 - (2) External service provider led
 - (3) Led by an external investment manager, real assets third-party operator and/or external property manager
- (2) Primary focus of stewardship activity
 - (1) Environmental factors
 - (2) Social factors
 - (3) Governance factors
- (3) Asset class(es)
 - (1) Listed equity
 - (2) Fixed income
 - (3) Private equity
 - (4) Real estate
 - (5) Infrastructure
 - (6) Hedge funds
 - (7) Forestry
 - (8) Farmland
 - (9) Other
- (4) Description of the activity and what was achieved. For collaborative activities, provide detail on your individual contribution.

We began an engagement with a global gaming content and technology company in 2023 to encourage them to publish an organisation wide strategy related to responsible gaming. We shared our feedback that given the high materiality of this issue, and the potential implications related to regulatory and social licence impacts, it would be appropriate that the company should establish and communicate clear goals, strategies, and measures related to responsible gaming. In 2024, this company published it's updated responsible gaming strategy with six specific goals and 2030 targets. The company also confirmed that Alphinity's feedback was a key consideration for the strategy development.

(D) Example 4:
Title of stewardship activity:

AMR Engagement

- (1) Led by
 - (1) Internally led

- (2) External service provider led
- (3) Led by an external investment manager, real assets third-party operator and/or external property manager

(2) Primary focus of stewardship activity

- (1) Environmental factors
- (2) Social factors
- (3) Governance factors

(3) Asset class(es)

- (1) Listed equity
- (2) Fixed income
- (3) Private equity
- (4) Real estate
- (5) Infrastructure
- (6) Hedge funds
- (7) Forestry
- (8) Farmland
- (9) Other

(4) Description of the activity and what was achieved. For collaborative activities, provide detail on your individual contribution.

In 2021, we signed on to a collaborative initiative with FAIRR that strives for greater disclosure over how animal pharmaceutical companies are addressing the risk of antimicrobial resistance (AMR). Our primary interest was Zoetis' role in antibiotics and other antimicrobials to the agriculture industry. We engaged with the company on multiple occasions to communicate our views on responsible antimicrobial production, oversight in applications and investment into alternatives. These meetings, alongside company disclosures, increased our confidence that the company is responsibly managing AMR risks. We have published an external research report to support knowledge in the investment industry around AMR considerations and how companies can mitigate this risk. In 2024 the company reported a decrease in antibiotic sales year-on-year for the past six years, introduced AMR targets to focus on value-chain stewardship.

(E) Example 5:

Title of stewardship activity:

(1) Led by

- (1) Internally led
- (2) External service provider led
- (3) Led by an external investment manager, real assets third-party operator and/or external property manager

(2) Primary focus of stewardship activity

- (1) Environmental factors
- (2) Social factors
- (3) Governance factors

(3) Asset class(es)

- (1) Listed equity
- (2) Fixed income
- (3) Private equity
- (4) Real estate
- (5) Infrastructure
- (6) Hedge funds
- (7) Forestry
- (8) Farmland
- (9) Other

(4) Description of the activity and what was achieved. For collaborative activities, provide detail on your individual contribution.

CLIMATE CHANGE

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

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

(A) Yes, within our standard planning horizon

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

0-5 years Threat: The ongoing changes to global climate policies, and the differences between regions, such as the US and Europe, increases uncertainty for investee companies and reduces confidence in global regulations and expectations. This increases operational complexity and can also affect the cost of capital, reduce revenues, introduce greater social licence risks, and ultimately may affect share prices. Threat: Investee companies fail to appropriately plan for and estimate how the potential impacts of climate change (physical or transition) may limit their future earning potential, leading to a loss of shareholder confidence and reduced financial performance. Threat: External pressure to set a net zero commitment, encourages investee companies to make false or misleading statements leading to regulatory or legal action.

This pressure may also encourage companies to make poor or risky capital allocation or investment decisions. Opportunity: Strategically considering climate change drivers as a business opportunity rather than a threat creates opportunities for new markets and/or revenue streams for investee companies. This increases shareholder confidence and reduces the likelihood that the low carbon transition will have an overall net negative impact on the business. Threat: Climate related pricing/policies increases operational costs associated with office electricity and international travel. Threat/Opportunity: Increasing client expectations and changing mandate requirements (e.g. fossil fuel exclusions or emissions reduction targets) increase complexity within our business and increase compliance/reporting burden. This also presents an opportunity to develop specific products and offerings which cater to the specific needs of these clients.

(B) Yes, beyond our standard planning horizon

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

5+ years Threat/Opportunity: Changes to global climate policies and global weather patterns, significantly impacts macro-economic factors like import/export markets, government investments, tourism and migration, and consumer behaviour, which significantly change global market conditions. Threat: Changes to global climate policies affects global trade and impacts Australia's position as a major exporter of minerals, energy, and agricultural products such as wheat and beef. Threat/Opportunity: An accelerated transition to a low carbon economy creates new market opportunities, which continues to benefit businesses that are actively seeking to participate in the transition

- (C) No, we have not identified climate-related risks and/or opportunities affecting our investments

Additional context to your response(s): (Voluntary)

See our Climate Change Statement for full TCFD aligned reporting.

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

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

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

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

We recognise that climate change and the disorderly transition pose a considerable systemic risk to the global economy, our investments, and our duty to maximise returns while minimising client risks. Consequently, we are committed in our support of the global objective of achieving net zero greenhouse gas emissions by 2050 or earlier, aligning with international efforts to maintain temperature increases well below 2°C (ideally 1.5°C) as outlined by the United Nations Paris Agreement. We recognise that any such commitment must be supported with robust goals that are in our clients' best interests and which will not compromise our fiduciary responsibility to maximise risk-adjusted returns. Climate change and the net zero transition pose both medium and long-term challenges and opportunities for investment environments and portfolio companies.

Due to the uncertainty regarding the timing and pathways of the transition in certain sectors, companies impacted are encouraged to develop comprehensive, science-based, scenario-tested, and credible net zero transition plans. Companies should also aim to decarbonise and prepare for the net zero economy in a financially disciplined approach that supports the transition while managing the current energy network and economic conditions. We complete our climate risk analysis by evaluating each company's specific risks and opportunities, such as their operating model, industry position, and applicable regulations, to determine the quality and appropriateness of their transition plans. Risk categories We have identified three risk categories in relation to climate change.

1. Operational: Risks which may impact our operations such as through electricity pricing or flight costs.

2.

Investment: Risks which may impact our investment activities and performance outcomes.

3. Regulatory and stakeholder: Risks which may impact our operational or investment activities but are driven by regulation or stakeholder expectations and requirements.

- Materiality of climate change operational risks Alphinity's operational energy use is relatively small and consists of three main components including electricity used to power our single office in Sydney (Scope 2), indirect fuel use for air travel (Scope 3), and indirect electricity used in accommodation when employees travel (Scope 3). We have no Scope 1 emissions since we do not use fuel in our operations. Our operational emissions footprint is presented in our Annual ESG and Sustainability Report

- Materiality of climate change investment risks Climate change is well recognised as a systemic risk which can cause material and ongoing risks to the global economy and investment landscape.

The following observations are presented in the 2024 ESG and Sustainability Report and summarise our views on the materiality of climate change from an investment perspective. In 2024, climate risks related to the global energy transition, physical climate change and operational emissions footprints were assessed as some of the most material issues across our holdings. Due to regional differences in energy transition policy and priorities, along with the good progress many companies have made to reduce their emissions, we have noted that the materiality for operational emissions has decreased this year, which in part reflects changes to our holdings compared to the year prior. Similarly, energy transition opportunities are less material overall due to a general deceleration in climate change priorities through the year.

We still believe that scope 3 emissions, especially through the supply chain, could present a material impact to companies where regulations like the European Carbon Border Adjustment Mechanism are enforced. Despite the focus on climate change and the relative maturity in the transition risk space, the overall level of company disclosure on physical climate risks and scenario analysis remains low. This is also a key driver of physical risk being included in the top material topics in 2024, as the actual and residual risks are still challenging to assess.

- Materiality of climate change regulatory and stakeholder risks We are impacted by disclosure regulations and requirements related to climate change. For example, the Australian mandatory climate reporting laws, effective from January 1, 2025 will increase our reporting requirements from 2027.

We are also materially influenced by the needs and requirements of other stakeholders such as our clients. For example, clients may place additional restrictions on their funds through activity exclusions or emissions reduction commitments.

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

Additional context to your response(s): (Voluntary)

more information can be found in our Climate Change Statement on our website

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 42	PLUS	N/A	N/A	PUBLIC	Climate change	General

Which sectors are covered by your organisation's strategy addressing high-emitting sectors?

- (A) Coal

Describe your strategy:

Across all portfolios we have excluded investment in producers of thermal coal producers (at least 10% revenue threshold). This is based on the poor long-term outlook for thermal coal as the world de-carbonises, and the associated investment risk for coal-producing companies.

Our Net Zero Alignment Framework is based on the second edition of the Paris Aligned Investment Initiative's Net Zero Investment Framework (NZIF 2.0) and includes a bespoke set of indicators and scoring methodology. The goal of this framework is to measure the proportion of companies where operational emissions strategies are aligned with net zero by 2050. This contributes to more detailed analysis of company transition plans, benchmarks portfolio risk, and supports more effective stewardship and investment considerations related to climate change. We have adopted the NZIF definition of high-impact and material sectors and this has been integrated into our company assessments and scoring methodology. We will assign engagement objectives for companies within high-impact sectors.

(B) Gas

Describe your strategy:

Our sustainable portfolios exclude gas producers (5% revenue threshold for the Global Sustainable Equity Fund and 10% revenue threshold for the Australian Sustainable Share Fund) as we seek to avoid companies that are involved in activities we consider incompatible with the achievement of the United Nations Sustainable Development Goals.

Our Net Zero Alignment Framework is based on the second edition of the Paris Aligned Investment Initiative's Net Zero Investment Framework (NZIF 2.0) and includes a bespoke set of indicators and scoring methodology. The goal of this framework is to measure the proportion of companies where operational emissions strategies are aligned with net zero by 2050. This contributes to more detailed analysis of company transition plans, benchmarks portfolio risk, and supports more effective stewardship and investment considerations related to climate change. We have adopted the NZIF definition of high-impact and material sectors and this has been integrated into our company assessments and scoring methodology. We will assign engagement objectives for companies within high-impact sectors.

(C) Oil

Describe your strategy:

Our sustainable portfolios exclude oil producers (5% revenue threshold for the Global Sustainable Equity Fund and 10% revenue threshold for the Australian Sustainable Share Fund) as we seek to avoid companies that are involved in activities we consider incompatible with the achievement of the United Nations Sustainable Development Goals.

Our Net Zero Alignment Framework is based on the second edition of the Paris Aligned Investment Initiative's Net Zero Investment Framework (NZIF 2.0) and includes a bespoke set of indicators and scoring methodology. The goal of this framework is to measure the proportion of companies where operational emissions strategies are aligned with net zero by 2050. This contributes to more detailed analysis of company transition plans, benchmarks portfolio risk, and supports more effective stewardship and investment considerations related to climate change. We have adopted the NZIF definition of high-impact and material sectors and this has been integrated into our company assessments and scoring methodology. We will assign engagement objectives for companies within high-impact sectors.

(D) Utilities

Describe your strategy:

Our sustainable portfolios exclude companies generating electricity from fossil fuels including thermal coal, natural gas, and oil (5% revenue threshold for the Global Sustainable Equity Fund and 10% revenue threshold for the Australian Sustainable Share Fund) as we seek to avoid companies that are involved in activities we consider incompatible with the achievement of the United Nations Sustainable Development Goals.

Our Net Zero Alignment Framework is based on the second edition of the Paris Aligned Investment Initiative's Net Zero Investment Framework (NZIF 2.0) and includes a bespoke set of indicators and scoring methodology. The goal of this framework is to measure the proportion of companies where operational emissions strategies are aligned with net zero by 2050. This contributes to more detailed analysis of company transition plans, benchmarks portfolio risk, and supports more effective stewardship and investment considerations related to climate change. We have adopted the NZIF definition of high-impact and material sectors and this has been integrated into our company assessments and scoring methodology. We will assign engagement objectives for companies within high-impact sectors.

(E) Cement

Describe your strategy:

Our Net Zero Alignment Framework is based on the second edition of the Paris Aligned Investment Initiative's Net Zero Investment Framework (NZIF 2.0) and includes a bespoke set of indicators and scoring methodology. The goal of this framework is to measure the proportion of companies where operational emissions strategies are aligned with net zero by 2050. This contributes to more detailed analysis of company transition plans, benchmarks portfolio risk, and supports more effective stewardship and investment considerations related to climate change. We have adopted the NZIF definition of high-impact and material sectors and this has been integrated into our company assessments and scoring methodology. We will assign engagement objectives for companies within high-impact sectors.

(F) Steel

Describe your strategy:

Our Net Zero Alignment Framework is based on the second edition of the Paris Aligned Investment Initiative's Net Zero Investment Framework (NZIF 2.0) and includes a bespoke set of indicators and scoring methodology. The goal of this framework is to measure the proportion of companies where operational emissions strategies are aligned with net zero by 2050. This contributes to more detailed analysis of company transition plans, benchmarks portfolio risk, and supports more effective stewardship and investment considerations related to climate change. We have adopted the NZIF definition of high-impact and material sectors and this has been integrated into our company assessments and scoring methodology. We will assign engagement objectives for companies within high-impact sectors.

(G) Aviation

Describe your strategy:

Our Net Zero Alignment Framework is based on the second edition of the Paris Aligned Investment Initiative's Net Zero Investment Framework (NZIF 2.0) and includes a bespoke set of indicators and scoring methodology. The goal of this framework is to measure the proportion of companies where operational emissions strategies are aligned with net zero by 2050. This contributes to more detailed analysis of company transition plans, benchmarks portfolio risk, and supports more effective stewardship and investment considerations related to climate change. We have adopted the NZIF definition of high-impact and material sectors and this has been integrated into our company assessments and scoring methodology. We will assign engagement objectives for companies within high-impact sectors.

(H) Heavy duty road

Describe your strategy:

Our Net Zero Alignment Framework is based on the second edition of the Paris Aligned Investment Initiative's Net Zero Investment Framework (NZIF 2.0) and includes a bespoke set of indicators and scoring methodology. The goal of this framework is to measure the proportion of companies where operational emissions strategies are aligned with net zero by 2050. This contributes to more detailed analysis of company transition plans, benchmarks portfolio risk, and supports more effective stewardship and investment considerations related to climate change. We have adopted the NZIF definition of high-impact and material sectors and this has been integrated into our company assessments and scoring methodology. We will assign engagement objectives for companies within high-impact sectors.

(I) Light duty road

Describe your strategy:

Our Net Zero Alignment Framework is based on the second edition of the Paris Aligned Investment Initiative's Net Zero Investment Framework (NZIF 2.0) and includes a bespoke set of indicators and scoring methodology. The goal of this framework is to measure the proportion of companies where operational emissions strategies are aligned with net zero by 2050. This contributes to more detailed analysis of company transition plans, benchmarks portfolio risk, and supports more effective stewardship and investment considerations related to climate change. We have adopted the NZIF definition of high-impact and material sectors and this has been integrated into our company assessments and scoring methodology. We will assign engagement objectives for companies within high-impact sectors.

(J) Shipping

Describe your strategy:

Our Net Zero Alignment Framework is based on the second edition of the Paris Aligned Investment Initiative's Net Zero Investment Framework (NZIF 2.0) and includes a bespoke set of indicators and scoring methodology. The goal of this framework is to measure the proportion of companies where operational emissions strategies are aligned with net zero by 2050. This contributes to more detailed analysis of company transition plans, benchmarks portfolio risk, and supports more effective stewardship and investment considerations related to climate change. We have adopted the NZIF definition of high-impact and material sectors and this has been integrated into our company assessments and scoring methodology. We will assign engagement objectives for companies within high-impact sectors.

(K) Aluminium

Describe your strategy:

Our Net Zero Alignment Framework is based on the second edition of the Paris Aligned Investment Initiative's Net Zero Investment Framework (NZIF 2.0) and includes a bespoke set of indicators and scoring methodology. The goal of this framework is to measure the proportion of companies where operational emissions strategies are aligned with net zero by 2050. This contributes to more detailed analysis of company transition plans, benchmarks portfolio risk, and supports more effective stewardship and investment considerations related to climate change. We have adopted the NZIF definition of high-impact and material sectors and this has been integrated into our company assessments and scoring methodology. We will assign engagement objectives for companies within high-impact sectors.

(L) Agriculture, forestry, fishery

Describe your strategy:

Our Net Zero Alignment Framework is based on the second edition of the Paris Aligned Investment Initiative's Net Zero Investment Framework (NZIF 2.0) and includes a bespoke set of indicators and scoring methodology. The goal of this framework is to measure the proportion of companies where operational emissions strategies are aligned with net zero by 2050. This contributes to more detailed analysis of company transition plans, benchmarks portfolio risk, and supports more effective stewardship and investment considerations related to climate change. We have adopted the NZIF definition of high-impact and material sectors and this has been integrated into our company assessments and scoring methodology. We will assign engagement objectives for companies within high-impact sectors.

(M) Chemicals

Describe your strategy:

Our Net Zero Alignment Framework is based on the second edition of the Paris Aligned Investment Initiative's Net Zero Investment Framework (NZIF 2.0) and includes a bespoke set of indicators and scoring methodology. The goal of this framework is to measure the proportion of companies where operational emissions strategies are aligned with net zero by 2050. This contributes to more detailed analysis of company transition plans, benchmarks portfolio risk, and supports more effective stewardship and investment considerations related to climate change. We have adopted the NZIF definition of high-impact and material sectors and this has been integrated into our company assessments and scoring methodology. We will assign engagement objectives for companies within high-impact sectors.

(N) Construction and buildings

Describe your strategy:

Our Net Zero Alignment Framework is based on the second edition of the Paris Aligned Investment Initiative's Net Zero Investment Framework (NZIF 2.0) and includes a bespoke set of indicators and scoring methodology. The goal of this framework is to measure the proportion of companies where operational emissions strategies are aligned with net zero by 2050. This contributes to more detailed analysis of company transition plans, benchmarks portfolio risk, and supports more effective stewardship and investment considerations related to climate change. We have adopted the NZIF definition of high-impact and material sectors and this has been integrated into our company assessments and scoring methodology. We will assign engagement objectives for companies within high-impact sectors.

(O) Textile and leather

Describe your strategy:

Our Net Zero Alignment Framework is based on the second edition of the Paris Aligned Investment Initiative's Net Zero Investment Framework (NZIF 2.0) and includes a bespoke set of indicators and scoring methodology. The goal of this framework is to measure the proportion of companies where operational emissions strategies are aligned with net zero by 2050. This contributes to more detailed analysis of company transition plans, benchmarks portfolio risk, and supports more effective stewardship and investment considerations related to climate change. We have adopted the NZIF definition of high-impact and material sectors and this has been integrated into our company assessments and scoring methodology. We will assign engagement objectives for companies within high-impact sectors.

(P) Water

Describe your strategy:

Our Net Zero Alignment Framework is based on the second edition of the Paris Aligned Investment Initiative's Net Zero Investment Framework (NZIF 2.0) and includes a bespoke set of indicators and scoring methodology. The goal of this framework is to measure the proportion of companies where operational emissions strategies are aligned with net zero by 2050. This contributes to more detailed analysis of company transition plans, benchmarks portfolio risk, and supports more effective stewardship and investment considerations related to climate change. We have adopted the NZIF definition of high-impact and material sectors and this has been integrated into our company assessments and scoring methodology. We will assign engagement objectives for companies within high-impact sectors.

(Q) Other

- (R) We do not have a strategy addressing high-emitting sectors**

Provide a link(s) to your strategy(ies), if available

<https://www.fidante.com/au/ALPH-ClimateChangeStatement.pdf>

<https://www.fidante.com/au/ALPH-ESGReport.pdf>

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

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

- (A) Yes, using the Inevitable Policy Response Forecast Policy Scenario (FPS) or Required Policy Scenario (RPS)
- (B) Yes, using the One Earth Climate Model scenario
- (C) Yes, using the International Energy Agency (IEA) Net Zero scenario
- (D) Yes, using other scenarios**
Specify:

We have assessed the resilience of our 2024 holdings using our Net Zero Alignment Framework which includes a specific indicator on emissions targets aligned to the Paris Agreement (below 2 degrees). This assessment helps us to consider the transition risks associated with a below 2 degree scenario to our portfolio holdings.
More information on our assessment and the outcomes for 2024 can be found in our 2024 ESG and Sustainability Report.

- (E) No, we have not assessed the resilience of our investment strategy in different climate scenarios, including one that holds temperature rise to below 2 degrees

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

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

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

The five pillars of our approach to managing climate change were formalised in 2021 and include:

- Risk analysis We identify climate-related risks on a company-by-company basis using our ESG materiality framework. There are three climate risk factors incorporated into our ESG Framework. Physical risks refer to the impacts of weather events, such as fires, storms, and floods, whereas transition risks result from policy action taken to shift the economy away from carbon intensive activities. In 2024, we also added a company's operational emissions footprint as a separate issue to capture growing regulatory risks, carbon taxes and reputational impacts for large emitters. Alphinity became a signatory to the Net Zero Asset Managers Initiative (NZAMI) at the end of 2023.

In 2024, we developed a Net Zero Asset Alignment Framework to measure the proportion of companies which are aligned to net zero by 2050. This assessment is focussed on assessing the credibility and quality of a company's climate transition plan and will enhance the way in which we manage climate risk in our investments. Further information on the outcomes and application of this framework is provided in later sections of this chapter. We exclude thermal coal producers from all Alphinity strategies, subject to a 10% revenue threshold, and exclude all fossil fuel producers and companies that generate energy using fossil fuels from our sustainable strategies (10% revenue threshold for the Australian Sustainable Share Fund, 5% revenue threshold for the Global Sustainable Equity Fund).

- Benchmarking Since 2021, we have used the Climate Action 100+ net zero framework to benchmark and assess the maturity of company transition plans, and reported these annually in our disclosures.

This year, we updated our approach and developed a Net Zero Alignment Framework, which builds on our previous assessments, to better inform our view on relative and absolute portfolio transition risk and progress.

We have presented the outcomes of this assessment, alongside our emissions intensity metrics, in the 2024 ESG and Sustainability Report.

- Carbon metrics We measure and report the carbon intensity and carbon footprint of all strategies externally annually. These disclosures are presented in our annual ESG and Sustainability Report. These metrics are useful indicators of a portfolio's potential exposure to transition risks such as policy intervention or changing consumer behaviour. We actively consider measuring and integrating new carbon metrics into our tools. In 2024, we considered calculating other carbon metrics as a representation of risk, such as emissions normalised to enterprise value including cash (EVIC) or emissions per unit of product volume (relevant in particular to mining companies) We also updated our internal climate models to highlight weekly changes in carbon intensity metrics, and integrated these into our portfolio management tools and outputs.

We have increased our efforts to ensure the timeliness and accuracy of emissions disclosure from third-party data sources, which underpins the rigour of our financed emissions models. Although analysing the carbon footprint of portfolios does not equate to climate risk management, it highlights large carbon contributors, sources of transition risk in the portfolio, company emissions performance year on year, and areas of focus in terms of research and engagement.

- **Stewardship** We aim to actively engage with all large emitters across our strategies to understand associated transition risks, provide feedback on their strategies, and encourage efforts to manage climate risk. Where material risks are identified we will also set engagement objectives that we can track progress against over time. As outlined in our Stewardship Policy, engagement activities are completed by all members of the Alphinity team, including the Portfolio Management team.

Where sufficient progress is not being made, we will escalate concerns through formal written communications and proxy voting decisions. From 2025, we will revise some of our climate-related objectives according to the gaps identified for companies in our Net Zero Alignment Framework. We are also involved in climate-related initiatives such as IGCC's policy working group, and collaborative engagements through Climate Action 100+. In 2024, we were appointed as co-leads for the Wesfarmers engagement group.

- **Investment considerations** When a potential risk is identified, we complete additional analysis, research or company engagement as required to better understand the extent of the risk, timeframes, and how the company is managing, or planning to manage the issue. The outcomes of this risk assessment may result in changes to investment decisions, valuation, and financial modelling, where appropriate.

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

To implement the 5 pillars of our approach to identify climate change risks (above), we have a process to integrate these risks and considerations into overall risk management. This process includes taking the outcomes from emissions footprints (company and portfolio level) and our Net Zero Alignment Framework assessments and integrating them through our standard ESG integration, stewardship and research programs. This process is outlined in detail on page six of our Climate Change Statement <https://www.fidante.com/au/ALPH-ClimateChangeStatement.pdf>

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

(1) Describe your process

To implement the 5 pillars of our approach to identify climate change risks (above), we have a process to integrate these risks and considerations into overall risk management. This process includes taking the outcomes from emissions footprints (company and portfolio level) and our Net Zero Alignment Framework assessments and integrating them through our standard ESG integration, stewardship and research programs. This process is outlined in detail on page six of our Climate Change Statement <https://www.fidante.com/au/ALPH-ClimateChangeStatement.pdf>

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

To implement the 5 pillars of our approach to identify climate change risks (above), we have a process to integrate these risks and considerations into overall risk management. This process includes taking the outcomes from emissions footprints (company and portfolio level) and our Net Zero Alignment Framework assessments and integrating them through our standard ESG integration, stewardship and research programs. This process is outlined in detail on page six of our Climate Change Statement <https://www.fidante.com/au/ALPH-ClimateChangeStatement.pdf>

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

Additional context to your response(s): (Voluntary)

See our Climate Change Statement for more information.

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

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

(A) Exposure to physical risk

(1) Indicate whether this metric or variable was used and disclosed, including the methodology

(1) Metric or variable used

- (2) Metric or variable used and disclosed
- (3) Metric or variable used and disclosed, including methodology

(B) Exposure to transition risk

(1) Indicate whether this metric or variable was used and disclosed, including the methodology

- (1) Metric or variable used
 - (2) Metric or variable used and disclosed
 - (3) Metric or variable used and disclosed, including methodology
- (2) Provide link to the disclosed metric or variable, including the methodology followed, as applicable

<https://www.fidante.com/au/ALPH-ESGReport.pdf>

(C) Internal carbon price

(D) Total carbon emissions

- (1) Indicate whether this metric or variable was used and disclosed, including the methodology
- (1) Metric or variable used
 - (2) Metric or variable used and disclosed
 - (3) Metric or variable used and disclosed, including methodology
- (2) Provide link to the disclosed metric or variable, including the methodology followed, as applicable

<https://www.fidante.com/au/ALPH-ESGReport.pdf>

(E) Weighted average carbon intensity

- (1) Indicate whether this metric or variable was used and disclosed, including the methodology
- (1) Metric or variable used
 - (2) Metric or variable used and disclosed
 - (3) Metric or variable used and disclosed, including methodology
- (2) Provide link to the disclosed metric or variable, including the methodology followed, as applicable

<https://www.fidante.com/au/ALPH-ESGReport.pdf>

(F) Avoided emissions

(G) Implied Temperature Rise (ITR)

(H) Non-ITR measure of portfolio alignment with UNFCCC Paris Agreement goals

(I) Proportion of assets or other business activities aligned with climate-related opportunities

- (1) Indicate whether this metric or variable was used and disclosed, including the methodology
- (1) Metric or variable used
 - (2) Metric or variable used and disclosed
 - (3) Metric or variable used and disclosed, including methodology

(J) Other metrics or variables

Specify:

positive and negative revenue alignment to climate related SDGs (eg SDG13, SDG7)

- (1) Indicate whether this metric or variable was used and disclosed, including the methodology
- (1) Metric or variable used
 - (2) Metric or variable used and disclosed
 - (3) Metric or variable used and disclosed, including methodology
- (2) Provide link to the disclosed metric or variable, including the methodology followed, as applicable

<https://www.fidante.com/au/ALPH-ESGReport.pdf>

- (K) Our organisation did not use or publicly disclose any climate risk metrics or variables affecting our investments during the reporting year

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

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

(A) Scope 1 emissions

- (1) Indicate whether this metric was disclosed, including the methodology
- (1) Metric disclosed
 - (2) Metric and methodology disclosed

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

<https://www.fidante.com/au/ALPH-ESGReport.pdf>

(B) Scope 2 emissions

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

○ (1) Metric disclosed

● **(2) Metric and methodology disclosed**

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

<https://www.fidante.com/au/ALPH-ESGReport.pdf>

(C) Scope 3 emissions (including financed emissions)

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

○ (1) Metric disclosed

● **(2) Metric and methodology disclosed**

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

<https://www.fidante.com/au/ALPH-ESGReport.pdf>

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

SUSTAINABILITY OUTCOMES

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

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

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

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

Additional context to your response(s): (Voluntary)

see from page 32 of our 2024 ESG and Sustainability Report

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

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

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

(B) The UNFCCC Paris Agreement

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

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

(E) The EU Taxonomy

(F) Other relevant taxonomies

(G) The International Bill of Human Rights

- (H) The International Labour Organization's Declaration on Fundamental Principles and Rights at Work and the eight core conventions
- (I) The Convention on Biological Diversity
- (J) Other international framework(s)
- (K) Other regional framework(s)
- (L) **Other sectoral/issue-specific framework(s)**

Specify:

Net Zero Investment Framework

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

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

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

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

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

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

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

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 48.1	PLUS	PGS 48	N/A	PUBLIC	Sustainability outcomes	1, 2

Why has your organisation taken action on specific sustainability outcomes connected to its investment activities?

- (A) **We believe that taking action on sustainability outcomes is relevant to our financial risks and returns over both short- and long-term horizons**
- (B) We believe that taking action on sustainability outcomes, although not yet relevant to our financial risks and returns, will become so over a long-time horizon
- (C) **We have been requested to do so by our clients and/or beneficiaries**

- (D) We want to prepare for and respond to legal and regulatory developments that are increasingly addressing sustainability outcomes
- (E) We want to protect our reputation, particularly in the event of negative sustainability outcomes connected to investments
- (F) We want to enhance our social licence-to-operate (i.e. the trust of beneficiaries, clients, and other stakeholders)
- (G) We believe that taking action on sustainability outcomes in parallel to financial return goals has merit in its own right
- (H) Other

HUMAN RIGHTS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 49	PLUS	PGS 47	PGS 49.1	PUBLIC	Human rights	1, 2

During the reporting year, what steps did your organisation take to identify and take action on the actual and potential negative outcomes for people connected to your investment activities?

- (A) We assessed the country level context of our potential and/or existing investments to understand how this could connect our organisation to negative human rights outcomes

Explain how these activities were conducted:

In 2021 we introduced a Modern Slavery and Human Rights Framework to support the consistent identification and analysis of different risks across investee companies and those under consideration for investment. This framework includes a risk assessment and management assessment. The risk assessment includes consideration of country level context associated with particular commodities across supply chains (eg child labour related to cocoa farming in Africa), and with specific operations. We map supply chain (where possible) and operational exposure to high risk countries using the Global Slavery Index data to define high risk.

- (B) We assessed the sector context of our potential and/or existing investments to understand how this could connect our organisation to negative human rights outcomes

Explain how these activities were conducted:

In 2021 we introduced a Modern Slavery and Human Rights Framework to support the consistent identification and analysis of different risks across investee companies and those under consideration for investment. In 2023 we enhanced our visibility of supply chain risks by identifying 25 high risk products and commodities. This includes 14 categories outlined in the Global Slavery Index and a further 11 categories such as cobalt, mica, bricks and tea, identified from the US List of Goods Produced by Child or Forced Labour and other sources. The same 25 categories were utilised in 2024, however, this list may change in the future. This framework includes a risk assessment and management assessment. The risk assessment includes consideration of sector level issues associated with particular commodities across supply chains (eg high level of exposure to human rights issues for the consumer sector), and with specific operations (eg cleaning services). We apply sub-sector default risk levels for supply chain and operations and then adjust them based on the specifics of each company, or knowledge of the business.

- (C) We assessed the human rights performance of our potential and/or existing investments to understand how this could connect our organisation to negative human rights outcomes

Explain how these activities were conducted:

As investors, we have a responsibility to ensure, to the greatest extent possible, that modern slavery does not occur in the companies in which we invest, including in their supply chains. We assess a company's ability to manage modern slavery risks within their supply chains and operations based on governance and oversight, existing policies, and management strategies that enables them to identify and respond to incidences as they arise. We subscribe to external ESG research providers and closely monitor any flags against for UN Global Compact Compliance or controversies related to human rights violations. We use a standard risk framework to identify companies on our portfolios that present a high level of risk within their upstream supply chains, downstream value chains, or operation.

- Upstream supply chain risks: Risks related to supply chain components, including key high-risk commodities, which support product development, manufacture, and company operations.
- Downstream value chain risks: Risks related to the application and use of a company's products or services.

For example, modern slavery exposures through lending practices.

- Operational risks: Risks associated with employees and/or contract workforce, operational locations including factories and distribution centres, and overall working conditions.

We assess a company's response to modern slavery risks by considering governance and oversight, any specific strategies to address risks, and the quality of disclosure. We engage with companies to discuss specific risks in more detail and to confirm our views on the company's management response. We use the Australian Modern Slavery Act as a guide for good practice, particularly in relation to disclosure, and encourage companies to enhance their management of key risks over time. We also use a number of other frameworks and guidelines to assess modern slavery risk including the UN Global Compact, Global Slavery Index, International Labour Organisation and World Economic Forum. We complete a full risk assessment at least once per year as part of our end of financial year ESG analysis, however we use this framework consistently throughout the year to inform company level ESG reviews.

Where we cannot collect adequate information through disclosures or industry research we have assigned a temporary risk level and will aim to validate the exposure further through company engagement or research. See our annual ESG and Sustainability Report for details on this assessment. Further information can also be found in our Modern Slavery fact sheet. <https://www.fidante.com/au/ALPH-ModernSlaveryFactSheet.pdf>.

(D) We monitored severe and emerging human rights controversies to understand how this could connect our organisation to negative human rights outcomes

Explain how these activities were conducted:

as above.

(E) We took other steps to assess and manage the actual and potentially negative outcomes for people connected to our investment activities

Specify:

We have a specific focus on First Nations. This has been called out as a thematic priority in 2024. See our Annual ESG report for more information <https://www.fidante.com/au/ALPH-ESGReport.pdf>

Explain how these activities were conducted:

as above.

- (F) We did not identify and take action on the actual and potentially negative outcomes for people connected to any of our investment activities during the reporting year

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 49.1	PLUS	PGS 49	N/A	PUBLIC	Human rights	1, 2

During the reporting year, which stakeholder groups did your organisation include when identifying and taking action on the actual and potential negative outcomes for people connected to your investment activities?

(A) Workers

Sector(s) for which each stakeholder group was included

- (1) Energy
- (2) Materials
- (3) Industrials
- (4) Consumer discretionary
- (5) Consumer staples
- (6) Healthcare
- (7) Finance
- (8) Information technology
- (9) Communication services
- (10) Utilities
- (11) Real estate

(B) Communities

Sector(s) for which each stakeholder group was included

- (1) Energy
- (2) Materials
- (3) Industrials

- (4) Consumer discretionary
- (5) Consumer staples
- (6) Healthcare
- (7) Finance
- (8) Information technology
- (9) Communication services
- (10) Utilities
- (11) Real estate

(C) Customers and end-users

Sector(s) for which each stakeholder group was included

- (1) Energy
- (2) Materials
- (3) Industrials
- (4) Consumer discretionary
- (5) Consumer staples
- (6) Healthcare
- (7) Finance
- (8) Information technology
- (9) Communication services
- (10) Utilities
- (11) Real estate

(D) Other stakeholder groups

Specify:

First Nations

Sector(s) for which each stakeholder group was included

- (1) Energy
- (2) Materials
- (3) Industrials
- (4) Consumer discretionary
- (5) Consumer staples
- (6) Healthcare
- (7) Finance
- (8) Information technology
- (9) Communication services
- (10) Utilities
- (11) Real estate

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 49.2	PLUS	PGS 47	N/A	PUBLIC	Human rights	1, 2

During the reporting year, what information sources did your organisation use to identify the actual and potential negative outcomes for people connected to its investment activities?

(A) Corporate disclosures

Provide further detail on how your organisation used these information sources:

Corporate disclosures are a key input to our assessment of ESG issues relevant to a specific company. We undertake ESG materiality assessments for all companies in our portfolio's. From this we identify ESG risk statements and an overall risk level. Corporate Disclosures are reviewed to collect the information needed to understand the ESG materiality assessment and identify priority risks.

(B) Media reports

Provide further detail on how your organisation used these information sources:

We subscribe to controversy reporting through our ESG research provider. These reports include summaries of media reports which sometimes include issues related to human rights. We also monitor media reports as part of our ongoing ESG management practices.

(C) Reports and other information from NGOs and human rights institutions

Provide further detail on how your organisation used these information sources:

We reference reports from NGOs and other organisations as part of our modern slavery risk management assessment (described above). Examples include the Human Rights Watch reports. We are also members of the PRI Advance Collaborative engagement and use the assessments to inform our approach.

(D) Country reports, for example, by multilateral institutions, e.g. OECD, World Bank

Provide further detail on how your organisation used these information sources:

we will reference country level reports to understand trends and risks related to people. We also use country level reporting for the SDGs.

(E) Data provider scores or benchmarks

Provide further detail on how your organisation used these information sources:

We use external data providers for our ESG materiality assessment and other specific assessments like the Modern Slavery risk assessment. for example, Global Slavery index, controversy reporting from third party ESG research provider

(F) Human rights violation alerts

Provide further detail on how your organisation used these information sources:

Our external ESG ratings and research provider includes Global Standards screening and information on compliance with human rights principles.

(G) Sell-side research

Provide further detail on how your organisation used these information sources:

We use a range of sell-side research that helps inform our ESG analysis, including information and insights on human rights.

(H) Investor networks or other investors

Provide further detail on how your organisation used these information sources:

We are part of the PRI Advance program which is focussed on collaborative engagement between investors to address human rights in the mining and energy sectors.

(I) Information provided directly by affected stakeholders or their representatives

Provide further detail on how your organisation used these information sources:

We will at times engage directly with specific community or workforce groups. for example, in 2024 we have engaged with Union representatives and Traditional Owners who are impacted by various mining and energy development activities.

(J) Social media analysis

(K) Other

Specify:

Site visits

Provide further detail on how your organisation used these information sources:

We have attended a number of site visits to further investigate human rights issues in specific supply chains eg Palm Oil in Indonesia and Apparel in Bangladesh and Vietnam.

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 50	PLUS	PGS 47	N/A	PUBLIC	Human rights	1, 2

During the reporting year, did your organisation, directly or through influence over investees, enable access to remedy for people affected by negative human rights outcomes connected to your investment activities?

(A) Yes, we enabled access to remedy directly for people affected by negative human rights outcomes we caused or contributed to through our investment activities

(B) Yes, we used our influence to ensure that our investees provided access to remedies for people affected by negative human rights outcomes we were linked to through our investment activities

Describe:

Following meetings with community stakeholders, we engaged directly with investee companies to share information and concerns. We shared specific details provided by the stakeholders with the goal of improving access to remedy and encouraging the company to address concerns.

(C) No, we did not enable access to remedy directly, or through the use of influence over investees, for people affected by negative human rights outcomes connected to our investment activities during the reporting year

LISTED EQUITY (LE)

OVERALL APPROACH

MATERIALITY ANALYSIS

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

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

(3) Active - fundamental

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

(1) for all of our AUM

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

(1) for all of our AUM

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

(1) for all of our AUM

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

o

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

o

MONITORING ESG TRENDS

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

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

(3) Active - fundamental

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

(1) for all of our AUM

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

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

○

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

○

(A) Yes, we have a formal process that includes scenario analysis - Specify: (Voluntary)

We have in place a structured ESG integration review process. Material issues and associated risks for each company are determined by the ESG and investment team and can be updated at any time. Regardless, we believe that a structured review process is necessary to drive consistency and accountability across the various teams. At the company level, the ESG materiality assessment and ESG risk levels are reviewed with each member of the investment team, covering their relevant stocks with the ESG team at least twice a year. A portfolio-wide analysis on key ESG topics (climate change, modern slavery, health and safety and diversity) is completed annually as part of our ESG and Sustainability Report disclosures. We also monitor and discuss different scenarios related to ESG risks and drivers in our weekly investment meetings.

PRE-INVESTMENT

ESG INCORPORATION IN RESEARCH

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

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

(2) Active - fundamental

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

(1) in all cases

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

(1) in all cases

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

(1) in all cases

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

o

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

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

(3) Active - fundamental

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

ESG INCORPORATION IN PORTFOLIO CONSTRUCTION

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
LE 5	PLUS	OO 21	N/A	PUBLIC	ESG incorporation in portfolio construction	1

Provide an example of how you incorporated ESG factors into your equity selection and research process during the reporting year.

Cintas is a US-based uniform and work apparel company which rents and sell uniforms and ancillary products and services such as mops, first aid and fire inspection kits. In its core uniform and facility services unit, which is close to 90% of revenue, Cintas provides uniform retail programs which include supplying, washing, and mending uniforms and other profession-specific clothing. Cintas has over 1 million customers, operates 11,000 routes distributing products and services, and has close to 45,000 full time employees. Before investing in Cintas in our Global Equities strategies, we completed an ESG review to identify material ESG risks and opportunities, confirm an ESG risk level for the company, and identify any actions for the portfolio management team and engagement priorities for the company. We identified a range of minor ESG considerations through this review. However the risk of environmental fines/increasing operational costs driven by the poor management of environmental discharges and excess water use, was identified as material and required further review. We engaged with the company in August 2024 to clarify its environmental management processes, the use and disposal of water, and the extent of past fines. For example, through this engagement we discovered 90% of water used is returned to the ecosystem with 30% of facilities using recycled water. Cintas also uses automated dispensing systems to precisely dose all detergents and reduce the risk of overdosing caused by human error, limiting excess chemicals in waterways. Through this engagement we were able to better understand the risks, building on the good quality disclosures from the company, and finalised the ESG risk level of 1. This risk level requires the ESG and portfolio management teams to monitor company ESG performance, however, no ongoing engagement objective has been identified.

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

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

(3) Active - fundamental

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

(1) for all of our AUM

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

(1) for all of our AUM

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

(1) for all of our AUM

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

(3) for a minority of our AUM

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

o

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

Material ESG factors (SDG scoring) are used to define the universe for our two Sustainable Funds.

POST-INVESTMENT

ESG RISK MANAGEMENT

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

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

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

Additional context to your response(s): (Voluntary)

B) We have a Sustainable Compliance Committee in place for our 2 Sustainable Funds. These funds apply additional exclusions. See the Fund Charters for more information.

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

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

(2) Active - fundamental

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

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

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

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

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

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

o

DISCLOSURE OF ESG SCREENS

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

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

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

SUSTAINABILITY OUTCOMES (SO)

SETTING TARGETS AND TRACKING PROGRESS

SETTING TARGETS ON SUSTAINABILITY OUTCOMES

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SO 1	PLUS	PGS 48	SO 2, SO 2.1, SO 3	PUBLIC	Setting targets on sustainability outcomes	1, 2

What specific sustainability outcomes connected to its investment activities has your organisation taken action on?

(A) Sustainability outcome #1

(1) Widely recognised frameworks used to guide action on this sustainability outcome

(1) The UN Sustainable Development Goals (SDGs) and targets

(2) The UNFCCC Paris Agreement

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

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

(5) The EU Taxonomy

(6) Other relevant taxonomies

(7) The International Bill of Human Rights

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

(9) The Convention on Biological Diversity

(10) Other international, regional, sector-based or issue-specific framework(s)

(2) Classification of sustainability outcome

(1) Environmental

(2) Social

(3) Governance-related

(4) Other

(3) Sustainability outcome name

Investing in companies that align with SDG13 under 2 Sustainable Funds.

(4) Number of targets set for this outcome

(1) No target

(2) One target

(3) Two or more targets

(B) Sustainability outcome #2

(1) Widely recognised frameworks used to guide action on this sustainability outcome

(1) The UN Sustainable Development Goals (SDGs) and targets

(2) The UNFCCC Paris Agreement

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

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

(5) The EU Taxonomy

(6) Other relevant taxonomies

(7) The International Bill of Human Rights

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

(9) The Convention on Biological Diversity

(10) Other international, regional, sector-based or issue-specific framework(s)

(2) Classification of sustainability outcome

- (1) Environmental
- (2) **Social**
- (3) Governance-related
- (4) Other

(3) Sustainability outcome name

Investing in companies that align with SDG3 under 2 Sustainable Funds.

(4) Number of targets set for this outcome

- (1) **No target**
- (2) One target
- (3) Two or more targets

(C) **Sustainability outcome #3**

(1) Widely recognised frameworks used to guide action on this sustainability outcome

- (1) **The UN Sustainable Development Goals (SDGs) and targets**
- (2) The UNFCCC Paris Agreement
- (3) The UN Guiding Principles on Business and Human Rights (UNGPs)
- (4) OECD frameworks: OECD Guidelines for Multinational Enterprises and Guidance on Responsible Business Conduct for Institutional Investors
- (5) The EU Taxonomy
- (6) Other relevant taxonomies
- (7) The International Bill of Human Rights
- (8) The International Labour Organization's Declaration on Fundamental Principles and Rights at Work and the eight core conventions
- (9) The Convention on Biological Diversity
- (10) Other international, regional, sector-based or issue-specific framework(s)

(2) Classification of sustainability outcome

- (1) **Environmental**
- (2) Social
- (3) Governance-related
- (4) Other

(3) Sustainability outcome name

Investing in companies that align with SDG7 under 2 Sustainable Funds.

(4) Number of targets set for this outcome

- (1) **No target**
- (2) One target
- (3) Two or more targets

(D) **Sustainability outcome #4**

(1) Widely recognised frameworks used to guide action on this sustainability outcome

- (1) **The UN Sustainable Development Goals (SDGs) and targets**
- (2) The UNFCCC Paris Agreement
- (3) The UN Guiding Principles on Business and Human Rights (UNGPs)
- (4) OECD frameworks: OECD Guidelines for Multinational Enterprises and Guidance on Responsible Business Conduct for Institutional Investors
- (5) The EU Taxonomy
- (6) Other relevant taxonomies
- (7) The International Bill of Human Rights
- (8) The International Labour Organization's Declaration on Fundamental Principles and Rights at Work and the eight core conventions
- (9) The Convention on Biological Diversity
- (10) Other international, regional, sector-based or issue-specific framework(s)

(2) Classification of sustainability outcome

- (1) **Environmental**
- (2) Social
- (3) Governance-related
- (4) Other

(3) Sustainability outcome name

Investing in companies that align with SDG12 under 2 Sustainable Funds.

(4) Number of targets set for this outcome

- (1) No target
- (2) One target
- (3) Two or more targets

(E) Sustainability outcome #5

(1) Widely recognised frameworks used to guide action on this sustainability outcome

- (1) The UN Sustainable Development Goals (SDGs) and targets
- (2) The UNFCCC Paris Agreement
- (3) The UN Guiding Principles on Business and Human Rights (UNGPs)
- (4) OECD frameworks: OECD Guidelines for Multinational Enterprises and Guidance on Responsible Business Conduct for Institutional Investors
- (5) The EU Taxonomy
- (6) Other relevant taxonomies
- (7) The International Bill of Human Rights
- (8) The International Labour Organization's Declaration on Fundamental Principles and Rights at Work and the eight core conventions
- (9) The Convention on Biological Diversity
- (10) Other international, regional, sector-based or issue-specific framework(s)

(2) Classification of sustainability outcome

- (1) Environmental
- (2) Social
- (3) Governance-related
- (4) Other

(3) Sustainability outcome name

Investing in companies that align with SDG2 under 2 Sustainable Funds.

(4) Number of targets set for this outcome

- (1) No target
- (2) One target
- (3) Two or more targets

(F) Sustainability outcome #6

(1) Widely recognised frameworks used to guide action on this sustainability outcome

- (1) The UN Sustainable Development Goals (SDGs) and targets
- (2) The UNFCCC Paris Agreement
- (3) The UN Guiding Principles on Business and Human Rights (UNGPs)
- (4) OECD frameworks: OECD Guidelines for Multinational Enterprises and Guidance on Responsible Business Conduct for Institutional Investors
- (5) The EU Taxonomy
- (6) Other relevant taxonomies
- (7) The International Bill of Human Rights
- (8) The International Labour Organization's Declaration on Fundamental Principles and Rights at Work and the eight core conventions
- (9) The Convention on Biological Diversity
- (10) Other international, regional, sector-based or issue-specific framework(s)

(2) Classification of sustainability outcome

- (1) Environmental
- (2) Social
- (3) Governance-related
- (4) Other

(3) Sustainability outcome name

Investing in companies that align with SDG10 under 2 Sustainable Funds.

(4) Number of targets set for this outcome

- (1) No target
- (2) One target
- (3) Two or more targets

(G) Sustainability outcome #7

(1) Widely recognised frameworks used to guide action on this sustainability outcome

(1) The UN Sustainable Development Goals (SDGs) and targets

(2) The UNFCCC Paris Agreement

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

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

(5) The EU Taxonomy

(6) Other relevant taxonomies

(7) The International Bill of Human Rights

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

(9) The Convention on Biological Diversity

(10) Other international, regional, sector-based or issue-specific framework(s)

(2) Classification of sustainability outcome

(1) Environmental

(2) Social

(3) Governance-related

(4) Other

(3) Sustainability outcome name

Investing in companies that align with SDG9 under 2 Sustainable Funds.

(4) Number of targets set for this outcome

(1) No target

(2) One target

(3) Two or more targets

(H) Sustainability outcome #8

(1) Widely recognised frameworks used to guide action on this sustainability outcome

(1) The UN Sustainable Development Goals (SDGs) and targets

(2) The UNFCCC Paris Agreement

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

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

(5) The EU Taxonomy

(6) Other relevant taxonomies

(7) The International Bill of Human Rights

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

(9) The Convention on Biological Diversity

(10) Other international, regional, sector-based or issue-specific framework(s)

(2) Classification of sustainability outcome

(1) Environmental

(2) Social

(3) Governance-related

(4) Other

(3) Sustainability outcome name

Investing in companies that align with SDG8 under 2 Sustainable Funds.

(4) Number of targets set for this outcome

(1) No target

(2) One target

(3) Two or more targets

(I) Sustainability outcome #9

(1) Widely recognised frameworks used to guide action on this sustainability outcome

(1) The UN Sustainable Development Goals (SDGs) and targets

(2) The UNFCCC Paris Agreement

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

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

(5) The EU Taxonomy

- (6) Other relevant taxonomies
- (7) The International Bill of Human Rights
- (8) The International Labour Organization's Declaration on Fundamental Principles and Rights at Work and the eight core conventions
- (9) The Convention on Biological Diversity
- (10) Other international, regional, sector-based or issue-specific framework(s)
- (2) Classification of sustainability outcome
 - (1) Environmental
 - (2) **Social**
 - (3) Governance-related
 - (4) Other
- (3) Sustainability outcome name
 - Investing in companies that align with SDG1 under 2 Sustainable Funds.
- (4) Number of targets set for this outcome
 - (1) **No target**
 - (2) One target
 - (3) Two or more targets
- (J) Sustainability outcome #10

CONFIDENCE-BUILDING MEASURES (CBM)

CONFIDENCE-BUILDING MEASURES

APPROACH TO CONFIDENCE-BUILDING MEASURES

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

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

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

THIRD-PARTY EXTERNAL ASSURANCE

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
CBM 2	CORE	OO 21, CBM 1	N/A	PUBLIC	Third-party external assurance	6

For which responsible investment processes and/or data did your organisation conduct third-party external assurance?

- (A) Policy, governance and strategy
- (C) Listed equity
 - Select from dropdown list:
 - (1) Data assured
 - (2) Processes assured
 - (3) Processes and data assured

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
CBM 3	PLUS	CBM 1	N/A	PUBLIC	Third-party external assurance	6

Provide details of the third-party external assurance process regarding the information submitted in your PRI report.

- (1) Description of the third-party external assurance process
- (2) Assurance standard(s) used by the third-party assurance provider
 - (A) PAS 7341:2020
 - (B) ISAE 3000 and national standards based on this
 - (C) Dutch Standard 3810N (Assurance engagements regarding sustainability reports)
 - (D) RevR6 (Assurance of Sustainability)
 - (E) IDW AsS 821 (Assurance Standard for the Audit or Review of Reports on Sustainability Issues)
 - (F) Accountability AA1000 Assurance Standard (AA1000AS)
 - (G) IFC performance standards
 - (H) SSAE 18 and SOC 1
 - (I) **Other national auditing/assurance standard with guidance on sustainability; specify:**

ASAE 3000 - Australian Standard on Assurance Engagements ASAE 3000 Assurance Engagements Other than Audits or Reviews of Historical Financial Information (ASAE 3000).

- (J) Invest Europe Handbook of Professional Standards
- (K) ISAE 3402 Assurance Reports on Controls at a Service Organisation
- (L) AAF 01/20
- (M) AAF 01/06 Stewardship Supplement
- (N) ISO 26000 Social Responsibility
- (O) ISO 14065:2020 General principles and requirements for bodies validating and verifying environmental information
- (P) ASAE 3410 Assurance Engagements on Greenhouse Gas Statements
- (Q) PCAF
- (R) NGER audit framework (National Greenhouse and Energy Reporting)
- (S) Auditor's proprietary assurance framework for assuring RI-related information
- (T) Other greenhouse gas emissions assurance standard; specify:
- (3) Third-party external assurance provider's report that contains the assurance conclusion

<https://www.fidante.com/au/ALPH-ESGReport.pdf>

INTERNAL REVIEW

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

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

- (A) **Board, trustees, or equivalent**
Sections of PRI report reviewed
 - (1) the entire report
 - (2) **selected sections of the report**
- (B) **Senior executive-level staff, investment committee, head of department, or equivalent**
Sections of PRI report reviewed
 - (1) **the entire report**

- (2) selected sections of the report
- (C) None of the above internal roles reviewed selected sections or the entirety of the responses submitted in our PRI report this year