

RESPONSIBLE INVESTING FRAMEWORK.

1. Responsible investment (RI) definition

- 1.1. Responsible investment is a matter of stewardship. We define stewardship as the careful and responsible execution of the investing-related duties entrusted to us by our customers and clients.

2. Statements of belief

We believe that:

- 2.1. The interests of our customers, clients and shareholders are impacted by Environmental, Social and Governance (ESG) factors. Accordingly we must consider these topics and factor them into our decisions.
- 2.2. Wealth managers have a responsibility to allocate clients' capital to productive purposes in the pursuit of sustainable long term wealth protection and enhancement. Our customers, clients and stakeholders are increasingly holding us accountable to this.
- 2.3. The understanding and application of ESG matters in investing continues to develop. As a major financial institution, it is important that we participate in and shape that conversation.
- 2.4. We will earn and maintain the trust of our customers, clients and stakeholders through delivering this stewardship through the principles of integrity, balance, transparency and focus.

3. Guiding principles

We will apply the following fundamental principles to guide our ESG decisions and commitments as asset owners, asset managers, investment platform providers and advisers.

- 3.1. **Integrity:** place the interests of customers and clients, and our fiduciary duties at the centre of all considerations; and be driven by what we believe is the right thing in accordance with our vision.
- 3.2. **Balance:** continually deepen our understanding of ESG matters; ensure ESG considerations are integrated into our decision making processes; and listen carefully to parties on all sides of the debate.
- 3.3. **Transparency:** be clear to our customers and stakeholders about the basis of our decisions and the implications; and be open about our progress against our RI framework and commitments.
- 3.4. **Focus:** develop and implement strategies that influence meaningful change; and support customers and clients to exercise their own choice by providing ESG knowledge and innovative solutions.

4. Responsible investing commitments

- 4.1. We will seek to understand customer and client ESG needs.
- 4.2. We will reflect the growing public awareness and demand of RI issues through the development and delivery of innovative ESG products and services.
- 4.3. We will embed ESG considerations into our existing investment decision making and active ownership practices.
- 4.4. We will build the capacity of staff to understand and assess ESG risks and opportunities.
- 4.5. We will provide transparency regarding how we manage ESG considerations and annually disclose our progress against our commitments, aligning our reporting with established standards.
- 4.6. We will engage with investees and fund managers to encourage the disclosure of ESG risks and impacts as they are identified.
- 4.7. We will collaborate with and, where appropriate, challenge internal and external parties in order to:
 - a. Build the broader industry understanding of ESG;
 - b. Encourage uptake of ESG throughout the investment value chain; and,
 - c. Deliver meaningful change.