

Vontobel

ESG Integration and Stewardship

Report 2024

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Foreword

At Vontobel, our commitment to ESG investing is rooted in our belief that these considerations are vital for long-term value creation for our clients. Over the past year, we have continued to embed ESG considerations across our investment processes and formalized our stance on climate and nature.

We recognize that the ESG landscape is evolving amidst a complex global backdrop—marked by economic uncertainty, shifting regulations, and public debate. We view these challenges as opportunities to reaffirm our role because for us, it remains clear. As a fiduciary, we act on behalf of our clients, who entrust us with their capital. Our duty is to help clients meet their goals and we do so by offering the knowledge, tools, and investment solutions that empower investors to consider sustainability in their financial strategies.

We believe that incorporating ESG considerations into our investment analysis and decision-making processes helps us to make better-informed investment decisions and manage risks more effectively. Over the years, we have developed a robust ESG framework that guides our investment decisions. This report describes how we act as a steward of our client's assets and outlines our ongoing efforts in ESG integration and stewardship.

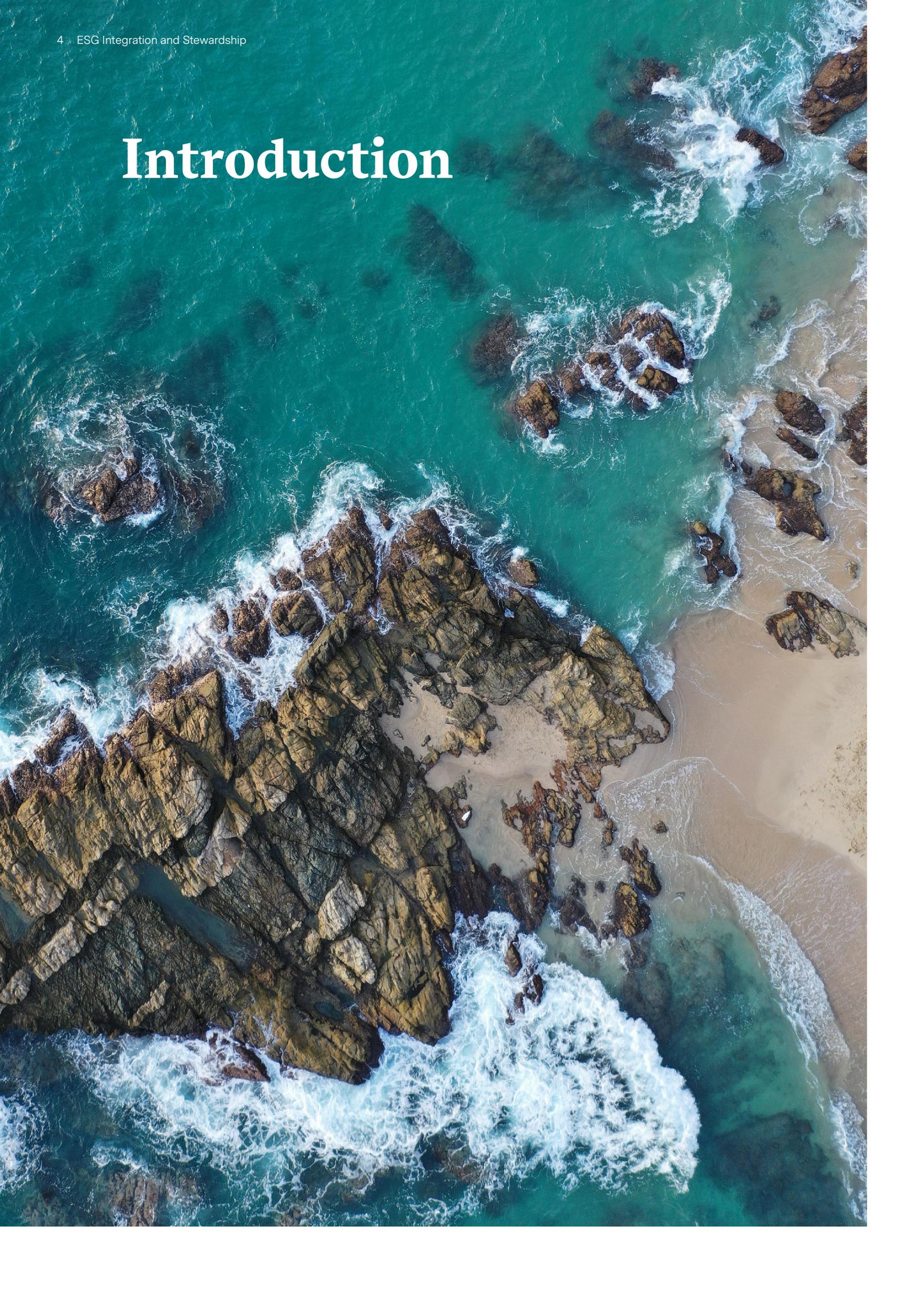
We are grateful for the trust that our clients place in us, and we look forward to continuing to serve them in the years to come.

—

Andrew Jackson

Head Investments

Introduction



Our profile

About Vontobel

We are an international investment firm providing investment, advisory, and solution capabilities to private and institutional clients. Headquartered in Zurich, Switzerland, we operate across 28 locations worldwide. Vontobel Holding AG shares are listed on the SIX Swiss Exchange and are majority-owned by the Vontobel families. A long-term majority shareholding enables Vontobel to think and act with a long-term perspective. Entrepreneurial independence is key to our business, and the resulting freedom comes with a responsibility to uphold social responsibility.

With our investment-led approach focused exclusively on the buy-side business, we think and act purely from the client's perspective—investors serving investors. Our proven and unique investment capabilities form the foundation of our business model. This structure allows us to develop exceptional investment approaches in a robust and replicable manner. Vontobel has built a strong and well-diversified range of investment boutiques, making targeted investments in recent years. We have approximately 250 specialists working in our investment hubs in Switzerland, Europe, Asia and the US, managing strategies and solutions across equities, fixed income, quantitative, multi-asset, and private markets. Our conviction that successful investing begins with personal responsibility drives us to empower employees, enabling them to unlock their potential, take ownership of their work, and bring opportunities to life. We continuously assess our achievements as we strive to exceed client expectations.

For Institutional Clients, we offer asset management expertise and services tailored to sophisticated investors and intermediaries, such as banks, insurance companies, and asset managers. The combination of our local presence and international reach plays a key role in serving our clients, underpinned by strong independent investment capabilities. As active managers, we invest with high conviction, supported by innovative research and robust risk management, aiming to deliver excellent performance for our clients.

In our Annual Report, we highlight our priorities for 2025–2026 on page 11.

110.8

billion CHF
assets under management¹

50.9

percent
family owned

20

locations
across the globe

6

investment teams

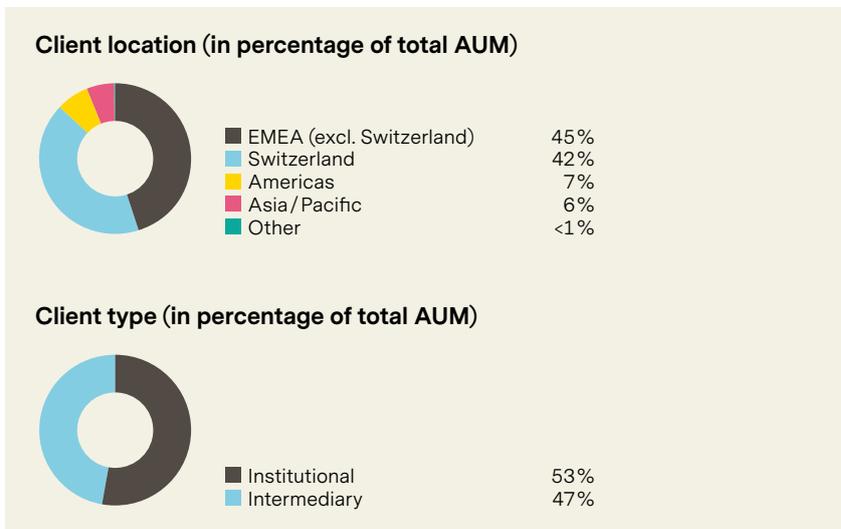
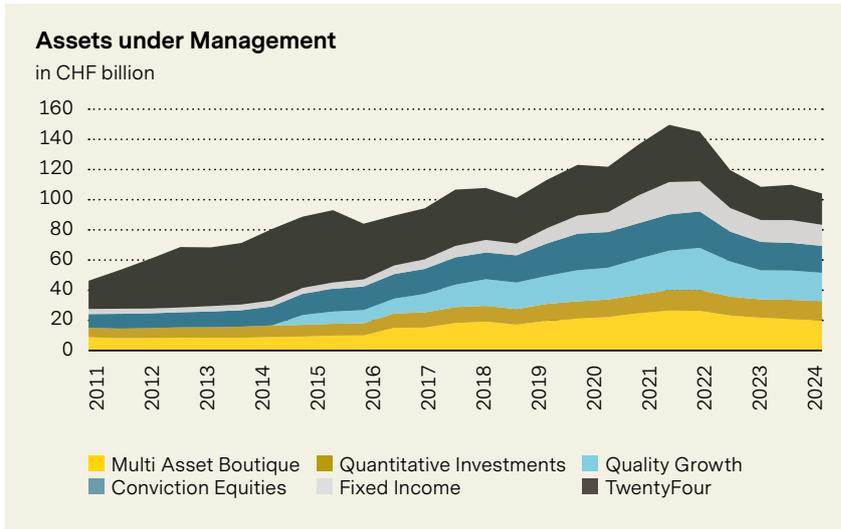
250

over
experts²

¹ Vontobel's Institutional Clients segment only.

² More information about our ESG experts can be found on page 53.

Key facts and figures



→ More information about our financial reporting can be found under vontobel.com/financial-reporting.

Our ESG journey

Our heritage

Responsible entrepreneurship has traditionally been part of Vontobel's corporate culture. Much of what is key to Vontobel today was already visible in the early years of the company. Vontobel dates back to 1924. Even in those difficult years, the founding generation, led by Jakob Vontobel, was committed to implementing a sound business policy and a conservative capital position and thus laid the foundations for the system of values that Vontobel still upholds today. Our brand colors have their origins in the family crest due to this strong connection.

The second generation, led by Dr. Hans Vontobel, was committed to the principle of moderation throughout his life. The closest equivalent to the term sustainability may well be "moderation". The original definition of sustainability is to only harvest as much wood from the forest as can be regenerated naturally within a foreseeable period. Dr. Hans Vontobel was the son of Jakob Vontobel and, from 1943 onwards, spent decades working tirelessly for the company as a member of the second generation. He also brought an entirely new dimension to Vontobel's system of values—that of social commitment.

Close ties with the Vontobel family place us in a unique position to stay the course through market turmoil while guaranteeing our entrepreneurial independence. We consider the resulting freedom an obligation of social responsibility.

A responsible corporate citizen and employer

Corporate responsibility has a long tradition at Vontobel, from ESG investment solutions to environmental sustainability to serving communities.

Vontobel acts as a responsible corporate citizen and employer, supporting communities and considering environmental aspects when running its own operations. Sustainability also plays a relevant role in our business activities. Investors can obtain a range of sustainable solutions from us. These include various equity funds in which sustainability aspects form an important criterion for the valuation and selection of companies.

We have had sustainability principles since 2007, thus emphasizing Vontobel's commitment to sustainability as a corporate citizen and employer. Vontobel further developed its sustainability positioning with the six Sustainability Commitments (more information can be found on page 11).

We remain true to our own founding principles. In 2016, Dr. Maja Baumann, granddaughter of Dr. Hans Vontobel, and Björn Wettergren, his great-nephew, were elected as members of the Board of Directors of Vontobel Holding AG representing the founding families. They are the fourth generation of the families to assume a position of responsibility within the company. They both feel committed to upholding the values of previous generations and ensure that Vontobel continues to write its corporate history in terms of sustainability over the coming decades.



“As owners thinking for the long term, we support Vontobel’s efforts to play an active role in the sustainable transformation of our economy and society for future generations.”

—
Dr. Maja Baumann

Fourth generation of the Vontobel family and member of the Board of Directors

Key dates

● 1998

Vontobel's first ESG investment solutions

The first investment solutions followed a best-in-class approach, i.e., investing in companies with above-average sustainability score based on a positive assessment of the company's performance, first in the environmental sector, later also in the areas of governance and social areas.

● 2007

Vontobel's 10 sustainability principles

Vontobel defined its commitment to sustainability in exact terms in 2007 in the form of its 10 sustainability principles. From the integration of sustainability in our investment activities to being a fair employer and acting in an environmentally friendly manner, these principles cover the entire range of our activities as a financial institution.

● 2009

Offsetting all operational emissions

Vontobel is offsetting all its operational carbon emissions (Scope 1, Scope 2, and Scope 3 emissions¹) through the purchase of CO₂-certificates of external products that save the equivalent volume of emissions.

● 2010

Vontobel became a signatory to the Principles for Responsible Investments (PRI)

Through the signing of the Principles for Responsible Investments, Vontobel has committed itself to the gradual implementation of six principles for the broad integration of sustainability in investment processes.

In 2023, Vontobel was awarded a 4-star rating for the PRI module "Investment and Stewardship Policy".²

● 2011

Group-wide exclusion of controversial weapons

All our investments must fulfill minimum requirements. Cluster munitions and land mines are banned by international conventions. Vontobel therefore approved a group-wide policy that prohibits investments in companies that manufacture these types of weapons. Stringent processes ensure that no manufacturers of cluster munitions and land mines are included in our investment funds, discretionary mandates, or investment recommendations.

● 2017

Alignment with UN Global Compact Principles

The Global Compact is a strategic initiative of the United Nations for companies such as Vontobel that commit themselves to aligning their business activities and strategies with ten universally accepted principles covering human rights, labor standards, environmental protection, and anti-corruption.

● 2019

ESG Investing and Advisory Policy

This policy details how Vontobel integrates sustainability risks, and principal adverse sustainability impacts in its investment decision, and advisory services. With regards to sustainable finance, it explains our rationale, objectives, governance structure, and how we implement this policy across business divisions.

¹ We base our operational carbon emission calculations on the Greenhouse Gas (GHG) Protocol. In our scope 3 operations emissions we include energy-related emissions not included in Scope 1 or 2, business travel with external vehicles, commuting, food, paper, printing, mailings, waste, and water. In this reporting period (2022/2023) we have also included IT devices. Other Scope 3 emissions are not included. The selected projects run under international standards such as the Verified Carbon Standard (VCS). Detailed information about the project is available at: vontobel.com/en-ch/about-vontobel/responsibility/environment-and-climate.

² More information on the Principles of Responsible Investment can be found under unpri.org.

● **2021**

Signatory to the UK Stewardship Code

Vontobel has demonstrated its commitment to effective stewardship through the application of the principles of the UK Stewardship Code.

Vontobel is a member of various organizations and a co-signatory to a number of investor initiatives. In this way, we have committed ourselves to the sustainable development of the environment and society.

→ Find more about our memberships on page [56](#) and on our website under vontobel.com/ratings-memberships.

● **2022**

Six Sustainability Commitments

In 2022, the Board of Directors laid the strategic foundations for Vontobel's sustainability commitment from 2023 onwards. In collaboration with the Executive Committee, it defined the Group's sustainability positioning and six Sustainability Commitments.

→ Find more about our six Sustainability Commitments on page [11](#).

Four ESG investment principles

In 2022, our investment teams formalized four common ESG investment principles, that are being measured from 2023 onwards. The implementation of these principles has been monitored by the Corporate Sustainability Committee.

→ More about our four ESG investment principles on page [21](#).

● **2024**

Publication of Climate and Nature statements

Vontobel published position statements on climate and nature, outlining why these topics matters to us, what our beliefs are, and how we support these beliefs through our actions.

Our Sustainability Positioning

“Sustainability has always been a focus for our owner families, now in their fourth generation. As corporate citizens, we honor their commitment by contributing to the health of our local communities. As an investment firm, we empower investors with the necessary knowledge, tools and investment options to consider sustainability in the building of their better futures. Through these efforts, we contribute to the UN’s SDGs and aim for our impact to be proportionate to our reach.”



Vontobel’s six Sustainability Commitments and progress

Throughout the years, Vontobel has continued to empower clients to build better futures. In 2022, the Board of Directors laid the strategic foundation for Vontobel’s sustainability journey from 2023 onwards. In collaboration with the Executive Committee, the Board of Directors revised the previous sustainability principles and defined the Group’s Sustainability Positioning and six Sustainability Commitments instead. The Sustainability Commitments set out the key levers we have as an investment firm and as a corporate citizen to deliver on the promise we have made based on our Sustainability Positioning. We work systematically across all our client segments and Centers of Excellence to deliver on our six Sustainability Commitments and, in doing so, help to drive the transition to a more sustainable economy and society.

Corporate sustainability and the ESG investment landscape are rapidly evolving, largely driven by regulatory changes, but also evolving investor expectations. To ensure our six Sustainability Commitments remain relevant and provide an appropriate base for engaging in dialogue with our stakeholders about sustainability, we have instituted a biennial review process.

The biennial review process is an important measure for us to ensure not only the adequacy of our Sustainability Commitments but to validate that our internal processes and management are effective. The inaugural review was conducted during the reporting period, and we are pleased to present our reviewed Sustainability Commitments in this report. The CSC discussed and defined the outcome of the review, this was submitted to ExCo and ultimately to the BoD. The commitments have been refined with clearer targets and internal key performance indicators (KPIs) that serve as the underlying metrics to monitor our progress. The refined targets and KPIs are a key measure in ensuring the effectiveness commitment management. We have made a conscious decision to eliminate terms like net zero from our commitments due to varying interpretations among different stakeholder groups. In the reviewed commitments, our aim is to provide a transparent depiction of our goals and actions. Consequently, we now refer to our reduction path and GHG emission reduction targets when discussing our climate ambitions within our operations and banking and trading books.

Our six Sustainability Commitments



Empower our stakeholders to challenge us through governance and transparency.

We see transparency as a key tool for empowering our stakeholders to track how we deliver on our sustainability ambitions. We see good governance (the “G” in ESG) as a key mechanism to ensure delivery of our ESG strategy, at both the product and corporate levels. We report on our sustainability-related performance using state-of-the-art reporting standards.



Incorporate ESG consideration into active investment decisions.

We believe that ESG consideration is part of our fiduciary duty, requires investment team accountability and demands transparency. For this reason, our investment teams subscribe to four ESG Investment Principles. This foundation enables us to offer a wide range of ESG solutions, in response to our clients’ desired investment objective(s), which can be any one, or a balance of, the following:

1. optimizing risk-adjusted performance through the consideration of financially material ESG issues;
2. mitigating negative environmental and social impact from investments; and
3. investing in companies that provide products and services that aim to actively and positively contribute to the UN Sustainable Development Goals (SDGs).



Advise our private clients on the benefits, opportunities and risks of ESG investments.

We advise our private clients on the benefits, opportunities and risks of ESG investments to help them build portfolios that meet their beliefs and needs. Thus, we want to offer them an ESG product shelf to choose from. Our Private Clients ESG framework sets the basis to map our ESG investment solutions to individual client ESG preferences.



Taking significant steps to reduce greenhouse gas emissions across our operations and in our banking and trading books.

We are taking significant steps to reduce greenhouse gas emissions across our operations and in our banking and trading books. In doing so, we aim to contribute to the goals outlined in the Paris Agreement¹. We have set interim targets for our decarbonization pathway for the bond investments in our banking and trading books and aim to offset all our operational emissions for Scopes 1–3. We strive to continue to improve our practices and report meaningful progress to our stakeholders.



Continue creating a great workplace where everyone can thrive.

Our work practices advance equality, diversity and inclusion and foster a workplace environment where everyone has the opportunity to develop and reach their full potential. Mutual respect and openness, without discrimination, shape our culture.



Be an active member of the local community.

Vontobel operates with the spirit of citizenship to foster quality of life in the places we live and work. We do this by providing jobs and enabling and encouraging our employees to play an active role in their local communities. Vontobel and the charitable Vontobel Foundation have sponsored projects in the areas of social welfare, medical research, nature and culture since 1993.

Sustainability Report

Our sustainability report, which is an integral part of our annual report, details our progress on our six Sustainability Commitments.

→ Refer to page 91 of our Annual Report



¹ In this context, we specifically refer to Article 2, 1. (a) of the Paris Agreement as adopted in December 2015, which states: “Holding the increase in the global temperature to well below 2°C above pre-industrial levels and pursuing efforts to limit the temperature increase to 1.5°C above pre-industrial levels, recognizing that this would significantly reduce risks and impacts of climate change”.

Oversight



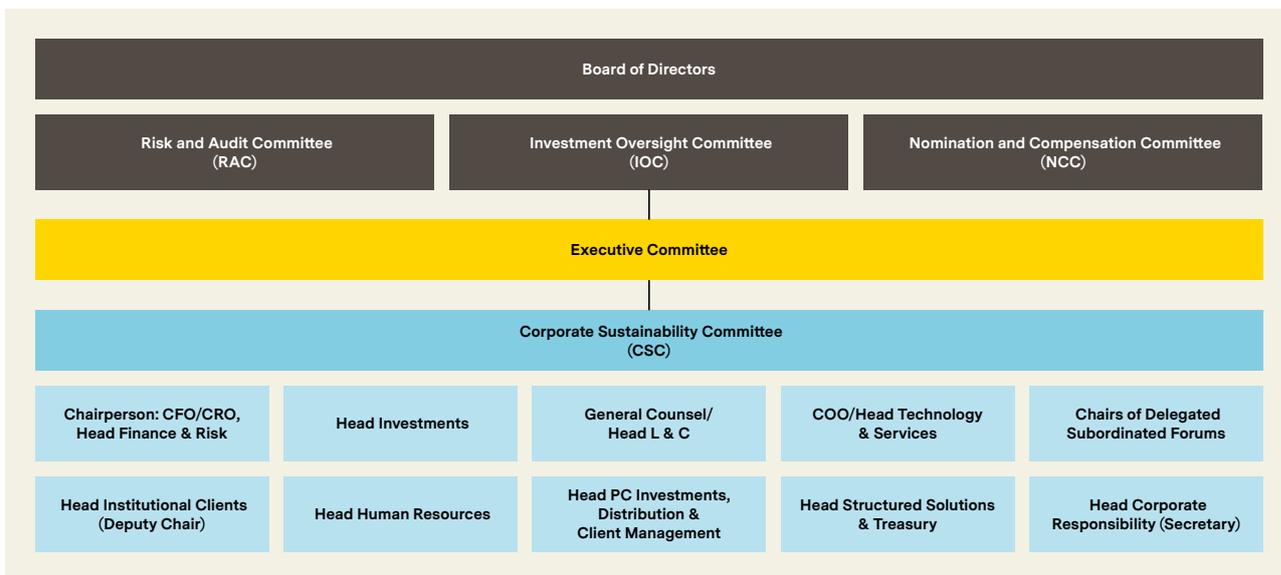
ESG governance

Our Group-level sustainability governance remains a vital instrument for us to fulfill our commitments. We are convinced that effective governance with clearly allocated roles and responsibilities is a key feature in the transition toward a sustainable future and necessary for an organization to operate efficiently. Our focus in 2024 was on further enhancing oversight capabilities at Vontobel. The review of the six Sustainability Commitments, with a focus on detailing our targets and sharpening key performance indicators (KPIs), played a pivotal role in this endeavour. This review equips our oversight bodies, such as the Board of Directors (BoD), with the necessary tools to perform their oversight functions.

Board of Directors

The Board of Directors (BoD) of Vontobel Holding AG is responsible for defining the overall strategic direction of Vontobel and for the approval of the strategy. As such, the BoD has a decisive influence on Vontobel’s strategy, structure and culture. In order for the Board of Directors to perform these duties credibly and to act independently from the Executive Committee (ExCo), it must be composed of qualified and experienced members (please refer to the Annual Report 2024 p. 38–39 for a detailed description of the governance bodies at Vontobel and p.33 for the skills matrix of the BoD members that includes sustainability/ ESG).

In 2024, the Board of Directors nominated a BoD member as Sustainability Spokesperson. The Sustainability Spokesperson takes on the role of “spiritus rector” on sustainability-related topics and is the Board’s point of contact on the subject. While the entire Board of Directors maintains overall responsibility for sustainability-related topics, we believe that this dedicated role will further strengthen our oversight and focus on this critical area.



“Our organizational structure and governance are crucial. The complexity of sustainability issues highlights the need for collective decisionmaking in the Corporate Sustainability Committee, where all relevant functions are represented.”

—
Dr. Thomas Heinzl
 CFO, CRO, CSC Chair

Corporate Sustainability Committee

On an operational level, the Corporate Sustainability Committee (CSC) is the main governance and decision-making body for corporate sustainability. It has delegated authority from the Executive Committee and is responsible for governing and overseeing the Group-wide sustainability initiatives, including ongoing activities (“run”) and “change” oversight. The CSC is responsible for the supervision and implementation of the six Sustainability Commitments and external regulatory frameworks and for preventing any form of greenwashing.

Investment Management Committee

The Investment Management Committee (IMC) is on the same level as the CSC, also with delegated authority from the ExCo. While the CSC treats topics related to corporate sustainability, the IMC is the main governance and decision-making body for sustainability-related topics within products. The integration of ESG factors in our investment solutions is managed directly within the respective investment teams under the oversight of the IMC. The Head Investments is a member of both the IMC and the CSC and provides regular updates to the CSC regarding these topics.

The CSC meets at least quarterly to discuss and decide on sustainability activities and initiatives. The CSC reports directly to the Executive Committee on a semi-annual basis, at least. The Executive Committee reports to the Board of Directors on sustainability.

The CSC is chaired by the Vontobel Holding AG CFO / CRO (Chief Financial Officer / Chief Risk Officer). Its members represent all relevant areas in order to ensure that transformation is coordinated and driven forward across all Client Segments and Centers of Excellence. Each of the six Sustainability Commitments is allocated to a dedicated member of the senior management team, who acts as the Commitment Owner and is operationally responsible for implementing and managing the respective commitment (e.g., the Head Human Resources owns the Great Workplace Commitment). All Commitment Owners are members of the CSC. The CSC members include the chairs of the three delegated subordinate forums: ESG Investment Forum, ESG Private Clients Forum and ESG Structured Products Forum. The subordinated forums are key to knowledge sharing among the different business areas and ensure horizontal communication around sustainability / ESG topics. The members and permanent guests of the CSC are defined in its Terms of Reference. In 2024, the Terms of Reference were reviewed to ensure that the membership structure remains adequate and that all relevant areas are included in the CSC.

ESG Investment Forum

The ESG Investment Forum contributes to strong ESG product governance by assessing new or re-positioned investment product quality by reviewing the investment approaches of boutiques and strategies in terms of ESG quality, resources, team setup and ESG data usage, among others. The ESG Investment Forum discussions focus on reviewing and challenging ESG approaches.

ESG guiding principles and policies

Code of Conduct

Our Code of Conduct defines principles and practices that employees, governing bodies and all representatives who act on behalf of Vontobel must observe to ensure that we perform our business activities in a fair, ethical, transparent, and responsible manner.

→ Find out more about our code of conduct on our website under vontobel.com/code-of-conduct.

Guidelines for sustainable procurement

We strive to conduct our own operations in accordance with high environmental and social standards, and we therefore also expect our business partners to adhere to the principles of responsible business conduct. These aspects have been incorporated into our tendering process and have served as a guide when awarding contracts since 2021.

Specifically, regarding our investment activities, we have the following policies in place that govern our ESG practice:

Position on climate and nature

Vontobel has formulated position statements on climate and nature, which explain why we care about these topics, what our beliefs are, and how we support our beliefs with actions.

ESG Investing and Advisory Policy

This Group-wide policy details how Vontobel approaches ESG investing. In particular, it explains our rationale, our ESG investing objectives, governance structure and how we implement this policy across our business divisions. It has been reviewed in 2024 to reflect organizational changes, business practices, and new regulatory requirements.¹

Exclusion framework

Vontobel's exclusion framework sets out our approach to applying exclusions, structured across three levels to align with the sustainability ambitions of the products they apply to.

Voting and Engagement policies

Whenever authorized to do so, we actively exercise voting rights for our Vontobel funds. Furthermore, we maintain an active dialogue with all companies in which the funds invest. Vontobel's Institutional Clients segment has a voting policy and engagement policy in place. They define how we fulfill this responsibility.

→ Find out more about our guidelines and policies in our ESG Library on page 60 and on our website under vontobel.com/principles-policies.

¹ The amended policy enters into force in 2025.

Sustainability / ESG Risk Framework

Risk management for our Institutional Clients segment and Investment Center of Excellence is carried out by independent risk teams consisting of over 50 employees, mainly located in Zurich, Luxembourg, and London.

→ More information about our risk management-related processes can be found on page [48](#).

What are sustainability / ESG risks?

We define sustainability / ESG risks as an environmental, social, or governance event or condition that, if it occurs, could cause an actual or potential material negative impact on the value of the investment. ESG risks refer more broadly to any negative financial impact on the institution resulting from the current or prospective impacts of ESG factors on its counterparties or invested assets.

Vontobel identifies sustainability / ESG risks as a driver of existing risk categories. Sustainability / ESG factors are relevant for all business and risk processes. We therefore identify environmental risks, social risks, and governance risks within our risk management approach.

Environmental risks

Environmental risks are the negative impacts of environmental degradation and climate change (e.g., air pollution, water pollution, scarcity of fresh water, land contamination, biodiversity loss, deforestation), known as physical risks. Further negative impacts originate from the adjustment of policies and actions to transition toward a more environmentally sustainable economy, known as transition risks.

In the context of climate-related risks, we consider the following risk drivers:

- Transition risk refers to Vontobel's or our clients' financial loss, which may result directly or indirectly from the adjustment process toward a lower-carbon and more environmentally sustainable economy. This process may be influenced particularly by changes in policy, technology, and consumer and market preferences.
- Physical risk refers to the impact of a changing climate (e.g., flooding) and environmental degradation. Physical risk can be categorized as follows:
 - Acute physical risks are event-driven and include increased severity of extreme weather events (e.g., cyclones, hurricanes, or floods).
 - Chronic physical risks refer to long-term shifts in climate patterns (e.g., sustained higher temperatures) that may cause sea level rise or prolonged heat waves.

There are additional environmental risks for which physical risks are also relevant, such as environmental degradation in the form of water stress, biodiversity loss, and pollution.

- Litigation risk refers to Vontobel's financial or reputational loss, which may result directly or indirectly from climate-related litigation, such as failure to take appropriate climate action or a breach of underlying frameworks.

Direct financial impact can occur through stranded assets, which are assets that have suffered from unanticipated or premature write-downs, devaluations, or conversion to liabilities.

Social risks

Social risks relate to the rights, wellbeing, and interests of people and communities and include factors such as (in) equality, health, inclusiveness, labor relations, workplace health and safety, human capital, and communities.

Governance risks

Governance risks occur in reference to items such as executive leadership and pay, audits, internal controls, tax avoidance, board independence, shareholder rights, corruption, bribery, and ESG-related policies and procedures.

Three lines of defense model applied to ESG

Vontobel's risk management organization follows the three lines of defence model, which provides a structured approach to risk management. This model distinguishes three roles: risk ownership, risk control, and risk assurance.

First line of defence for ESG risks related to our investing activities

In the first line of defense, our investment teams, including portfolio managers, risk managers, financial analysts, and dedicated ESG analysts, are responsible for developing and properly applying the investment process, where the financial product considers ESG criteria.

Portfolio managers, supported by ESG analysts, have primary responsibility for day-to-day risk management. Identification and management of sustainability risks by the first line of defence are integral parts of the investment process, where applicable.

ESG analysts are embedded in the investment teams and work closely with financial analysts and portfolio managers which promotes continuous exchange and knowledge transfer. Investment teams can also receive additional training and have access to a large set of resources from research and data providers.

Boutiques and teams follow various procedures to identify ESG related risks, which also depend on the investment strategy, asset classes, and geographies.

In addition, investment teams exercise voting rights whenever authorized to do so and engage with companies in order to improve their business practices, in the belief that this will help generate better long-term risk-adjusted results.

The Investment Risk team is responsible for overseeing portfolio-level ESG metrics, such as controversies and ESG ratings, as well as climate metrics, including exposure to coal, fossil fuels, carbon footprint, and climate scenarios. While other departments, such as ESG analysts, focus on company-specific metrics, the team emphasizes monitoring these metrics at portfolio level and comparing them against relevant benchmarks. The team presents its analyses to the Investment Performance Committee (IPC), which decides whether an action should be taken.

Second line of defense for ESG risks related to our investing activities

The role of our second line of defense is to control and challenge the first line's risk management efforts. Key functions are Investment Control, Group Non-Financial Risk, Legal and Compliance. The Non-Financial Risk team is responsible for defining and propagating the ESG risk framework, developing the tools for identifying and assessing sustainability/ESG risks and supporting climate scenarios. When it comes to investing activities, a dedicated team in Compliance performs pre-trade checks over portfolio transactions, while our Investment Control function operates post-trade checks.

Checks over investment restrictions

Our portfolio management system allows us to check compliance with investment guidelines restrictions on a pretrade and post-trade basis. The investment guidelines comprise restrictions based on regulations, legal and offering documents such as prospectus, clientdriven, and internal rules, including those that are ESG-related. The parameterization of the investment guidelines in our portfolio management system is handled by the independent Investment Control unit.

Pre-trade checks

Portfolio managers can simulate trades and check each trade against restrictions prior to placing orders to prevent the occurrence of breaches. When submitting orders, an automated check of the investment guidelines restrictions is performed, generating alerts to the portfolio managers highlighting potential breaches that would materialize in the event that the orders were executed. Trades generating regulatory and contractual alerts are reviewed by Compliance, which ultimately decides whether to lift the alerts if no actual breach is found.

Post-trade checks

The independent Investment Control team conducts a daily posttrade review of portfolios using our portfolio management system. Should Investment Control and the respective portfolio manager fail to agree whether a breach has actually occurred, the issue will be escalated to Compliance, Legal and Risk functions. Investment Control and Portfolio Management will be informed about the results of the analyses and the follow-up.

What happens when a breach occurs?

The independent Investment Control team, which reports to the CFO/CRO, controls adherence to the guidelines' restrictions on a daily trade basis. In the event of a breach being detected by Investment Control, the portfolio managers are consulted for clarification, and corrective measures are taken where appropriate, considering the investors' interests. If necessary, issues may be escalated to the investment team's head, the Head Investments Risk Management and Compliance.

Monthly breach reports are produced and circulated to the appropriate stakeholders.

First and second line of defense applied to ESG-related non-investment risks

While the focus of this report is on investment related activities, ESG risks can also arise, for example, from offering investment solutions. Besides investment teams, other first line of defense functions are responsible for managing ESG risks linked to the product lifecycle and our relationship with clients, such as our sales, relationship managers and product management functions. As a risk mitigating measure, these functions receive regular training and informative sessions, ensuring that they are well educated on ESG-related requirements that apply during client onboarding phase as well as the full lifecycle and appropriately inform our clients about the ESG profile of their financial products. Also, for these areas, the ESG risk framework developed by our Non-Financial Risk team applies.

We have also documented ESG-related processes for areas of the business that could be exposed to ESG risks (especially those related to greenwashing and ESG regulation), such as the preparation of marketing materials and investment communications, precontractual disclosures, consideration of sustainability preferences, client reports, and regulatory reports. Such process documentation provides a basis for risk management measures such as reviews and preventive/detective controls conducted by the first and/or second line of defense functions. The risk owners (first line of defense) annually confirm that the process documentation and where relevant, the control documentation, are up to date, that the controls are effective, and that the ESG risks are adequately mitigated.

Third line of defense

Our third line of defense consists of Internal Audit, which reports to the Board of Directors (BoD). Its audit activities are based on the guidelines issued by the Institute of Internal Auditors (IIA), which were declared binding by the Swiss Financial Market Supervisory Authority (FINMA).

Monitoring of severe ESG controversies

Critical ESG Events (CEE) represent the most severe ESG-related controversies or breaches of international norms. They are often related to Principal Adverse Sustainability Impacts such as significant negative impact on the environment and/or society. Moreover, these instances can signal insufficient management of sustainability risks by a company or a government and excessive harm to society or the environment, which is beyond the tolerance of many of Vontobel's investors and stakeholders. Accordingly, we have a process in place to identify and monitor such instances.¹

Our assessment is based on ESG data and assessment methodologies provided by external ESG data providers such as MSCI and Sustainalytics², and our in-house ESG research. As active investment managers, we conduct our own analysis to assess the impact of such instances on the relevant portfolio and on wider stakeholders. Securities of issuers will be excluded when Vontobel confirms Critical ESG Events and determines that the issuer's activities cause excessive harm to society or the environment, such as through violations of international norms and standards mentioned above, or as a result of involvement in severe controversies, including those related to governance matters. However, Vontobel recognizes that excluding such issuers may not always be the best approach to mitigate the adverse effects of their activities. In these cases, Vontobel will monitor these issuers, where it believes that reasonable progress can be attained, for example, through active ownership activities.

The compliance with such process is monitored through pre- and post-trade checks.

→ More information about this process can be found in our ESG Investing and Advisory policy under vontobel.com/principles-policies.

Identification of Potential Critical ESG Event

- Based on third-party data providers such as MSCI ESG or Sustainalytics and/or
- In-house ESG research

Monitoring

- Pre-trade checks
- Post-trade checks

Actions

- For confirmed CEE: an orderly sell-down shall be concluded within three months at the latest of the concluded status of the CEE for all portfolios in scope of this framework.
- Where we believe reasonable progress can be achieved: An engagement program where time for engagement against set objectives is established. During the engagement period, securities can be traded. Portfolio managers are warned however about the possible risk of hard selling in case of an unsuccessful engagement or conclusion of a confirmed CEE.

Governance

Potential CEE are presented to the Delegated Group, which were given the authority by the Investment Management Committee over the process previously mentioned.

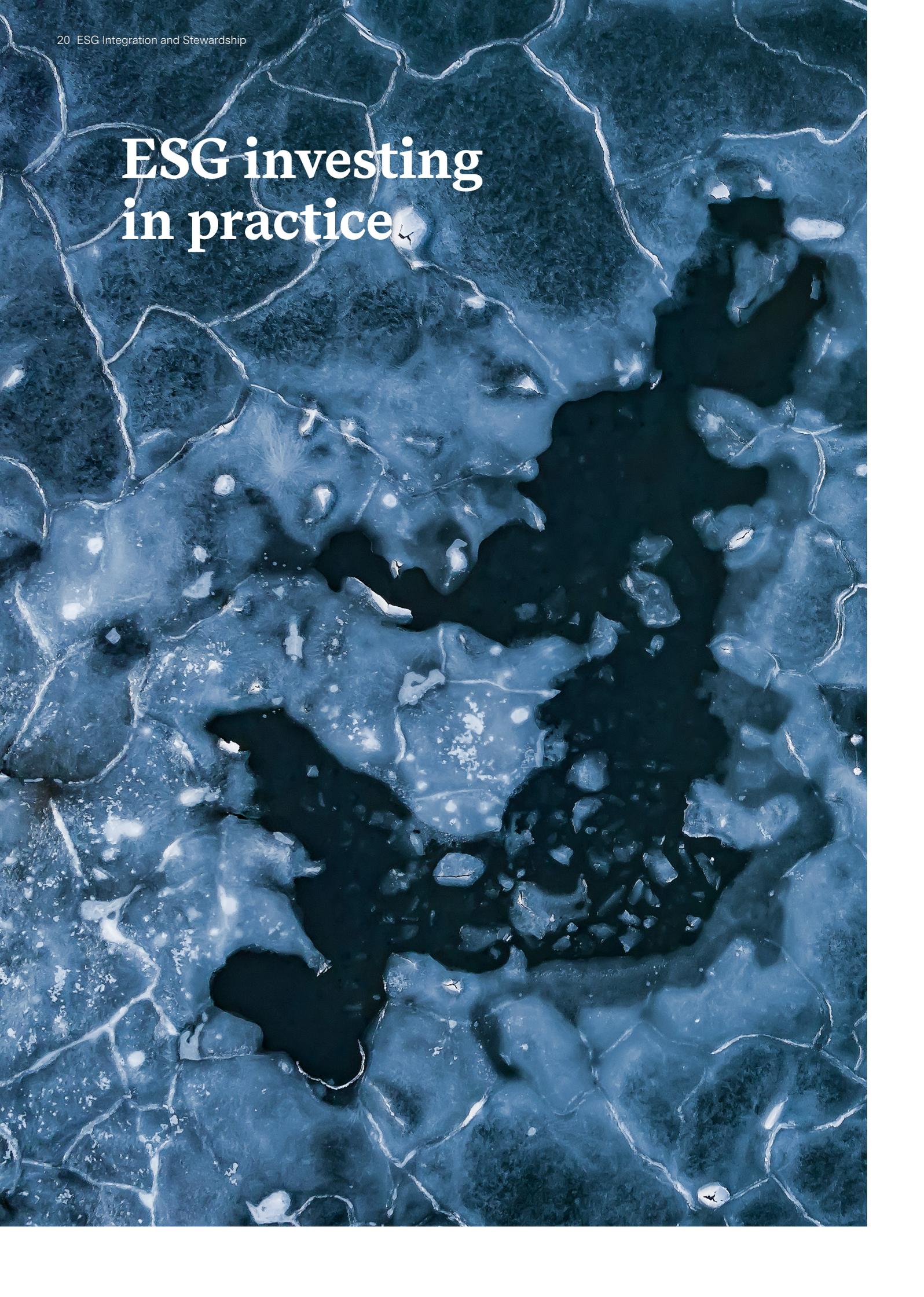
¹ TwentyFour is an independent operating subsidiary of Vontobel and does not partake in the process relating to CEE.

² The ESG assessment methodology of such providers typically takes into account international norms, such as:

- UN Guiding Principles on Business and Human Rights,
- the OECD Guidelines for Multinational Enterprises,
- the International Labor Organization (ILO) Declaration on Fundamental Principles and Rights at Work,
- the ILO Core Conventions,
- and the UN Global Compact.

An ESG flag is only triggered when there is a severe violation of these international norms.

ESG investing in practice



Our approach to ESG

As a pioneer in this field, we have been offering our clients a range of investment solutions that incorporate ESG criteria since the 1990s. We deliver value through our diverse and highly specialized teams and dedicated ESG analysts.

Our investment teams subscribe to four common ESG investment principles because we believe, over time, that this enables our clients to achieve their investment objectives. As active investors, we make use of the tools of engagement and voting to perform our fiduciary duty as stewards of our clients' capital. Our investment teams are accountable for the application of our ESG investment principles, and we commit to transparency through disciplined disclosure, reporting, and dialogue. The implementation of these principles is measured from 2023 onwards, using selected key performance indicators (KPIs).

This foundation enables us to offer a range of investment solutions in response to our clients' desired investment objectives, which may be any one or a balance of the following:

- Optimizing risk-adjusted performance through the consideration of financially material ESG issues.
- Mitigating negative environmental and social impact from investments.
- Investing in companies providing products and services that aim to actively and positively contribute to the UN Sustainable Development Goals (SDGs).

Our four ESG investment principles

1

We incorporate ESG considerations into our investment processes to enable our clients to better achieve their investment objectives.

3

Our investment teams are accountable for the application of our ESG investment principles.

2

As active managers, we leverage the tools of engagement and voting.

4

We are committed to transparency through disciplined disclosure, reporting and dialogue with all our stakeholders.

1

Principle

We incorporate ESG considerations into our investment processes to enable our clients to better achieve their investment objectives.

Vontobel offers a range of ESG solutions. To ensure transparency and comparability, we have grouped all our investment solutions that incorporate ESG considerations into three categories¹:

- Integrated ESG Risks: Exclusion of controversial weapons and consideration of sustainability/ ESG risks.
- Promote ESG: In addition to the integration of sustainability/ ESG risks, these products consider material ESG factors and certain negative impacts on society and the environment during the investment process. Furthermore, subject to asset owners' consent and operational feasibility, voting and engagement are aligned with the ESG strategy, and ESG reporting is available.
- Sustainable: In addition to the criteria applied to the "Promote ESG" category, these products further apply exclusions of certain sectors and industries and invest at least partially or solely (in the case of selected investments strategies) in companies that positively contribute to the realization of environmental and/ or social objectives through their economic activities.

These companies play a positive role in the sustainable development of the economy and society and capture opportunities arising from this transition.

As of December 31, 2024, Vontobels Institutional Clients segment had a total of CHF 105.8 billion of assets under management invested in solutions that incorporate ESG consideration (excludes structured investments, non-discretionary mandates and actively managed certificates).

Investment solutions in Vontobels Institutional Clients segment that incorporate ESG criteria^{1,2}

IN B CHF	
Sustainable	30.8
Promote ESG	30.3
Integrated ESG Risks	44.8
Total	105.8



“We believe in the power of choice in ESG investing and empower our clients to build portfolios that align with their personal values and financial goals. Leveraging our expertise, we strive to guide them in navigating the sustainability options in investment, helping them create a better future on their terms.”

—
Christel Rendu de Lint
Co-CEO

¹ Vontobel nomenclature, not necessarily aligned to any specific regulatory nomenclature.

² Excluding hedging and liquidity instruments.

How we leverage ESG data for investment insights

Different sources of information factored into ESG tools and methodologies

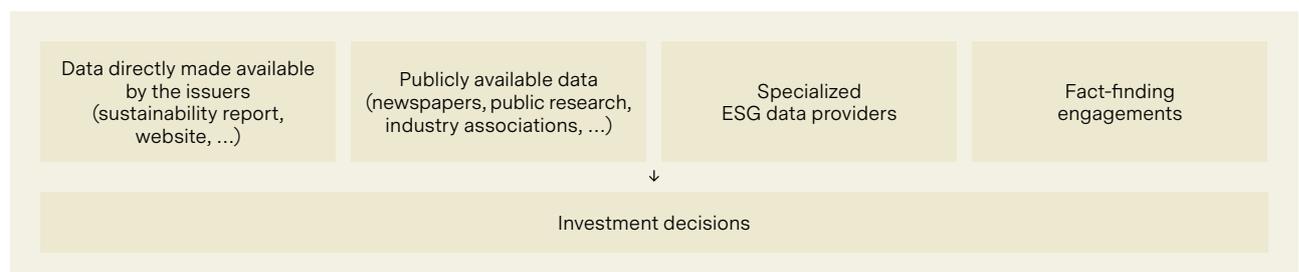
We have access to a broad range of data sources. We typically do not rely on a single source of information, and we strive to build a holistic picture of trends and companies. On top of data directly made available by issuers and publicly available data, we use data from various other sources, including leading ESG data providers like MSCI ESG or Sustainalytics. Where we identify a need, we may use a local or a specialized ESG data provider to enhance our insights.

In some cases, the information we gather from these conventional data sources is not sufficient. Thus, fact-finding engagements may be conducted directly by our investment specialists and ESG analysts. This involves actively requesting information on ESG aspects, either where such information is not available at all or where insufficient information has been provided in response to our questions. This allows us to make better-informed decisions.

Informed by third-party ESG data, our dedicated ESG analysts, who are embedded in our investment teams, develop tools tailored to investment strategies, asset classes, and geographies. The processed information then informs acquisition, monitoring, and exit decisions. Through this setup, we ensure that our investment decisions are taken with appropriate expertise.

For instance, our Quality Growth research team includes analysts who previously worked as investigative journalists. Their role is to help the investment team build a deeper knowledge of the risks and opportunities facing company management and investors. They enable our investment team to go deeper and source information beyond traditional data sources.

Our main sources of information



ESG service providers

We use services of external leading providers in their field. It allows us to access high-quality resources and expertise to make better investment decisions and support our business.

ESG data providers¹

- MSCI ESG
- Sustainalytics
- Refinitiv
- Inrate
- RepRisk
- SynTao Green Finance
- ISS ESG
- Ceres
- Carbon4Finance
- Bloomberg

We also have access to ESG data on broader data platforms such as Factset and Bloomberg.

Voting and engagement service providers

- Responsible Engagement Overlay (reo®)
- Sustainalytics
- Institutional Shareholder Services (ISS)
- Ethos

→ More information about our voting and engagement service providers can be found in the dedicated section on page [23](#).

→ Read more about how we monitor service providers on page [50](#).

¹ Our investment specialists select the data providers based on their investment strategy (e.g., regional coverage). For the avoidance of doubt not all providers are used for all financial products.

2

Principle

As active managers, we leverage the tools of engagement and voting.

As a signatory to the UN Principles for Responsible Investment, Vontobel commits to being an active owner and to incorporate environmental, social, and corporate governance (ESG) issues into its ownership policies and practices. We believe active ownership adds value between long-term partners. At the same time, we are convinced that voting and engagement can have a positive influence on companies, economies, societies, and the environment.

Since 2019, Vontobel's Institutional Clients segments has had voting and engagement policies in place, corresponding statements can be found under vontobel.com/esg-library.

We engage with companies and sovereign issuers for updates and issues of concern. As an active investment manager, we prefer to engage with the management of investee companies directly. We also use collaborative engagements, performed by third parties. Reasons to engage can include business strategy, corporate governance issues, change in the capital structure, remuneration issues, and identified environmental and social risks.

An important part of active ownership is our voting activities. Vontobel recognizes that portfolio management of the assets of clients, which include stocks, may include an obligation to vote in relation to the stock. If authorized to do so, Vontobel will vote in a manner which it reasonably believes to be in the best interest of the client and in line with any specific legal or regulatory requirements that may apply.

Our active ownership framework**Voting**

We have selected specialized voting service providers that provide us with voting research. The voting policies followed by these providers typically take into account ESG criteria.

We are working with:

- Responsible Engagement Overlay (reo®), by Columbia Threadneedle
- Institutional Shareholder Services (ISS)
- Ethos

Engagement*Direct engagement activities*

Our investment teams conduct engagement activities, either to better understand certain aspects of the ESG performance of the companies, or to raise specific issues of concerns.

Collaborative engagement activities

Our partnership with specialized stewardship service providers allows us to engage with other investors on ESG topics. In certain cases, we may also collaborate directly with other investors.

We are working with:

- Responsible Engagement Overlay (reo®), by Columbia Threadneedle
- Sustainalytics on selected thematic engagements

→ More information about our voting and engagement activities on page [29](#).

3

Principle

Our investment teams are accountable for the application of our ESG investment principles.

ESG capabilities are embedded in our investment teams

We believe ESG considerations require investment team accountability. Our dedicated ESG analysts are embedded within our investment teams, and their work is integrated into the investment process. This allows them to collaborate closely with financial analysts and portfolio managers, fostering a continuous exchange. It also ensures that our clients benefit from deep expertise in specific asset classes.

Several specialists with different backgrounds work on ESG-related topics, be they portfolio management, ESG research or overarching topics. They build on several years of investment experience and a strong track record in the ESG field. 14 of them are ESG analysts and are fully dedicated to ESG topics.

Since 2023, the application of the four ESG Investment Principles is integrated in the performance assessment of our Investments senior leadership.

Key roles in the application of our four ESG investment principles

ESG analysts

They conduct ESG research and work on the further development of the integration of ESG considerations in our investment strategies.

10+ ESG analysts¹

Portfolio managers that manage “Promote ESG” and “Sustainable” funds²

They apply the ESG investment process and work in close collaboration with the ESG analysts.

30+ portfolio managers

An integrated approach, firm wide collaborations

In addition to ESG analysts embedded in our investment teams, the Institutional Clients ESG Center advises investment teams on the latest regulatory, market and product developments. This team plays an instrumental role in the continuous development of Vontobel’s ESG framework, building the link between the investment team and other functions.

Each investment team is represented by an ESG Lead in the ESG Investment Forum which, among other tasks, serves as a platform to review and challenge ESG approaches and product governance structures. The members of the ESG Investment Forum shape the ESG product strategy, formulate investment-related ESG policies and assess investor-led ESG initiatives. The ESG Lead is appointed by the head of each investment team. In addition to the collaboration within the ESG Investment Forum, the exchange between ESG analysts is fostered through dedicated working groups.

→ More information about the ESG Investment Forum can be found on page [14](#).

¹ More information about our ESG experts can be found on page [53](#).

² More information about our ESG product categories can be found on page [22](#).

4

Principle

We are committed to transparency through disciplined disclosure, reporting, and dialogue with all our stakeholders.

Disciplined disclosure

We commit to transparently disclosing the ESG process that we apply for our financial products, when they integrate ESG criteria in the investment process. This information is typically included in the respective pre-contractual disclosures. The extent and focus of the disclosures depend on the ESG process applied, ranging from the sole consideration of financially material sustainability risks to investments in companies that positively contribute to an environmental or social objective.

Reporting on our ESG activities on a regular basis

We report regularly on Vontobel's ESG activities through our yearly reports.

For Vontobel as a group:

- Corporate Responsibility & Sustainability Report
- UN PRI Transparency Report
- Statement on principal adverse impacts (PAI) of investment decisions on sustainability factors

Specifically covering Investments and Institutional Client business related activities:

- ESG Integration and Stewardship Report
- Voting and Engagement Report
- Voting records

→ The reports are available under am.vontobel.com/esg-library.

For our investment products, we provide amongst other the following reports:

- Factsheets: ESG data is included in fund factsheets (made available on a monthly basis on our website)
- Swiss Climate Scores: specifically for our swiss institutional investors, we produce swiss climate scores, based on an initiative driven by the Swiss Government.
- Regulatory SFDR reports: for our investment funds in scope of SFDR (available on an annual basis)
- European ESG Template ("EET") for our Vontobel funds domiciled in the EU and Switzerland
- Other reports tailored to the strategy, e.g., Impact Reports for Listed Impact strategies, mandate ESG reports.

One example is the Impact Report published for our Listed Impact strategies on a yearly basis. For each strategy, a set of indicators is defined and linked to the impact pillars of the investment strategies. As an example, for the impact pillar "clean water", the SDG 6 "Clean Water and Sanitation" is pursued, and the indicators "drinking water provided" and "water recycled, treated, saved" are tracked to quantify the impact. Moreover, we have developed a method designated "Potential Avoided Emissions" (PAE) together with ISS ESG back in 2016. Since 2024 we partner with Carbon4 Finance. They employ a methodology aligned with the consideration of avoided emissions, similar to our approach in previous years. We appreciate the wider application of their data to our full opportunity set and for a future stock selection process.

Case study: Swiss Climate Scores

Switzerland and its financial market participants are committed to transitioning to net-zero greenhouse gas emissions (GHG) by 2050. Honoring this commitment requires decreasing GHG emissions to limit global temperature increase to well below 2°C. To achieve this goal, the Swiss Federal Council launched the Swiss Climate Scores in June 2022 with a purpose to improve climate-related financial disclosures, assess the alignment of investments with the Paris Agreement, foster investment decisions that contribute to reaching climate goals and strengthen the position of Switzerland as a leading hub for sustainable finance. The Swiss Climate Scores were updated in December 2023. The Swiss Climate Scores are a set of six current-state and forward-looking indicators applied to financial products (see graphic below). The indicators offer a comprehensive view of the alignment of the product with the goals of the Paris Agreement, delivering clear and straightforward information.

Vontobel has been actively participating in several working groups that support the Secretariat for International Finance (SIF) in developing the Swiss Climate Scores, including the one from Swiss Bankers Association (SBA) and the joint one from Swiss Sustainable Finance (SSF) and Asset Managers Association (AMAS). Vontobel welcomes the Swiss Climate Scores as part of its commitment to transparency not only at the entity but also at the product level. Vontobel was one of the early adopters of the Swiss Climate Scores and offers dedicated reporting for selected products and on request. We are convinced that the Swiss Climate Scores play an important role in helping our sustainability-minded investors to better reach their investment objectives. In 2024, we further expanded the scope of products for which we provide the Swiss Climate Scores. We aim to make them available for all our funds for our institutional investors in Switzerland in 2025 on our website.

More information about Swiss Climate Scores: sif.admin.ch/en/swiss-climate-scores-en

Current state

-  Greenhouse gas emissions
-  Exposure to fossil fuel activities and renewable energy

Transition to net zero

-  Verified commitments to net zero
-  Credible climate stewardship
-  Management to net zero
-  Global warming alignment (optional)

Engaging in a dialogue with our clients and stakeholders

Our communication with clients is always focused on their needs. Our goal is to provide relevant information to clients about our investment strategies. This allows clients to remain informed about market events and enables them to choose the products and services that best fit their needs.

Providing access to our views

Clients can access our views as well as information on the products and services we offer through digital channels, including email, website, video platforms, webinars, and social media. Our Relationship Managers and Client Portfolio Managers are responsible for our direct interactions with clients through regular calls, in-person meetings, and participation in proprietary and industry events. They provide our clients with appropriate information and regular updates that may also directly involve our ESG specialists.

- A selection of our most recent content and publications are available on our website. Find more under vontobel.com/insights.

Engaging in a dialogue with our clients and stakeholders is a central part of our commitment, reflected in client surveys such as the “Vontobel 2024 Investor ESG Study” or the “Vontobel 2024 Advisor ESG Study”.



“Navigating the ESG landscape remains indispensable, ensuring to stay at the forefront of investment trends which allows to build cutting edge portfolios for clients while ensuring these align with their ESG preferences.”

—
Christoph von Reiche
Head Institutional Clients

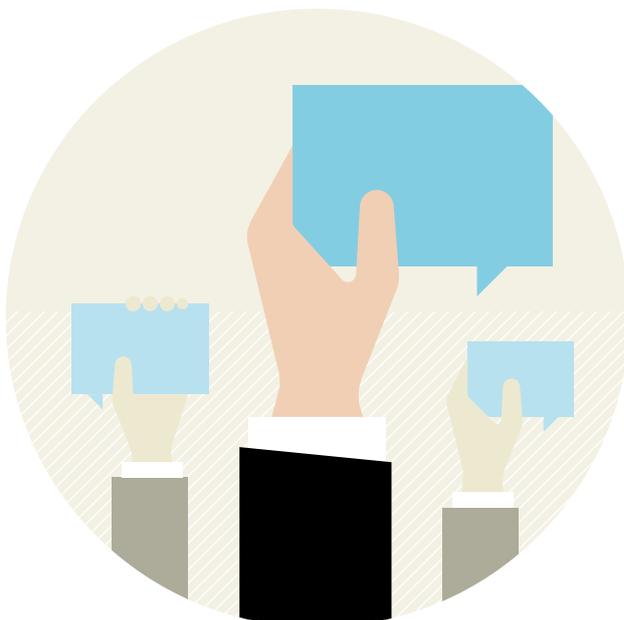
Voting and engagement



Voting and engagement

As a signatory to the UN Principles for Responsible Investment, Vontobel commits to being an active owner and to incorporating environmental, social, and corporate governance (ESG) issues into its ownership policies and practices. We believe active ownership adds value between long-term partners. As ESG issues can materially impact the future success of a company and therefore its shareholder value, we see active ownership as an important way to support long-term risk-adjusted returns for investors. This is why leveraging the tools of voting and engagement is one of our four ESG investment principles.¹

Since 2019, Vontobel has had voting and engagement policies in place, corresponding statements can be found under am.vontobel.com/esg-investing.



¹ More information about the four ESG investment principles on page [19](#).

Voting

Integral to our investment philosophy is the proactive exercise of investors' rights, both for equity and bond holders alike. We firmly believe that ownership comes with a responsibility to safeguard and assert these rights in the best interest of our clients. As such, we participate in voting activities related to corporate governance, executive compensation, strategic decisions, and environmental and social policies. For equity holders, this includes voting on matters such as board elections, mergers and acquisitions, and shareholder proposals. Similarly, for bond holders, we engage in voting on issues such as debt restructuring, covenant amendments, and bondholder meetings. By exercising these rights, we advocate for transparency, accountability, and fair treatment of investors.

Our voting setup

Vontobel recognizes that portfolio management of the assets of clients, which include stocks, may include an obligation to vote in relation to the stock. At the same time, voting represents one of the ways we can express our views.

If authorized to do so, Vontobel will vote in respect of the stock, typically by proxy, in a manner that it reasonably believes to be in the best interest of the client and in line with any specific legal or regulatory requirements in different jurisdictions or markets that may apply.

The scope of our voting policy covers all actively managed funds and discretionary mandates managed by Vontobel, unless we have not been authorized to vote on behalf of clients in relation to the assets managed.¹ Funds and mandates managed based on quantitative investment strategies are not covered by our voting policy. However, they may have a voting setup in a comparable manner.

Use of proxy voting advisors across our investment solutions

Vontobel works with specialist research providers who support portfolio managers with their research and voting recommendations. To ensure that all covered votes are treated, the portfolios of our funds are sent on a daily basis to our proxy voting advisors by our custodian. Recommendations are provided by the proxy voting advisor to the investment teams based on guidelines that have been reviewed and approved by Vontobel.

In some cases, and on specific topics, we may develop tailored proxy voting guidelines with the relevant proxy voting service providers, which provide specialized research on voting decisions.

In 2023, Vontobel was using three proxy voting service providers: Institutional Shareholder Services, Inc. (ISS), Ethos Services SA (Ethos) and Responsible Engagement Overlay (reo®), by Columbia Threadneedle. These service providers are used depending on the focus and active ownership approach of the strategies. For instance, Ethos has been selected for its expertise on the Swiss market and is thus used for our funds that have a focus on Swiss equities. ISS allows us to tailor voting policies, a service we use for our Quality Growth strategies.

Operational aspects related to our voting process

When selecting a voting service provider, we pay particular attention to the voting principles and policies they follow. With this approach, the vote recommendations we receive reflect the convictions of the respective investment strategies. The voting policies of our providers can be found on their websites.

Due diligence of the proxy voting advisors' services is regularly performed on the services used, as described on page 50.

¹ As most of our managed assets are under external custody, we closely collaborate with the external custodians to setup proxy voting. As part of this process, we clarify with the custodian if there is a stock lending process in place and if there is a potential impact on the proxy voting.

Clients' needs related to voting are analyzed on a case-by-case basis. For segregated accounts, clients may have their own voting setup and directly exercise voting rights for listed equities. Alternatively, clients might delegate voting to Vontobel, so that we exercise voting rights on behalf of the clients. The conditions related to these activities will be contractually agreed with the client. For our mutual funds, we do not accommodate stock lending.

Our portfolio managers and analysts receive alerts of forthcoming shareholder meetings, along with the voting recommendations provided by the engaged proxy voting advisors. Portfolio managers and analysts review the voting recommendations, and if they agree, no action is required, and Vontobel votes accordingly. In certain cases, they may have a different opinion; for example, the standard recommendation does not align with their in-depth knowledge of the company in question and its management, which may have been gained in the context of engagement activities. The portfolio manager can change the vote on an item on the agenda with appropriate documentation, thus providing justification for any choices that deviate from those recommended by the engaged proxy-voting service provider. The overruling process is outlined in our voting policy. This process ensures that we execute our voting obligations and make decisions in the interests of our clients. The respective management company coordinates these aspects and the related processes.

Exercising bondholders' rights

When invested solely through fixed income instruments, we do not have votes at companies' annual general meetings (AGMs), but this does not prevent us from engaging on behalf of our clients when we feel this is appropriate. We manage corporate actions such as consenting (or not) to repurchase offers, bond exchanges, and covenant modifications, among other matters.

Engagement

At Vontobel, we consider engagement to be an important element of our investment activities. It allows us to express our views and expectations toward companies and encourage them to consider ESG aspects.

Reasons to engage

In general, we will engage on any topic when we believe it is in our clients' interests. Reasons to engage with an investee company can include business strategy, corporate governance issues, changes in the capital structure, remuneration issues, and identified environmental and social risks. Engagement includes ongoing communications between the investment team and the management teams of investee companies and can range from ongoing updates and questioning of the current and future business model to engagement on specific issues that may cover ESG concerns.

Our analysts and portfolio managers, as part of their fundamental research activities, carry out fact-finding engagements either due to data gaps or to better understand a company's performance and policies. These engagements address material sustainability issues that are relevant to our investment strategies' objectives. As bond holders, we have the opportunity to exchange with issuers during the bond issuance or restructuring phases and encourage more transparency regarding sustainability matters.

Another reason to engage is when key ESG risks are flagged that can impact future cash flows, or severe underperformances related to sustainability factors (e.g., human rights, corruption, environmental damage, etc.). We engage in a direct dialogue with our holdings to understand the company's plans to manage and mitigate them. Through these consultations, we aim to encourage companies to improve their (ESG) risk management practices and disclosures by referencing specific areas of improvement where they are needed. We conduct thematic engagement campaigns related to strategic priorities. These are focused on issues we see across a number of our holdings. The value that may be gained from these campaigns does not need to be an immediate benefit. For example, if a company has high carbon intensity or emissions and does not appear to have a plan to reduce those emissions, it may make sense to engage even if the potential reduction of carbon emission will not necessarily immediately impact business continuity or the financial performance of the company. At Vontobel, we

coordinate our investment teams' various engagement efforts through a Vontobel-wide engagement group. This is meant to share best practice and key learnings with the aim to improve our boutiques' interactions with many of our holdings toward a longer-term, objective-oriented, ongoing dialogue on the most pertinent ESG issues.

Methods and forms of engagement

As an active manager, we generally prefer to engage with the management of investee companies directly. We do not have a standalone engagement team since we believe in direct contact between investee company management teams and investment professionals such as portfolio managers and analysts who have specific expert knowledge and understanding of the context in which the company has been selected as an investment.

We understand this is an iterative process of ongoing dialogue and a relationship of trust. We engage with management through a variety of communication formats, including face-to-face meetings, conference calls, emails, and letters.

In addition to direct engagement activities, we also partner with engagement pool providers. We see many advantages in working with a partner on voting and engagement. By pooling the assets in an engagement partner tool, we reach the scale that is necessary to be present and visible to management teams and boards in dialogues and engagement activities. This enables us to exert greater influence than our own investment volume would allow. At the same time, it allows us to target a broader range of companies as we have access to more resources and can benefit from specialized expertise and experience. Additionally, it facilitates our collaboration with other investors. The engagement pool providers establish a long-term engagement plan with objectives and milestones, and this persists irrespective of investment inflows and outflows by the provider's clients. In this way, it can take a truly long-term perspective and sustains regular pressure throughout the life of the issue engagement. Engagement service providers typically report their progress on engagements by a series of milestones, marking events such as companies acknowledging the issue, committing to making improvements, and implementing the improvements. This progress is tracked based on predefined objectives. Insights gained from these engagements may be factored into our research process.

Since 2022, we have partnered with reo®. They provide a service that allows investors to receive market-leading corporate engagement on equity and corporate bond holdings. We selected reo® based on their coverage of our portfolios and the quality of services delivered. As part of the criteria for assessing the quality of the services, we looked at the depth of the engagement activities, the processes used (objective setting, progress tracking), and the reporting offered. In 2023, reo® provided their proxy voting services with a 23-year track record and 40+ ESG specialists.

Engaging as a bondholder

As a fixed income investor of meaningful size, we engage on sustainability risks and underperformance where possible. We can make a difference either during the bond issuance, if the issuer is eager enough to change our opinion about themselves, or once the indentures need to be reassessed, such as during restructuring. Additionally, by occasionally participating in bondholder committees, Vontobel can help resolve relevant issues, which are often driven by ESG misgivings.

Monitoring our engagement activities

We monitor our engagement efforts and follow the company's improvements in key indicators, especially toward their set goals. Such logs of our engagements and company milestones are, depending on the investment team, summarized in our client quarterly reporting. We only remain as investors and engage if we believe the company still meets our original investment thesis and maintains the quality of operations that we require from our investment holdings. If not, we remain vigilant of the potential need for escalation. Engagement could be escalated through additional meetings with the management and dialogue with the board chairman and non-executive directors.

Where these engagements do not progress in the direction that the investment team believes is in the best interests of shareholders or the shareholding is insufficient for an effective escalation on a standalone basis, other options are considered, including, but not limited to:

- Voting against resolutions at shareholder meetings;
- Collaborating with other institutional investors; and/or
- Selling some or all of the investment in the context of the value proposition of the investment as a whole.

→ A further engagement topic is that of public policy.

More information on this starting from page [37](#).

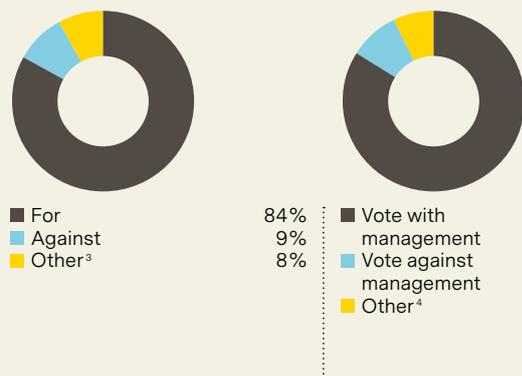
Voting highlights ¹

1323 meetings

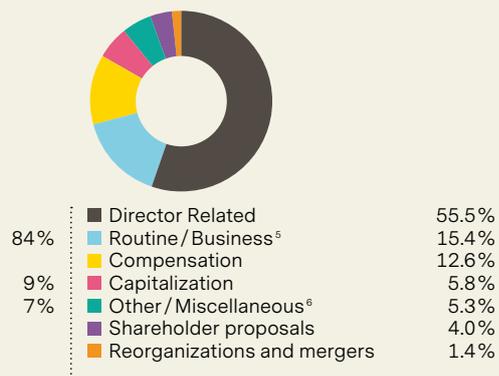
In 2024, we submitted votes at 1323 meetings, for companies based in different regions, whereby the largest part was based in North America and in Europe. 84 percent of voting items were voted “For”, and the remaining items were voted either “Against”, “Abstain”, “Withhold”, “One Year” or “Split”. 84 percent of voting items were cast with management. The remaining were either cast against management, voted split, or no recommendations from the management nor votes were expressed.

More information about our voting records can be found under am.vontobel.com/esg-investing.

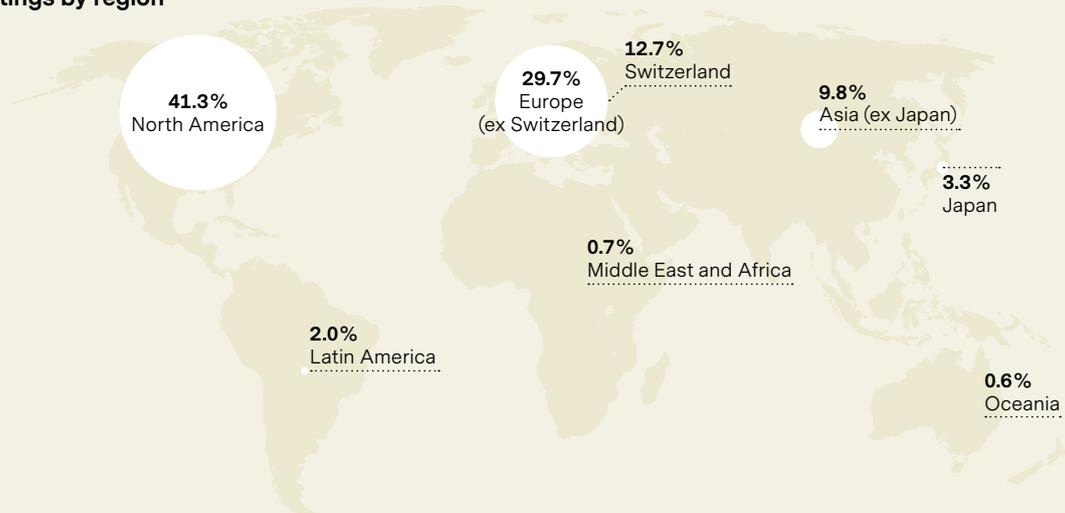
Vote Cast²



Vote by topic²



Meetings by region



¹ Scope of the voting statistics: Vontobel funds where Vontobel is the management company, investment manager and sponsor. White Label funds are excluded from the statistics. More information about the funds can be found under am.vontobel.com/vontobel-funds. Source: Vontobel, Ethos, ISS and reo[®]. The information presented here shows information across all ballot statuses for a given meeting/voting item, meaning all votes that were submitted on the respective proxy voting platform.

² Expressed as per voting item

³ Includes “Abstain”, “One Year”, “Split” (not necessarily 50/50 split), “Withhold”

⁴ Includes “Split” votes, and votes where the management did not express a recommendation.

⁵ Includes audit related items

⁶ Includes E&S management proposals, company articles related voting items and miscellaneous voting items.

Highlights of some of our voting decisions

Flutter Entertainment Plc

Quality Growth

Approve Remuneration Report

Executive compensation/remuneration is a cornerstone of our corporate engagement process: as such, we conduct ongoing discussions with company management regarding executive compensation. We had a strong level of confidence in their remuneration plan, and therefore supported this proposal. We will continue to engage with all portfolio companies on executive remuneration, particularly as it relates to corporate governance, talent acquisition, and retention.

Amazon.com, Inc.

Quality Growth

Report on Efforts to Reduce Plastic Use

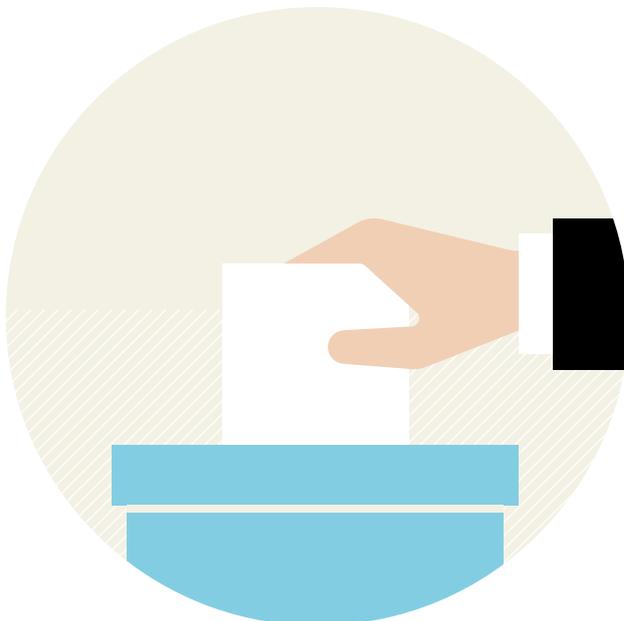
With our vote against management's recommendations, we supported this shareholder proposal advocating for an official report on efforts to reduce plastic use. We believe all stakeholders would benefit from additional disclosure on the company's management of risks related to plastic waste creation. Though the proposal did not succeed, we will continue to support relevant disclosures of ESG-related data.

RB Global, Inc.

Quality Growth

Change Jurisdiction of Incorporation

Management sought approval for an item that would reincorporate the company in a different jurisdiction. The proxy advisor recommended a vote against management, but after engaging with the company, we felt comfortable with the changes and determined that the potential impact to shareholders was immaterial and/or manageable. Furthermore, the passing of this item removed the requirement for board representation by Canadian residents. As diversity becomes increasingly important, we felt that eliminating this requirement was a logical step. We will continue to review all proxy ballots and will engage with management to better understand issues and vote in our clients' best interests.



Engagement highlights

In total, we engaged with 101 companies as part of our engagement activities in 2024. This was either directly conducted by us, in collaboration with others, or on our behalf through the engagement pool we subscribe to. Accordingly, the level of depth and involvement from our side varied depending on the activity. Some of our engagement efforts focused on gaining a better understanding of the company's activities and the context in which it operates. These discussions provide an opportunity for us to raise important topics and ask questions that are relevant to our investment activities.

In 2024, 101 companies were covered by our engagement efforts, either through engagement activities conducted by us directly, or through our engagement partner reo®.

Our engagements tackled environmental, social, and governance-related topics, as well as strategy, financial and reporting. While most engagements took place in North America and Europe, we also leveraged our local presence in Asia.

Our engagement toolbox

We believe engaging with companies is not a “one-size-fits-all” approach. Accordingly, we employ different engagement methods, depending on what we believe will be most effective.

Write shareholder letters or emails, outlining specific concerns or proposals, and request a response from the company.	Propose new board members who are aligned with shareholders' interests. This can be done through a proxy fight or by negotiating with the board.	Make public statements through the media or press releases to draw attention to specific issues or concerns.
Submit formal proposals for consideration at the company's annual general meeting (AGM).	Engage in a proxy campaign to gather votes from other shareholders in support of a particular agenda.	File complaints with relevant regulatory bodies if there are concerns about legal or ethical violations.

In certain cases, we also join forces with other investors in order to strengthen our influence.

A large part of the assets is covered by the engagement pool of Columbia Threadneedle Responsible Engagement Overlay (reo®).	We selectively join forces with other shareholders to push for specific changes or proposals.	We join engagement initiatives, powered by leading organisations.
reo® has 24-year track record of engagement and a team of 20+ active ownership specialists who interact with hundreds of companies every year.	An African telecommunications company—We worked with another major shareholder to promote better internal controls over subsidiaries.	In 2024, we joined UN PRI Spring, an engagement initiative focusing on biodiversity.

Case study

Assessing Net Zero Strategy: Engagement with a US-Based Energy Company

Topic

Environmental:
Climate change

Company profile

US-based energy company engaged in hydrocarbon exploration and petrochemical manufacturing

Engagement type

1:1 and email outreach

Status

Ongoing

Rationale and context

We engaged with a US-based energy company involved in hydrocarbon exploration in the US and the Middle East, as well as petrochemical manufacturing in the US, Canada, and Chile. Given its significant carbon footprint and industry position, we sought to assess the credibility and ambition of its Net Zero by 2050 strategy.

A key driver of our engagement was the company's MSCI Implied Temperature Rise (ITR) score of 10°C, which suggests a misalignment with global climate targets. This rating reflects, in part, the perceived lack of sufficient Net Zero targets and decarbonization efforts. However, based on the company's Climate Report 2024 and comparisons with other US peers, we noted that MSCI's rating might not fully capture its climate strategy. We raised this issue, and the company confirmed it had already initiated discussions with MSCI regarding its methodology.

Activity

We engaged through direct meetings and email outreach, reviewing the company's Net Zero strategy in depth.

Our engagement included:

- Raising concerns about its MSCI ITR score and the potential misalignment with its disclosed Net Zero efforts.
- Discussing its decarbonization progress, including a 20 percent reduction in Scope 1+2 emissions since 2019 and the integration of climate targets into executive compensation (30 percent weighting).
- Examining its four strategic Net Zero pillars:
 - Revolutionize—Innovative projects such as sustainable aviation fuel (SAF) and carbon upcycling for industrial use.
 - Reduce—Targeting Zero Flaring by 2030, enhanced gas leak detection via satellite surveillance, and a 65 percent reduction in methane emissions since 2019.
 - Reuse/ Recycle—Expanding circular carbon economy initiatives, including CO₂ utilization in production processes.
 - Remove—Investing in Direct Air Capture (DAC) solutions for carbon capture and storage.
- Assessing the implications of declining fossil fuel demand, considering the International Energy Agency's (IEA) Net Zero Roadmap 2023 update, which forecasts a 75 percent decline in oil demand and a 55–70 percent drop in gas demand by 2050.

Outcome

The company reaffirmed its commitment to Net Zero by 2050 and emphasized that it is actively exploring the new Science-Based Targets initiative (SBTi) guidelines for the oil and gas sector, expected in Q1 2025. If the framework is deemed feasible, the company would consider seeking SBTi validation of its Net Zero targets.

The company also confirmed that its Net Zero roadmap aligns with key IEA scenarios (NZE, APS, STEPS) and is already adapting its business model to reflect these transitions.

We will reassess the company's Net Zero strategy in Q2 2025, once the new SBTi guidelines for the oil and gas industry are released in Q1 2025. A follow-up engagement will be planned to evaluate how the company aligns with these developments and whether further improvements in disclosure and target setting are needed.

Case study

Enhancing ESG Disclosures: Investor Engagement on Paris-Aligned Benchmark Exclusion

Topic

Strategy, Financial and Reporting:
Corporate reporting

Company profile

Various global companies

Engagement type

1:1 and email outreach

Status

Ongoing

Rationale and context

In the context of implementing the ESMA fund naming guidelines, we are considering Paris-Aligned Benchmark (PAB) exclusions as part of our ESG strategy. However, we identified disclosure gaps on certain key criteria, particularly from companies outside the scope of EU reporting requirements, given our global investment approach.

To address this, we proactively engaged with a broad range of companies, urging them to improve transparency in relevant ESG disclosures. Our goal is to ensure that investors can access consistent, high-quality data when assessing alignment with the PAB framework.

Activity

To address this issue, we proactively engaged with a broad range of companies through targeted email communication. Our outreach highlighted the background of our request, urged companies to disclose relevant information publicly, and encouraged them to communicate these disclosures to ESG data providers to ensure widespread accessibility. We also provided best practice examples to support companies in enhancing their reporting.

In addition to email outreach, we conducted calls with select companies to delve deeper into individual PAB criteria, understand existing disclosure challenges, and provide further guidance on best practices. These discussions have allowed us to assess companies' readiness to align with evolving regulatory expectations and to identify areas where additional investor support may be beneficial.

Outcome

Some companies have already responded by publicly disclosing relevant information, while others have clarified their position bilaterally without yet making their disclosures public. For some companies, we were among the first investors to reach out on this issue. We will follow up with these companies to encourage further action and ensure that disclosures are accessible to the broader market.

Case study

Engagement on Biodiversity under the UN PRI Spring Initiative

The UN PRI Spring initiative, which we joined in 2024, is a collaborative investor program focused on enhancing corporate accountability for environmental, social, and governance (ESG) practices. Through this initiative, we are acting as collaborative investors for engagements with two companies—Banco Bradesco and L'Oréal—focusing on biodiversity and nature-related risks. By joining forces with other investors, the PRI Spring initiative encourages companies to integrate sustainability into their operations, promoting greater transparency, responsible business practices, and alignment with global biodiversity and environmental goals.

Topic

Environmental:
Biodiversity

Company profile

Banco Bradesco (Finance), L'Oréal (Ag, food, consumer good)

Engagement type

Collaborative engagement (PRI Spring)

Status

Ongoing

Rationale and context

Banco Bradesco, a major financier in the Amazon, and L'Oréal, a global cosmetics company, both face significant biodiversity risks in their operations. Through the UN PRI Spring initiative, we are collaborating with these companies, alongside other investors and stakeholders, to drive meaningful change in biodiversity risk management, deforestation mitigation, and sustainable sourcing.

Activity

Banco Bradesco: In collaboration with PRI Spring partners, we initiated joint discussions with Banco Bradesco's senior management, including the Head of Investor Relations and Head of Sustainability. These collaborative conversations allowed us to align on shared expectations for biodiversity risk management and identify areas where the bank could strengthen its deforestation mitigation efforts. Through ongoing dialogue, we emphasized the importance of integrating biodiversity risk assessments into their lending practices, particularly for high-risk projects in the Amazon.

As part of a broader collective engagement effort, we also coordinated with other PRI investors and stakeholders to advocate for the adoption of nature-related financial disclosures (e.g., TNFD). By working together, we aimed to influence the bank's approach to biodiversity risk, encouraging greater transparency and alignment with international frameworks.

L'Oréal: Our engagement with L'Oréal was similarly collaborative, involving discussions with the company's sustainability team and other PRI partners. We worked with L'Oréal to assess their efforts in traceability across the raw materials supply chain, focusing on their progress in tracing materials from plantations to refineries. We also identified key opportunities to enhance traceability to the farm level and engaged with L'Oréal on overcoming challenges in monitoring smaller suppliers.

In collaboration with industry peers and NGOs, we encouraged L'Oréal to adopt best practices in regenerative agriculture and biodiversity-positive sourcing, with the goal of scaling these efforts across its entire supply chain. Additionally, we focused on helping L'Oréal better integrate biodiversity considerations into its circular economy initiatives, including sustainable packaging and improving living wage standards within its supply chain.

Outcome

Banco Bradesco: Through our collective engagement, Banco Bradesco demonstrated a commitment to improving its deforestation risk management, though gaps remain, particularly with indirect suppliers in the meat-packing sector. We have collectively pushed for the bank to shorten the compliance deadlines for these suppliers and adopt standardized biodiversity risk assessments such as TNFD. Moving forward, we will continue our collaborative efforts with other investors to ensure that the bank strengthens its biodiversity risk screening and adopts robust nature-related financial disclosures.

L'Oréal: L'Oréal showed significant progress in supply chain traceability, though full transparency at the farm level is still a work in progress. With continued engagement, we will collaborate with PRI partners to press L'Oréal for further advancements in traceability, regenerative agriculture, and biodiversity impact assessments. We will also advocate for the integration of biodiversity goals into L'Oréal's broader sustainability strategy, ensuring that their supply chain practices align with global biodiversity objectives.

Case study

Enhancing Corporate Governance: Investor Engagement on CEO-Chairman Role and Board Diversity

Topic

Governance:
Board effectiveness, Diversity, Independence

Company profile

The primary distributor of one of the largest beverage companies in Latin America, involved in retail, beverages, and logistics.

Engagement type

1:1 meeting and follow-up communication

Status

Ongoing

Rationale and context

As a long-term shareholder, we engaged with the company on governance concerns, specifically around the combined CEO and Chairman role and the composition of its board. At the time of the AGM, we voted against the combined role, advocating for a separation of these positions to improve governance practices. Additionally, we raised concerns about board diversity, as the company's 15-member board had only three women, all non-independent.

Our objective was to encourage the company to adopt higher governance standards, particularly as a leading player in Latin America.

Activity

We initiated engagement by meeting with the company's Head of Investor Relations to discuss both the CEO-Chairman role and board diversity. During the meeting, we expressed concerns about the lack of independence and gender diversity on the board and emphasized the importance of separating the CEO and Chairman roles to align with best governance practices.

Following this, we continued to monitor the board's composition and engaged further through email correspondence. Our outreach encouraged the company to publicly disclose its progress on governance improvements and to consider adding independent female directors, aiming to align with both local corporate governance guidelines and broader global best practices.

Outcome

CEO-Chairman Role: The company confirmed that the separation of the CEO and Chairman roles is under review, with updates expected within the next year.

Board Diversity: In response to our engagement, the company added two independent female members to the board over the last 12 months, increasing independent membership to over 25 percent, meeting the corporate governance guidelines for independent directors.

Case study

Addressing Gender Pay Disparities in a European Bank

Topic

Social:
Human capital management

Company profile

Large Listed European Bank

Engagement type

1:1, Email

Status

Ongoing

Rationale and context

After identifying that the bank's gender pay gap was significantly higher than its peers, we engaged with the company to gain further insights into the reasons behind this disparity.

Activity

We reached out via email after reviewing the bank's disclosures. Investor Relations responded with insights on the causes of the gender pay gap and outlined ongoing initiatives aimed at addressing it.

Outcome

The bank's Investor Relations team provided explanations, noting that the gap stems from a higher proportion of men in senior positions and front-office roles, contributing to a high gender bonus pay gap. While the London branch aligns with industry averages, the bank is implementing initiatives such as targeted recruitment efforts and early-career development programs to improve gender balance. The bank also has DE&I committees in place to promote long-term change.

Case study

Investigating a Power Plant Accident: Ensuring Health & Safety Compliance

Topic

Social:
Human & Labor Rights; Human Capital Management;
Public Health

Company profile

Utility, Italy

Engagement type

1:1, Email and Teleconference Meeting

Status

Ongoing

Rationale and context

We engaged with the company after our ESG data provider flagged a low controversies score due to recent incidents. Specifically, we sought further details on the fatal power plant accident near Bologna in April 2024.

Activity

We held a teleconference with the company's Head of ESG to gain a deeper understanding of the incident. The company clarified that the accident occurred during a test on a hydroelectric plant, where turbines and alternators were operated at maximum speed. While the first test was successful, the second resulted in an explosion, likely due to a mechanical issue with the alternator.

Following the incident, the company launched an internal process to verify compliance with health and safety standards. They conducted a physical inspection and retrieved data from black boxes. Because the plant was submerged in water, a full inspection was not immediately possible, but six potential causes were identified—all pointing to a mechanical failure rather than procedural errors.

The company continues to monitor its suppliers for safety and human rights compliance. If the alternator supplier is found to be responsible, the company is prepared to take immediate action. If the issue is internal, the company has committed to strengthening its health and safety measures.

Outcome

The company provided sufficient clarity on the event, including its cause, investigation process, and potential remedial actions. They committed to addressing any identified shortcomings and implementing corrective measures if deemed at fault.

We have scheduled a follow-up meeting to review the final outcome of the investigation and assess the company's response.

Case study

A proactive approach to remuneration and talent management

Topic

Social:
Human Capital Management

Company profile

Analog Devices Inc

Engagement type

Collaborative, conducted by reo®

Status

Ongoing

Rationale and context

Analog Devices Inc (Analog) is a multinational semiconductor company that designs and manufactures analog, mixed-signal, and Digital Signal Processor (DSP) integrated circuits used for data conversion, signal processing, and power management.

Ro® engaged with several operational specialists at the company to discuss proposed changes to its remuneration policy, including annual short-term incentive measurements, more challenging short-term incentive targets, and a reduction of the maximum payout. These changes were introduced in response to investor feedback received earlier in the year following shareholder dissent at the previous AGM.

Activity

During the engagement, reo® discussed these proposals with the company and recognized its responsiveness to investor feedback. The improvements to remuneration practices represent a positive step in enhancing corporate governance. Reo® provided additional feedback to further refine the remuneration policy, including adjustments to the vesting schedule and change-in-control provisions.

Reo® also explored the company's succession planning processes, which demonstrated a strong awareness of risk management and talent development opportunities.

Outcome

Analog's proactive approach to addressing investor concerns and revising its remuneration policy reflects a commitment to good corporate governance. The company's willingness to engage on remuneration and succession planning matters is a positive development. However, reo® believes ongoing engagement may be necessary to monitor the implementation of these changes and ensure alignment with best practices in executive compensation and talent management.

Case study

An update on sustainable forestry and community engagement in Colombia

Topic

Environmental:
Climate change

Social:
Human Rights

Company profile

Smurfit WestRock PLC

Engagement type

Collaborative, conducted by reo®

Status

Ongoing

Rationale and context

Smurfit WestRock is an Irish-American supplier of paper-based packaging. The company is vertically integrated, spanning forestry assets (mainly in Colombia), mills, and plants, and is one of the largest paper and board producers in the world.

Reo® conducted a two-day site visit to Smurfit WestRock's forestry assets and pulp mill in Colombia, accompanied by the company's Chief Sustainability Officer. The visit aimed to assess the company's sustainable forestry practices, community engagement efforts, and the environmental and social impacts of its operations.

Activity

During the visit, reo® toured Smurfit WestRock's forest research unit, forestry plantations, and the Cali pulp plant. The company's scientific rigor and collaborations with universities in forestry research were evident. The plantations are established on degraded cattle pastures, and reo® observed significant soil erosion on similar cattle assets, highlighting the positive impact of afforestation in controlling erosion.

Additionally, reo® toured the new biomass boiler under construction at the Cali plant, which will replace coal. The company was encouraged to ensure that any third-party-sourced biomass is certified. From a social perspective, reo® also visited two primary and secondary schools funded by Smurfit WestRock in the local area. Alumni from these schools are often recruited into company roles, providing employment opportunities in economically disadvantaged regions of Colombia.

Outcome

Reo® was impressed by Smurfit WestRock's sustainable forestry practices, community engagement efforts, and the scope of the mill revamp in Cali. In particular, improvements in the company's management of operational impacts on biodiversity—an area of focus in reo®'s engagement over the past two years—were well received.

The company has acted on reo®'s recommendations and is currently evaluating some of the eDNA providers suggested for biodiversity monitoring. Going forward, engagement will focus on ensuring that the company sustainably sources feedstocks for the biomass boiler and continues to foster productive relationships with local Indigenous communities.

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Swiss Stewardship Code

Appendix 1

Further ESG and Stewardship processes

In this section, we describe further processes related to our ESG and Stewardship activities. The information mentioned below may be related to the UK Stewardship Code reporting requirements, about which more information can be found on page [61](#).

Risk management related processes

Classification of risks



- Sustainability/ESG risk: Risk that sustainability-related events could cause a material negative impact on the value of an investment. More broadly, the risk of negative financial impact on Vontobel stemming from ESG factors.
- Market risk: Risk of losses on positions due to factors driven by market forces with potentially material impact on the performance and valuation of financial assets.
- Credit/counterparty risk: Default risk, credit migration risk and concentration risk impacting both the expected cash flow and the valuation of positions.
- Liquidity risk: Funding liquidity risk of not meeting expected and unexpected cash flow and collateral needs without affecting either daily operations or the financial condition of the firm. Market liquidity risk of not being able to offset or eliminate a position at the market price because of inadequate market depth or market disruption.
- Operational risk: Risk of disruptions or failures in Vontobel’s day-to-day operations, leading to adverse impacts such as financial losses, regulatory penalties, legal liabilities, and a decline in Vontobel’s overall performance and stability.

Risk management governance

The governance of the risk management framework is ensured through two group-level bodies, the Investment Performance Committee (quarterly, chaired by the Head Investments) and the Operational Risk Committee (monthly, chaired by the Head Finance & Risk).

Four regular risk management activities support the governance framework at business unit level: The Investments Risk Meeting (quarterly), the Investment Broker Committee (quarterly), the Portfolio Manager Risk Review (monthly), and the Investment Control Breach Meeting (monthly).

This framework ensures effective communication and escalation of risk findings while retaining the necessary flexibility to respond to unanticipated events and emergencies, such as the market and economic crisis that was triggered by the Covid-19 pandemic in early 2020 or, more recently, the war in Ukraine.

An escalation process has been defined for our risk management oversight, as described below. More details about our committees, regular risk management activities and their attendees can be found on the following page.

Navigating through crisis

In case of unanticipated events and emergencies, such as the market and economic crisis triggered by the Covid-19 pandemic and the war in Ukraine during the past years, we rely on our risk management framework and its governance.

In such situations, our investment teams reassess their portfolios and seek to identify investments that may be particularly vulnerable to the crisis, as well as those that may be resilient to it. Several factors are considered, such as the potential impact on economic growth, geopolitical risks and changes in market sentiment. The situation and its impact on markets and industries are closely monitored, in coordination with functions such as Compliance, Legal and Investment Risk Management where relevant. As such, the potential regulatory constraints (e.g., sanctions at country and / or issuer level) are duly considered for the review and potential adjustment of the portfolio holdings and exposures.

On group-level, an emergency management team is formed to respond to groupwide threats, composed of the Executive Committee members, Investor Relation function, Corporate Communication function and subject matter experts as required.

In the absence of reliable market prices, Vontobel uses alternative valuation methodologies that are generally recognized and auditable to value the relevant sub-fund's assets or liabilities. This valuation process is performed by senior managers representing the Product Management, Compliance, and Investment Risk functions, acting independently from Portfolio Management.

Our client-centric approach during any crisis

We adjust our communication to meet client needs throughout any crisis. Our first step is to recognize that there is a crisis, be it sectoral or regional, and set up the structures outlined above to manage our activities.

A subgroup of the Institutional Clients Working Group focuses on investment communications. The team delivers communication on market events and enables clients to hear from our relationship managers and portfolio managers each day as a market crisis unfolds.

We use our digital resources to quickly share updates with our clients through various channels. As the crisis progresses, we evaluate how interested our clients are in these communications in different geographies using both qualitative and quantitative feedback. This helps us tailor our plans to provide clients with the information they need.

Conflicts of interest

Our policy framework

It may not always be possible to avoid conflicts of interest arising when providing financial services, especially those inherent to employees' roles. However, it is important to settle these issues, as the appropriate identification, management, and mitigation of conflicts of interest is evidence that the institution in question strives not to harm its clients, shareholders, employees, and third-party providers interests. Vontobel has Conflict of Interest policies that define and illustrate what a conflict of interest is describe how Vontobel identifies, documents, and manages potential and/or actual conflicts of interest and outline the measures that Vontobel has put in place to prevent conflicts of interest from occurring, in accordance with applicable legal provisions.

Our Group-wide policy is regularly updated and enhanced. The last update took place in December 2024. Among others, our monitoring framework relies on a global software well known in the industry to monitor gifts and entertainments, external mandates, and personal account dealings.

While addressing conflicts of interest in general, our Group-wide policy is supplemented by other policies that cover dedicated key topics (such as employee transactions, remuneration, AML and CFT, among other).

Our policy was developed in 2021 to reinforce the framework applicable to our business activities.

→ You will find our public Conflict of Interest policy statement, for Vontobel Holding AG, under vontobel.com/en-ch/legal-notice/mifid

How Vontobel ensures employee awareness and education on conflicts of interest

By means of regular communication with business representatives, the Legal & Compliance Center of Excellence aims to create awareness amongst employees, remind employees about the disclosure rules and hence allow self-disclosure of both potential and actual conflicts of interest situations into a dedicated register and/or our used software, depending on the typology of conflicts. Vontobel has defined an escalation process that includes disclosure and approval in the event an employee identifies a conflict of interest. Such an escalation process integrates employee line manager approval and, where defined in our policies, the approval of compliance as well.

In parallel, Compliance performs several controls that allow the identification of both potential and actual conflicts of interest cases. In such cases, the relevant employee will be contacted for a proper assessment and implementation of mitigation measures. With this, we increase employee awareness and aim to prevent other cases from occurring in the future.

What measures has Vontobel put in place to avoid conflicts of interest

Vontobel implemented several measures aiming to prevent conflicts of interest from occurring such as:

- Ensuring separation of employees and their reporting lines wherever relevant, e.g., financial analysts are independent from other business functions such as client-facing functions.
- Providing clear rules related to employee transactions/personal securities trading, applicable to all employees.
- Preventing relationship managers and employees in other client-facing functions from establishing business relationships through Vontobel with parties with whom they have close relationships outside of Vontobel.
- and requiring disclosure of employees' secondary professional activities and mandates to the proper internal authorities.

How does Vontobel manage actual and potential conflicts of interest related to Stewardship

As a general principle, Vontobel handles conflicts of interest related to Stewardship according to the same policies and processes defined to manage other conflicts of interest. Going into more granularity, Vontobel relies on several additional measures, policies, and standards to mitigate the risks of conflicts of interests related to Stewardship.

- Our Vontobel Code of Conduct summarizes the principles and practices that define the way Vontobel does business. As part of it, we undertake to act ethically, responsibly and with integrity toward our clients, shareholders, employees, business partners, authorities, and the general public.
- We have a ESG Investing and Advisory policy that formalizes principles, governance structures, and processes related to sustainable investing practices.
- We have voting and engagement policies in place that govern the submission of votes in a manner which Vontobel reasonably believes to be in the best interests of its clients.
- We use proxy voting service providers that follow proxy voting policies reviewed and approved by Vontobel. Investment teams must follow defined processes when changing votes including providing appropriate documentation.
- Our sustainable purchasing policy defines the environmental and social standards that we expect from our business partners.
- We separate client-facing functions from voting and engagement activities.

Examples of conflicts of interest related to stewardship

Criteria related to ESG product categorization

The implementation of regulatory requirements in our operations, has presented specific challenges and opportunities related to Stewardship, especially the Sustainable Finance Disclosure Regulation (SFDR) and its Regulatory Technical Standards (RTS) in the European Union. We have observed an increased interest from some of our clients for products that consider ESG aspects. At the same time, it is imperative to operationalize rigorous governance and operational processes to ensure the integrity of the investment processes of products that pursue such objectives.

We handled this challenge by taking measures such as:

- Defining clear minimum criteria for our ESG product categories.
- Strengthening our product governance related to ESG via our ESG Investment Forum (see further details about our ESG governance in our ESG investing and advisory policy at vontobel.com/SFDR).
- Initiating a project, led by our Institutional Clients Risk team, to document ESG processes and controls within investment teams, sales, and product management activities.
- Implementing appropriate controls both from first line and second line of defense perspectives.

Incorporating ESG information into investment decision making

In 2021 we began analyzing the potential conflict of interest arising when Portfolio Managers prioritize financial information over ESG information in investment decisions.

Within investment teams, the identified conflict of interest is partially mitigated through a rules-based approach to applying minimum ESG standards. Portfolio Managers are required to adhere to minimum quantitative ESG criteria, such as minimum ESG scores, norms-based exclusions, and sector-specific exclusions, depending on the defined ESG strategy of the product. Minimum ESG standards are programmed into data management systems such that Portfolio Managers cannot consider companies that are excluded from the investment universe based on minimum ESG criteria.

Some investment teams, such as those in the mtX franchise and the Fixed Income team also apply qualitative criteria based on proprietary research. In these cases, there is a separation between the roles of ESG analyst and financial analyst, and a consensus must be reached between the views of both parties for the Portfolio Manager to proceed with a trade.

In all cases, binding ESG criteria are defined in the investment guidelines of the financial product and quantitative criteria are independently controlled by our Investment Control team.

Proxy voting

Vontobel's Institutional Clients segment has implemented a Proxy Voting policy and associated procedures designed to ensure that voting is conducted in the best interests of clients. To facilitate the proxy voting process, Vontobel's Institutional Clients segment has engaged independent advisors to analyze proxy statements on behalf of its clients and vote proxies in accordance with its procedures. Defined processes are in place for deviating from the proxy voting advisor's recommendations. More information can be found on page [31](#).

Monitoring service providers

Guidelines for sustainable procurement

Vontobel strives to conduct its own operations according to high environmental and social standards, and we expect our business partners to adhere to the principles of responsible business conduct. These aspects are incorporated into our tendering process and serve as a guide when selecting suppliers. The relevant details are outlined in Vontobel's "Guidelines for sustainable procurement", which address matters such as employment conditions, child labor, forced labor, environmental protection, and the prevention of corruption. We expect our contractors to comply with these guidelines in order to work with Vontobel and to ensure that their own suppliers, subcontractors, and employees also adhere to them. In 2023, more than 80 percent of our third-party spending was allocated to countries classified as low-risk for child

labor, according to the UNICEF Children's Rights in the Workplace Index (Switzerland, Germany, UK).

→ These guidelines are available at vontobel.com/principles-policies.

Review of service providers

ESG data providers play an important role in ESG analyses, meeting reporting requirements and ensuring appropriate transparency to our clients. We set high expectations for ESG-related services provided by external parties. In particular, they should meet our needs in terms of data quality, service quality, and breadth of coverage. To ensure that ESG data providers can rely on clear expectations, we are in regular exchange with them. We observe that ESG data providers are also looking for this regular exchange, as it helps them to develop their services in a client-centric manner.

Occasionally, our service reviews may show negative results. In such cases, we carefully analyze the services provided, conduct a market analysis, and make collective decisions. This process may ultimately lead to terminating the business relationship with the service provider.

→ Read more about our service providers on page [23](#).

Example: monitoring of proxy voting service providers

To properly monitor service providers, the methodology should be tailored to the type of services, covering everything from the selection of the service providers to the review of their services.

We carefully select proxy voting service providers, seeking the best fit between the scope of their services, their voting policy, their areas of focus (if applicable), and our own voting policy and investment strategies. For example, for our funds focusing on Swiss equities, we have selected Ethos due to their expertise in the Swiss market.

The services provided by proxy voting providers are monitored as part of our ongoing monitoring framework. In addition, periodic due diligence reviews are conducted to assess the providers' ability to deliver the contracted services, in this case, voting services.

Appendix 2

Assessing client needs

We are close to our clients and listen carefully to their needs. We prefer a continuous exchange with clients rather than a sporadic approach, as it allows us to anticipate their needs and engage with them when it matters—always with a clear and distinct point of view. We consider this approach the most appropriate due to the diversity of markets in which we operate. Vontobel operates in several regions, serving different types of clients, ranging from global banks to pension funds, each with unique profiles, interests, and needs.

In addition to maintaining an ongoing dialogue with clients to assess their needs and satisfaction levels, we recognize the value of a structured and systematic approach. For this reason, we conduct various surveys.

Surveys

The Vontobel Advisor ESG Study 2024 aimed to uncover the opportunities and challenges faced by financial advisors and wealth managers in ESG investing. The survey gathered insights from over 300 advisors across Europe, Asia Pacific, and North America, supplemented by in-depth interviews with eight participants.

This analysis explores advisors' approaches to ESG investing, examining their biases, behaviors, and the obstacles they face. It also delves into their collaboration with asset managers, focusing on ESG product selection and how advisors navigate the complexities of integrating ESG into their practices.

We also use external surveys with (potential) clients, such as the Broadridge Fund Brand 50 Report, which helps us understand their perceptions of selected topics such as "Experts in what they do" or "Local knowledge". Such reports can help us identify potential areas for improvement.

Appendix 3

Personnel resources

Vontobel’s Group compensation policy can be found under vontobel.com/SFDR.

Integrated setup and ESG experts

As described on page 21, our ESG specialists are embedded within our boutiques, reflecting both their expertise and our belief that ESG topics should not be discussed in isolated silo functions. Embedding our ESG specialists in our boutiques was a natural consequence of our ESG integration process. We believe that deep integration of ESG know-how across all our boutiques helps us make better investment decisions and that this integrated structure brings even more relevance to ESG considerations in our investment decisions. Our ESG analysts sit together with financial analysts and portfolio managers, which fosters continuous exchange.

Our ESG network forms the core of our ESG expertise. The ESG network consists of dedicated ESG analysts, analysts undergoing deep research on ESG topics, portfolio managers of sustainable strategies, ESG leads of investment teams, as well as professionals working on overarching ESG topics. In total, more than 30 specialists with different backgrounds work on ESG-related topics, be it portfolio management, ESG research, or overarching topics. More than 10 of them are solely working on ESG-related topics. They build on several years of investment experience and a strong track record in the ESG field.

ESG experts within the investment teams

	Lara Kesterton Conviction Equities 		Markus Stierli Multi Asset 
	Xiaoyue Du Conviction Equities 		Veronika Stolbova Multi Asset 
	Gayle Chan Conviction Equities 		Yuqing Lian Multi Asset 
	Tanja Saric Conviction Equities 		Marion Swoboda Fixed Income 
	Matthias Fawer Conviction Equities 		Alexia Luyet Fixed Income 
	Brian Bandsma Quality Growth 		Kevin Loepfe Quantitative Investments 
	Marci Richburg Quality Growth 		Eugenio Carnemolla Quantitative Investments 

AM/INV ESG Center

	Lukas Münstermann Head of AM/INV ESG Center 
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-  ESG Lead representing the boutique in the ESG Investment Forum
-  ESG analysis
-  Engagement
-  Working exclusively on ESG related topics

ESG-related training

Vontobel's success depends to a significant extent on the skills and motivation of its employees. Therefore, we attach considerable importance to promoting employee development. On average, our employees working on ESG strategies and ESG research have gained more than 20 years of investment experience. ESG is a particularly evolving topic, and we recognize the importance of our teams staying up to date.

At Vontobel, we believe that on-the-job learning is the most effective. Through our setup and the resulting close and daily collaboration between ESG analysts and investment teams, we foster the ongoing dissemination of know-how related to ESG. During research meetings, general developments in ESG are discussed. The ESG Center also serves as a platform to monitor the latest developments in an ESG context and is in regular exchange with the investment teams. Certain mandatory training integrates ESG-related topics.

Through the Vontobel Academy, our employees can access internal and external training sessions. Additionally, Vontobel subventions ESG-related certificates. A growing number of employees undertake such training. In fact, by the end of 2023, more than 500 employees had successfully concluded at least one ESG-related training, either through Vontobel Academy or dedicated training sessions.

Furthermore, our employees have access to leading service providers for data, research, and engagement, such as MSCI ESG and Sustainalytics, as well as brokers. This allows them not only to learn more about the companies they are analyzing but also to access best-in-class studies and webinars about ESG. We also regularly invite external specialists from our ESG research providers to provide an outside view on relevant issues.

Long-term thinking and compensation

Vontobel is a globally operating financial expert with Swiss roots. We stand for long-term and sustainable commitment to our employees and shareholders. Our philosophy is to promote a performance-oriented culture, foster teamwork, and take a prudent approach to risk.

Furthermore, ESG risks and goals are assessed, monitored, and reviewed by our committees to ensure sustainable long-term growth.

Responsible investment goes hand-in-hand with a long-term perspective. At Vontobel, we believe that looking in the same direction and aligning our interests allows us to foster a long-term perspective. Our share participation plan has been part of our compensation system for several years. All employees (with some exemptions) who are awarded a bonus have the option of receiving 25 percent of it at preferential conditions in the form of registered shares of Vontobel Holding AG.

The consideration of ESG factors in our compensation system has been formalized in the reviewed Vontobel's Group Compensation Regulations, which was last reviewed and approved as of March 2024. More information below:

The consideration and alignment of ESG risks and goals within Vontobel's compensation policy reflect the aim of embedding ESG in our corporate values. We encourage entrepreneurial spirit, empower our people to take ownership of their work, and bring opportunities to life.

We appeal to each individual to have the courage to express an independent perspective, even if that goes against the consensus view.

Compensation principles

1. Pay for performance: A comprehensible overall compensation system that rewards contributions.
2. Drive culture: Promote an ownership mindset and courage. Foster performance and team-oriented culture.
3. Aligned and long-term orientation: Take account of the long-term interests of clients, employees, shareholders, and the company.
4. Competitive: Offer competitive compensation to attract and retain talent.
5. Compliant: Commitment to comply with legal and regulatory requirements. Promote risk consciousness and prevent conflicts of interest. ESG risks and goals are an integrated part of Vontobel's compensation policy.

The variable compensation serves the purpose of motivating employees to strive for exceptional long-term performance. The variable component is split into cash, deferred in shares and long-term incentives.

Variable compensation is based on the performance at Group level, down to the level of the division and entity, as well as the individual performance. Variable compensation is influenced by various key objectives, among them ESG risks and goals.

Appendix 4

Memberships and working groups

We are aware of our responsibility as a global investment firm and corporate citizen. In this way, we have committed ourselves to the sustainable development of the environment and society. Through our membership and participation in working groups, we aim to achieve various objectives:

Public support

Being a member of various organizations and a co-signatory to a number of investor initiatives allows us to materialize our commitment toward sustainability and also promote these initiatives. Our memberships are generally disclosed on our website. In certain cases, we may provide financial support for these initiatives through donations or memberships.

Adhere to frameworks

Some initiatives, such as the PRI and the UN Global Compact, have developed principles and transparency frameworks. By supporting these initiatives, we adhere to their principles and commit to reporting annually on our sustainable investing activities according to their specific transparency frameworks.

Contribute to exchange platforms

We believe that working together and sharing our knowledge can contribute to the development of well-functioning markets. As a pioneer in ESG investing, Vontobel has gained experience over many years. Through these platforms, we can share insights from our own experiences and also benefit from those of other market participants. In some of these cases, the working groups built around these platforms produce recommendations/reports that are shared and promoted widely.

Contribute to consultations

As mentioned above, certain working groups have specific goals, such as the issuance of recommendations, that may also serve as voluntary self-regulation. Especially in the Swiss context, there is an active dialogue between the governing and supervisory authorities and industry associations such as AMAS and SBA. In other cases, we may directly be involved in consulting working groups. This small group provides know-how to the regulator by sharing its experience on climate risk-related topics.

We believe that through our participation in these groups, we contribute to the convergence of best practices on the market. Also, it ensures that we are always at the cutting edge of ESG investing and can actively seize growth opportunities resulting from sustainable investment, thus best serving our clients.

Below, you will find some of our memberships, their purpose and activities, as well as our contribution. We support further initiatives such as “Sustainable Finance Geneva”, “Forum per la Finance Sostenibile”, the “Swiss Climate Foundation” and the “Corporate Support Group of ICRC”.

→ Find an exhaustive list of our memberships under vontobel.com/ratings-memberships.

Since 1924**Swiss Bankers Association (SBA)**

swissbanking.org

The Swiss Bankers Association is the Swiss financial sector's leading industry association. The main objective is to create the best possible operating conditions for banks in Switzerland. As the umbrella association of Switzerland's banks, the Swiss Bankers Association (SBA) brings together some 260 member institutions from the various bank categories and other financial services providers. The Association represents the financial center's interests vis-à-vis politicians, authorities, and the general public.

SBA has set the sustainable finance topic as one of their key priorities. Vontobel supports SBA with regular contributions and participation in subject-driven working groups. Vontobel also provides the representative for ABG/VAV on the SBA Expert Commission on Sustainable Finance. He also chairs the ABG/VAV's Sustainable Finance Working Group, which he represents on the Expert Commission.

Since 1984**Association of Swiss Asset and Wealth Management Banks (VAV/ABG)**

vav-abg.ch

The VAV is the Association of Swiss Asset and Wealth Management Banks. It comprises 23 banks that are head-quartered in Switzerland and primarily operate in the area of asset and wealth management for private and institutional clients. Its members manage assets totaling over CHF 1400 billion and employ around 19,000 staff in Switzerland and abroad.

Vontobel leads the Working Group Sustainable Finance of the VAV/ABG. On behalf of all members, the working group has developed 14 Priorities for Sustainable Finance as a voluntary framework. The goal of this working group is to exchange and transfer knowledge on relevant ESG topics and the development, updating, and tracking of ABG/VAV priorities for Sustainable Finance as a joint contribution to the transition to a more sustainable economy and society.

We are also participants of the VAV Contact Group Sustainable Finance whose goal is to provide an exchange platform for VAV members based on industry experts' input. Current topics are, for example, the EU and international development in sustainable finance, SBA self-regulation on client ESG preferences and ESG risk integration, and greenwashing prevention measures.

Since 1993**Asset Management Association Switzerland (AMAS)**

am-switzerland.ch

The Asset Management Association Switzerland is the representative association of the Swiss asset management industry. It aims to strengthen Switzerland's position as a leading center for asset management with high standards of quality, performance, and sustainability. To this end, it supports its members in developing the Swiss asset management industry and adding value for investors over the long term.

We are members of the Legal & Compliance Asset Management committee and actively participate in its meetings. In 2023, one of AMAS' key projects entered into force, namely, the principle-based self-regulation on transparency and disclosure for sustainability-related collective assets.

Since 2008**Swiss Climate Foundation**

klimatestiftung.ch

The Swiss Climate Foundation is a voluntary initiative by business for business. Its corporate partnerships allow it to award one to three million Swiss francs in funding annually. The Foundation's mission is to promote climate protection and strengthen Switzerland and Liechtenstein as business locations. The Swiss Climate Foundation supports small and medium-sized companies (SMEs) that develop climate-innovative products that have a significant impact on climate protection.

Vontobel is a long-standing partner of the Swiss Climate Foundation and one of its founding members. We contribute to the activities carried out by the foundation, such as the selection of funded projects, through our representation on both the foundation's board and its advisory board.

Since 2010**Principles for Responsible Investment (PRI)**

unpri.org

The six Principles for Responsible Investment are a voluntary and aspirational set of investment principles that offer a menu of possible actions for incorporating ESG issues into investment practice to act in the best long-term interests of beneficiaries. As a signatory to the Principles for Responsible Investment, Vontobel has committed itself to the gradual implementation of six principles for the broad integration of sustainability in investment processes. Through this, we actively deliver our contribution to the transformation to a more sustainable economy. The PRI regularly reports on actions and achievements on their website.

As a PRI signatory, we publicly report each year on our responsible investment activities within a defined framework of mandatory and voluntary indicators. Based on this report, signatories are rated according to the six PRI modules. Thus, together with over 3,000 signatories, we contribute to more transparency and comprehensible comparability among market participants.

→ More information about our PRI ratings under vontobel.com/responsibility. Find our Responsible Investment Transparency Report under unpri.org.

Since 2014**Swiss Sustainable Finance (SSF)**

sustainablefinance.ch

Vontobel is a founding member of SSF and played a significant role in setting up the organization. The SSF strengthens the position of Switzerland in the global marketplace for sustainable finance by informing, educating, and catalyzing growth. Vontobel hosts and sponsors SSF events and actively contributes to SSF publications like the annual Swiss Sustainable Investment Market Study, which has become a reference publication for the Swiss market for media and associations. Additionally, with its practice-oriented approach bringing together market participants, SSF serves as an exchange platform for different organizations, including the Swiss government and supervisory authorities.

Vontobel co-leads the Wealth and Asset Management Workgroup at SSF. This workgroup aims to promote sustainable investing in Swiss private wealth and asset management and further strengthen Swiss offerings in this field. To do so, the group runs projects and publishes different guides to support market participants. An example is the report "100 terms related to sustainable finance" whose goal was to align the language used when talking about sustainable finance. Another example is the resources provided to Swiss financial market participants to support regulatory changes related to the implementation of the EU Action Plan for Sustainable Finance. Vontobel participated in webinars and workshops to promote and present these resources.

Since 2017

UN Global Compact

unglobalcompact.org

Global Compact is a strategic initiative of the United Nations for companies such as Vontobel that commit themselves to aligning their business activities and strategies with ten universally accepted principles covering human rights, labor standards, environmental protection, and anti-corruption. Within our sphere of influence as a company, we thus help to promote key sustainability principles around the globe.

→ More about our Sustainability Report in our ESG Library on page [60](#) and under vontobel.com/sustainability-report.

Since 2019

Global Impact Investing Network (GIIN)

thegiin.org

Impact investments aim at creating measurable social and environmental impact alongside a financial return. GIIN is dedicated to increasing the scale and effectiveness of impact investing. By convening impact investors to facilitate knowledge exchange, highlighting innovative investment approaches, building the evidence base for the industry, and producing valuable tools and resources, the GIIN seeks to accelerate the industry's development through focused leadership and collective action.

We have been active members of the GIIN's working group on listed equities since 2019, which culminated in a jointly developed guidance document that describes several practices or characteristics an investor can expect from an impact investing fund. Published in March 2023, "Guidance for Pursuing Impact in Listed Equities" is the result of a multi-year project involving more than 100 investors. It covers the four main aspects of listed equities impact investing: setting a fund or portfolio strategy, portfolio design and selection, engagement, and the use of performance data. The guidance is structured around four main characteristics of impact investing.

Appendix 5

Our ESG Library

Sustainability Report

At Group level, Vontobel publishes a sustainability report, as part of the annual report.

- Find our Sustainability Report under vontobel.com/sustainability-report.



RI Transparency Report

As a PRI Signatory, we report publicly on our responsible investment activities each year.

- Find our RI Transparency Report under unpri.org.



Our principles and policies

We have diverse principles and policies in place that guide our activities:

- Code of Conduct
- ESG Investing and Advisory policy
- Guidelines on cluster bombs and land mines
- Voting and Engagement policies

- Find more information about these policies on page 15 and under vontobel.com/esg-library.

Articles, podcasts, insights, and webinars

We regularly produce and share our research findings and thoughts about ESG-related topics on our website.

- Find more under am.vontobel.com/insights.

International conferences and roundtables

We regularly share our views and knowledge through speakers at international conferences.

Appendix 6

UK Stewardship Code

More information about these principles can be found under frc.org.uk.

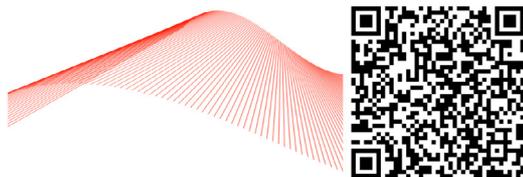
PRINCIPLES	PAGES
Purpose and governance	
1. Purpose, strategy, and culture	5–11, 14–15, 21–27
2. Governance, resources and incentives	13–15, 23, 25, 52–54
3. Conflicts of interest	48–49
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8. Monitoring managers and service providers	50–51
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9. Engagement	24, 32–33, 36–45
10. Collaboration	21, 32–33, 36, 55–58
11. Escalation	32–33, 36–45
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12. Exercising rights and responsibilities	24, 30–31, 34–35

Appendix 7

Swiss Stewardship Code

More information about these principles can be found under am-switzerland.ch and sustainablefinance.ch.

PRINCIPLES	PAGES
1. Governance	13–15, 23, 25, 52–54
2. Stewardship Policies	15, 21, 34, 36, 49–50
3. Voting	13, 21, 24, 30–31, 34–35, 48–49
4. Engagement	13, 32–33, 36–45, 55–58
5. Escalation	29–33, 36–45
6. Monitoring of Investee Entities	14–15, 21–27, 32–33
7. Delegation of Stewardship Activities	29–33, 36, 49
8. Conflicts of Interest	48–49
9. Transparency and Reporting	30–45

Swiss Stewardship Code

ASSET MANAGEMENT
ASSOCIATION

Swiss
Sustainable
Finance

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