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Dear Investor,

As an active manager, we have a long-standing belief that financially material environmental, social and governance (ESG) factors can be an important driver of long-term investment returns from both an opportunity and a risk-mitigation perspective. More details on our philosophy and approach to ESG integration can be found in our [ESG Policy](#) and in other ESG-related reports, papers and materials on our website: www.nb.com/esg.

One of the ways we have demonstrated our commitment to ESG integration is through our membership of the Principles for Responsible Investment (PRI) since 2012. The PRI's reporting and assessment process provides one framework through which to understand our ESG integration efforts, and so we are pleased to provide you with a copy of our 2024 Transparency Report and the assessment results, which cover the 12-month reporting period to end 2023.

Neuberger Berman scored above the median of all reporting signatories globally for ESG integration efforts in the 2024 PRI assessment report. The PRI introduced new questions and changed the scoring methodologies for some of the modules in the 2023 reporting cycle and the questions remained unchanged in the 2024 cycle. Among the nine reporting modules which we were eligible for, we achieved the highest possible rating of 5 stars for seven modules and 4 stars for the remaining two modules.

This marks the fifth year in a row where Neuberger Berman obtained the top rating for our overarching Policy, Governance and Strategy category, which aims to capture signatories' overall approach to responsible investment, including engagement and proxy voting. In addition, we continue to be pleased with the assessment results for our public and private fixed income platform – including Private Debt, Securitized and Sovereign Debt which are generally perceived by the market as sub-asset classes where ESG integration is a relatively recent development.

Ultimately what matters to us is whether we are meeting your objectives, whether that is simply to maximize financial returns (aided by considering financially material ESG factors), or to seek specific sustainability outcomes alongside a financial return. Since the 1940s, we have responded to client demand, starting with avoidance screens to mitigate potential negative outcomes, and in more recent years to seek positive measurable outcomes through labelled "Impact" strategies.

Please do feel free to reach out to us with questions. We recognize that is a constantly evolving area, and as such, we welcome your feedback and opportunities to engage and collaborate.

Thank you for your interest.

Sincerely,



Joseph V. Amato
President and Chief Investment Officer – Equity
Member, ESG Committee



Jonathan Bailey
Global Head of ESG & Impact Investing
Chair, ESG Committee



PUBLIC TRANSPARENCY REPORT

2024

Neuberger Berman Group LLC

Generated 25-11-2024

About this report

PRI reporting is the largest global reporting project on responsible investment. It was developed with investors, for investors.

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

The public Transparency Reports, which are produced using signatories' reported information, provide accountability and support signatories to have internal discussions about their practices and to discuss these with their clients, beneficiaries, and other stakeholders.

This public Transparency Report is an export of the signatory's responses to the PRI Reporting Framework during the 2024 reporting period. It includes the signatory's responses to core indicators, as well as responses to plus indicators that the signatory has agreed to make public.

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

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

Disclaimers

Legal Context

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

Responsible investment definitions

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

Data accuracy

This document presents information reported directly by signatories in the 2024 reporting cycle. This information has not been audited by the PRI or any other party acting on its behalf. While this information is believed to be reliable, no representations or warranties are made as to the accuracy of the information presented. The PRI has taken reasonable action to ensure that data submitted by signatories in the reporting tool is reflected in their official PRI reports accurately. However, it is possible that small data inaccuracies and/or gaps remain, and the PRI shall not be responsible or liable for such inaccuracies and gaps.

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SENIOR LEADERSHIP STATEMENT (SLS)

SENIOR LEADERSHIP STATEMENT

SENIOR LEADERSHIP STATEMENT

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

Section 1. Our commitment

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

Since our inception in 1939, Neuberger Berman has remained singularly focused on delivering attractive long-term investment results for our clients. Many of our clients expect us to consider environmental, social, and governance (ESG) factors as part of our investment processes. Increasingly, regulators in a number of markets are asking for increased disclosure on the consideration of these factors. As active managers, we believe that financially material ESG factors may be important drivers of long-term investment returns from both an opportunity and a risk-mitigation perspective. We do not view ESG as a monolith, but rather a multitude of environmental, social, and governance-related issues that may or may not be financially material to a specific sector or company. Like any other factor that could impact performance, we believe it is consistent with our fiduciary duty to our clients to incorporate these factors when financially material into our analysis and decision making.

We also understand that for some clients the impact of their portfolios is an important consideration in conjunction with investment performance. Ultimately, we strive to provide clients with investment choice, which is why we clearly differentiate between our process focused investment strategies, which are ESG-integrated, and our outcome-focused strategies, which include sustainable, impact and exclusion-based strategies.

We believe that ESG factors, like any other factor, should be incorporated in a manner consistent with the specific asset class, investment objective and style of each investment strategy. For process-focused strategies, we start by understanding how a strategy generates investment returns and, in partnership with the portfolio manager, augment the existing investment process to formalize the consideration of financially material ESG factors. For outcome-focused investing, we have more standardized expectations on the measurement and consideration of social and/or environmental outcomes, which are sensitive to regulatory standards, naming rules, industry frameworks and common standards.

Our beliefs and vision form the basis of our five-pillar integration framework which was updated recently to introduce a new "Adapt" category to capture transition-oriented products and to better align with ESMA and SDR regulations. For all ESG-integrated strategies, each portfolio management team selects an approach from the framework below:

- Avoid: Ability to exclude particular issuers or whole sectors from the investable universe to meet regulatory requirements and accommodate client demands.
- Assess: Portfolio manager considers financial material ESG factors alongside traditional factors in their investment decisions. ESG factors are generally no more significant than other factors in the investment selection process.
- Adapt: Seek to achieve social and/or environmental outcomes through engagement with issuers while also achieving a financial goal.

- Amplify: Seek to achieve a financial goal by investing in high-quality issuers with sustainable business models, practices, products or services and leadership on relevant ESG factors.

- Aim for Impact: Seek to intentionally generate positive, measurable social and environmental outcomes for people and the planet alongside a market rate financial return, by investing in issuers whose core business, products, services or use of proceeds of each investment contributes to solutions of pressing environmental and social issues.

Ultimately, the capital we manage belongs to our clients and their beneficiaries. Therefore, we participate in and support industry collaborations and commitments where we believe our involvement can help further our clients' objectives. We believe that initiatives focused on improving disclosure, common frameworks, and industry education may help markets to be fair, orderly and efficient, as well as facilitate capital formation.

Section 2. Annual overview

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

Over the past year we have continued to invest in enhancing and innovating our responsible investing practices. One simple example is the growth of our centralised ESG Investing team from 22 (at end 2022) to 26 (at end 2023) with people located in New York, London and Shanghai. Our philosophy has always been to embed ESG expertise and responsibility within investment teams rather than grow an ever-larger central team, which is why over the past two years specialist ESG expertise has been added to investment teams as diverse as Emerging Market Debt, US Large Cap Value Equity, Almanac Real Estate, Japan Small/Mid Cap Equity, and many others. We have also added resources in key operating functions such as in ESG data and in private markets with a ESG Regulatory Specialist. These resources and capabilities assisted us in making enhancements across three broad areas during the past year:

1) Process-focused investing

We further strengthened our proprietary ESG rating, the NB ESG Quotient, which includes over 4,000 equity ratings and over 2,700 credit ratings. The NB ESG Quotient benefits from the use of non-traditional ESG data in partnership with our Data Science team and qualitative analyst inputs generated by our central equity and credit research teams. In line with our commitment to active ownership, we also enhanced our capabilities to engage directly with issuers on environmental, social, and governance topics that we believe may improve performance and reduce the risk profile of client portfolios. Overall in 2023, we completed 4,658 engagements including 3,256 equity engagements and 1,402 fixed income engagements. Furthermore, through NB Votes, our advance proxy vote disclosure initiative, we publicly declared our vote intentions and detailed voting rationales in advance of 43 shareholder meetings. To enhance the effectiveness of our stewardship efforts, we completed the roll-out of a new Research Management System, which allows portfolio managers and research analysts to more efficiently capture and share investment research and ESG-related data, as well as engagement objectives, notes and outcomes.

2) Outcomes-focused investing

For clients requesting their capital to be managed in line with sustainable or impact objectives, we continued to widen the range of solutions available. Given significant client interest in climate transition, we enhanced our proprietary Net-Zero Alignment Indicator, which combines over 30 quantitative data points with qualitative insights from our fundamental analysts to generate a forward-looking assessment of a company's climate transition potential. Not only does this tool provide a holistic view on our holdings' alignment status with regard to climate transition plans, but it also helps us construct portfolios aligned with our clients' net-zero criteria. For clients seeking investment strategies which aim to encourage issuers to take incremental action to help achieve the UN Sustainable Development Goals (SDGs), we further enhanced our Global High Yield SDG Engagement and Short Duration High Yield SDG Engagement strategies. These strategies represent the importance of stewardship for fixed income investors and the real-world outcomes that can be achieved through consistent and ongoing dialogue with issuers. For clients seeking investments made with the intention to generate positive, measurable social and environmental impact alongside a financial return, we continued to enhance our impact investing solutions across asset classes. We expanded our investment capabilities with a new Global Equity Impact strategy building on the three-year track record of our US Equity Impact strategy, while continuing to engage with holdings to demonstrate the investor role in shaping impact-oriented capital allocation decisions.

3) Regulation

Given the growing focus of global regulators on sustainability-related topics, such as via the EU's SFDR and MiFID II Sustainability Preferences, and emerging US regulations, we further enhanced our ESG governance processes to seek to ensure that our products continuously comply with regulatory requirements. This included expanding our ESG Product Oversight Committee (EPOC) which conducts periodic monitoring of the application of ESG factors by portfolio managers and introducing the EMEA ESG Product Committee, which provides approval of SFDR classifications. To proactively navigate the regulatory landscape, we appointed a dedicated ESG Policy and Regulatory Strategist, who is responsible for the firm's engagement with policymakers and other external stakeholders on policy and regulatory developments. Some examples of engagements in the past year include responding to the IFRS and SEC disclosure consultations, the UK government regarding its net zero review and supporting trade association such as the PRI's GPRG and the UK IA Net Zero Forum in their policy-related engagement efforts.

Section 3. Next steps

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

We continue to be committed to enhancing our approach to ESG investing over the next two years, including through the following steps:

1) Process-focused investing:

We will continue to expand our proprietary NB ESG Quotient and collaborate with our Data Science, Research and Investment teams to further enhance these ratings with additional data sets and custom analyst contributions relating to existing and emerging themes like Biodiversity, Human Rights, and Responsible Artificial Intelligence where these are financially material. We will also leverage our internal thought leadership by not only integrating our findings in ratings, but also publishing relevant white papers on ESG integration and other topics for our clients to access. We will continue to work with investment teams to strengthen the consideration of financially material ESG factors in investment analysis and portfolio decision making. We also continue to be focused on ensuring ESG analysis is appropriate for the asset class and region, including by adding additional regional and asset-class specific resources. Lastly, we launched an AI taskforce, which brings together a range of colleagues to identify ways that Generative AI capabilities can help us in bring efficiencies and new insights to our process-focused integration of financially material ESG factors.

2) Outcome-focused investing:

Today, outcome-oriented sustainable and impact labelled strategies represent a modest (but growing) proportion of our assets under management. In our sustainable strategies, portfolio managers use their judgment to actively seek to identify high-quality, well positioned issuers with leadership on relevant ESG factors. In our impact strategies, portfolio managers seek to achieve measurable positive social and environmental outcomes for people and the planet alongside a market-rate financial return. In the near-term, we aim to improve our capabilities to offer strategies tailored to the objectives of our clients. Given strong client demand, we will continue to strengthen and leverage our proprietary Net-Zero Alignment Indicator to offer clients a range of strategies across asset classes which will help them achieve their net-zero objectives. Furthermore, building on our US Equity Impact strategy, we are leveraging our proprietary impact measurement framework and Neuberger Berman's global research footprint to identify impact investing opportunities in global public equity markets.

3) Regulation:

As sustainability-related rules develop beyond the EU, we will continue to support our clients in navigating the complex regulatory landscape, and to adapt our internal processes and methodologies to new requirements. We are also committed to continuously enhance our governance processes and technology solutions to deliver robust compliance, as well as the monitoring and reporting of portfolio ESG data. To ensure investment teams are aware of regulatory requirements, we will continue to provide regular teach-ins and our Global ESG Policy Tracker. Further, we will continue to engage policymakers and our trade associations on key topics, including sustainability reporting and fund disclosures.

4) Commitment to continuous innovation:

ESG investing has seen rapid changes over the last few years, including in popular understanding, regulatory focus and client expectations. We understand that clients partner with us not only for our investment capabilities today, but also for our ongoing commitment to innovation. We believe this commitment to innovation is particularly important in relation to ESG investing and is one of the reasons why we established our Advisory Council of external individuals recognized for their leadership on a range of ESG topics. The Council has offered us advice on emerging sustainability topics such as net-zero investing, impact measurement, biodiversity and ESG integration in China. We remain committed to continuously innovating our approach to ESG investing.

Section 4. Endorsement

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

Name

Joe Amato

Position

President

Organisation's Name

Neuberger Berman Group LLC

● A

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

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ORGANISATIONAL OVERVIEW (OO)

ORGANISATIONAL INFORMATION

REPORTING YEAR

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

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

	Date	Month	Year
Year-end date of the 12-month period for PRI reporting purposes:	31	12	2023

SUBSIDIARY INFORMATION

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

Does your organisation have subsidiaries?

- ☒ (A) Yes
☐ (B) No

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 2.1	CORE	OO 2	OO 2.2	PUBLIC	Subsidiary information	GENERAL

Are any of your organisation's subsidiaries PRI signatories in their own right?

- ☐ (A) Yes
☒ (B) No

ASSETS UNDER MANAGEMENT

ALL ASSET CLASSES

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

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

USD

(A) AUM of your organisation, including subsidiaries, and excluding the AUM subject to execution, advisory, custody, or research advisory only

US\$ 463,418,053,107.00

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

US\$ 0.00

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

US\$ 0.00

ASSET BREAKDOWN

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

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

	(1) Percentage of Internally managed AUM	(2) Percentage of Externally managed AUM
(A) Listed equity	>10-50%	0%
(B) Fixed income	>10-50%	0%
(C) Private equity	>0-10%	>10-50%
(D) Real estate	>0-10%	0%
(E) Infrastructure	0%	0%
(F) Hedge funds	>0-10%	>0-10%
(G) Forestry	0%	0%
(H) Farmland	0%	0%
(I) Other	>0-10%	0%
(J) Off-balance sheet	0%	0%

(I) Other - (1) Percentage of Internally managed AUM - Specify:

Includes Specialty Alternative, Liquid Alternatives (ex Hedge Funds), options and multi-asset accounts, which include certain retail wealth management accounts which tend to be customized and/or client-directed

ASSET BREAKDOWN: EXTERNALLY MANAGED ASSETS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 5.2	CORE	OO 5, OO 5.1	SAM 3, SAM 8	PUBLIC	Asset breakdown: Externally managed assets	GENERAL

Provide a breakdown of your organisation's externally managed AUM between segregated mandates and pooled funds or investments.

(1) Segregated mandate(s)		(2) Pooled fund(s) or pooled investment(s)
(E) Private equity	0%	>75%
(H) Hedge funds	0%	>75%

ASSET BREAKDOWN: INTERNALLY MANAGED LISTED EQUITY

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

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

(A) Passive equity	0%
(B) Active – quantitative	>0-10%
(C) Active – fundamental	>75%
(D) Other strategies	0%

ASSET BREAKDOWN: INTERNALLY MANAGED FIXED INCOME

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

Provide a further breakdown of your internally managed fixed income AUM.

(A) Passive – SSA >0-10%

(B) Passive – corporate >0-10%

(C) Active – SSA >10-50%

(D) Active – corporate >50-75%

(E) Securitised >0-10%

(F) Private debt >10-50%

ASSET BREAKDOWN: INTERNALLY MANAGED PRIVATE EQUITY

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 5.3 PE	CORE	OO 5	N/A	PUBLIC	Asset breakdown: Internally managed private equity	GENERAL

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

(A) Venture capital 0%

(B) Growth capital 0%

(C) (Leveraged) buy-out 0%

(D) Distressed, turnaround or
special situations 0%

(E) Secondaries 0%

(F) Other >75%

(F) Other - Specify:

Private Equity

ASSET BREAKDOWN: INTERNALLY MANAGED REAL ESTATE

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 5.3 RE	CORE	OO 5	N/A	PUBLIC	Asset breakdown: Internally managed real estate	GENERAL

Provide a further breakdown of your internally managed real estate AUM.

(A) Retail >0-10%

(B) Office >0-10%

(C) Industrial >10-50%

(D) Residential >10-50%

(E) Hotel >0-10%

(F) Lodging, leisure and recreation 0%

(G) Education 0%

(H) Technology or science 0%

(I) Healthcare 0%

(J) Mixed use 0%

(K) Other >10-50%

(K) Other - Specify:

Includes self-storage and land

ASSET BREAKDOWN: INTERNALLY MANAGED HEDGE FUND

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 5.3 HF	CORE	OO 5	OO 11	PUBLIC	Asset breakdown: Internally managed hedge fund	GENERAL

Provide a further breakdown of your internally managed hedge fund assets.

(A) Multi-strategy	0%
(B) Long/short equity	>75%
(C) Long/short credit	0%
(D) Distressed, special situations and event-driven fundamental	>10-50%
(E) Structured credit	0%
(F) Global macro	0%
(G) Commodity trading advisor	0%
(H) Other strategies	0%

MANAGEMENT BY PRI SIGNATORIES

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 6	CORE	OO 5	N/A	PUBLIC	Management by PRI signatories	GENERAL

What percentage of your organisation's externally managed assets are managed by PRI signatories?

>10-50%

GEOGRAPHICAL BREAKDOWN

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

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

AUM in Emerging Markets and Developing Economies

(A) Listed equity	(2) >0 to 10%
(B) Fixed income – SSA	(3) >10 to 20%
(C) Fixed income – corporate	(2) >0 to 10%
(D) Fixed income – securitised	(2) >0 to 10%
(E) Fixed income – private debt	(2) >0 to 10%
(F) Private equity	(2) >0 to 10%
(G) Real estate	(2) >0 to 10%
(I) Hedge funds	(2) >0 to 10%

STEWARDSHIP

STEWARDSHIP

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

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

	(1) Listed equity - active	(3) Fixed income - active	(4) Fixed income - passive	(5) Private equity
(A) Yes, through internal staff	☒	☒	☒	☒
(B) Yes, through service providers	☐	☐	☐	☐
(C) Yes, through external managers	☐	☐	☐	☒
(D) We do not conduct stewardship	☐	☐	☐	☐
	(6) Real estate	(8) Hedge funds	(11) Other	
(A) Yes, through internal staff	☒	☒	☒	
(B) Yes, through service providers	☐	☐	☐	
(C) Yes, through external managers	☐	☐	☐	
(D) We do not conduct stewardship	☐	☐	☐	

STEWARDSHIP: (PROXY) VOTING

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 9 HF	CORE	OO 5	OO 9	PUBLIC	Stewardship: (Proxy) voting	GENERAL

Does your organisation have direct investments in listed equity across your hedge fund strategies?

- ☒ (A) Yes
☐ (B) No

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

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

	(1) Listed equity - active	(3) Hedge funds
(A) Yes, through internal staff	☒	☒
(B) Yes, through service providers	☐	☐
(C) Yes, through external managers	☐	☐
(D) We do not conduct (proxy) voting	☐	☐

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

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

	Percentage of your listed equity holdings over which you have the discretion to vote
(A) Listed equity – active	(9) >70 to 80%
(C) Hedge funds	(7) >50 to 60%

ESG INCORPORATION

INTERNALLY MANAGED ASSETS

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

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

	(1) Yes, we incorporate ESG factors into our investment decisions	(2) No, we do not incorporate ESG factors into our investment decisions
(B) Listed equity - active - quantitative	☒	☐
(C) Listed equity - active - fundamental	☒	☐
(E) Fixed income - SSA	☒	☐
(F) Fixed income - corporate	☒	☐
(G) Fixed income - securitised	☒	☐
(H) Fixed income - private debt	☒	☐
(I) Private equity	☒	☐
(J) Real estate	☒	☐
(M) Hedge funds - Long/short equity	☒	☐
(O) Hedge funds - Distressed, special situations and event-driven fundamental	☒	☐
(V) Other: Includes Specialty Alternative, Liquid Alternatives (ex Hedge Funds), options and multi-asset accounts, which include certain retail wealth management accounts which tend to be customized and/or client-directed	☐	☒

EXTERNAL MANAGER SELECTION

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 12	CORE	OO 5, OO 5.1	Multiple indicators	PUBLIC	External manager selection	1

For each externally managed asset class, does your organisation incorporate ESG factors, to some extent, when selecting external investment managers?

(1) Yes, we incorporate ESG factors when selecting external investment managers

(2) No, we do not incorporate ESG factors when selecting external investment managers

(E) Private equity	☒	☐
(H) Hedge funds	☒	☐

EXTERNAL MANAGER APPOINTMENT

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 13	CORE	OO 5, OO 5.1	Multiple indicators	PUBLIC	External manager appointment	1

For each externally managed asset class, does your organisation incorporate ESG factors, to some extent, when appointing external investment managers?

(1) Yes, we incorporate ESG factors when appointing external investment managers

(2) No, we do not incorporate ESG factors when appointing external investment managers

(E) Private equity	☒	☐
(H) Hedge funds	☒	☐

EXTERNAL MANAGER MONITORING

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 14	CORE	OO 5, OO 5.1	Multiple indicators	PUBLIC	External manager monitoring	1

For each externally managed asset class, does your organisation incorporate ESG factors, to some extent, when monitoring external investment managers?

(1) Yes, we incorporate ESG factors when monitoring external investment managers

(2) No, we do not incorporate ESG factors when monitoring external investment managers

(E) Private equity



(H) Hedge funds



ESG NOT INCORPORATED

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 16	CORE	OO 11, OO 12–14	N/A	PUBLIC	ESG not incorporated	1

Describe why your organisation does not currently incorporate ESG factors into your investment decisions and/or in the selection, appointment and/or monitoring of external investment managers.

Internally managed

(O) Other

Our “Other” category includes various asset classes ranging from Specialty Alternative, Liquid Alternatives (ex-Hedge Funds) and options to multi-asset accounts, which include retail wealth management accounts that tend to be customized and/or directed by clients for whom ESG may not be deemed material to the investment process. However, we do integrate ESG factors into some of our Specialty Alternative strategies, such as Insurance-Linked Securities, which inherently incorporates many environmental and social factors in the investment process as part of the transfer of climate-related catastrophe risk into broader capital markets. We have selected “No, ESG is not incorporated into investment decisions” for the “Other” category because the assets held in non-ESG integrated accounts outnumber those that are held in ESG-integrated accounts.

ESG STRATEGIES

LISTED EQUITY

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

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

Percentage out of total internally managed active listed equity

(A) Screening alone	>0-10%
(B) Thematic alone	0%
(C) Integration alone	0%
(D) Screening and integration	>10-50%
(E) Thematic and integration	0%
(F) Screening and thematic	0%
(G) All three approaches combined	>0-10%
(H) None	>10-50%

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

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

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

(A) Positive/best-in-class screening only	0%
(B) Negative screening only	>75%
(C) A combination of screening approaches	>0-10%

FIXED INCOME

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 17 FI	CORE	OO 5.3 FI, OO 11	Multiple, see guidance	PUBLIC	Fixed income	1

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

	(1) Fixed income - SSA	(2) Fixed income - corporate	(3) Fixed income - securitised
(A) Screening alone	>0-10%	>0-10%	0%
(B) Thematic alone	0%	0%	0%
(C) Integration alone	>75%	>75%	>75%
(D) Screening and integration	>0-10%	>0-10%	0%
(E) Thematic and integration	0%	0%	0%
(F) Screening and thematic	0%	0%	0%

(G) All three approaches combined	0%	0%	0%
(H) None	0%	0%	>0-10%

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 17.1 FI	CORE	OO 17 FI	N/A	PUBLIC	Fixed income	1

What type of screening does your organisation use for your internally managed active fixed income where a screening approach is applied?

	(1) Fixed income - SSA	(2) Fixed income - corporate
(A) Positive/best-in-class screening only	0%	0%
(B) Negative screening only	>75%	>75%
(C) A combination of screening approaches	0%	0%

ESG/SUSTAINABILITY FUNDS AND PRODUCTS

LABELLING AND MARKETING

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

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

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

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

>0-10%

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

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

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

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

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

>0-10%

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

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

Which ESG/RI certifications or labels do you hold?

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

- ☐ (AE) People's Bank of China green bond guidelines
☐ (AF) RIAA (Australia)
☒ (AG) Towards Sustainability label (Belgium)
☒ (AH) Other
 Specify:

Securities and Futures Commission Hong Kong (SFC), Taiwan ESG label

PASSIVE INVESTMENTS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 19	CORE	OO 5.3 FI, OO 11	LE 8, FI 10	PUBLIC	Passive investments	1

What percentage of your total internally managed passive listed equity and/or fixed income passive AUM utilise an ESG index or benchmark?

Percentage of AUM that utilise an ESG index or benchmark

(B) Fixed income - passive

0%

SUMMARY OF REPORTING REQUIREMENTS

SUMMARY OF REPORTING REQUIREMENTS

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

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

Applicable modules	(1) Mandatory to report (pre-filled based on previous responses)	(2.1) Voluntary to report. Yes, I want to opt-in to reporting on the module	(2.2) Voluntary to report. No, I want to opt-out of reporting on the module
Policy, Governance and Strategy	☒	☐	☐
Confidence Building Measures	☒	☐	☐
(B) Listed equity – active – quantitative	☒	☐	☐

(C) Listed equity – active – fundamental	☒	☐	☐
(E) Fixed income – SSA	☒	☐	☐
(F) Fixed income – corporate	☒	☐	☐
(G) Fixed income – securitised	☒	☐	☐
(H) Fixed income – private debt	☒	☐	☐
(I) Private equity	☐	☐	☒
(J) Real estate	☐	☐	☒
(M) Hedge funds – Long/short equity	☐	☐	☒
(O) Hedge funds – Distressed, special situations and event-driven fundamental	☐	☐	☒
(X) External manager selection, appointment and monitoring (SAM) – private equity	☒	☐	☐
(AA) External manager selection, appointment and monitoring (SAM) – hedge funds	☐	☐	☒

SUBMISSION INFORMATION

REPORT DISCLOSURE

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

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

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

POLICY, GOVERNANCE AND STRATEGY (PGS)

POLICY

RESPONSIBLE INVESTMENT POLICY ELEMENTS

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

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

- ☒ (A) Overall approach to responsible investment
- ☒ (B) Guidelines on environmental factors
- ☒ (C) Guidelines on social factors
- ☒ (D) Guidelines on governance factors
- ☒ (E) Guidelines on sustainability outcomes
- ☒ (F) Guidelines tailored to the specific asset class(es) we hold
- ☒ (G) Guidelines on exclusions
- ☐ (H) Guidelines on managing conflicts of interest related to responsible investment
- ☒ (I) Stewardship: Guidelines on engagement with investees
- ☒ (J) Stewardship: Guidelines on overall political engagement
- ☒ (K) Stewardship: Guidelines on engagement with other key stakeholders
- ☒ (L) Stewardship: Guidelines on (proxy) voting
- ☐ (M) Other responsible investment elements not listed here
 - ☐ (N) Our organisation does not have a formal responsible investment policy and/or our policy(ies) do not cover any responsible investment elements

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

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

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

Specify:

Responsible political engagement is among the issues covered by our stewardship guidelines. Given the potential reputational impact of the use of company funds in relation to trade associations and political processes, Neuberger Berman will generally support shareholder proposals asking investee companies for disclosure and/or reports on this issue. In our detailed evaluation of the proposals, we find the Center for Public Accountability Zicklin Index (CPA-Zicklin) to be an informative guidepost for assessing appropriate disclosure in relation to both the market and industry peers.

We recognize that policymakers play an important role in maintaining and enhancing the sustainability and stability of financial markets. We proactively engage regulators and policymakers on policy topics ranging from sustainability-related disclosures to the protection of small shareholders through formal letters, responses to policy consultations, and participation in industry-wide working groups and collaborative efforts, like the PRI's Global Policy Reference Group, the Investment Association's Climate Change Working Group, the IIGCC's Bondholder Stewardship Group, and the UKSIF. Most recently, we engaged with the European Commission on its Corporate Sustainability Reporting Directive (CSRD) and the SEC regarding its rule to enhance and standardize climate-related disclosures for investors. On an annual basis, our ESG Committee reviews the membership organizations we belong to ensure our memberships do not conflict with our ESG Policy. Where we believe our views on a particular policy topic diverge from those of our membership bodies, we may consider engaging with such organisations to bring our views to the table, and/or publishing our individual position.

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

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

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

☒ **(A) Overall approach to responsible investment**

Add link:

<https://www.nb.com/en/gb/esg/reporting-policies-and-disclosures>

☒ **(B) Guidelines on environmental factors**

Add link:

<https://www.nb.com/en/gb/esg/reporting-policies-and-disclosures>

☒ **(C) Guidelines on social factors**

Add link:

<https://www.nb.com/en/gb/esg/reporting-policies-and-disclosures>

☒ **(D) Guidelines on governance factors**

Add link:

<https://www.nb.com/en/gb/esg/reporting-policies-and-disclosures>

☒ **(E) Guidelines on sustainability outcomes**

Add link:

<https://www.nb.com/en/gb/esg/reporting-policies-and-disclosures>

☒ **(F) Specific guidelines on climate change (may be part of guidelines on environmental factors)**

Add link:

<https://www.nb.com/en/gb/esg/reporting-policies-and-disclosures>

☒ **(G) Specific guidelines on human rights (may be part of guidelines on social factors)**

Add link:

<https://www.nb.com/en/gb/esg/reporting-policies-and-disclosures>

☒ **(H) Specific guidelines on other systematic sustainability issues**

Add link:

<https://www.nb.com/en/gb/esg/reporting-policies-and-disclosures>

☒ **(I) Guidelines tailored to the specific asset class(es) we hold**

Add link:

<https://www.nb.com/en/gb/esg/reporting-policies-and-disclosures>

☒ **(J) Guidelines on exclusions**

Add link:

<https://www.nb.com/en/gb/esg/reporting-policies-and-disclosures>

☒ **(L) Stewardship: Guidelines on engagement with investees**

Add link:

<https://www.nb.com/en/gb/esg/reporting-policies-and-disclosures>

☒ **(M) Stewardship: Guidelines on overall political engagement**

Add link:

<https://www.nb.com/en/gb/esg/reporting-policies-and-disclosures>

☒ **(N) Stewardship: Guidelines on engagement with other key stakeholders**

Add link:

<https://www.nb.com/en/gb/esg/reporting-policies-and-disclosures>

☒ **(O) Stewardship: Guidelines on (proxy) voting**

Add link:

<https://www.nb.com/en/gb/esg/reporting-policies-and-disclosures>

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

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

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

☒ **(A) Overall stewardship objectives**

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

☒ **(C) Criteria used by our organisation to prioritise the investees, policy makers, key stakeholders, or other entities on which to focus our stewardship efforts**

☒ **(D) How different stewardship tools and activities are used across the organisation**

☒ **(E) Approach to escalation in stewardship**

☒ **(F) Approach to collaboration in stewardship**

☒ **(G) Conflicts of interest related to stewardship**

☒ **(H) How stewardship efforts and results are communicated across the organisation to feed into investment decision-making and vice versa**

☒ **(I) Other**

Specify:

Our Stewardship policy also covers our approach to utilizing proprietary ratings and data and service providers, public policy engagement and securities lending.

- (J) None of the above elements is captured in our policy(ies) or guidelines on stewardship

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

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

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

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

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

- ☒ (A) We have a publicly available policy to address (proxy) voting in our securities lending programme

Add link(s):

https://www.nb.com/handlers/documents.ashx?id=aba155d6-e78e-4668-800ffa69f05d45d0&name=Stewardship_and_Engagement_Policy_043021.pdf
https://www.nb.com/handlers/documents.ashx?id=e6b2f962-93ae-48b5-854e-627c89b3ea7f&name=S0301_nb_proxy_policy_procedures

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

RESPONSIBLE INVESTMENT POLICY COVERAGE

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

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

Combined AUM coverage of all policy elements

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

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

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

AUM coverage

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

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

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

☒ **(A) Listed equity**

(1) Percentage of AUM covered

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

☒ **(11) 100%**

☒ **(B) Fixed income**

(1) Percentage of AUM covered

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

☒ **(11) 100%**

☒ **(C) Private equity**

(1) Percentage of AUM covered

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

☒ **(11) 100%**

☒ **(D) Real estate**

(1) Percentage of AUM covered

- ☐ (1) >0% to 10%
- ☐ (2) >10% to 20%
- ☐ (3) >20% to 30%
- ☐ (4) >30% to 40%
- ☐ (5) >40% to 50%
- ☐ (6) >50% to 60%
- ☐ (7) >60% to 70%
- ☐ (8) >70% to 80%

- (9) >80% to 90%
- (10) >90% to <100%

● (11) 100%

☒ (F) Hedge funds

(1) Percentage of AUM covered

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

● (11) 100%

☐ (I) Other

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

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

☒ (A) Actively managed listed equity

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

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

● (11) 100%

☒ (C) Direct listed equity holdings in hedge fund portfolios

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

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

● (11) 100%

GOVERNANCE

ROLES AND RESPONSIBILITIES

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

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

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

Specify:

The CEO is responsible for updating the Board on material topics and is supported by the Global Head of ESG and Impact Investing, who is responsible for the ESG strategy, reports to the President, and keeps the Board and Partnership Committee informed. The Chief Risk Officer, CIO and COO ensure appropriate climate expertise and analytical capabilities are in place to support investment teams understand the potential implications of climate change for security analysis and portfolio construction.

- ☒ (C) Investment committee, or equivalent

Specify:

The ESG Committee is responsible for reviewing the firm's ESG Policy and climate-related corporate strategy annually and ensuring ESG integration is implemented consistently across the organization. They are supported by the ESG Product Committee, EMEA ESG Product Committee and ESG Product Oversight Committee, which oversee ESG commitments made at the product and/or investment strategy level, while the EMEA Product Governance Committee oversees product governance processes and controls.

- ☐ (D) Head of department, or equivalent
☐ (E) None of the above bodies and roles have oversight over and accountability for responsible investment

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

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

	(1) Board members, trustees, or equivalent	(2) Senior executive-level staff, investment committee, head of department, or equivalent
(A) Overall approach to responsible investment	☒	☒
(B) Guidelines on environmental, social and/or governance factors	☒	☒

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

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

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

☒ (A) Yes

Describe how you do this:

Approach to Public Policy Engagement:

Given policymakers play an important role in setting reporting and disclosure standards and reducing greenwashing by clarifying ESG-related terminology, we proactively engage with them, through formal letters to financial regulators and responses to policy consultations, on topics ranging from corporate disclosure of ESG metrics to the protection of small shareholders.

Most recently, we have engaged on:

- The European Commission's draft European Sustainability Reporting Standards (ESRS) to highlight the importance of aligning asset managers' disclosure requirements to what companies are required to report on under the ESRS and the Corporate Sustainability Reporting Directive;
- The International Sustainability Standards Board (ISSB) consultation to express our support for the use of the IFRS Sustainability Disclosure Standards as a global baseline, as well as a separate survey regarding the ISSB's next priorities;
- The U.S. Securities and Exchange Commission's (SEC) proposed rule on ESG disclosures by funds and investment advisers, which we believe will help investors make better informed investment decisions and understand how ESG factors are or are not used in the management of their assets;
- The U.K. Financial Conduct Authority's (FCA) consultation paper on its Sustainability Disclosure Requirements (SDR), introducing a disclosures, naming, labelling and marketing regime

We also find it valuable to be an active member in certain industry groups to debate and share our practitioner views on emerging policy issues, including the PRI's Global Policy Reference Group (GPRG). In addition, we are members of the Investment Company Institute (ICI), the Securities Industry and Financial Markets Association (SIFMA), the Investment Association (IA), the European Fund and Asset Management Association (EFAMA), the UK Sustainable Investment and Finance Association (UKSIF), and other groups that actively contribute to policy and regulatory discussions. Our ESG Committee reviews our membership organizations on an annual basis to ensure our memberships do not conflict with our ESG Policy.

Neuberger Berman does not rely on third parties to speak on our behalf. Our organisation directly engages with policymakers to represent our interests and advocate for our positions. This approach allows us to more effectively influence policy outcomes that align with our goals. Where we believe our views on a particular policy topic diverge from those of our membership bodies, we may consider engaging with such organisation to bring our views to the table, and/or publishing our individual position.

Neuberger Berman's Corporate Approach to Political Activities:

Neuberger Berman is a nonpartisan global firm. Our partners' political views vary across the spectrum and across regions. The firm does not make political contributions and does not have an employee Political Action Committee (PAC). Neuberger Berman employees can, however, make political contributions in their personal capacity. The firm has a Political Activity Policy that is designed to ensure compliance with SEC Rule 206(4)-5 (the "Pay-to-Play Rule") as well as state-and-local political contribution and pay-to-play laws, and to avoid any actual or apparent conflicts of interest. The Political Activity Policy requires all employees of Neuberger Berman that are either U.S. citizens or green card holders to pre-clear all political activities in the firm's proprietary database, including those of their spouse, domestic partner, their dependent children, and others that they materially support. Political activities include, but are not limited to: (i) contributions made directly to candidates and their campaigns, (ii) contributions to PACs and to political parties at the national (e.g., the Democratic and Republican National Committees) and state and local levels, and (iii) "in-kind" contributions related to political activities, such as volunteering or fundraising for a political campaign.

- (B) No
- (C) Not applicable, our organisation does not conduct any form of political engagement directly or through any third parties

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

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

☒ **(A) Internal role(s)**

Specify:

Individual research analysts in the research department and portfolio managers are responsible for implementing ESG integration in their portfolios and investment research for funds and accounts that incorporate ESG factors. We believe that this bottom-up approach encourages strategy-specific innovation while allowing each portfolio management team to learn from best practices across the investment platform. Our ESG Investing team accelerates this process with top-down expertise and support.

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

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

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

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

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

Describe: (Voluntary)

Neuberger Berman's Board of Directors (the "Board") is responsible for reviewing and approving the Neuberger Berman Group Strategy, which includes the ESG Strategy. As a subset of all enterprise-wide risks and opportunities, the Board oversees responsible investment enterprise activities and reviews the firm's approach to responsible investment at least once a year during the Neuberger Berman Group Board annual meeting. The ESG Policy is also reviewed on an annual basis by the firm's Board of Directors and Partnership Committee, which is comprised of selected leaders of Neuberger Berman and serves as an advisory board for senior management on material decisions and the strategy direction of the firm.

Senior management has integrated ESG risk factors and climate-related risks into day-to-day operations at the firm including into budget, overall strategy, capital management, risk management, and other matters that the Board oversees, and this is reflected in the materials that are provided to the Board. The Board is periodically updated on the firm's progress on its commitment to the Net Zero Asset Managers Initiative. In addition, the Board also receives materials and information from the Advisory Council. The Advisory Council provides guidance on new sustainability topics and is currently comprised of six industry experts, including three members with climate expertise.

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

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

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

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

Indicate whether these responsible investment KPIs are linked to compensation

● (1) KPIs are linked to compensation

- (2) KPIs are not linked to compensation as these roles do not have variable compensation
- (3) KPIs are not linked to compensation even though these roles have variable compensation

Describe: (Voluntary)

We believe incorporation of ESG issues into our investment process impacts investment performance, which directly impacts the variable pay of investment professionals at all levels. As such, portfolio managers and analysts' compensation is tied to appropriate use of ESG issues as we believe these have a direct impact on long term investment performance of our portfolios. In addition, many investment professionals manage strategies that have specific goals relating to responsible investment in their objectives and performance against these objectives are evaluated in their appraisal process. For example, research analysts are responsible for completing and maintaining the NB ESG Quotient, our proprietary ESG ratings on the securities that they cover and this is incorporated into their appraisal process.

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

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

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

	(1) Board members, trustees or equivalent	(2) Senior executive-level staff, investment committee, head of department or equivalent
(A) Specific competence in climate change mitigation and adaptation	☒	☒
(B) Specific competence in investors' responsibility to respect human rights	☐	☒
(C) Specific competence in other systematic sustainability issues	☐	☒

(D) The regular training of this senior leadership role does not include any of the above responsible investment competencies

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EXTERNAL REPORTING AND DISCLOSURES

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

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

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

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

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

- ☒ (A) Yes, including all governance-related recommended disclosures
- ☒ (B) Yes, including all strategy-related recommended disclosures
- ☒ (C) Yes, including all risk management-related recommended disclosures
- ☒ (D) Yes, including all applicable metrics and targets-related recommended disclosures

- ☐ (E) None of the above

Add link(s):

<https://www.nb.com/en/gb/esg/reporting-policies-and-disclosures>

[https://www.nb.com/handlers/documents.ashx?id=98c5238d-9213-4e6c-8fcf-](https://www.nb.com/handlers/documents.ashx?id=98c5238d-9213-4e6c-8fcf-8d4aa2640039&name=2023%20Neuberger%20Berman%20Group%20TCFD%20Report)

[8d4aa2640039&name=2023%20Neuberger%20Berman%20Group%20TCFD%20Report](https://www.nb.com/handlers/documents.ashx?id=98c5238d-9213-4e6c-8fcf-8d4aa2640039&name=2023%20Neuberger%20Berman%20Group%20TCFD%20Report)

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

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

☒ **(A) Disclosures against the European Union's Sustainable Finance Disclosure Regulation (SFDR)**

Link to example of public disclosures

<https://www.nb.com/en/gb/esg/reporting-policies-and-disclosures?section=sustainability-related-disclosures>

☐ (B) Disclosures against the European Union's Taxonomy

☐ (C) Disclosures against the CFA's ESG Disclosures Standard

☒ **(D) Disclosures against other international standards, frameworks or regulations**

Specify:

Climate-related corporate strategy in line with voluntary disclosure recommendations of the Financial Stability Board's Task Force on Climate-related Financial Disclosures (TCFD)

Link to example of public disclosures

<https://www.nb.com/en/gb/esg/reporting-policies-and-disclosures?section=sustainability-related-disclosures>

☒ **(E) Disclosures against other international standards, frameworks or regulations**

Specify:

2022 Investment Stewardship Report in line with UK FRC Stewardship Code

Link to example of public disclosures

<https://www.nb.com/en/gb/esg/reporting-policies-and-disclosures?section=sustainability-related-disclosures>

☒ **(F) Disclosures against other international standards, frameworks or regulations**

Specify:

UN Global Compact Communication on Progress 2022

Link to example of public disclosures

<https://www.nb.com/en/gb/esg/reporting-policies-and-disclosures?section=sustainability-related-disclosures>

☒ **(G) Disclosures against other international standards, frameworks or regulations**

Specify:

Operating Principles for Impact Management

Link to example of public disclosures

<https://www.nb.com/en/gb/esg/reporting-policies-and-disclosures?section=sustainability-related-disclosures>

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

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

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

Add link(s):

https://www.nb.com/handlers/documents.ashx?id=aba155d6-e78e-4668-800ffa69f05d45d0&name=Stewardship_and_Engagement_Policy_043021.pdf
<https://www.nb.com/handlers/documents.ashx?id=bb36fb0d-0ad1-40e0-a5d1-0efb2cd417d7&name=Neuberger%20Berman%202023%20Stewardship%20and%20Sustainability%20Report>
<https://www.nb.com/handlers/documents.ashx?id=0886ab89-304d-48c2-aede-3e30e8d60471&name=Neuberger%20Berman%20Annual%20Report%20-%20MAY%202024>

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

STRATEGY

CAPITAL ALLOCATION

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

Which elements do your organisation-level exclusions cover?

- ☐ (A) Exclusions based on our organisation's values or beliefs regarding particular sectors, products or services
- ☐ (B) Exclusions based on our organisation's values or beliefs regarding particular regions or countries
- ☐ (C) Exclusions based on minimum standards of business practice aligned with international norms such as the OECD Guidelines for Multinational Enterprises, the International Bill of Human Rights, UN Security Council sanctions or the UN Global Compact
- ☐ (D) Exclusions based on our organisation's climate change commitments

☒ (E) Other elements

Specify:

Neuberger Berman has ongoing screening methods in place for determining whether a customer or issuer appears on any list issued by the Office of Foreign Assets Control (OFAC) or other applicable sanctions regimes. We screen investments against OFAC's specially designated nationals list and any list that provides for prohibitions on trading with listed person, as applicable. We also screen all investments against sanctions lists maintained by the EU, UK, and UN.

For certain products, Neuberger Berman maintains a formal Neuberger Berman UCITS Controversial Weapons Exclusion Policy that defines specific exclusion criteria. We have also implemented a Thermal Coal Involvement Policy and are committed across all of our co-mingled U.S. registered mutual, exchange-traded, and closed-end funds and international UCITS range, to subject investments in companies that have more than 25% of revenue derived from thermal coal mining or are expanding new thermal coal power generation to formal review and approval by Neuberger Berman's Environmental, Social and Governance ("ESG") Committee before the initiation of any new investment positions in the securities of those companies.

We have also established the Global Standards Policy which defines specific exclusion criteria in relation to the United Nations Global Compact Principles ("UNGC"), the OECD Guidelines for Multinational Enterprises ("OECD Guidelines"), the United Nations Guiding Principles on Business and Human Rights ("UNGPs") and the International Labour Standards Conventions ("ILO"). This applies to our UCITS funds that are classified as Article 8 and Article 9 under SFDR.

All sustainable and impact portfolios are managed in compliance with at least the minimum exclusions laid out in our Sustainable Exclusions Policy. In addition, we are also able to customize guidelines for separate accounts to particular client needs.

- (F) Not applicable; our organisation does not have any organisation-level exclusions

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

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

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

STEWARDSHIP: OVERALL STEWARDSHIP STRATEGY

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

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

	(1) Listed equity	(2) Fixed income	(3) Private equity	(4) Real estate	(6) Hedge funds
(A) Maximise our portfolio-level risk-adjusted returns. In doing so, we seek to address any risks to overall portfolio performance caused by individual investees' contribution to systematic sustainability issues.	☒	☒	☒	☒	☒
(B) Maximise our individual investments' risk-adjusted returns. In doing so, we do not seek to address any risks to overall portfolio performance caused by individual investees' contribution to systematic sustainability issues.	☐	☐	☐	☐	☐

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

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

Neuberger Berman has identified nine key governance and engagement principles focused on positively influencing corporate behaviors to seek to drive long-term, economic value. As a multi-asset class manager, we engage with issuers across the capital structure using a range of tools and approaches guided by these principles.

1. Strategy: Adopt, formulate and communicate value-enhancing long-term strategies

2. Incentives: Align management and board incentives with long-term shareholder goals
3. Board Independence: Effective boards of directors must be truly independent
4. Shareholder representation: Strive to maximise shareholder representation
5. Capital deployment: Allocate capital to maximise long-term risk-adjusted shareholder value
6. Transparency and Communications: Provide transparency in communication and reporting
7. Risk Management: Board of directors should actively engage with management to evaluate and control enterprise risk
8. Environmental issues: Consider the material impacts of their business operations on the environment
9. Social issues: Actively assess the material impacts of their business and operations on their employees, customers, local communities and society

Our engagement prioritization is a function of the following considerations: severity of ESG concern as assessed by our proprietary ESG Ratings, potential economic exposure to the risk, relative level of influence on a situation (be it through engagement or a voting decision), type of entity (e.g., company or government), and the existence of an emergent risk as identified through our internal assessment or collaborative engagement campaigns. While the prioritization assessment is ongoing, the timing of the engagement may be reactionary in certain cases, opportunistic in cases of industry events or pre-planned meetings, or proactive where time allows and without undue restrictions such as during quiet periods or M&A events that may prevent outreach actions. Ultimately, we aim to prioritize engagement that is expected to have a high impact on the protection of and improvement to the value of our clients' assets, be it through the advancement of actionable disclosure, understanding of risks and risk management at an issuer, or through influence and action to mitigate risks and take advantage of investment opportunities.

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

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

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

STEWARDSHIP: (PROXY) VOTING

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

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

- ☐ (A) Before voting is executed, we review external service providers' voting recommendations for controversial and high-profile votes
- ☐ (B) Before voting is executed, we review external service providers' voting recommendations where the application of our voting policy is unclear
- ☐ (C) We ensure consistency with our voting policy by reviewing external service providers' voting recommendations only after voting has been executed
- ☐ (D) We do not review external service providers' voting recommendations
- ☒ (E) Not applicable; we do not use external service providers to give voting recommendations

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

How is voting addressed in your securities lending programme?

- ☐ (A) We recall all securities for voting on all ballot items
- ☒ (B) When a vote is deemed important according to pre-established criteria (e.g. high stake in the company), we recall all our securities for voting

Provide details on these criteria:

Some NB products or client accounts where NB has authority and responsibility to vote the proxies may participate in a securities lending program administered by NB. Where a security is currently on loan ahead of a shareholder meeting, NB will generally attempt to terminate the loan in time to vote those shares. Where a security that is potentially subject to being loaned is eligible to be voted in a stockholder meeting a portfolio manager may restrict the security from lending. NB maintains the list of securities restricted from lending and receives daily updates on upcoming proxy events from the custodian.

- ☐ (C) Other
- ☐ (D) We do not recall our securities for voting purposes
- ☐ (E) Not applicable; we do not have a securities lending programme

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

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

- ☒ (A) We vote in favour of resolutions expected to advance progress on our stewardship priorities, including affirming a company's good practice or prior commitment

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

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

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

- ☒ (A) We pre-declared our voting intentions publicly through the PRI's vote declaration system on the Resolution Database
- ☒ (B) We pre-declared our voting intentions publicly by other means, e.g. through our website
Add link(s) to public disclosure:
<https://www.nb.com/en/gb/esg/nb-votes>
- ☒ (C) We privately communicated our voting decision to investee companies prior to the AGM/EGM
- (D) We did not privately or publicly communicate our voting intentions prior to the AGM/EGM
- (E) Not applicable; we did not cast any (proxy) votes during the reporting year

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

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

- (A) Yes, for all (proxy) votes
- ☒ (B) Yes, for the majority of (proxy) votes
Add link(s):
<https://www.nb.com/en/gb/esg/nb-votes>
- (C) Yes, for a minority of (proxy) votes
- (D) No, we do not publicly report our (proxy) voting decisions company-by-company and in a central source

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

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

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

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

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

	(1) In cases where we abstained or voted against management recommendations	(2) In cases where we voted against an ESG-related shareholder resolution
(A) Yes, we publicly disclosed the rationale	(1) for all votes	(1) for all votes
(B) Yes, we privately communicated the rationale to the company	(3) for a minority of votes	(3) for a minority of votes
(C) We did not publicly or privately communicate the rationale, or we did not track this information	○	○
(D) Not applicable; we did not abstain or vote against management recommendations or ESG-related shareholder resolutions during the reporting year	○	○

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

<https://www.nb.com/en/gb/esg/nb-votes>

<https://viewpoint.glasslewis.com/WD/?siteId=NeubergerBerman>

<https://viewpoint.glasslewis.com/WD/?siteId=neubergerbermanucits>

https://www.nb.com/handlers/documents.ashx?id=fcc2e7a2-a451-4dd8-95bf-8b53ee0a20bf&name=Proxy_Voting_Report_2020.pdf

STEWARDSHIP: ESCALATION

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

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

	(1) Listed equity	(2) Direct listed equity holdings in hedge fund portfolios
(A) Joining or broadening an existing collaborative engagement or creating a new one	☒	☒
(B) Filing, co-filing, and/or submitting a shareholder resolution or proposal	☒	☐
(C) Publicly engaging the entity, e.g. signing an open letter	☒	☒
(D) Voting against the re-election of one or more board directors	☒	☒
(E) Voting against the chair of the board of directors, or equivalent, e.g. lead independent director	☒	☒
(F) Divesting	☒	☒
(G) Litigation	☐	☐
(H) Other	☐	☐
(I) In the past three years, we did not use any of the above escalation measures for our listed equity holdings	☐	☐

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 37	CORE	Multiple, see guidance	N/A	PUBLIC	Stewardship: Escalation	2

For your corporate fixed income assets, what escalation measures did your organisation, or the external investment managers or service providers acting on your behalf, use in the past three years?

- ☒ (A) Joining or broadening an existing collaborative engagement or creating a new one
- ☐ (B) Publicly engaging the entity, e.g. signing an open letter
- ☒ (C) Not investing
- ☒ (D) Reducing exposure to the investee entity
- ☒ (E) Divesting
- ☐ (F) Litigation
- ☐ (G) Other
- ☐ (H) In the past three years, we did not use any of the above escalation measures for our corporate fixed income assets

STEWARDSHIP: ENGAGEMENT WITH POLICY MAKERS

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

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

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

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

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

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

Selected examples where we have engaged recently through letters, public consultation responses, and government backed working groups

- The European Commission public consultation on the Level 1 review of the Sustainable Finance Disclosure Regulation (SFDR) to support the enhancement of the current regime through streamlined disclosures and, potentially, the introduction of voluntary labels
- The European Supervisory Authorities' (ESAs) consultation regarding amendments to the SFDR's Regulatory Technical Standards (RTS) to provide constructive feedback on the impact of certain changes, including the introduction of new templates and transparency requirements
- The European Commission's draft European Sustainability Reporting Standards (ESRS) to highlight the important of aligning asset managers' disclosure requirements to what companies are required to report on under the ESRS and the Corporate Sustainability Reporting Directive
- The International Sustainability Standards Board (ISSB). By serving as a member of the ISSB Investor Advisory Group, we share our practitioner's views on the global baseline and what we believe should be the next priorities
- The Taskforce for Nature-related Financial Disclosures (TNFD) Disclosure Framework to highlight the challenges and opportunities of nature-related reporting for financial institutions. As part of the Taskforce for Nature-related Financial Disclosures (TNFD) Forum, we are actively contributing to the work of the Taskforce through consultations
- The U.S. Securities and Exchange Commission's (SEC) proposed rule on ESG disclosures by funds and investment advisers, which we believe will help investors make better informed investment decisions and understand how ESG factors are or are not used in the management of their assets
- The U.K. Financial Conduct Authority's (FCA) consultation paper on its Sustainability Disclosure Requirements (SDR), introducing a disclosures, naming, labelling and marketing regime

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

☒ (E) Other methods

Describe:

We also find it valuable to be an active member in key industry groups to debate and share our practitioner views on emerging policy issues, including the PRI's Global Policy Reference Group (GPRG), the IIGCC's Bondholder Stewardship Group, the Asian Corporate Governance Association (ACGA), the Investment Association's Climate Change Working Group, and the Board of the US SIF.

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

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

☒ (A) We publicly disclosed all our policy positions

Add link(s):

https://www.nb.com/handlers/documents.ashx?id=aba155d6-e78e-4668-800ffa69f05d45d0&name=Stewardship_and_Engagement_Policy_043021.pdf

☒ **(B) We publicly disclosed details of our engagements with policy makers**

Add link(s):

<https://www.nb.com/handlers/documents.ashx?id=0b52fe19-63f1-4a0f-9d5d-9c80d6816f11&name=Neuberger%20Berman%202023%20Public%20Consultation%20Engagements>

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

CLIMATE CHANGE

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

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

☒ **(A) Yes, within our standard planning horizon**

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

We are committed to understanding our climate-related risks and opportunities, and managing risks material to our business. We can segment climate-related risks into two categories:

- Physical risk: Physical risks resulting from climate change will be both event-driven (acute) and longer-term shifts (chronic) in climate patterns. Physical risks could result in asset damage and business disruptions to portfolio companies that lead to decreased security valuations and thus affect our investment value chain.

- Transition risk: The global transition to a low-carbon economy will cause policy, legal, technology and market shifts as the world addresses the mitigation and adaptation requirements related to climate change over the short, medium and long term. Transition risks could result in increased capital expenditures, increased stranded asset risk, and decreased demand for certain goods and services for our portfolio companies that lead to decreased security valuations and thus affect our investment value chain.

We have identified key channels through which climate risks and opportunities would impact portfolio companies and thus present a source of investment risk. We adopt the following definitions regarding timeframe of critical impact, which is when we believe the portfolios we manage on behalf of clients will have the greatest level of financial exposure to the risk under consideration: short-term (1 year), medium-term (2-5 years), long-term (5+ years).

We consider the following climate risk channels for our investment portfolios:

1) Physical risk (acute)

Description: Risks from increased severity of extreme weather events

Timeframe of critical impact: Long term

Impact on portfolio companies: Increased write-offs, capital costs, and insurance premiums due to physical asset damage; decreased revenues due to business disruptions

2) Physical Risk: Chronic

Description: Risks from increased variability in weather patterns

Timeframe of critical impact: Long term

Impact on portfolio companies: Increased operating expenses due to need to adapt to variable weather patterns and temperatures; decreased revenues due to business disruptions; increased insurance premiums

3) Transition Risk: Policy

Description: Risks from climate transition regulation that can affect a company's direct operations, suppliers, or customers

Timeframe of critical impact: Short, medium, and long term

Impact on portfolio companies: Increased capital expenditures due to nationally determined emissions reduction targets or carbon pricing for certain sectors or their suppliers; increased electricity costs due to grid low carbon transition; decreased revenues due to shifting market demand

4) Transition Risk: Technology

Description: Risks from failing to create or transition to new low carbon emissions technologies

Timeframe of critical impact: Short, medium, and long term

Impact on portfolio companies: Decreased demand for products and services; stranded asset risk

5) Transition Risk: Market

Description: Risks from changing consumer behavior, increased costs of raw materials and uncertain market signals

Timeframe of critical impact: Short, medium, and long term

Impact on portfolio companies: Decreased demand for goods and services due to shift in consumer preferences; increased production costs due to input prices; changes in energy costs

6) Transition Risk: Reputation

Description: Risks from negative stakeholder feedback resulting from inadequate climate action

Timeframe of critical impact: Short, medium, and long term

Impact on portfolio companies: Decreased demand for goods and services; decreased revenue from impacts on workforce; decreased capital availability

We also consider the following climate opportunity channels:

1) Resource Efficiency

Description: Opportunities from efficiency in use of water and raw materials

Timeframe of critical impact: Long term

Impact on portfolio companies: Decreased operating expenditures due to efficiencies

2) Energy Source

Description: Opportunities from use of lower emissions sources, supportive policy incentives and new technologies

Timeframe of critical impact: Short, medium, and long term

Impact on portfolio companies: Decreased operating expenditures due to efficiencies, decreased sensitivity to energy prices

3) Products & Services, Resilience

Description: Opportunities from development of climate mitigation and adaptation solutions

Timeframe of critical impact: Short, medium, and long term

Impact on portfolio companies: Increased revenue through demand for climate mitigation and adaptation solutions

4) Markets

Description: Access to new markets, use of public-sector initiatives

Timeframe of critical impact: Short, medium, and long term

Impact on portfolio companies: Increased revenues due to access to subsidies and tax credits

For more information, please see our TCFD report: <https://www.nb.com/handlers/documents.ashx?id=1d48d43e-956e-4cf9-83d7-c4a443c29827&name=TCFD%20Global%20Report>

- ☐ (B) Yes, beyond our standard planning horizon
- ☐ (C) No, we have not identified climate-related risks and/or opportunities affecting our investments

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

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

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

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

Our TCFD report covers climate risks and opportunities that affect both our investment portfolios and business strategy and operations. We are committed to understanding these climate-related risks and opportunities and managing risks that we believe are material to our business. There are a number of risk channels through which physical and transition risks, and climate opportunities, could affect portfolio companies and therefore investment portfolios over the short-, medium-, and long-term. Portfolio managers have several tools at their disposal to assess climate risks and opportunities across asset classes including carbon emissions, Climate Value-at-Risk, our proprietary Net-Zero Alignment Indicator, NB ESG Quotient, media monitoring, and direct bilateral engagement.

We distinguish our ESG philosophy by process-focused investing and outcome-focused investing. For process-focused investing strategies, such as our ESG-integrated strategies, the conclusions drawn from each assessment can be used by portfolio managers to more accurately price securities in their investment selection process and in doing so, construct more resilient portfolios that can help protect client value over the long term. For outcome-focused investment strategies, such as our sustainable and impact strategies, where our clients specifically seek to achieve sustainability outcomes alongside financial returns, we have developed specific measures that measure positive outcomes for climate mitigation and adaptation. We have also implemented asset-class specific assessment tool, including:

- Listed public equity and corporate fixed income: We have implemented top-down scenario analysis for modelling transition and physical risks at the company level in line with the recommendations of the TCFD. This scenario analysis currently focuses on our listed public equity and corporate-issuer fixed income holdings in the firm's U.S. mutual funds and international UCITS range. Multiple scenarios estimate the impact of warming average temperatures at levels of 1.5°C, 2°C (early action), 2°C (late action), and 3°C. The resulting CVaR considers transition risks, from both policy and technology changes related to the transition to net-zero emissions, and physical risks, including acute weather events and chronic changes in climate patterns. In addition, our Net-Zero Alignment Indicator is considered at both the portfolio and security level across our net-zero committed listed equity and corporate fixed income portfolios. For those portfolios, we see engagement as a critical tool to affect real economy emissions reductions.

- Sovereigns: We believe that an effective approach to assessing sovereign sustainability needs to be forward-looking, surmount the challenges of data limitations and be comparable to corporate sustainability measures. We measure climate risks and opportunities for sovereigns by leveraging carbon metrics, the NB Sovereign ESG Quotient and NB Sovereign Sustainability Assessment, and Net-Zero Alignment Indicator for sovereigns (which draws on GermanWatch's Climate Change Performance Index (CCPI), Climate Action Tracker (CAT), and the Net Zero Tracker).

As climate impact becomes more important for some of our clients, we see an opportunity to partner with them on developing solutions to invest in the climate transition and in climate solutions. These opportunities are taken into consideration when resourcing the ESG Investing team, embedding ESG resources on investment teams, and enhancing ESG data and technology capabilities.

We offer clients climate-related solutions at both the asset allocation and individual investment strategy level, including:

- Our Climate-Integrated Strategic Asset Allocation (SAA) solution, which serves to incorporate climate risks and opportunities into top-down portfolio construction for multi-asset portfolios, and can include carbon emissions constraints for net-zero committed portfolios.

- Climate transition strategies, which rely on the output of our Net-Zero Alignment Indicator to tilt towards companies that stand to benefit from the global energy transition.

- Net-zero aligned strategies, which are committed to achieving net zero and have adopted either a carbon footprint or portfolio alignment interim target by 2030.

- Thematic or impact strategies that can capture companies that are developing and providing innovative solutions to climate change.

As a global investor, we operate in many jurisdictions, all of which are adopting sustainability-related reporting and disclosure requirements, which presents a source of transition risk for our business strategy and operations. The need to comply with these regulations is taken into consideration when applicable in business decisions around developing or enhancing infrastructure such as committees focused on ESG matters, Asset Management Guideline Oversight (AMGO) monitoring, and internal audit.

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

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

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

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

Specify:

We have implemented top-down scenario analysis for modelling transition and physical risks at the company level in line with the recommendations of the TCFD. This scenario analysis currently focuses on listed public equity and corporate-issuer fixed income holdings in the firm's U.S. mutual funds, international UCITS range and separately managed accounts

This year, we began using the REMIND scenarios in-line with industry recommendations, and in order to better understand the impact of orderly vs. disorderly scenarios. Our standard approach centers around a 2°C orderly scenario. However, we also have the capability to estimate climate impacts across 1.5°C orderly, 1.5°C disorderly, 2°C disorderly, and 3°C scenarios. CVaR is just one tool we use amongst many to measure climate risk. Overdependence on such models could lead to unintended consequences for capital allocation if the scenarios inadvertently understate both the economic damage of climate change and possible positive opportunities.

At year-end 2023, across all scenarios for a 15-year time horizon, firm-wide holdings we manage were more resilient to climate risks than their respective benchmarks. In addition, the holdings-level CVaR data allows us to identify key sectors and regions within our portfolio with the highest financial exposure to climate risks overall, as well as specific types of physical risks. While some sector/region combinations within the portfolio face significant climate risk, we have a lower level of exposure to those sectors relative to overall investment in the region. In addition, our holdings in certain regions appear to have lower climate risk than the expected risk for those regions. In terms of physical risk, the assets we manage face lower physical risk than MSCI ACWI in all categories except for river low flow and fluvial flooding, and we have fewer positive effects from extreme cold.

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

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

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

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

There are a number of risk channels through which physical and transition risks, and climate opportunities, could affect portfolio companies and therefore investment portfolios. Portfolio managers have several tools at their disposal to assess climate risks and opportunities at the company level. While backward-looking metrics such as carbon footprint and intensity are important, robust quantification of climate risk should go beyond those metrics and seek to capture real-time insights.

- **Carbon Emissions:** We understand that carbon-intensive securities, companies, and portfolio will be more materially exposed to transition risks. Therefore, our portfolio managers have access to tools to track (i) carbon metrics at a point-in-time, and (ii) carbon metrics progress year-over-year. While the two main metrics portfolio managers track are carbon footprint and carbon intensity, they also have access to absolute emissions and apportioned emissions. All carbon metrics are available for Scope 1, Scope 2, and Scope 3 across our listed public equities and fixed income universe.
- **Climate Value-at-Risk:** Different securities and companies will have varying levels of exposure to physical risk depending on the nature of their businesses, real asset holdings and locations of key assets. Additionally, they will have different potential regulatory costs, as well as technology opportunities related to low-carbon technology solutions for companies that need to comply with GHG reduction requirements. Climate Value-at-Risk estimates the costs related with physical and transition risks at the security level across our listed public equities and corporate fixed income universe.
- **Net-Zero Alignment Indicator:** As active managers, we strongly believe that ESG analysis should incorporate analyst judgement. While backward-looking indicators such as carbon footprint and carbon intensity are important to track, they only provide a partial picture of each company and sector's unique net-zero journey. To better capture real-time insights, we designed a forward-looking Net-Zero Alignment Indicator that seeks to capture a company's current status and progress over time towards net-zero targets. The Indicator was created in partnership with our clients with decarbonization targets and incorporates specific sub-indicators that were informed by the high-level expectations of the Institutional Investor Group on Climate Change (IIGCC). The Indicator utilizes multiple quantitative data points from both traditional ESG data providers and specialized climate data sets, as well as real-time insights from both our credit and equity research analysts. The Indicator is utilized across our listed public equities and fixed income universe.
- **NB ESG Quotient:** The NB ESG Quotient, our proprietary ESG ratings system, considers energy efficiency, carbon emissions intensity, carbon footprint and low carbon opportunities where it is material at the sub-sector level. It also takes into account ESG controversies that could lead to reputational risk where it is material at the sub-sector level. The NB ESG Quotient covers 4,000+ equity ratings and 2,700+ credit ratings.
- **Media monitoring:** Select portfolio managers and research analysts utilize screens to conduct a more in-depth review of climate-related controversies that could lead to reputational risk. Our media monitoring data provider screens, on a daily basis, over 100,000 public sources and stakeholders in 23 languages, and contains specific filters that identify controversy topics.

In addition to the tools described, portfolio managers and research analysts may assess climate risks through direct bilateral engagement with companies.

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

Neuberger Berman has a rigorous risk management framework that comprises investment risk and business risk (covering operational risk and asset management guideline oversight ["AMGO"]), each working to protect client assets and the business. Our Investment Risk and Business Risk teams regularly review portfolios across our investment platform using industry-accepted ESG ratings to understand the ESG performance of a portfolio relative to its benchmark in addition to proprietary tools.

The Risk Group oversees ESG-related risks as part of its Risk Framework and Governance structure. The Risk Group regularly engages with portfolio managers and the ESG Investing team on strategy/fund-level ESG risks, which may include reviewing key ESG metrics such as MSCI ESG scores, carbon emissions, CVaR etc., as well as discussions on ESG exclusions and fund/account level restrictions. The Head of Business Risk and the Head of Investment Risk also chair the ESG Product Oversight Committee, which oversees ongoing compliance with ESG claims for all strategies/products and is a member of the ESG Product Committee and the ESG Committee.

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

(1) Describe your process

Within our investment portfolios, we leverage three key pillars to identify and manage climate risks: (i) minimum standards, (ii) issuer engagement, and (iii) policy advocacy.

Minimum Standards for Certain Vehicles: For certain clients and investment vehicles, we believe there are benefits to avoiding certain companies and issuers that face materially negative climate risks. We have a number of avoidance policies designed to meet client climate and sustainability objectives and comply with regulations in specific jurisdictions, which includes our Thermal Coal Involvement Policy, Global Standards Policy, Sustainable Exclusion Policy and Private Markets Avoidance Policy.

Issuer Engagement: We use engagement as a tool to mitigate exposure to transition and physical risks by encouraging issuers to enhance disclosures, evaluate their practices, and make changes to mitigate potentially material risks where necessary.

Our climate change engagement priorities include encouraging company boards to establish formal oversight of climate risk; encouraging issuers to disclose emissions and set Science-Based Targets; requesting disclosure on how companies are managing physical and transition risks; and tracking management responsiveness and progress toward these goals. In addition to asking companies for emissions disclosure, we also ask for TCFD-aligned reporting. We believe escalation should be investment-driven, taking into consideration matters such as investment objectives, issuer-specific circumstances, and our history of engagement. In the event that an issuer is not taking sufficient action to manage climate risks, we may take investment action.

In addition, for specific mandates with client-directed net-zero objectives, the Net-Zero Alignment Indicator allows us to undertake more targeted stewardship in areas where a company is making less progress towards net-zero alignment. As a result, the Indicator creates a positive feedback loop: research analysts and portfolio managers can conduct engagements on the weakest sub-indicators, and the company's responses can be fed back into the indicator to enhance our insights.

Policy Advocacy: We recognize that policymakers play a crucial role in maintaining and enhancing the sustainability and stability of financial markets. We proactively engage regulators and policymakers on policy and regulatory topics related to climate change, including on sustainability-related disclosures, the global alignment of reporting requirements through formal letters to domestic and foreign financial regulators, responses to policy consultations, and participation in industry-wide working groups and collaborative efforts. We are active members of the PRI's Global Policy Reference Group (GPRG), Investment Association's (IA) Net Zero Forum, Securities Industry and Financial Markets Association (SIFMA), European Fund and Asset Management Association (EFAMA), the Investment Company Institute (ICI Global), all of which provide a forum for us to debate and share our practitioner views on emerging policy issues.

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

Neuberger Berman has a rigorous risk management framework that comprises investment risk and business risk (covering operational risk and asset management guideline oversight ["AMGO"]), each working to protect client assets and the business. Our Investment Risk and Business Risk teams regularly review portfolios across our investment platform using industry-accepted ESG ratings to understand the ESG performance of a portfolio relative to its benchmark in addition to proprietary tools.

Specifically in relation to minimum standards, exclusion monitoring is undertaken by AMGO who implement pre-trade restrictions directly into the order management systems which alert portfolio managers to transactions which may potentially be in breach of client guidelines at the point of trade entry. In addition, AMGO monitors holdings-based alerts daily, and subjects all accounts to a periodic tactical review by AMGO to ensure compliance with all investment restrictions that may not be automated within the order management system. Any exceptions or warnings are reviewed with portfolio managers, and AMGO ensures that appropriate actions are taken to resolve potential breaches.

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

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

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

- ☒ (A) Exposure to physical risk

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

<https://www.nb.com/handlers/documents.ashx?id=98c5238d-9213-4e6c-8fcf-8d4aa2640039&name=2023%20Neuberger%20Berman%20Group%20TCFD%20Report>

☒ (B) Exposure to transition risk

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

<https://www.nb.com/handlers/documents.ashx?id=98c5238d-9213-4e6c-8fcf-8d4aa2640039&name=2023%20Neuberger%20Berman%20Group%20TCFD%20Report>

☐ (C) Internal carbon price

☒ (D) Total carbon emissions

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

☒ (E) Weighted average carbon intensity

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

☒ (F) Avoided emissions

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

☐ (G) Implied Temperature Rise (ITR)

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

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

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

☐ (J) Other metrics or variables

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

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

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

☒ (A) Scope 1 emissions

- (1) Indicate whether this metric was disclosed, including the methodology
 - (1) Metric disclosed
 - (2) Metric and methodology disclosed
- (2) Provide links to the disclosed metric and methodology, as applicable

<https://www.nb.com/handlers/documents.ashx?id=98c5238d-9213-4e6c-8fcf-8d4aa2640039&name=2023%20Neuberger%20Berman%20Group%20TCFD%20Report>

☒ **(B) Scope 2 emissions**

- (1) Indicate whether this metric was disclosed, including the methodology
 - ☐ (1) Metric disclosed
 - ☒ **(2) Metric and methodology disclosed**
- (2) Provide links to the disclosed metric and methodology, as applicable

<https://www.nb.com/handlers/documents.ashx?id=98c5238d-9213-4e6c-8fcf-8d4aa2640039&name=2023%20Neuberger%20Berman%20Group%20TCFD%20Report>

☒ **(C) Scope 3 emissions (including financed emissions)**

- (1) Indicate whether this metric was disclosed, including the methodology
 - ☐ (1) Metric disclosed
 - ☒ **(2) Metric and methodology disclosed**
- (2) Provide links to the disclosed metric and methodology, as applicable

<https://www.nb.com/handlers/documents.ashx?id=98c5238d-9213-4e6c-8fcf-8d4aa2640039&name=2023%20Neuberger%20Berman%20Group%20TCFD%20Report>

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

SUSTAINABILITY OUTCOMES

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

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

- ☒ **(A) Yes, we have identified one or more specific sustainability outcomes connected to our investment activities**
- ☐ (B) No, we have not yet identified the sustainability outcomes connected to any of our investment activities

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

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

- ☒ **(A) The UN Sustainable Development Goals (SDGs) and targets**
- ☒ **(B) The UNFCCC Paris Agreement**
- ☒ **(C) The UN Guiding Principles on Business and Human Rights (UNGPs)**
- ☒ **(D) OECD frameworks: OECD Guidelines for Multinational Enterprises and Guidance on Responsible Business Conduct for Institutional Investors**
- ☒ **(E) The EU Taxonomy**
- ☒ **(F) Other relevant taxonomies**

Specify:

Sustainable Finance Disclosure Regulation (SFDR)

- ☒ **(G) The International Bill of Human Rights**

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

☐ (I) The Convention on Biological Diversity

☒ (J) Other international framework(s)

Specify:

UN Global Compact

☐ (K) Other regional framework(s)

☐ (L) Other sectoral/issue-specific framework(s)

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

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

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

☒ (A) Identify sustainability outcomes that are closely linked to our core investment activities

☒ (B) Consult with key clients and/or beneficiaries to align with their priorities

☐ (C) Assess which actual or potential negative outcomes for people are most severe based on their scale, scope, and irremediable character

☒ (D) Identify sustainability outcomes that are closely linked to systematic sustainability issues

☐ (E) Analyse the input from different stakeholders (e.g. affected communities, civil society, trade unions or similar)

☒ (F) Understand the geographical relevance of specific sustainability outcome objectives

☐ (G) Other method

☐ (H) We have not yet determined the most important sustainability outcomes connected to our investment activities

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

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

☒ (A) Yes, we have taken action on some of the specific sustainability outcomes connected to our investment activities

☐ (B) No, we have not yet taken action on any specific sustainability outcomes connected to our investment activities

MANAGER SELECTION, APPOINTMENT AND MONITORING (SAM)

OVERALL APPROACH

EXTERNAL INVESTMENT MANAGERS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SAM 1	CORE	OO 21	N/A	PUBLIC	External investment managers	4

For the majority of your externally managed AUM in each asset class, which responsible investment aspects does your organisation consider important in the assessment of external investment managers?

(5) Private equity

Organisation

(A) Commitment to and experience in responsible investment



(B) Responsible investment policy(ies)



(C) Governance structure and senior-level oversight and accountability



People and Culture

(D) Adequate resourcing and incentives



(E) Staff competencies and experience in responsible investment



Investment Process

(F) Incorporation of material ESG factors in the investment process



(G) Incorporation of risks connected to systematic sustainability issues in the investment process	☒
(H) Incorporation of material ESG factors and ESG risks connected to systematic sustainability issues in portfolio risk assessment	☒
Stewardship	
(I) Policy(ies) or guidelines on stewardship	☒
(J) Policy(ies) or guidelines on (proxy) voting	☐
(K) Use of stewardship tools and activities	☒
(L) Incorporation of risks connected to systematic sustainability issues in stewardship practices	☒
(M) Involvement in collaborative engagement and stewardship initiatives	☒
(N) Engagement with policy makers and other non-investee stakeholders	☒
(O) Results of stewardship activities	☒
Performance and Reporting	
(P) ESG disclosure in regular client reporting	☒
(Q) Inclusion of ESG factors in contractual agreements	☒
(R) We do not consider any of the above responsible investment aspects important in the assessment of external investment managers	☐

SERVICE PROVIDERS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SAM 2	CORE	OO 21	N/A	PUBLIC	Service providers	4

Which responsible investment aspects does your organisation consider important when assessing all service providers that advise you in the selection, appointment and/or monitoring of external investment managers?

- ☐ (A) Incorporation of their responsible investment policy into advisory services
- ☐ (B) Ability to accommodate our responsible investment policy
- ☐ (C) Level of staff's responsible investment expertise
- ☐ (D) Use of data and analytical tools to assess the external investment manager's responsible investment performance
- ☐ (E) Other
- ☐ (F) We do not consider any of the above responsible investment aspects important when assessing service providers that advise us in the selection, appointment and/or monitoring of external investment managers
- ☒ (G) Not applicable; we do not engage service providers in the selection, appointment or monitoring of external investment managers

SELECTION

RESPONSIBLE INVESTMENT PRACTICES

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SAM 4	CORE	OO 12, OO 21	SAM 5, SAM 6, SAM 7	PUBLIC	Responsible investment practices	General

During the reporting year, did your organisation select new external investment managers or allocate new mandates to existing investment managers?

- ☒ (A) Yes, we selected external investment managers or allocated new mandates to existing investment managers during the reporting year
- ☐ (B) No, we did not select new external investment managers or allocate new mandates to existing investment managers during the reporting year
- ☐ (C) Not applicable; our organisation is in a captive relationship with external investment managers, which applies to 90% or more of our AUM

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SAM 5	CORE	SAM 4	N/A	PUBLIC	Responsible investment practices	4

During the reporting year, what responsible investment aspects did your organisation, or the service provider acting on your behalf, review and evaluate when selecting new external investment managers or allocating new mandates to existing investment managers?

Organisation

☒ **(A) Commitment to and experience in responsible investment (e.g. commitment to responsible investment principles and standards)**

Select from dropdown list

- ☒ **(1) for all of our mandates**
- ☐ (2) for a majority of our mandates
- ☐ (3) for a minority of our mandates

☒ **(B) Responsible investment policy(ies) (e.g. the alignment of their responsible investment policy with the investment mandate)**

Select from dropdown list

- ☒ **(1) for all of our mandates**
- ☐ (2) for a majority of our mandates
- ☐ (3) for a minority of our mandates

☒ **(C) Governance structure and senior-level oversight and accountability (e.g. the adequacy of their governance structure and reported conflicts of interest)**

Select from dropdown list

- ☒ **(1) for all of our mandates**
- ☐ (2) for a majority of our mandates
- ☐ (3) for a minority of our mandates

People and Culture

☒ **(D) Adequate resourcing and incentives (e.g. their team structures, operating model and remuneration structure, including alignment of interests)**

Select from dropdown list

- ☒ **(1) for all of our mandates**
- ☐ (2) for a majority of our mandates
- ☐ (3) for a minority of our mandates

☒ **(E) Staff competencies and experience in responsible investment (e.g. level of responsible investment responsibilities in their investment team, their responsible investment training and capacity building)**

Select from dropdown list

- ☒ **(1) for all of our mandates**
- ☐ (2) for a majority of our mandates
- ☐ (3) for a minority of our mandates

Investment Process

☒ **(F) Incorporation of material ESG factors in the investment process (e.g. detail and evidence of how such factors are incorporated into the selection of individual assets and in portfolio construction)**

Select from dropdown list

- ☒ **(1) for all of our mandates**
- ☐ (2) for a majority of our mandates
- ☐ (3) for a minority of our mandates

☒ **(G) Incorporation of risks connected to systematic sustainability issues in the investment process (e.g. detail and evidence of how such risks are incorporated into the selection of individual assets and in portfolio construction)**

Select from dropdown list

- ☒ **(1) for all of our mandates**
- ☐ (2) for a majority of our mandates
- ☐ (3) for a minority of our mandates

- ☒ (H) Incorporation of material ESG factors and ESG risks connected to systematic sustainability issues in portfolio risk assessment (e.g. their process to measure and report such risks)

Select from dropdown list

- ☒ (1) for all of our mandates
- ☐ (2) for a majority of our mandates
- ☐ (3) for a minority of our mandates

Performance and Reporting

- ☒ (I) ESG disclosure in regular client reporting

Select from dropdown list

- ☒ (1) for all of our mandates
- ☐ (2) for a majority of our mandates
- ☐ (3) for a minority of our mandates

- ☒ (J) Inclusion of ESG factors in contractual agreements

Select from dropdown list

- ☒ (1) for all of our mandates
- ☐ (2) for a majority of our mandates
- ☐ (3) for a minority of our mandates

- ☐ (K) We did not review and evaluate any of the above responsible investment aspects when selecting new external investment managers or allocating new mandates to existing investment managers during the reporting year

STEWARDSHIP

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SAM 6	CORE	OO 8, OO 21, SAM 4	N/A	PUBLIC	Stewardship	4

During the reporting year, which aspects of the stewardship approach did your organisation, or the service provider acting on your behalf, review and evaluate when selecting new external investment managers or allocating new mandates to existing investment managers?

- ☒ (A) The alignment of their policy(ies) or guidelines on stewardship with the investment mandate

Select from dropdown list

- ☒ (1) for all of our mandates
- ☐ (2) for a majority of our mandates
- ☐ (3) for a minority of our mandates

- ☒ (B) Evidence of how they implemented their stewardship objectives, including the effectiveness of their activities

Select from dropdown list

- ☒ (1) for all of our mandates
- ☐ (2) for a majority of our mandates
- ☐ (3) for a minority of our mandates

- ☒ (C) Their participation in collaborative engagements and stewardship initiatives

Select from dropdown list

- ☒ (1) for all of our mandates
- ☐ (2) for a majority of our mandates
- ☐ (3) for a minority of our mandates

- ☒ (D) Details of their engagements with companies or issuers on risks connected to systematic sustainability issues

Select from dropdown list

- ☒ (1) for all of our mandates
- ☐ (2) for a majority of our mandates
- ☐ (3) for a minority of our mandates

- ☐ (E) Details of their engagement activities with policy makers

- ☒ (F) Their escalation process and the escalation tools included in their policy on stewardship

Select from dropdown list

- ☒ (1) for all of our mandates
- ☐ (2) for a majority of our mandates
- ☐ (3) for a minority of our mandates

- (G) We did not review and evaluate any of the above aspects of the stewardship approach when selecting new external investment managers or allocating new mandates to existing investment managers during the reporting year

MONITORING

RESPONSIBLE INVESTMENT PRACTICES

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SAM 9	CORE	OO 14, OO 21	N/A	PUBLIC	Responsible investment practices	4

For the majority of your externally managed AUM in each asset class, which aspects of your external investment managers' responsible investment practices did your organisation, or the service provider acting on your behalf, monitor during the reporting year?

(5) Private equity

Organisation

(A) Commitment to and experience in responsible investment (e.g. commitment to responsible investment principles and standards)



(B) Responsible investment policy(ies) (e.g. the continued alignment of their responsible investment policy with the investment mandate)



(C) Governance structure and senior level oversight and accountability (e.g. the adequacy of their governance structure and reported conflicts of interest)



People and Culture

(D) Adequate resourcing and incentives (e.g. their team structures, operating model and remuneration structure, including alignment of interests)



(E) Staff competencies and experience in responsible investment (e.g. level of responsible investment responsibilities in their investment team, their responsible investment training and capacity building)

☒

Investment Process

(F) Incorporation of material ESG factors in the investment process (e.g. detail and evidence of how such factors are incorporated into the selection of individual assets and in portfolio construction)

☒

(G) Incorporation of risks connected to systematic sustainability issues in the investment process (e.g. detail and evidence of how such risks are incorporated into the selection of individual assets and in portfolio construction)

☒

(H) Incorporation of material ESG factors and ESG risks connected to systematic sustainability issues in portfolio risk assessment (e.g. their process to measure and report such risks, their response to ESG incidents)

☒

Performance and Reporting

(I) ESG disclosure in regular client reporting (e.g. any changes in their regular client reporting)

☒

(J) Inclusion of ESG factors in contractual agreements

☒

(K) We did not monitor any of the above aspects of our external investment managers' responsible investment practices during the reporting year

☐

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SAM 12	CORE	OO 14, OO 21	N/A	PUBLIC	Responsible investment practices	1

For the majority of your externally managed AUM in each asset class, how often does your organisation, or the service provider acting on your behalf, monitor your external investment managers' responsible investment practices?

(5) Private equity

(A) At least annually	☒
(B) Less than once a year	☐
(C) On an ad hoc basis	☒

STEWARDSHIP

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SAM 13	CORE	OO 8, OO 21	N/A	PUBLIC	Stewardship	1, 2

For the majority of your externally managed AUM in each asset class, which aspects of your external investment managers' stewardship practices did your organisation, or the service provider acting on your behalf, monitor during the reporting year?

(5) Private equity

(A) Any changes in their policy(ies) or guidelines on stewardship	☒
(B) The degree of implementation of their policy(ies) or guidelines on stewardship	☒
(C) How they prioritise material ESG factors	☒
(D) How they prioritise risks connected to systematic sustainability issues	☒

(E) Their investment team's level of involvement in stewardship activities	☒
(F) Whether the results of stewardship actions were fed back into the investment process and decisions	☐
(G) Whether they used a variety of stewardship tools and activities to advance their stewardship priorities	☒
(H) The deployment of their escalation process in cases where initial stewardship efforts were unsuccessful	☐
(I) Whether they participated in collaborative engagements and stewardship initiatives	☒
(J) Whether they had an active role in collaborative engagements and stewardship initiatives	☐
(K) Other	☐
(L) We did not monitor our external investment managers' stewardship practices during the reporting year	☐

ENGAGEMENT AND ESCALATION

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SAM 16	CORE	OO 14, OO 21	N/A	PUBLIC	Engagement and escalation	4

What actions does your organisation, or the service provider acting on your behalf, include in its formal escalation process to address concerns raised during monitoring of your external investment managers' responsible investment practices?

(5) Private equity

(A) Engagement with their investment professionals, investment committee or other representatives



(B) Notification about their placement on a watch list or relationship coming under review



(C) Reduction of capital allocation to the external investment managers until any concerns have been rectified



(D) Termination of the contract if failings persist over a (notified) period, including an explanation of the reasons for termination



(E) Holding off selecting the external investment managers for new mandates or allocating additional capital until any concerns have been rectified



(F) Other



(G) Our organisation does not have a formal escalation process to address concerns raised during monitoring



VERIFICATION

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SAM 17	CORE	OO 14, OO 21	N/A	PUBLIC	Verification	1

For the majority of your externally managed AUM in each asset class, how did your organisation, or the service provider acting on your behalf, verify that the information reported by external investment managers on their responsible investment practices was correct during the reporting year?

(5) Private equity

(A) We checked that the information reported was verified through a third-party assurance process



(B) We checked that the information reported was verified by an independent third party



(C) We checked for evidence of internal monitoring or compliance



(D) Other



(E) We did not verify the information reported by external investment managers on their responsible investment practices during the reporting year



LISTED EQUITY (LE)

OVERALL APPROACH

MATERIALITY ANALYSIS

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

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

	(2) Active - quantitative	(3) Active - fundamental
(A) Yes, our investment process incorporates material governance factors	(1) for all of our AUM	(1) for all of our AUM
(B) Yes, our investment process incorporates material environmental and social factors	(1) for all of our AUM	(1) for all of our AUM
(C) Yes, our investment process incorporates material ESG factors beyond our organisation's average investment holding period	(1) for all of our AUM	(1) for all of our AUM
(D) No, we do not have a formal process. Our investment professionals identify material ESG factors at their discretion	○	○
(E) No, we do not have a formal or informal process to identify and incorporate material ESG factors	○	○

MONITORING ESG TRENDS

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

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

	(2) Active - quantitative	(3) Active - fundamental
(A) Yes, we have a formal process that includes scenario analyses	(1) for all of our AUM	(1) for all of our AUM
(B) Yes, we have a formal process, but it does not include scenario analyses		
(C) We do not have a formal process for our listed equity strategies; our investment professionals monitor how ESG trends vary over time at their discretion	○	○
(D) We do not monitor and review the implications of changing ESG trends on our listed equity strategies	○	○

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

Neuberger Berman has implemented top-down scenario analysis for modelling transition and physical risks at the company level in line with the recommendations of the Task Force on Climate-Related Financial Disclosures (TCFD). Multiple scenarios estimate the impact of warming average temperatures under a 1.5°C orderly and disorderly scenario, 2°C orderly and disorderly scenario and 3°C scenario. The analysis measures physical climate risks, such as the impact of extreme weather events, wildfires and floods, as well as transition risks, which are business risks associated with the net-zero transition. Different securities and companies will have varying levels of exposure to physical risk depending on the nature of their business models and physical locations. Additionally, the analysis considers potential regulatory costs, as well as technology opportunities related to low carbon technology solutions for companies that need to comply with GHG reduction requirements. The portfolio analytics output helps us understand the Climate Value-at-Risk ("CVaR") for the portfolio. We disclose the CVaR based on our climate scenario analysis for our overall listed equity business in our TCFD report.

PRE-INVESTMENT

ESG INCORPORATION IN RESEARCH

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

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

	(1) Active - quantitative	(2) Active - fundamental
(A) We incorporate material governance-related risks into our financial analysis and equity valuation or security rating process	(2) in a majority of cases	(1) in all cases
(B) We incorporate material environmental and social risks into our financial analysis and equity valuation or security rating process	(2) in a majority of cases	(2) in a majority of cases
(C) We incorporate material environmental and social risks related to companies' supply chains into our financial analysis and equity valuation or security rating process	(3) in a minority of cases	(2) in a majority of cases
(D) We do not incorporate material ESG risks into our financial analysis, equity valuation or security rating processes	○	○

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

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

	(2) Active - quantitative	(3) Active - fundamental
(A) We incorporate qualitative and/or quantitative information on current performance across a range of material ESG factors	(1) in all cases	(2) in a majority of cases
(B) We incorporate qualitative and/or quantitative information on historical performance across a range of material ESG factors	(1) in all cases	(2) in a majority of cases
(C) We incorporate qualitative and/or quantitative information on material ESG factors that may impact or influence future corporate revenues and/or profitability	(1) in all cases	(2) in a majority of cases
(D) We incorporate qualitative and/or quantitative information enabling current, historical and/or future performance comparison within a selected peer group across a range of material ESG factors	(1) in all cases	(2) in a majority of cases
(E) We do not incorporate qualitative or quantitative information on material ESG factors when assessing the ESG performance of companies in our financial analysis, equity investment or portfolio construction process	○	○

ESG INCORPORATION IN PORTFOLIO CONSTRUCTION

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

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

	(2) Active - quantitative	(3) Active - fundamental
(A) Material ESG factors contribute to the selection of individual assets and/or sector weightings within our portfolio construction and/or benchmark selection process	(2) for a majority of our AUM	(2) for a majority of our AUM
(B) Material ESG factors contribute to the portfolio weighting of individual assets within our portfolio construction and/or benchmark selection process	(2) for a majority of our AUM	(2) for a majority of our AUM
(C) Material ESG factors contribute to the country or region weighting of assets within our portfolio construction and/or benchmark selection process	(3) for a minority of our AUM	(2) for a majority of our AUM
(D) Other ways material ESG factors contribute to your portfolio construction and/or benchmark selection process		
(E) Our stock selection, portfolio construction or benchmark selection process does not include the incorporation of material ESG factors	○	○

POST-INVESTMENT

ESG RISK MANAGEMENT

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

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

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

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

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

	(1) Active - quantitative	(2) Active - fundamental
(A) Yes, our formal process includes reviews of quantitative and/or qualitative information on material ESG risks and ESG incidents and their implications for individual listed equity holdings	☒	☒
(B) Yes, our formal process includes reviews of quantitative and/or qualitative information on material ESG risks and ESG incidents and their implications for other listed equity holdings exposed to similar risks and/or incidents	☒	☒

(C) Yes, our formal process includes reviews of quantitative and/or qualitative information on material ESG risks and ESG incidents and their implications for our stewardship activities	☒	☒
(D) Yes, our formal process includes ad hoc reviews of quantitative and/or qualitative information on severe ESG incidents	☒	☒
(E) We do not have a formal process to identify and incorporate material ESG risks and ESG incidents into our risk management process; our investment professionals identify and incorporate material ESG risks and ESG incidents at their discretion	☐	☐
(F) We do not have a formal process to identify and incorporate material ESG risks and ESG incidents into our risk management process	☐	☐

DISCLOSURE OF ESG SCREENS

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

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

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

FIXED INCOME (FI)

OVERALL APPROACH

MATERIALITY ANALYSIS

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

Does your organisation have a formal investment process to identify and incorporate material ESG factors across your fixed income assets?

	(1) SSA	(2) Corporate	(3) Securitised	(4) Private debt
(A) Yes, our investment process incorporates material governance factors	(1) for all of our AUM	(1) for all of our AUM	(2) for a majority of our AUM	(1) for all of our AUM
(B) Yes, our investment process incorporates material environmental and social factors	(1) for all of our AUM	(1) for all of our AUM	(2) for a majority of our AUM	(1) for all of our AUM
(C) Yes, our investment process incorporates material ESG factors depending on different investment time horizons	(1) for all of our AUM	(1) for all of our AUM	(1) for all of our AUM	(1) for all of our AUM
(D) No, we do not have a formal process; our investment professionals identify material ESG factors at their discretion	○	○	○	○
(E) No, we do not have a formal or informal process to identify and incorporate material ESG factors	○	○	○	○

MONITORING ESG TRENDS

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

Does your organisation have a formal process for monitoring and reviewing the implications of changing ESG trends across your fixed income assets?

	(1) SSA	(2) Corporate	(3) Securitised
(A) Yes, we have a formal process that includes scenario analyses	(2) for a majority of our AUM	(1) for all of our AUM	
(B) Yes, we have a formal process, but does it not include scenario analyses			(2) for a majority of our AUM
(C) We do not have a formal process for our fixed income assets; our investment professionals monitor how ESG trends vary over time at their discretion	○	○	○
(D) We do not monitor and review the implications of changing ESG trends on our fixed income assets	○	○	○

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

In line with our belief that ESG analysis should be based on materiality and customized by asset class and investment style, it is primarily the responsibility of each portfolio manager to integrate climate-related risks into their respective investment process in a manner that is appropriate for investment decision-making.

With Board and senior leadership team's oversight, we have developed analytical capabilities for understanding and managing transition and physical risks and opportunities across key asset classes. We consider climate scenario analysis for all listed equity and corporate bond portfolios. The security analysis results in an aggregate Climate Value-at-Risk ("Climate VaR") at the portfolio level based on a range of scenarios including those aligned with a 2° Celsius and a 1.5° Celsius transition. Climate VaR is reviewed at least annually for each investment strategy and the security-specific Climate VaR will help identify opportunities for engagement with companies.

Data and analysis of climate change risks and opportunities are already incorporated into our NB ESG Quotient, our proprietary ESG ratings for securities (corporates and sovereigns) where our analysts believe them to be potentially material to financial performance. These ratings are used by portfolio managers in portfolio construction in a manner which is appropriate for the specific asset class and investment style of the strategy. For example, the low ESG rating assigned by our analysts for U.S.-coal utilities directly leads to a notching down of our internal credit ratings for those issuers.

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

The consideration of transition and physical climate risks in non-corporate asset classes such as sovereign credit and securitised credit is limited by the availability of reliable data and appropriate scenario analysis models. However, we do incorporate material environmental factors such as carbon emissions trends, and physical assets at risk in our NB ESG Quotient and risk assessment models.

PRE-INVESTMENT

ESG INCORPORATION IN RESEARCH

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

For the majority of your fixed income investments, does your organisation incorporate material ESG factors when assessing their credit quality?

	(1) SSA	(2) Corporate	(3) Securitised	(4) Private debt
(A) We incorporate material environmental and social factors	☒	☒	☒	☒
(B) We incorporate material governance-related factors	☒	☒	☒	☒
(C) We do not incorporate material ESG factors for the majority of our fixed income investments	☐	☐	☐	☐

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

Does your organisation have a framework that differentiates ESG risks by issuer country, region and/or sector?

	(1) SSA	(2) Corporate	(3) Securitised	(4) Private debt
(A) Yes, we have a framework that differentiates ESG risks by country and/or region (e.g. local governance and labour practices)	(1) for all of our AUM	(1) for all of our AUM	(2) for a majority of our AUM	(1) for all of our AUM
(B) Yes, we have a framework that differentiates ESG risks by sector	(1) for all of our AUM	(1) for all of our AUM	(1) for all of our AUM	(1) for all of our AUM

(C) No, we do not have a framework that differentiates ESG risks by issuer country, region and/or sector

○

○

○

○

(D) Not applicable; we are not able to differentiate ESG risks by issuer country, region and/or sector due to the limited universe of our issuers

○

○

○

○

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
FI 5	CORE	OO 21	N/A	PUBLIC	ESG incorporation in research	1

How does your organisation incorporate material ESG factors when selecting private debt investments during the due diligence phase?

☒ **(A) We use a qualitative ESG checklist**

Select from dropdown list:

☒ **(1) in all cases**

☐ (2) in a majority of cases

☐ (3) in a minority of cases

☒ **(B) We assess quantitative information on material ESG factors, such as energy consumption, carbon footprint and gender diversity**

Select from dropdown list:

☒ **(1) in all cases**

☐ (2) in a majority of cases

☐ (3) in a minority of cases

☒ **(C) We check whether the target company has its own responsible investment policy, sustainability policy or ESG policy**

Select from dropdown list:

☒ **(1) in all cases**

☐ (2) in a majority of cases

☐ (3) in a minority of cases

☒ **(D) We hire third-party consultants to do technical due diligence on specific material ESG factors where internal capabilities are not available**

Select from dropdown list:

☒ **(1) in all cases**

☐ (2) in a majority of cases

☐ (3) in a minority of cases

☒ **(E) We require the review and sign-off of our ESG due diligence process by our investment committee, or the equivalent function**

Select from dropdown list:

☒ **(1) in all cases**

☐ (2) in a majority of cases

☐ (3) in a minority of cases

☐ (F) We use industry-recognised responsible investment due diligence questionnaire (DDQ) templates

☒ **(G) We use another method of incorporating material ESG factors when selecting private debt investments during the due diligence process**

Specify:

NB Private Debt performs ESG due diligence on the asset with a materiality-based assessment by industry of potential ESG risks. Each category (workforce, supply chain, environmental, governance) is rated as a low, moderate or high potential material ESG factor. The team also performs ESG analysis on the private equity sponsor with an assessment of sponsor's level of ESG integration at both the firm and fund strategy levels. Funds and sponsors are given a rating based on degree of ESG integration. Ratings range from 1 to 4, applying the following formula: Absent = 1, Initial = 2, Developing = 3, Integrated = 4.

Select from dropdown list:

- ☒ (1) in all cases
- ☐ (2) in a majority of cases
- ☐ (3) in a minority of cases
- ☐ (H) We do not incorporate material ESG factors when selecting private debt investments during the due diligence phase

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

How do you incorporate significant changes in material ESG factors over time into your fixed income asset valuation process?

	(1) SSA	(2) Corporate	(3) Private debt
(A) We incorporate it into the forecast of financial metrics or other quantitative assessments	(1) for all of our AUM	(1) for all of our AUM	(1) for all of our AUM
(B) We make a qualitative assessment of how material ESG factors may evolve	(1) for all of our AUM	(1) for all of our AUM	(1) for all of our AUM
(C) We do not incorporate significant changes in material ESG factors	☐	☐	☐

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
FI 7	CORE	OO 21	N/A	PUBLIC	ESG incorporation in research	1

At what level do you incorporate material ESG factors into the risks and/or returns of your securitised products?

- ☒ (A) At both key counterparties' and at the underlying collateral pool's levels

Explain: (Voluntary)

The securitised sub-sector and nature of exposure will guide the level at which ESG factors are integrated. For example, exposure linked to US Government Sponsored Enterprises benefitting from a government guarantee will be assessed at the counterparty level, while exposure linked to specific collateral will be assessed based on our understanding of pool characteristics, including sector relevant ESG criteria, and provisions for risk mitigation.

- ☐ (B) At key counterparties' level only
- ☐ (C) At the underlying collateral pool's level only

ESG INCORPORATION IN PORTFOLIO CONSTRUCTION

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
FI 8	CORE	OO 21	N/A	PUBLIC	ESG incorporation in portfolio construction	1

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

	(1) SSA	(2) Corporate	(3) Securitised
(A) Material ESG factors contribute to the selection of individual assets and/or sector weightings within our portfolio construction and/or benchmark selection process	(1) for all of our AUM	(1) for all of our AUM	(1) for all of our AUM
(B) Material ESG factors contribute to determining the holding period of individual assets within our portfolio construction and/or benchmark selection process	(3) for a minority of our AUM	(3) for a minority of our AUM	(3) for a minority of our AUM
(C) Material ESG factors contribute to the portfolio weighting of individual assets within our portfolio construction and/or benchmark selection process	(1) for all of our AUM	(1) for all of our AUM	(1) for all of our AUM
(D) Material ESG factors contribute to the country or region weighting of assets within our portfolio construction and/or benchmark selection process	(1) for all of our AUM	(1) for all of our AUM	(1) for all of our AUM
(E) Material ESG factors contribute to our portfolio construction and/or benchmark selection process in other ways			
(F) Our security selection, portfolio construction or benchmark selection process does not include the incorporation of material ESG factors	○	○	○

POST-INVESTMENT

ESG RISK MANAGEMENT

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
FI 11	CORE	OO 21	N/A	PUBLIC	ESG risk management	1

How are material ESG factors incorporated into your portfolio risk management process?

	(1) SSA	(2) Corporate	(3) Securitised	(4) Private debt
(A) Investment committee members, or the equivalent function or group, can veto investment decisions based on ESG considerations	(1) for all of our AUM	(1) for all of our AUM	(1) for all of our AUM	(1) for all of our AUM
(B) Companies, sectors, countries and/or currencies are monitored for changes in exposure to material ESG factors and any breaches of risk limits	(1) for all of our AUM	(1) for all of our AUM	(1) for all of our AUM	(1) for all of our AUM
(C) Overall exposure to specific material ESG factors is measured for our portfolio construction, and sizing or hedging adjustments are made depending on the individual issuer or issue sensitivity to these factors	(1) for all of our AUM	(1) for all of our AUM	(2) for a majority of our AUM	(1) for all of our AUM
(D) We use another method of incorporating material ESG factors into our portfolio's risk management process				
(E) We do not have a process to incorporate material ESG factors into our portfolio's risk management process	○	○	○	○

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
FI 12	CORE	OO 21	N/A	PUBLIC	ESG risk management	1

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

	(1) SSA	(2) Corporate	(3) Securitised	(4) Private debt
(A) Yes, our formal process includes reviews of quantitative and/or qualitative information on material ESG risks and ESG incidents and their implications for individual fixed income holdings	☒	☒	☒	☒
(B) Yes, our formal process includes reviews of quantitative and/or qualitative information on material ESG risks and ESG incidents, and their implications for other fixed income holdings exposed to similar risks and/or incidents	☒	☒	☒	☒
(C) Yes, our formal process includes reviews of quantitative and/or qualitative information on material ESG risks and ESG incidents, and their implications for our stewardship activities	☒	☒	☒	☒
(D) Yes, our formal process includes ad hoc reviews of quantitative and/or qualitative information on severe ESG incidents	☒	☒	☒	☒
(E) We do not have a formal process to identify and incorporate ESG risks and ESG incidents; our investment professionals identify and incorporate ESG risks and ESG incidents at their discretion	☐	☐	☐	☐
(F) We do not have a formal process to identify and incorporate ESG risks and ESG incidents into our risk management process	☐	☐	☐	☐

PERFORMANCE MONITORING

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
FI 13	CORE	OO 21	N/A	PUBLIC	Performance monitoring	1

During the reporting year, how did your organisation incorporate material ESG factors when monitoring private debt investments?

☒ (A) We used a qualitative ESG checklist

Select from dropdown list:

- ☐ (1) in all cases
- ☒ (2) in the majority of cases
- ☐ (3) in the minority of cases

☒ (B) We assessed quantitative information on material ESG factors, such as energy consumption, carbon footprint and gender diversity

Select from dropdown list:

- ☒ (1) in all cases
- ☐ (2) in the majority of cases
- ☐ (3) in the minority of cases

☐ (C) We hired third-party consultants to do technical assessment on specific material ESG factors where internal capabilities were not available

☒ (D) We used industry body guidelines

Select from dropdown list:

- ☒ (1) in all cases
- ☐ (2) in the majority of cases
- ☐ (3) in the minority of cases

☐ (E) We used another method to incorporate material ESG factors into the monitoring of private debt investments

☐ (F) We did not incorporate material ESG factors when monitoring private debt investments

DISCLOSURE OF ESG SCREENS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
FI 18	CORE	OO 17 FI, OO 21	N/A	PUBLIC	Disclosure of ESG screens	6

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

☒ (A) We share a list of ESG screens

☒ (B) We share any changes in ESG screens

☐ (C) We explain any implications of ESG screens, such as any deviation from a benchmark or impact on sector weightings

☐ (D) We do not share the above information for all our fixed income assets subject to ESG screens

CONFIDENCE-BUILDING MEASURES (CBM)

CONFIDENCE-BUILDING MEASURES

APPROACH TO CONFIDENCE-BUILDING MEASURES

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

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

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

INTERNAL AUDIT

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
CBM 4	CORE	OO 21, CBM 1	N/A	PUBLIC	Internal audit	6

What responsible investment processes and/or data were audited through your internal audit function?

- ☒ (A) Policy, governance and strategy
 - Select from dropdown list:
 - ☐ (1) Data internally audited
 - ☐ (2) Processes internally audited
 - ☒ (3) Processes and data internally audited
- ☒ (B) Manager selection, appointment and monitoring
 - Select from dropdown list:
 - ☐ (1) Data internally audited
 - ☐ (2) Processes internally audited
 - ☒ (3) Processes and data internally audited
- ☒ (C) Listed equity
 - Select from dropdown list:
 - ☐ (1) Data internally audited

- (2) Processes internally audited
- (3) Processes and data internally audited

☒ (D) Fixed income

Select from dropdown list:

- (1) Data internally audited
- (2) Processes internally audited
- (3) Processes and data internally audited

INTERNAL REVIEW

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

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

- ☐ (A) Board, trustees, or equivalent
- ☒ (B) Senior executive-level staff, investment committee, head of department, or equivalent

Sections of PRI report reviewed

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