

HOW WE SCREEN



Performance with principles®

Why do you screen?

Screening is one of EdenTree's four core pillars that support our approach to responsible and sustainable investment. Screening, at its simplest, entails reviewing the suitability of companies to be included in our funds in accordance with their ethical, ESG and thematic policies.



EdenTree's 'Performance with Principles' approach means we aim to achieve superior long-term performance delivered responsibly and sustainably. Ever since the launch of our first screened fund in 1988, we have taken ethical considerations into account as well as environmental, social and governance (ESG) issues. We strongly believe that investing should not compromise values, which is why we apply a robust screening process, avoiding companies that cause harm and seeking to invest in companies that are good corporate citizens.

What screening criteria are applied?

To be considered suitable for inclusion within our range of responsible, sustainable and impactful funds, an investment idea must meet the criteria laid down in this screening model.

The ten absence of harm criteria that make up Ethics/Values aim to avoid activities that are harmful to society. Companies that derive more than ten percent of their profits or turnover from these activities are excluded from our portfolios.

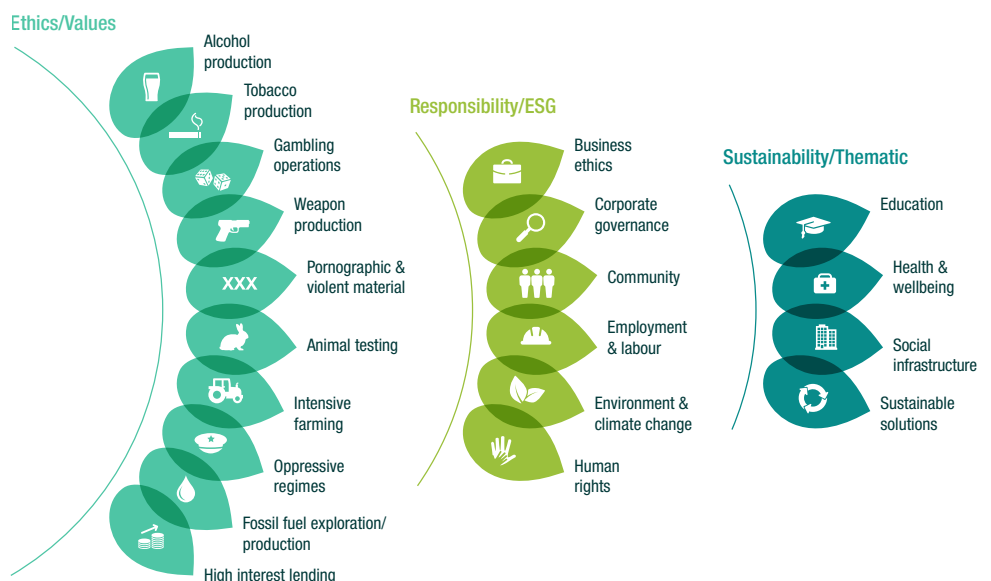
We then integrate six areas of business risk under the Responsibility/ESG screen. Although this screen is designed to commend stocks into the Funds, they can also act as a brake on investment.

Finally, we look at companies through a thematic lens and consider the positive sustainability case in terms of products and services. The thematic focus varies across our different strategies; the majority of our funds have a positive weighting towards Education, Health & Wellbeing, Social Infrastructure and Sustainable Solutions, whilst our newly launched Green Infrastructure and Green Future Funds have a specific thematic focus on environmental solutions.

For the Responsible and Sustainable Fund range the RI Team is the ultimate arbiter in deciding whether a holding is suitable for inclusion. Given their sole focus on environmental solutions, the two products in the 'Green' Impactful Fund range follow an integrated approach to assessing ESG risks, with the Fund Managers working closely with (but not directed by) the RI Team.

Sustainability criteria

Our responsible and sustainable screening captures the quality and strength of a company's approach to sustainable business. This includes assessing a diverse range of indicators including environment and climate change, conflict minerals, custody of supply in raw materials sourcing (e.g. timber) and pollution. By way of example when specifically assessing corporate sustainability as it relates to climate change we would analyse key indicators such as emissions disclosure, how targets are set, whether they are science based and ambitious enough to demonstrate commitment to a low carbon economy and whether the company is providing solutions that support climate resilience, mitigation and / or adaptation.



What exclusion criteria do you apply?

The ten exclusion criteria which make up the Ethics/ Values screen, aim to avoid activities that are harmful to society. Companies that derive more than ten percent of their profits or turnover from these activities are excluded from our universe of investible stocks.

- **Alcohol production:** Manufacturers of alcoholic beverages, but not retailers (except dedicated pub companies).
- **Gambling operations:** Includes betting shops, internet sites, bingo and casino, racing venues, lotteries and the supply of gaming machines.
- **Pornographic & violent materials:** Includes print, digital and broadcast media plus companies operating dedicated licensed sex premises showing live shows. Also captures violent materials, for example some developers of video games.
- **Conventional weapon production:** The manufacture of weapons and weapon systems or goods and services specifically to support those systems.
- **Tobacco production:** The manufacture of tobacco products, but not tobacco retailers.
- **Intensive farming:** Companies involved in intensive farming in the beef, dairy, poultry and fish sectors.
- **Fossil fuel exploration & production:** Oil & gas exploration & production, as well as thermal coal extraction and production.
- **High Interest Lending (non-standard sub-prime credit):** Companies operating wholly or mainly in high interest lending (non-standard sub-prime credit) where this is defined as (and limited to) door-stop lending, pay-day loans and/ or pawn-broking sub-prime credit.

Specific policies have been produced to cover other areas including indiscriminate or strategic weaponry; animal testing; and oppressive regimes.

- **Animal testing:** We will seek to avoid companies that use animals to test cosmetic or household products. We do invest in pharmaceuticals companies that may conduct animal testing, but we encourage them to adopt the 3R principles refine, reduce, and replace.
- **Oppressive regimes:** Based on our proprietary, weighted system we seek to avoid companies operating in countries identified as being oppressive regimes; these are reviewed on a case-by-case basis. [Click here](#).
- **Unconventional weapons:** We seek to avoid companies with exposure to the manufacture of unconventional weapons, defined as nuclear, biological and chemical weapons, land mines and cluster bombs.

How do you assess ESG risks?

We assess investment ideas across six areas of potential business risk, which forms the Responsibility/ESG screen. This informs the decision making process as to whether a company is suitable for inclusion in the Funds or not. The Responsibility/ESG risk criteria may also act as a brake on investment.

- **Business Ethics** – includes codes of conduct, ethical practices, culture and behaviours, ethical sourcing, supply chain, taxation and lobbying.
- **Community** – includes license to operate, giving programmes, employing local people, offering work placement schemes.
- **Corporate Governance** – includes code compliance with ‘market best practice’, commitment to the standards of good governance practice and process.
- **Environment & Climate Change** – includes climate change, GHG emissions, natural capital, water and waste, biodiversity, air pollution and supporting renewable energy.
- **Employment & Labour** – includes promoting equal opportunity and diversity, anti-discrimination, health & safety, fair reward structures including Living Wage, union representation, ILO Conventions, whistle-blower protection.
- **Human Rights** – includes support for UN Universal Declaration of Human Rights, bonded, child and forced labour, land rights, indigenous people.

Each business risk is assessed and we look at companies’ policies, disclosure and targets, as well as any controversies. We then apply a ‘traffic light’ system for the responsible and sustainable fund range, assigning a green, red or amber flag to each of the ESG risks as we analyse them:

Responsibility/ ESG (Positive) Criteria: Conclusion		
Business Ethics	Community	Corporate Governance
Employment & Labour	Environmental & Climate Management	Human Rights

Poor disclosure might lead to amber, as might evidence that a key indicator is going in reverse e.g. GHG emissions or accident rates. Red is used when the company shows poor practice or has been involved in a serious controversy.

What do you mean by themes?

Our Funds apply a discretionary thematic approach by looking at companies from a Sustainability/Thematic angle. These are typically areas of the market we are positive on for their strong social utility or their sustainability credentials.

- **Education:** Education, training, human development, promoting girls education, student housing and support.
- **Health & Wellbeing:** affordable healthcare, access to medicine, pharmaceuticals R&D, biotechnology, critical care, nutrition & Wellbeing.
- **Social Infrastructure:** Social housing, affordable housing, community & housing associations, urban regeneration, brownfield development, public facilities.
- **Sustainable Solutions:** Products & solutions, circular economy, sustainable development goals, impact investing (fixed income). We have identified 12 sub-categories in which a sustainable solution may be apparent; these include energy efficiency, pollution prevention, water, waste, transport, safety & security and green finance.

How does the screening process work?

As bottom-up, active stock pickers, the investment and responsible & sustainable case is considered in parallel. Fund managers suggest new stock ideas and the Responsible Investment Team will then screen those. All screenings are peer reviewed within the Responsible Investment Team to ensure rigor and consistency. There are several potential screening outcomes:

- **Passes:** this means the company passes the ethics screens and our Responsibility/ESG tests.
- **Suitable with caution:** this means the company passes the ethics screens, however there may be some residual concerns over management of ESG risk, this is then flagged to the fund manager and we engage on the identified issues.
- **Engagement needed prior to investment:** this specific case is reserved for situations where we may need more information on the ethics screens before we can make a final decision or want to talk to the company prior to investing on material ESG risk. This is a temporary outcome, once the engagement has successfully completed (or not) we may invest in the company or fail it.
- **Fails:** the fund manager cannot invest, because the company does not pass the ethics screens and/or fails to meet minimum ESG standards, and/or is a clear anti-sustainability stock. The RI Team's decision is final whatever the outcome.

Can you give some examples of the different outcomes?

PASS: Companies that pass our screens typically have transparent disclosure and show strong management of key ESG issues. Key risks are well understood and demonstrate leadership in improving practices in their industry.

Companies that pass our screens are seeking to reduce their impacts; all metrics tend to be reducing. Examples of companies in our portfolios that passed the screens (green) are Novo Nordisk, which provides excellent disclosure and SSE because of its interesting low carbon transition.

SUITABLE WITH CAUTION: these are companies that still pass our screens and are suitable for inclusion in the funds, but the RI Team flags a number of residual issues that are of concern. This could be because of controversies a company has been involved in, poor corporate governance, or a lack of disclosure on important ESG issues. Examples in our portfolios are The Disney Co. or Valmont Industries, where disclosure could be improved.

ENGAGE BEFORE INVEST: these are companies where more information is required to ensure they do not breach our screens. Abbott Laboratories and Thermo Fisher both required engagement owing to insufficient information in key risk areas.

FAILS: these companies show significant failings and do not or no longer meet our criteria. Examples include Lyondell Basell because of a lack of commitment to managing climate risks, Facebook because of concerns on business ethics and poor corporate governance, Neste Oil owing to its exposure to palm oil and high risk environmental management, and Amazon due to concerns on ethics, labour rights and governance.



New funds for 2022

We launched three new Funds in 2022 which are designed to focus specifically on companies whose core business activities address a range of environmental and social challenges.

Global Impact Bond Fund

The Fund aims to deliver positive and social environmental impact by investing in fixed interest securities issued by companies that make a positive contribution to society and the environment through sustainable and socially responsible practices.

The positive impact sought is categorised but not limited to the EdenTree themes of Sustainable Solutions, Social Infrastructure, Health & Wellbeing as well as Education.

The Global Impact Bond Fund is subject to the full EdenTree Responsible and Sustainable screening process, but differs from our Responsible and Sustainable Funds by also requiring at least 80% of the holdings to have a demonstrable positive impact.

The Fund also provides transparency on the impacts of its investments annually by reporting measurable outcomes data and Key Performance Indicator metrics, including (but not limited to):

- GHG emissions avoided (metric tonnes)
- Energy Savings (megawatt hours (MWH))
- Water Savings (gallons)
- Number of jobs created
- Number of social/affordable homes
- Number of medical doses provided
- Number of shipments to low income countries
- Number of Educational Institutions funded

Declared contribution to the UN Sustainable Development Goals also reported and monitored.

IA Sector Global Corporate Bond

Green Future Fund

The Fund invests in companies which provide sustainable solutions to some of the world's environmental challenges, such as:

- Alternative Energy (the generation, storage and distribution of clean energy)
- Energy Efficiency (the enabling of a low carbon transition)
- A Circular Economy (solutions for sustainable materials and resource stewardship)
- Environmental Services (pollution control, testing and impact management)
- Water Management (water conservation and management)
- Future Mobility (technologies and services enabling sustainable transportation)
- Regenerative Agriculture (sustainable food production)

The screening process for the Green Future Fund will differ from the Responsible and Sustainable Funds by only using the 10 criteria within the Ethics/Values portion of the screen. The fund managers will also embed ESG criteria through their own analysis, working closely with (but not directed by) the RI Team.

The Fund provides transparency on its environmental footprint through periodic reporting to investors. This reporting provides both quantitative and qualitative assessments on how investee companies are achieving environmental targets and developing solutions to address the world's environmental challenges.

IA Sector Global

New funds for 2022



Green Infrastructure Fund

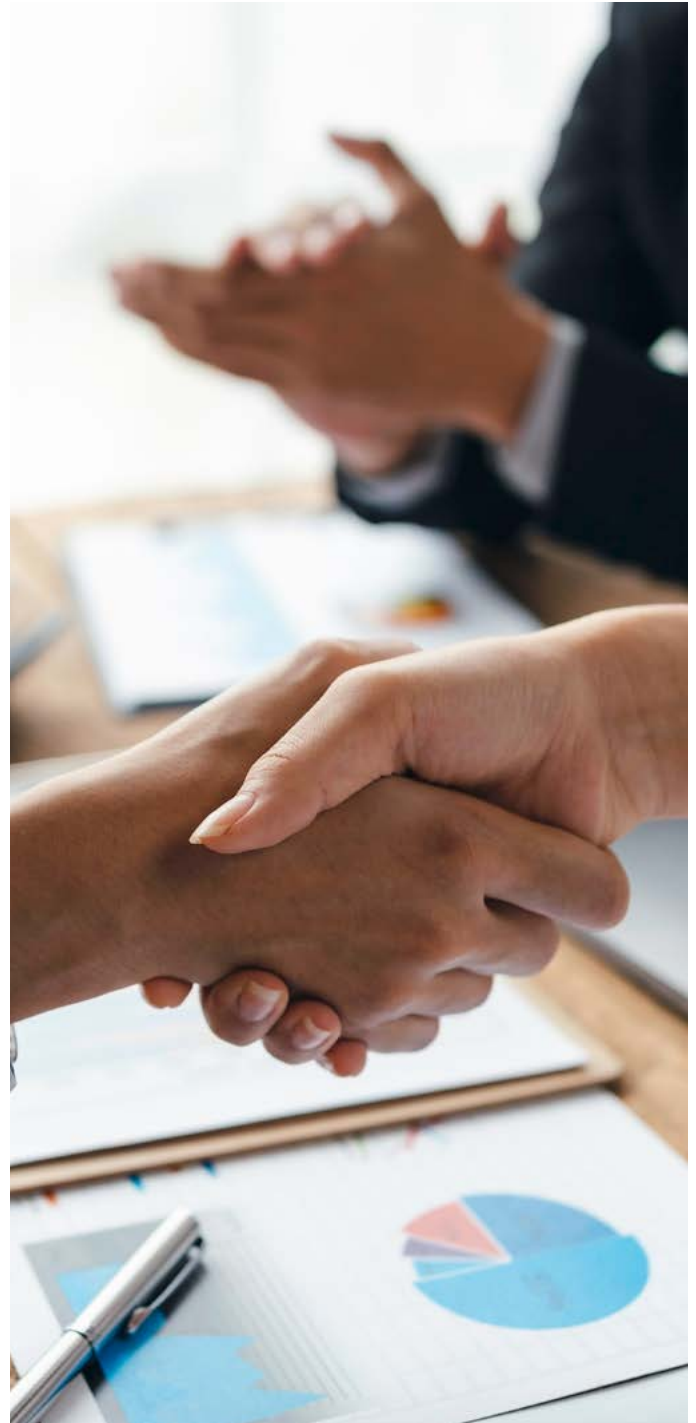
The Fund invests in listed infrastructure-related equities and investment companies that demonstrate positive environmental outcomes by addressing some of the challenges around climate change, sustainable water use, pollution prevention and control, and the transition to a circular economy.

The infrastructure-related companies have businesses based on the ownership, operation, construction, development, or debt funding of real assets and infrastructure projects in the following fields;

- Alternative Energy (the generation of clean energy)
- Energy Storage and Efficiency (enabling a low carbon transition)
- Natural Capital (such as sustainable forestry and agriculture)
- Circular Economy (solutions for recycling, waste processing and resource stewardship)
- Water Management (treatment, conservation and management)
- Sustainable Transportation (technologies enabling sustainable transportation)

The screening process for the Green Infrastructure Fund will differ from the Responsible and Sustainable Funds by only using the 10 criteria within the Ethics/Values portion of the screen. The fund managers will also embed ESG criteria through their own analysis, working closely with (but not directed by) the RI Team.

IA Sector Infrastructure



What information do you use for screening?

The Responsible Investment Team has access to a range of sources to conduct its screening. We use ESG data ratings provided by ISS, a service provider which specialises in rating companies within an industrial sector peer group; this is used for the purposes of our first-tier analysis. However ESG ratings provided by third party data providers do not mandate our screening decisions; the RI Team then conducts additional research and analysis from publicly available materials. This can include company literature (annual reports, websites and sustainability reports), industry or trade body publications and websites, as well as NGO reports and websites. Government and academic research and investor benchmark initiatives are also useful. Investor databases such as CDP and WDI provide additional detail on specific topics.

Can you ensure only screened companies are allowed?

We have integrated the 'Charles River' system into our screening process; this places automatic tags on all stocks (including excluded ones) preventing fund managers from dealing. It also ensures fund managers are unable to trade in an unscreened stock that has not been signed off by the RI Team. The RI Team is the ultimate guardian of screening decisions for the responsible and sustainable fund range.

Companies that fall into breach (i.e. they acquire a business that breaches the ethics screen) would be sold down over a period of time – usually three months. The Charles River system will prevent any further investment. Stocks are monitored on an ongoing basis to ensure they continue to meet the Funds' positive criteria.

We maintain an updated database of excluded stocks, which is uploaded into the Charles River system on a regular basis.

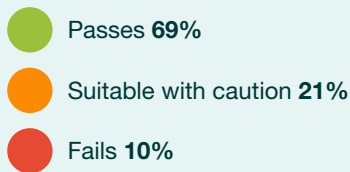
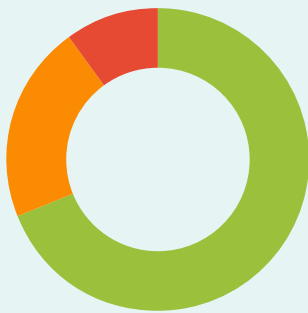
To strengthen the process, routine checks are carried out by our compliance team to ensure screened companies are coded correctly into our system.



Do many companies fail your screens?

In 2022, new ideas achieved a 69% pass rate – an improvement on both 2021 (61%) and 2020 (53%). Of the remaining requests, 21% were judged suitable with caution and 10% failed our screening and did not progress.

2022 screening outcomes

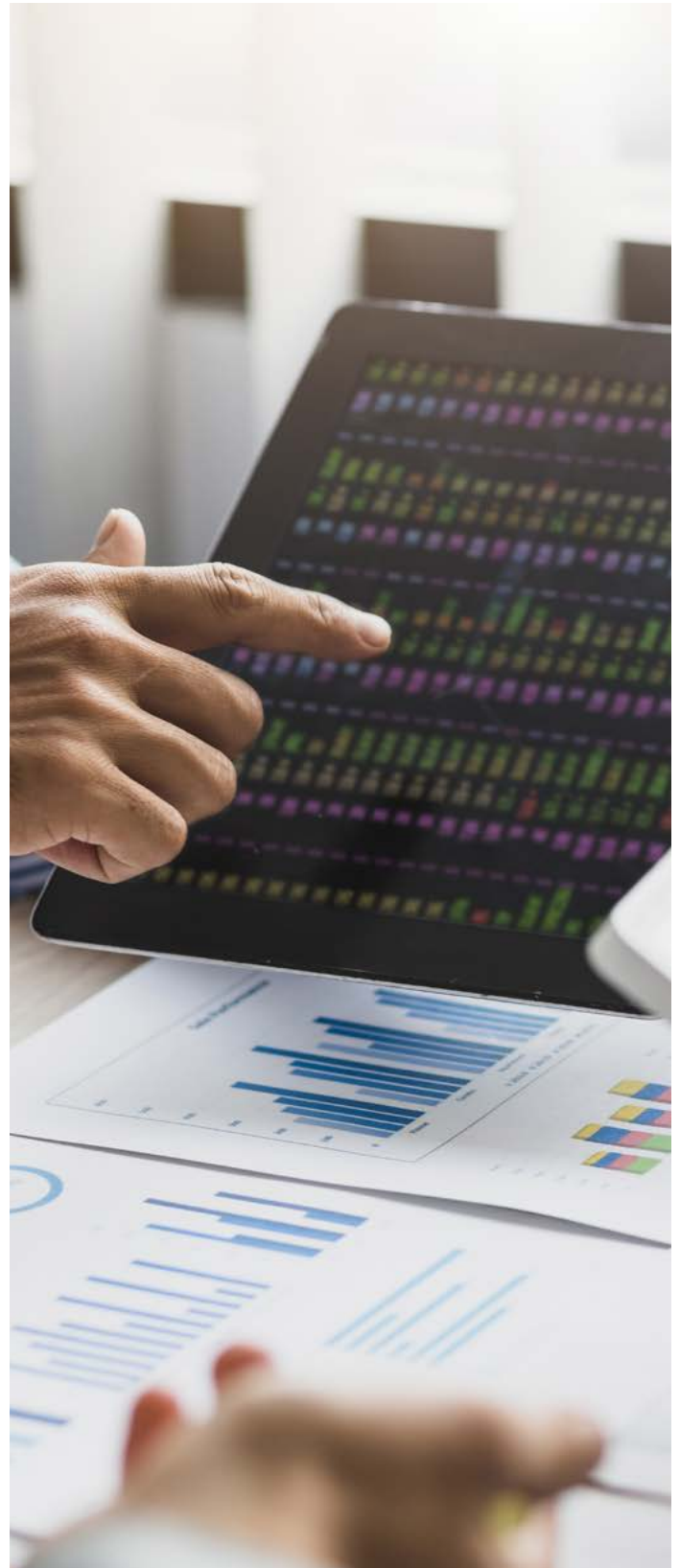


Is there any oversight of the screening process?

Our responsible and sustainable investment process is overseen by an independent Responsible Investment Advisory Panel. The panel meets three times a year and may advise and inform but not mandate a course of action. The panel is made up of independent experts and panel meeting agendas always include discussions on new stocks that have been screened or where controversies affect holdings in screened portfolios.

How do you take clients' views into account?

We respond regularly to enquiries from clients about individual holdings, and we also periodically hold client focus groups to discuss specific screening examples with ethical challenges.



THE RESPONSIBLE INVESTMENT TEAM

We have a specialist in-house Responsible Investment (RI) team who carry out thematic and stock-specific research to identify ethically responsible investment ideas for our range of screened Funds. Headed up by Neville White, Head of RI Policy & Research, and supported by Responsible Investment Analysts Carlota Esguevillas, Amelia Gaston and Cordelia Dower-Tylee, the team is also responsible for creating an on-going dialogue with companies, allowing us to engage on a wide variety of ethical and socially responsible investment concerns. For investors, it's an added layer of assurance that our client's money is being invested in companies that are operating in a responsible and sustainable way. Our ethical and responsible investment process is overseen by an independent Advisory Panel that meets three times a year, and comprises industry and business experts, appointed for their specialist knowledge.



We hope you find this useful and informative.

For any further information please contact us on **0800 011 3821** or at ifa@edentreeim.com



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