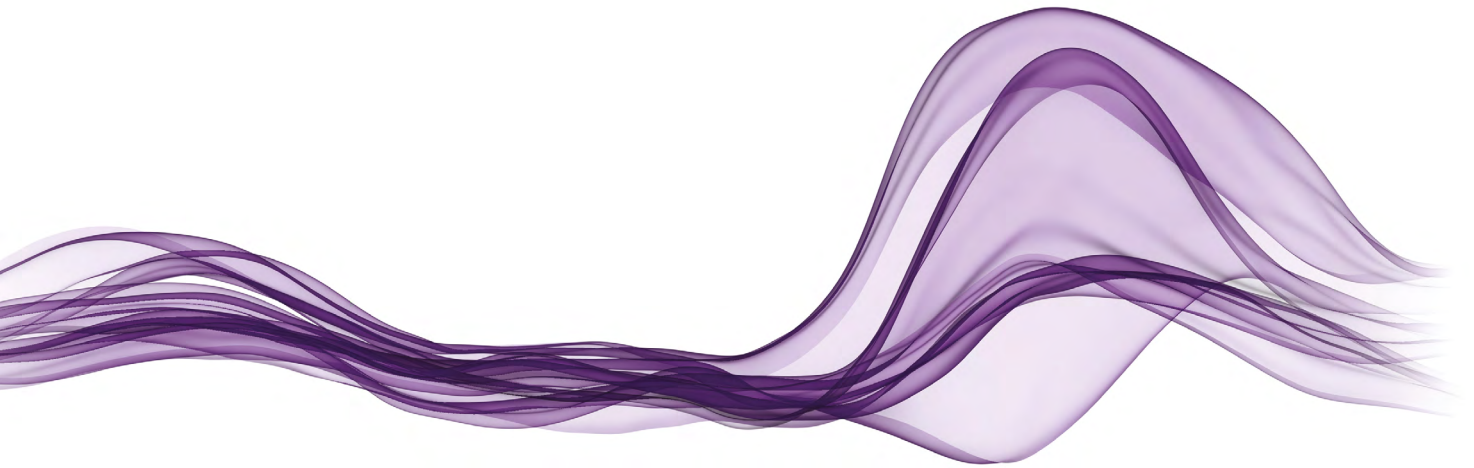


Controversial weapons policy



1 Introduction

Royal London Asset Management is committed to being a responsible investor and a good steward of our client's capital. As part of this approach, we have implemented a firm-wide exclusion of controversial weapons across all our funds, as we believe strongly that we should not support involvement in such products.

This policy document outlines our approach to implementing our controversial weapons exclusion across all Royal London Asset Management funds. The policy is effective as of 1 January 2021. Regulatory documentation will be updated on a rolling basis to reflect this.

1.1 Policy review process

This policy is updated where required to reflect changes in international law and good practice. Along with all other exclusions applied within Royal London Asset Management, the suitability of our controversial weapons exclusions definition is reviewed on an annual basis by our Investment Committee and our Distribution and Product Committee. The Investment Committee meets on a monthly basis and is chaired by our Chief Investment Officer.

1.2 Definition

While there is no one definition of controversial weapons, Royal London Asset Management defines it as weapons which have an indiscriminate and disproportional impact on civilians or weapons that are illegal and prohibited by international conventions and treaties. International conventions and treaties relevant under this definition include:

- **The Anti-Personnel Mines Treaty 1997**¹, also known as the Ottawa Convention, prohibits the use, stockpiling, production and transfer of anti-personnel mines
- **The Biological Weapons Convention 1975**², prohibits the development, production and stockpiling of bacteriological (biological) and toxin weapons
- **The Chemical Weapons Convention 1977**³, prohibits the development, production, stockpiling and use of chemical weapons
- **The Convention on Cluster Munitions 2008**⁴, prohibits the use, production, transfer and stockpiling of cluster munitions

2 Exclusion scope

Based on Royal London Asset Management's definition of controversial weapons, no Royal London Asset Management fund will knowingly invest in corporate equity and/or debt involved in the manufacture of cluster munitions, anti-personnel landmines and chemical and biological weapons (which we collectively define as 'controversial weapons').

The policy does not apply to indirect investments in controversial weapons. This includes, for example financial institutions who themselves invest in controversial weapons and/or companies who via their pension funds invest in controversial weapons.

2.1 Pooled funds and segregated funds

To date our firm wide exclusion policy includes all pooled and segregated funds.

In the instance of segregated funds, clients do have the ability to control the fund's investment policy and therefore while we would not encourage it, clients do have the ability to remove the use of the controversial weapons exclusions policy should they choose to do so. Currently, no segregated client fund has exposure to controversial weapons.

3 Exclusion process

Royal London Asset Management has engaged a third party provider to identify companies involved in the production of controversial weapons, in line with the definition used in this policy, and prepared a list of excluded companies. This list is reviewed on a quarterly basis and results are embedded into our in-house order management system. By embedding the list of excluded companies into our order management systems, Fund Managers are prevented from investing in excluded companies.

In the rare instance a breach does occur, we will follow our existing policies and procedures regarding fund breaches.

4.1 Contact Details

For more information on Royal London Asset Management's approach to the implementation of our Controversial Weapons Exclusions Policy, please contact us at: ESG@RLAM.co.uk

Notes

- 1 <https://www.armscontrol.org/factsheets/ottawa>
- 2 <https://www.un.org/disarmament/wmd/bio/>
- 3 <https://www.opcw.org/chemical-weapons-convention>
- 4 <https://www.clusterconvention.org/>

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We are happy to provide this document in Braille, large print and audio

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Ref: PO RLAM PD 0028