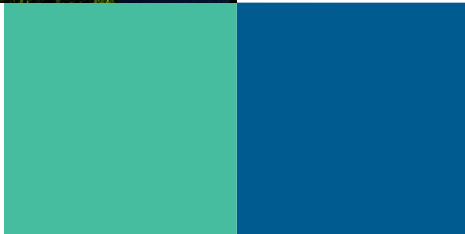


Morgan Stanley

INVESTMENT MANAGEMENT

# Sustainable Investing Policy

October 2023





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# Executive Summary

Morgan Stanley Investment Management (“MSIM”) provides broad-based specialization across a range of asset classes in public and private markets worldwide<sup>1</sup>. We have been creating value for our clients for over 40 years and operate in more than 20 countries. Our independent investment teams leverage Morgan Stanley’s global resources to serve a diverse client base of governments, institutions, corporations, advisors and individuals worldwide. Our investment solutions include a broad range of high-conviction active strategies, alternatives, customization strategies and sustainability expertise<sup>2</sup>.

MSIM’s investment teams are responsible for developing their individual approaches to sustainable investing. MSIM believes that environmental, social and governance (“ESG”) factors can present investment risks and opportunities. Understanding and managing these risks and opportunities may therefore contribute to both risk mitigation and long-term investment returns. Engagement and stewardship are a key part of this understanding, where investment teams seek to engage with the assets or companies they own, seeking to deliver long-term value and align with our objective to be responsible stewards of our clients’ capital.

The meaning/definition of sustainable investing varies from investor to investor. MSIM is characterized by its global reach, experience, and reputation for providing customized solutions to clients. MSIM has a decentralized approach towards investment management, consisting of independent public and private markets investment teams and asset class platforms. This decentralized investment approach allows investment teams to tailor their approach to sustainability using multiple factors including, but not limited to, the objectives of the product, asset class and investment time horizon, as well as the specific research and portfolio construction, philosophy and process used by each team. Investment teams deploy their skill and judgment in assessing the materiality of ESG-related risks and opportunities as appropriate for each investment strategy<sup>3</sup>.

We aim to create a culture that fosters independent thought including diverse investment approaches and innovation. This is demonstrated by our investment offerings that range across various geographies, investment styles, asset classes and approaches to sustainability.

<sup>1</sup>MSIM refers to the investment management business segment of Morgan Stanley, a global financial services firm. MSIM is composed of a number of wholly-owned subsidiaries of Morgan Stanley, including MSIM Fund Management (Ireland) Limited. References to “Morgan Stanley” or the “Firm” in this Policy refer to the parent company and its consolidated subsidiaries. In some instances, MSIM may leverage or be a part of Morgan Stanley’s processes and/or initiatives related to sustainable investing. Certain subsidiaries of Morgan Stanley in its Investment Management business, including but not limited to Calvert Research and Management and Parametric Portfolio Associates LLC, may differ in their approach to sustainable investing and maintain separate sustainability policies. Accordingly, the discussion of sustainable investing described herein may not be applicable to each Morgan Stanley affiliate or investment team. Further, some investment strategies may not consider ESG factors where it is not currently feasible or appropriate to do so, e.g. passive investment strategies, certain asset allocation strategies, or where requested by clients.

<sup>2</sup> Sustainability expertise across asset classes, where appropriate. Please see footnote 3 below.

<sup>3</sup> Some investment strategies may not consider ESG factors where it is not currently feasible or appropriate to do so, e.g. passive investment strategies, certain asset allocation strategies, or where requested by clients.

# MSIM Sustainability Approach



As a client-centric organisation, our approach is premised on delivering investment and risk management solutions tailored to a wide range of clients' preferences, including any relevant sustainability preferences. MSIM investment teams act as responsible long-term investors and our collective purpose in delivering long-term value for our clients therefore guides our sustainability business agenda, investment and stewardship activities. We seek to deliver on this approach in three main areas:

## **Deliver Global Depth and Breadth in Sustainable Investing Expertise**

Within certain MSIM investment teams, there are designated sustainability specialists or individuals

responsible for particular aspects of sustainability. These efforts are supported by the MSIM Sustainability Team and other centralized resources, as discussed throughout this Policy.

## **Offer Clients a Spectrum of Flexible and Innovative Sustainable Investing Solutions**

Providing our clients with investment solutions across asset classes that seek alignment with their return objectives alongside their sustainability preferences.

## **Maintain High Standards of Governance and Stewardship**

Effective management of stewardship and sustainability issues is an important component of our business approach, which requires committed leadership, strategic focus and appropriate checks and balances to enable overall accountability and transparency. To that end, we have established governance systems, risk management and controls to support and advance sustainable investing and stewardship across our business activities.

## **A) DELIVER GLOBAL DEPTH AND BREADTH IN SUSTAINABLE INVESTING EXPERTISE**

MSIM's investment teams incorporate the assessment of material ESG risks and opportunities into investment decision-making processes, as appropriate, and according to investment teams' particular investment strategies. Incorporation of such ESG risks and opportunities may occur at various stages of the investment lifecycle including due diligence and research, valuation, asset selection, portfolio construction, and ongoing engagement and investment monitoring.

MSIM's investment teams seek to leverage such assessment of ESG risks and opportunities, along with other relevant information, in a way that is aligned with the specific investment philosophy, asset class, and time horizon of a given strategy or product.

Investment teams may leverage any of the following types of information and resources to support their ESG analysis:

- i. Company disclosed information (which may include a company's quarterly financials, earnings calls, general company reporting and / or disclosures, including sustainability-related disclosures);
- ii. Non-company disclosed information (such as news reports or industry data);
- iii. Third-party research and data;
- iv. Engagement with company management;
- v. Proprietary and derived research and data; and/or;
- vi. Other data sourced through bespoke due diligence.

## **B) OFFER CLIENTS A SPECTRUM OF FLEXIBLE AND INNOVATIVE SUSTAINABLE INVESTING SOLUTIONS**

We offer clients a wide range of sustainable investing solutions across asset classes in actively and passively managed vehicles that seek to align with clients' returns objectives, alongside their sustainability preferences. These include products that may consider ESG factors at a security and/or portfolio level, by deploying a variety of ESG tools and investing approaches, including without limitation, minimum criteria for inclusion, exclusionary screens (e.g. sector/norms-based/sovereign/environmental/social controversies etc.), utilizing proprietary quantitative and qualitative assessment processes, and intentional tilts towards certain sustainability factors, and/or requiring a threshold allocation to certain thematic labelled/certified securities<sup>4</sup>, such as a focus on sustainable/thematic outcomes and/or seek to achieve attractive financial returns alongside positive environmental and/or social

impacts. We also strive to provide relevant quantifiable metrics and reporting for our products and solutions<sup>5</sup>, as data availability and access improve over time.

## **C) GOVERNANCE AND STEWARDSHIP**

### **Governance**

We view effective management of sustainability issues as an important component of our business approach as we believe it is fundamental to the long-term success of our organization and our ability to deliver value for our clients. We have governance systems, risk management processes and controls that seek to support the incorporation of sustainability considerations within our business activities.

**MSIM ESG COMMITTEE:** MSIM has established an ESG Committee (the "Committee") co-chaired by the MSIM Co-Head and Chief Investment Officer of the Solutions & Multi-Asset Group and MSIM's Global Head of Risk & Analysis. The Committee consists of senior representatives from MSIM's Sustainability team, Office of the Chief Operating Officer and other advisory and related functions who oversee and guide MSIM's support for the sustainable investment strategies of each investment business. Key topics overseen by this Committee include: MSIM's ESG-related business goals, ESG-related product development and marketing frameworks, MSIM's investment teams' ESG-related engagement programme, ESG-related training and ESG-related technology and data initiatives. The Committee is responsible for this Sustainable Investing Policy, which it reviews periodically and updates as appropriate to ensure that it accurately reflects the philosophy and processes that govern MSIM's sustainable investing approaches.

**MSIM SUSTAINABLE INVESTING TEAM LEADS:** It is the MSIM investment teams' responsibility to define their approach to consideration of ESG factors. Many of MSIM's investment teams or asset class platforms have appointed at least one dedicated Sustainable Investing/ESG specialist to co-ordinate and support the sustainable investing approaches for the relevant team. A key responsibility of these specialists is to work with their respective investment teams to help encourage incorporation of ESG factors where relevant, in line with each team's investment philosophy and strategy.

<sup>4</sup> Examples include green bonds or climate bonds (the latter of which can be issued according to the Climate Bonds Standard & Certification Scheme.

<sup>5</sup> Including products' sustainable features and information and data required for regulatory disclosures, where relevant.

These specialists may support the investment staff in such incorporation of ESG factors in investment processes through research, training, knowledge-sharing, engagement with companies, and representing their asset class/team in relevant ESG-related forums and groups as necessary.

**MSIM SUSTAINABILITY TEAM:** Led by MSIM's Global Head of Sustainability, the MSIM Sustainability team supports MSIM's collective sustainable-related processes and governance. The MSIM Sustainability team works with the sustainability leads from our investment teams to coordinate global sustainable investing and stewardship initiatives. These activities include supporting investment teams in relation to sustainability-related reporting and regulatory disclosure requirements, incorporating ESG factors into their investment approaches, developing sustainable products and supporting sustainability data utilization, development of tools and sustainability research, as appropriate.

MSIM's Global Stewardship function, as part of the MSIM Sustainability team, supports and helps investment teams coordinate MSIM proxy voting and investee engagement activities.

**MORGAN STANLEY GLOBAL SUSTAINABILITY OFFICE:** MSIM's sustainable investing efforts are supported by Morgan Stanley's<sup>6</sup> decade-plus commitment to sustainable finance and Firm-level resources. The Morgan Stanley Global Sustainability Office ("GSO") drives the Firm's sustainability strategy and helps to integrate sustainability considerations across the Firm's policies, business activities and operations.

GSO partners with teams across the Firm's three business segments (Institutional Securities Group, Wealth Management, and MSIM) to provide innovative ESG advice, products, and solutions for Morgan Stanley's clients. GSO advises MSIM on product development and ESG data analysis, collaborates on thought leadership, and partners on internal knowledge-sharing and external industry affiliations.

**ENVIRONMENTAL AND SOCIAL RISK MANAGEMENT GROUP:** The Firm's Environmental and Social Risk Management Group ("ESRM") provides internal subject matter expertise to MSIM's private markets teams on environmental and social risk, conducts due diligence on relevant transactions, engages with stakeholders, and monitors emerging risks and developments in partnership with the Firm's business units, GSO and other relevant control functions.

## Stewardship

As active investors and active owners, MSIM has a duty to be good stewards of our clients' capital. We fulfil this duty by seeking to engage with selected companies in which we invest, and by exercising our proxy voting and other rights as shareholders. These stewardship activities give us the opportunity to help guide companies in which we invest toward better ESG practices, which we believe may contribute to producing attractive returns for our clients over the long-term.


























Our investment teams endeavor to engage in constructive dialogue with companies, which may encompass activities ranging from meetings and discussions on a particular issue to multi-year engagements/stewardship on a range of environmental, social, or governance topics specific to the company or asset to encourage enhancement of companies' ESG practices. This can encompass a range of topics that may affect the long-term value of a business or asset, including strategy, capital structure, operational performance and delivery, risk management, executive pay and corporate governance. This helps us manage risk in the near and long-term, enhance our understanding of our investee companies/issuers, and, where relevant, create positive sustainable outcomes – all of which contribute to the long-term returns of our clients.

MSIM has identified five common themes which certain of our investment teams focus on in their engagements, based on respective strategies, where relevant and appropriate. These five MSIM Engagement Themes<sup>7</sup> are aligned with the United Nations Sustainable Development Goals, which are areas that may cause risk to our society and well-being, global economy and/or capital markets, but may also present opportunities for improved sustainable and/or financial outcomes.

<sup>6</sup> References to "Morgan Stanley" or the "Firm" in this Policy refer to the parent company and its consolidated subsidiaries.

<sup>7</sup> These may not apply to MSIM affiliates.

## MSIM Engagement Themes

	<p><b>DECARBONIZATION &amp; CLIMATE RISK</b> Supporting the transition to low carbon economy in line with Paris Agreement goals</p>	<ul style="list-style-type: none"> <li>■ Renewable energy and clean tech</li> <li>■ Energy efficiency</li> <li>■ Physical impact adaption</li> <li>■ Just transition</li> </ul>	   
	<p><b>DIVERSE &amp; INCLUSIVE BUSINESS</b> Supporting business practices that create a more just and inclusive society</p>	<ul style="list-style-type: none"> <li>■ Affordable access to essential services</li> <li>■ Investing in communities</li> <li>■ Racial justice</li> <li>■ Pay equity</li> <li>■ Board/employee diversity</li> </ul>	   
	<p><b>NATURAL CAPITAL &amp; BIODIVERSITY</b> Supporting business models that reduce negative impact on biodiversity in line with the Post 2020 Biodiversity Framework</p>	<ul style="list-style-type: none"> <li>■ Sustainable sourcing and use of resources</li> <li>■ Land and sea use change</li> <li>■ Deforestation</li> <li>■ Pollution reduction</li> </ul>	   
	<p><b>CIRCULAR ECONOMY &amp; WASTE REDUCTION</b> Supporting business models that reduce impact on natural resources and that innovate to reduce waste generation, with a focus on plastic waste</p>	<ul style="list-style-type: none"> <li>■ Recycling and reuse</li> <li>■ Sustainable sourcing</li> <li>■ Lifecycle analysis</li> <li>■ Water stewardship</li> </ul>	   
	<p><b>DECENT WORK &amp; RESILIENT JOBS</b> Supporting decent work across the entire value chain and making workforces resilient in the face of innovation and change</p>	<ul style="list-style-type: none"> <li>■ Automation and the workforce</li> <li>■ Supply chain management</li> <li>■ Living wage</li> <li>■ Workforce well-being</li> </ul>	   

Investment teams may also engage on other areas not limited to these five themes. MSIM recognises that the UN Sustainable Development Goals (SDGs) were written by Governments for Governments and therefore engagement themes with corporates and the SDGs may not be perfectly aligned. The content of this publication has not been approved by the United Nations and does not reflect the views of the United Nations or its officials or Member States. See <https://www.un.org/sustainabledevelopment/sustainable-development-goals> for more details on the Sustainable Development Goals.

## Engagement

MSIM believes engagement – when effective – is mutually beneficial as it enables companies/issuers to explain how their approach to sustainability relates to their broader business strategy and allows investors to work closely with companies/issuers on specific environmental, social and governance issues which they believe pose a downside risk and/or opportunity to the business. To that end, when MSIM investment teams identify financially material ESG-related or other issues impacting companies/issuers in which we hold positions, we seek to proactively engage in active dialogue with companies/issuers and the results of such interactions in turn inform our investment processes.

On the public markets side, MSIM's investment teams who manage active investment portfolios that consider ESG factors/features apply an active approach to stewardship.

As discussed below, our investment teams exercise proxy voting and other rights as shareholders. Our investment teams also periodically monitor and engage with companies/issuers in the normal course of their investment process and leverage the support of the MSIM Global Stewardship team where needed. Investment teams in our public securities business selectively interact with company boards of directors when appropriate and beneficial for shareholder or bondholder value. MSIM engages with companies across their capital structure, including through our debt holdings, and leverages our Fixed

Income platform to engage with bond issues beyond listed companies, including sovereign states, agencies and private companies. In our private equity business, members of investment teams may serve on the board of directors or invest with other external managers and may address ESG topics through board engagement or engagement with external managers. Engagement helps to foster productive dialogue, focusing on sustainability risk management and value-generation opportunities.

Engagements are prioritized based on a variety of factors including position size, cadence of annual general meetings, headline events, and materiality of engagement topics. Engagement objectives also differ based on these factors, and can range from information gathering, to encouraging specific disclosures and improved sustainability and governance practices such as adopting longer-term vesting schedules or adopting science-based carbon reduction targets, where appropriate. Please see [MSIM's Engagement and Stewardship Principles](#) for more information on our approach to engagement for public markets. Certain investment teams that invest in the private markets may elect to follow the same Principles, as appropriate.

### **Proxy Voting**

Exercising our proxy voting rights enables us to guide portfolio companies toward improved ESG practices, which we believe may contribute to producing attractive returns for our clients over the long-term. Proxy voting decisions are typically made in-house by members of the relevant investment team and the Global Stewardship team, as required. We do not automatically support management recommendations but consider the merits of each proposal against relevant governance and sustainability criteria and base our voting decisions on the in-depth knowledge of our investment teams and the governance expertise of the MSIM Global Stewardship team, as required.

The MSIM Proxy Voting Policy and Procedures address a broad range of issues and provides general voting parameters on proposals that arise most frequently. We endeavor to integrate relevant governance criteria along with our Proxy Voting Policy and Procedures with investment goals, using the vote to encourage portfolio companies to enhance long-term shareholder value and to provide a high standard of transparency such that equity markets can seek to value corporate assets appropriately. For more information on our approach to engagement and proxy voting policies, please see [MSIM's Proxy Voting Policy and Procedures](#).

### **D) ADVOCACY AND COLLABORATION**

The investment teams responsible for MSIM's actively managed investment solutions generally find one-to-one discussions to be the most effective way to articulate views to companies/issuers. However, we are supportive of collaborative engagement where it could be necessary or useful to materially enhance portfolio value and where we can do so in a manner that is in full compliance with applicable laws and regulations. These may include collaboration with industry peers and standard-setting organizations, and engagement in public policy development in ways that seek to advance sustainable investing practices. Factors that we consider before participating in collaborative actions may include, but are not limited to: potential conflicts of interest, our obligations under competition or antitrust laws, materiality of the issue and potential for delivering tangible outcomes in relation to key sustainability or stewardship-related issues. Notwithstanding the adopted mode of collaboration, we approach collaborative engagement from the perspective of our role as fiduciaries of client assets, acting on behalf of and in the best interest of our clients. To this end, we interact with, and/or maintain memberships with a variety of international and regional organizations which serve to reinforce our sustainability commitments and priorities.

### **E) TRAINING**

We recognize that the impact of sustainability factors on our investments and assets and the tools and best practices for assessing those impacts are rapidly evolving. As such, we foster a culture of ongoing learning and improvement through our training programs.

Topical training and knowledge-sharing is provided periodically to investment teams and relevant stakeholders on global sustainability regulations and frameworks, client ESG/stewardship requirements and interests, sustainable investing and engagement trends and best practices, and mitigation of greenwashing risks. These may be facilitated by the MSIM Sustainability team, the Firm's GSO, ESRM, Legal and Compliance, and both internal and external sustainability subject matter experts. Certain investment teams may arrange for new joiners and existing members within their teams to undergo asset class or team-specific sustainability training.

We continue to invest in our employees' development to help meet our evolving needs and the preferences of our clients.





# Sustainability Risk & Adverse Impacts

## Approach to Sustainability Risk

Under the Sustainable Finance Disclosure Regulation (“SFDR”) (EU 2019/2088) sustainability risks are environmental, social or governance events that can pose actual or potential material risks to our investments, at the individual asset and portfolio levels. These risks include, but are not limited to, climate change transition and physical risks; natural resources depletion; waste intensity; labor retention, turnover and unrest; supply chain disruption; corruption and fraud; and human rights violations. MSIM recognizes that the universe of relevant risks may grow and evolve over time as the universe of sustainability factors considered relevant

to the investment industry evolves. The materiality of such risks to an individual asset and to a portfolio as a whole depends on industry, country, asset class, and investment approach. Sustainability risks can materialize for assets and investments in a range of ways, for example: impaired or stranded asset values, increased operational costs, unforeseen liabilities and penalties, loss of access to markets/customers, and reputational damage. MSIM investment teams are the first line of defense for identifying, understanding, and mitigating potential sustainability risk in portfolios.

For public markets portfolios, the MSIM Global Risk and Analysis (“GRA”) team conducts sustainability investment risk analysis using third party data. This includes assessments of sustainability risk exposures, controversial business exposures, United Nations Global Compact and other global norms compliance, and climate change and transition risk scenarios. This risk analysis has been developed and delivered independently of the investment teams. The GRA team monitors this information periodically and presents its findings to various risk committees. Periodic portfolio-level risk reports are available upon request to the investment teams to use at their discretion, and GRA may contact to portfolio managers to engage on ESG risks, where necessary. Furthermore, as needed and requested, the MSIM Sustainability and GRA teams collaborate with investment teams to conduct analyses on the sustainability risk of select portfolio themes and companies.

For private markets portfolios, the investment teams are responsible for conducting due diligence, on material issues relating to a proposed investment in line with the Morgan Stanley Environmental and Social Policy Statement (“Policy Statement”), which may include, for example, the ongoing monitoring of energy, greenhouse gas, water and waste data and implementation of any asset-relevant initiatives. ESG issues or opportunities are raised and reviewed as part of the Investment Committee process. ESG risks and opportunities are periodically evaluated as part of asset management activities in line with each team’s ongoing diligence process. The investment teams also coordinate with ESRM to address any potential environmental and social due diligence considerations that may cause potential issues and/or pose franchise risk to the Firm, as per the Global Environmental and Social Risk Management Policy. This enables potential significant issues to be escalated to the Firm Franchise Committee as relevant. Finally, for our MSIM Infrastructure and Real Estate Investing strategies, our investment teams seek to maintain insurance coverage against liability to third parties and property damage in amounts and on terms that they consider customary and appropriate for their respective businesses.

### **Accountability and Incentives**

Where required by regulation, MSIM’s local entities have adopted remuneration policies to promote sound and effective risk management with respect to sustainability risks, and which do not encourage excessive risk-taking with respect to sustainability risks.

### **Principal Adverse Impacts on Sustainability Factors**

Certain business activities of some companies may have some level of adverse impact on broader systemic sustainability factors such as environmental matters, social and employee matters, respect for human rights. The SFDR has defined a set of metrics for financial market participants to measure and report on principal adverse impacts, covering themes such as greenhouse gas emissions, biodiversity, waste, employee and social matters, and violations of international norms, amongst other topics. These principal adverse impacts may be taken into account for products that fall within scope of this regulation.

MSIM’s investment teams follow their own investment approaches and methodologies to determine if and how to consider or prioritise principal adverse impacts, as appropriate for each product, in line with its specific investment policy. We use reasonable efforts to obtain the required data to monitor these potential impacts, and to understand any remediation efforts undertaken by companies. Portfolio managers maintain discretion over the extent to which the outcomes of this due diligence affect ongoing engagement and asset stewardship.

Across products that do take principal adverse impacts into account, the MSIM Sustainability, Portfolio Surveillance and GRA teams monitor and review portfolio holdings for adherence with the relevant commitments and restrictions defined in each product’s investment policy.

Additionally, we strive to adhere to several normative business conduct codes and standards. MSIM adopts the principles-based framework for responsible investing as a signatory to the Principles for Responsible Investment (“PRI”). We also adhere to the governance standards and implement the UK Stewardship Code and other relevant regional stewardship codes in our approach to investing and stewardship.

Finally, the collaboration of our private markets investing businesses with ESRM to identify and address potential environmental and social issues, as outlined in the Policy Statement, also supports MSIM’s monitoring and mitigation of potential principal adverse impacts.



## Reporting & Transparency

We periodically report on our sustainable investing and stewardship activities, including our [proxy voting records](#) in accordance with applicable regulations, voluntary commitments and also our [PRI Transparency](#) and [UK Stewardship Code Reports](#). Information about our activities is also included in the Firm's group-level sustainability reporting.

We may also communicate with our clients on the sustainability characteristics of specific portfolios and related metrics as well as engagement and voting reporting through both periodic and tailored reports, depending on the product. We strive for timely responses to other stakeholders that request sustainability information, where disclosure is in line with our confidentiality obligations to our clients. Our individual investment teams may also communicate their ESG efforts through investment forums and thought leadership pieces that describe their strategy-level approach and views on key ESG issues and trends or through strategy-level ESG reporting.



## Related Policies & Reports

This Policy operates within a broader Morgan Stanley sustainability infrastructure, aspects of which are detailed several other policies, statements, and reports, including, without limitation:

### **MSIM FMIL Statement on Principle Adverse Impacts**

An annual regulatory disclosure document, outlining how our in-scope MSIM entity, MSIM Fund Management

(Ireland) Limited considers relevant principle adverse impacts of its investment decisions on sustainability factors, according to the EU SFDR regulations.

### **MSIM Climate Report**

An annual regulatory, climate-related disclosure document reporting how our in-scope entity, Morgan Stanley Investment Management Limited considers climate-related risks and opportunities when managing investments, in-line with the Taskforce for Climate-related Financial Disclosures, as required by the Financial Conduct Authority in the United Kingdom.

### **IM Private Investment Environmental and Social Risk Management Procedure**

Internal procedure that describes a risk management framework for identification of transactions to be referred to ESRM, as part of the MSIM Private Credit & Equity and Real Assets business units' due diligence processes.

### **Morgan Stanley ESG Report**

An annual report providing a comprehensive overview of Morgan Stanley's activities, progress, and performance across key ESG topics including diversity and inclusion, climate, and sustainability.

### **Global Environmental and Social Risk Management Policy**

Internal policy that outlines a framework to identify, assess and address those transactions that pose potentially significant environmental and social risks that may also pose franchise risk to the Firm.

### **Morgan Stanley Environmental and Social Policy Statement**

Public policy statement that outlines the Firm's approaches to identify and address environmental and social risk.

### **Morgan Stanley Global Franchise Risk Policy**

Internal policy that describes the firm's risk management framework for addressing potential risks to Morgan Stanley's franchise, including environmental and social franchise risk.

### **Morgan Stanley Statement on Human Rights**

Public statement that describes the Firm's approaches to protecting and advancing human rights through its business activities and operations.

### **Morgan Stanley Code of Conduct**

Defines standards of ethical conduct and integrity for Morgan Stanley employees.

## IMPORTANT INFORMATION

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To that end, investors should seek independent legal and financial advice, including advice as to tax consequences, before making any investment decision. Charts and graphs provided herein are for illustrative purposes only.

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As part of our procedures, MSIM appointed a third party to conduct an assessment of the data collection, processing, calculation and reporting processes used to compile the TCFD metrics. The procedures included enquiries with management teams and walkthroughs of the end to end data collection and reporting systems. The findings were reported to the MSIM ESG Committee and the MSIM Limited Board. The review did not constitute an assurance engagement performed in accordance with any standards applicable to assurance and, as such, no assurance conclusion was expressed.

Individual investment vehicles may have specific ESG related goals and restrictions. Please refer to governing documents of individual vehicles to understand their binding ESG criteria.