

RESPONSIBLE INVESTMENT

MPS

Our approach to incorporating ESG factors into the investment process



Our firmwide approach to responsible investment

As a responsible investor Quilter Cheviot is committed to its role as a steward of clients' assets in order to protect and enhance long-term returns. This encompasses our engagement with investee companies, through proxy voting and face-to-face dialogue, as well as taking into account environmental, social and governance (ESG) factors which could impact shareholder returns.

Our beliefs

There is no such thing as an environmental, social and governance (ESG) fund or an ESG company: all will take different approaches so cannot be directly compared.

As a responsible investor, the main pillars of our approach are:

- to analyse ESG data to better inform investment decisions, and
- to proactively engage with the companies and funds we hold on behalf of our clients (active ownership)



“*A strategy and practice to incorporate environmental, social and governance (ESG) factors in investment decisions and active ownership.*”

United Nations backed Principles for Responsible Investment

Responsible investment in practice

There are three main approaches to responsible investment that we undertake across our Managed Portfolio Service (MPS) at Quilter Cheviot. We vote and engage with companies and fund managers on ESG matters. Integrating ESG considerations into our investment process can have direct and indirect positive outcomes on the investments we make on behalf of our clients.

At Quilter Cheviot and across Quilter, we have adopted the Investment Association's responsible investment framework. The points below summarise our three main approaches to responsible investment.

| Stewardship | ESG integration | ESG screening |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p>Active ownership agenda</p>  <p>Signatory of:</p>  | <p>Focus on core list of equities, funds and fixed income holdings</p> <p>Part of the investment process - research analysts working alongside RI team</p> <p>Multiple data providers including ISS, Sustainalytics, Ethical Screening, CDP and other NGO data providers</p> | <p>At a firm level we exclude direct investment in controversial weapons and have undertaken an attestation process for our third-party actively managed funds.</p> <p>Additionally, clients may set their own screens within our Discretionary Portfolio Service</p> |

Stewardship involves engaging with companies to discuss ESG issues to improve their handling and disclosure of such issues. This may be carried out individually or in collaboration with other investors. It includes voting, either in person or by proxy, which involves formally expressing approval or disapproval through voting on resolutions.

This is the explicit and systematic inclusion of ESG issues in investment analysis and decisions - to better manage risks and improve returns.

At Quilter Cheviot this is integrated into the investment process and our research teams are responsible for incorporating this into their ongoing analysis of investments.

At Quilter Cheviot we have a firm-wide restriction on investing directly in cluster munitions and anti-personnel landmines. We also monitor any potential indirect exposure to this on an ongoing basis.

Our resources

The MPS team works alongside the responsible investment team and the research teams. The responsible investment team has overall responsibility for the firm's active ownership work and leads on collaborations such as the 30% Club and PRI; and are members of various industry working groups such as the TISA Responsible and Sustainable Investment Committee and the PRI Wealth Management Group. The team also leads on strategic and regulatory developments across the business and also as part of Quilter's wider responsible investment team.

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|  <p>Equity research team</p> <p>Identifying ESG challenges and opportunities using qualitative and quantitative assessments</p> <p>Active engagement with companies on ESG matters</p> |  <p>Responsible investment team</p> <p>Overall responsibility for active ownership (engagement and voting) and industry collaborations</p> <p>Working alongside the research teams to continually enhance our ESG integration approach</p> <p>Quantitative ESG data</p> <p>Strategic and regulatory developments</p> |  <p>Fund research team</p> <p>Proprietary ratings at a fund level based on the approach taken to stewardship and ESG integration</p> <p>Active engagement with fund managers on ESG matters</p> |
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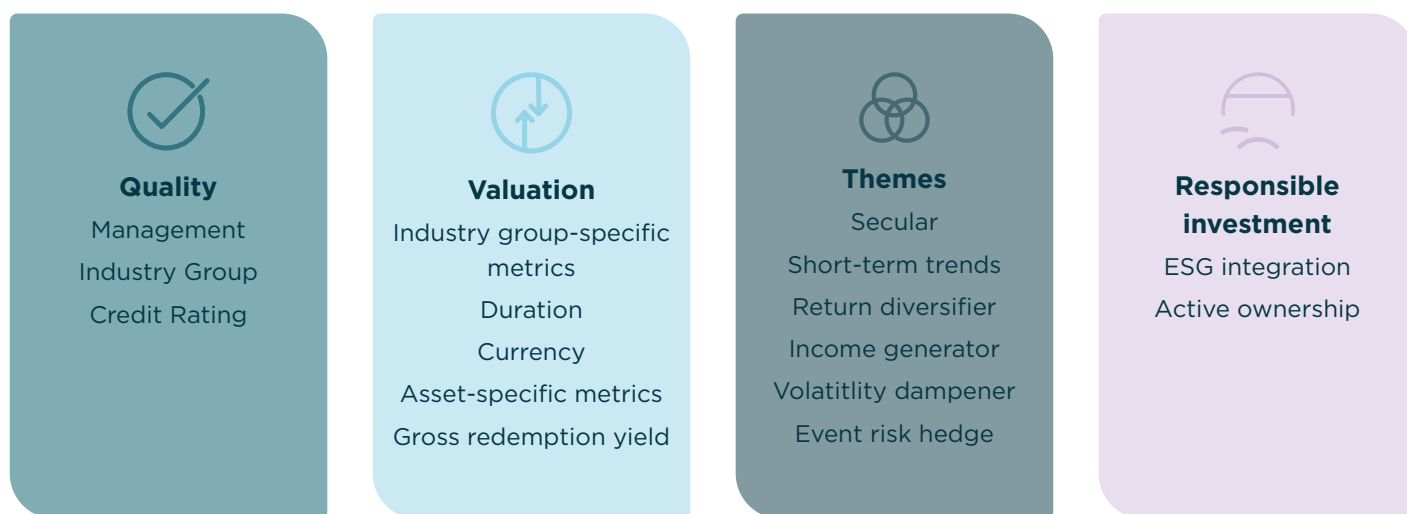
ESG factors are integrated into our investment process

ESG integration

Embedding ESG factors within our investment decision making is integral to our responsible investment approach. This is not about excluding companies or funds but evaluating their approach to ESG - there are different approaches depending on whether we are investing directly or via funds.

ESG integration and equities

Our five core MPS strategies invest directly in equities via our exclusive 'Building Blocks', a range of funds designed and managed by Quilter Cheviot exclusively for use within our services. These Building Blocks invest primarily in direct equities in the UK, North American, and European markets. As part of our research process, we consider environmental, social and governance (ESG) factors. Responsible investment sits alongside the other three fundamentals pillars of our equity selection process: quality, valuation and themes.



ESG integration and fund selection

Quilter Cheviot is one of the largest fund buyers in the UK market. We have a specialist fund research capability responsible for monitoring around 300 closed and open-ended funds.

When we invest via a third-party fund, one of our considerations is how the manager incorporates environmental, social and governance (ESG) factors as well as stewardship practices into their investment process, alongside traditional financial metrics. For us, taking environmental, social and governance issues into account is about ensuring all potential risks to an investment are considered.

At worst, not considering ESG factors might lead to reputational and financial damage for companies that are not managing these issues effectively.

| What we believe | What we think about | How we do this |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <ul style="list-style-type: none"> ESG considerations are part of the investment process The fund analyst is responsible for assessing a fund's ESG approach Having separate teams looking at the same fund from different perspectives does not work | <ul style="list-style-type: none"> Incorporation of ESG factors Engagement and stewardship activity Investment team and firm's responsible investment capability Data suppliers and usage | <ul style="list-style-type: none"> Regular face to face meetings with managers and where applicable responsible investment teams Regular RFIs (Requests for Information) which include ESG question sets Analytic tools to assess ESG factors Proprietary fund and firm level ratings for processes |

Voting and engagement

In our capacity as an investment manager we act as steward for our clients' assets. Company shares usually carry voting rights and exercising these enables shareholders to express their view and engage with companies to support the creation of wealth, benefitting shareholders, the wider economy other stakeholders. As a responsible investor we will use voting rights (where appropriate) to further the economic interests of our clients and we have established a set of voting principles which guide how we vote.

Within the MPS Building Blocks, we vote on our UK, European and US equity and investment trust positions. We use ISS as our proxy voting service provider and vote in accordance with Quilter Cheviot's decision, as the voting of holdings reflects our investment thesis.

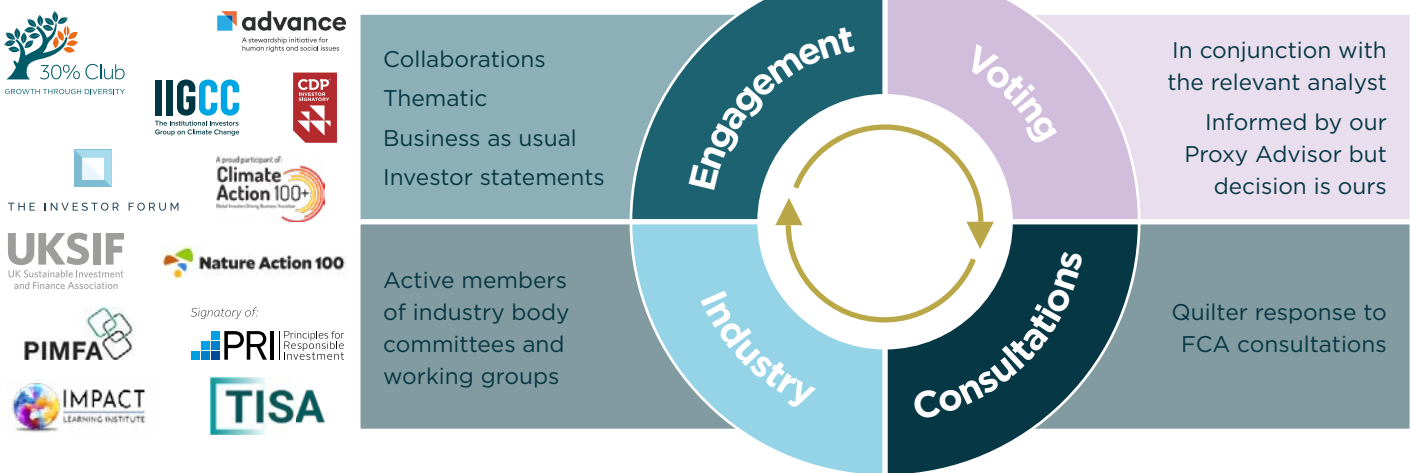
Stewardship = Active Ownership

Engagement is part of our Stewardship (also known as active ownership) approach.

We undertake our own engagement with the responsible investment team working alongside the relevant analyst, as well as the analyst progressing their own engagements on non-governance issues.

Our response to the Stewardship Code can be found **here**. Further information on our engagement policy be found **here**. Further information on our voting policy, providing more information on our approach to stewardship can be found **here**.

Alternatively, please visit our website: www.quiltercheviot.com



Quilter Cheviot
 Senator House
 85 Queen Victoria Street
 London EC4V 4AB
 +44 (0)20 7150 4000

**To find out more please contact your investment manager
 or email: marketing@quiltercheviot.com**



Investors should remember that the value of investments, and the income from them, can go down as well as up and that past performance is no guarantee of future returns. You may not recover what you invest.

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