PineBridge® INVESTMENTS

25 November 2025

Principal Adverse Sustainable Impact Policy

PineBridge Investments Ireland Limited

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1. Introduction

This document sets out disclosures by Pinebridge Investments Ireland Limited (the "**Firm**"), in respect of its obligation under Article 4 of the EU Sustainable Finance Disclosure Regulation ("**SFDR**") to make a "comply or explain" statement as to whether it shall consider the principal adverse impacts of investment decisions on sustainability factors.

2. No Consideration of Sustainability Adverse Impacts

The Firm is supportive of the aim of this requirement which is to improve transparency and investor understanding of how investment decisions impact sustainability factors across society and the environment.

However, the Firm does not currently consider the adverse impacts of investment decisions on sustainability factors. This is principally because (i) of a lack of consistent, accessible and accurate data from the underlying portfolio companies and (ii) the Firm is not a financial market participant that is required to do so given that it does not have an average number of employees exceeding 500 during the financial year. The Firm will maintain the position of not considering adverse impacts on sustainability factors until such time as it feels it has the necessary data and framework to be able to make these considerations meaningfully and report on them clearly.

The Firm will review this position regularly and will update investors accordingly with relevant information, should the position change.

3. Global Policy Statement on Responsible Investment

The Firm has implemented a Global Policy Statement on Responsible Investment. Under this policy, the Firm sets out its overarching ESG Statement of Principle and how the Firm integrates sustainability-related considerations into its investment processes.

Details of this can be found at: https://www.pinebridge.com/en/investor-types/default/about-us/esg-investing

4. Stewardship & Active Ownership

The Firm has implemented a shareholder Stewardship and Engagement Policy, for the purposes of the revised Shareholder Rights Directive ("SRD II"). Our Stewardship and Engagement Policy sets out how we integrate shareholder engagement in our investment strategy. This includes how we:

- monitor investee companies on relevant matters (including strategy, financial and non-financial performance and risk, capital structure, social and environmental impact and corporate governance)
- conduct dialogue with investee companies
- exercise voting rights and other rights attached to shares
- cooperate with other shareholders
- communicate with relevant stakeholders of the investee companies
- manage actual and potential conflicts of interests in relation to our engagement.

Our Stewardship and Engagement Policy is available on our website at:
https://www.pinebridge.com/_assets/pdfs/stewardship-and-engagement.pdf

5. Adherence to responsible business codes and international standards

In connection with ESG, the Firm adheres to responsible business codes and internationally recognised standards for due diligence and reporting. For these purposes, the Firm refers to its adherence to the following codes and standards:

Signatories of:

Principles of Responsible Investing (PRI)
UK Stewardship Code
Japan Stewardship Code
Taiwan Annual Report of the Stewardship Principles for Institutional Investors
UK Local Government Pension Scheme Code

Member of the:

Sustainability Accounting Standards Board's Standards Advisory Group (SASB)
Advisory Council of the Green Bond Principles and Social Bond Principles
Transition Pathway Initiative
Swiss Sustainable Finance Initiative