Baillie Gifford™

Divulgación de información del sitio web de productos financieros: resumen

Worldwide Responsible Global Alpha Paris-Aligned Fund

Sin objetivo de inversión sostenible

Este producto financiero promueve características medioambientales o sociales, pero no tiene un objetivo de inversión sostenible. Aunque no tiene como objetivo una inversión sostenible, tendrá como mínimo un 20 % de inversiones sostenibles.

Puede consultar más información en el texto completo de la divulgación de información.

Características medioambientales o sociales

El Fondo promueve las siguientes características medioambientales o sociales:

- Prácticas empresariales responsables de conformidad con los principios del Pacto Mundial de las Naciones Unidas para empresas.
- Estándares medioambientales y sociales mínimos logrados mediante la exclusión de las actividades empresariales que, en opinión del Gestor de Inversiones, sean perjudiciales para el medioambiente y la sociedad.
- Estudio activo de las cuestiones medioambientales y sociales mediante la votación por delegación aplicada de acuerdo con el documento «Stewardship Principles and Guidelines» (Principios y directrices de administración) del Gestor de Inversiones.
- Una intensidad de las emisiones de gases de efecto invernadero gestionada, medida de acuerdo con la huella de carbono del Fondo, con el objetivo de que sea inferior a la del MSCI ACWI EU Paris Aligned Requirements Index (el «Índice»).
- Contribución a la transición hacia un futuro con bajas emisiones de carbono mediante una evaluación cualitativa.

Aunque el Fondo pretende tener una huella de carbono inferior a la del Índice, este Índice no se utiliza como referencia para lograr las características medioambientales o sociales promovidas, ya que el Fondo no adapta sus características medioambientales o sociales a las del Índice.

Estrategia de inversión

El Fondo se gestiona de forma activa e invierte en valores de renta variable mundiales que cotizan, se negocian o se gestionan en Mercados Regulados y tienen en cuenta factores medioambientales, sociales y de gobernanza. Al investigar empresas para su posible inclusión en la cartera, el Gestor de Inversiones utiliza un marco de análisis para valorar cómo pueden afectar los factores medioambientales, sociales o de gobernanza a la sostenibilidad del crecimiento de los beneficios de una empresa. El Fondo utiliza la evaluación basada en normas, la exclusión en función de la actividad empresarial (tanto cuantitativa como cualitativamente) y la gestión activa para respaldar el logro de las características medioambientales o sociales promovidas. El Gestor de Inversiones aplica una política para evaluar la buena gobernanza en áreas que abarcan las estructuras de buena gestión, las relaciones con los trabajadores, la remuneración del personal y el cumplimiento de las obligaciones fiscales. Las empresas que no superen esta evaluación no formarán parte del Fondo.

El Gestor de Inversiones gestionará el fondo para alinear las participaciones del fondo con el objetivo de emisiones netas cero de GEI para 2050 o antes, en línea con los esfuerzos globales para limitar el calentamiento a 1,5C ("cero neto"). Como parte de este proceso, todas las empresas de la cartera son evaluadas activamente y priorizadas para el compromiso con su alineación hacia el cero neto de manera continua.

Puede consultar más información en el texto completo de la divulgación de información.

Proporción de inversiones

El Fondo se compromete a tener como mínimo un total de un 20 % de inversiones sostenibles, de las cuales un 10 % deben ser inversiones sostenibles con un objetivo medioambiental, pero que no estén alineadas con la taxonomía de la UE. El 10 % restante se repartirá entre otras inversiones medioambiental o socialmente sostenibles, pero sin asignación fija, ya que esto dependerá de la disponibilidad de oportunidades de inversión sostenibles.

Puede consultar más información en el texto completo de la divulgación de información.

Seguimiento de las características medioambientales o sociales

Las características medioambientales o sociales se supervisan interna y externamente de diversas maneras. El Fondo utiliza la evaluación basada en normas, la exclusión en función de la actividad empresarial (tanto cuantitativa como cualitativamente) y la gestión activa para respaldar el logro de las características medioambientales o sociales promovidas. Estos métodos se implementan continuamente mediante el cumplimiento y el seguimiento constantes de los compromisos vinculantes.

Puede consultar más información en el texto completo de la divulgación de información.

Métodos

Los siguientes indicadores de sostenibilidad se utilizan para medir el logro de las características medioambientales o sociales promovidas:

- El porcentaje de inversiones que cumplen la política del Gestor de Inversiones sobre la evaluación del incumplimiento de los principios del Pacto Mundial de las Naciones Unidas para empresas.
- El porcentaje de inversiones que cumplen con las exclusiones en función de la actividad empresarial.
- El porcentaje de las posiciones votadas.
- La huella de carbono del Fondo es inferior a la del Índice.
- El porcentaje de inversiones que se considera que desempeñan una función en la transición hacia un futuro con bajas emisiones de carbono tras una evaluación cualitativa.

Puede consultar más información en el texto completo de la divulgación de información.

Fuentes y tratamiento de datos

El Gestor de Inversiones utiliza una combinación de análisis internos (documentados con información de fuentes públicas divulgada por las empresas en las que se invierte) y fuentes de datos de terceros para lograr cada una de las características medioambientales o sociales que promueve el Fondo.

Puede consultar más información en el texto completo de la divulgación de información.

Limitaciones de los métodos y los datos

El panorama de los datos ESG está avanzando rápidamente, y tanto la calidad como la metodología de los datos se enfrentan actualmente a retos que afectan a todo el sector, tales como la falta de divulgación de información corporativa y la evolución de los requisitos normativos.

Estas limitaciones se mitigan principalmente con la propia investigación interna e implicación activa con las empresas del Gestor de Inversiones, así como mediante la comparación de métricas clave con diferentes proveedores de datos. A causa de esta mitigación, el Gestor de Inversiones considera que la promoción de las características medioambientales y sociales apenas se ha visto alterada.

Puede consultar más información en el texto completo de la divulgación de información.

Diligencia debida

El punto de partida de todas las estrategias de Baillie Gifford es el análisis fundamental ascendente de valores. Este proceso se centra en describir las empresas, el sector en el que operan y su enfoque en cuanto a cuestiones materiales o posibles cuestiones materiales.

El acceso a datos externos de proveedores independientes ayuda a describir más detalladamente cada posición, y se valora en gran medida la búsqueda de perspectivas e información de expertos e investigadores externos para ayudar a fundamentar el enfoque del Fondo.

Al margen del Fondo, el Gestor de Inversiones aplica continuamente la diligencia debida a toda la actividad empresarial para supervisar los compromisos que se establecen, tal y como se especifica en la sección relativa al seguimiento, bajo la vigilancia de un comité designado.

Puede consultar más información en el texto completo de la divulgación de información.

Políticas de implicación

La supervisión de las inversiones y la implicación que el Gestor de Inversiones realiza en nombre de los clientes es un factor esencial en el proceso de inversión y un aspecto fundamental del modo en que el Gestor de Inversiones ejerce sus responsabilidades administrativas. Todos los gestores de inversiones, los analistas de inversiones y los analistas ESG participan en este proceso. Estas personas y estos equipos pueden reunirse con el equipo directivo y otros miembros del personal ejecutivo, jefes de divisiones y miembros no ejecutivos como parte de las actividades de implicación.

Cada año, se divulgará información relativa a las inversiones que estén sujetas a procesos formales de implicación y seguimiento en virtud de la política del Gestor de Inversiones sobre la evaluación del incumplimiento de los principios del Pacto Mundial de las Naciones Unidas para empresas.

Puede encontrar más información sobre la política de implicación del Gestor de Inversiones en el documento «Stewardship Principles and Guidelines» (Principios y directrices de administración) de Baillie Gifford, que está disponible públicamente en su sitio web.

Puede consultar más información en el texto completo de la divulgación de información.

Índice de referencia designado

No se ha designado ningún índice como índice de referencia para lograr las características medioambientales o sociales que promueve el producto.

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Financial product website disclosure

Worldwide Responsible Global Alpha Paris-Aligned Fund

This document provides the investor with detailed information about the Fund in relation to the Sustainable Finance Disclosure Regulation ('SFDR'). This is a regulatory document required under SFDR. The information contained in this document is to help the investor understand the sustainability characteristics and/or objectives and risks of this Fund. This document should be read in conjunction with other relevant regulatory documentation so the investor can make an informed decision to invest.

No sustainable investment objective

This financial product promotes environmental or social characteristics, but does not have as its objective sustainable investment. While it does not have as its objective a sustainable investment, it will have a minimum proportion of 20% of sustainable investments.

The Fund commits to partially invest in sustainable investments, defined as economic activities that contribute to either an environmental or social objective. These economic activities may contribute to such objective due to: (a) generating a certain level of revenues, either through products and/or services, that are aligned with the broader sustainable objectives of society as currently best defined by the United Nations Sustainable Development Goals ('SDGs'), some which can be mapped on a high-level basis against the environmental objectives outlined in the EU Taxonomy and/or (b) reducing absolute greenhouse gas emissions, either through their products and/or services or business practices, to seek to achieve the long-term global warming objectives of the Paris Agreement. Reduction of greenhouse gas emissions aligns with the climate mitigation objective in the EU Taxonomy. The Fund does not commit to the specific environmental objectives in the EU Taxonomy, but may make investments that contribute to these specific environmental objectives, in which case they will be disclosed in the periodic reporting included in the annual report.

Upon investment and over the life of the product, mandatory indicators for adverse impacts in Table 1 of Annex I of SFDR Regulatory Technical Standards ('RTS') and opt-in indicators for adverse impacts selected by the Investment Manager in Tables 2 and 3 of Annex I of SFDR RTS that are deemed to indicate the presence of a principal adverse impact are assessed and excluded or monitored depending on the principal adverse impact indicator. When not explicitly excluded, principal adverse impacts are monitored through stewardship activities which include the following non-exhaustive actions to mitigate or reduce principal adverse impacts: (a) voting (b) dialogue and engagement and (c) collaborative activities. In instances wherein a sustainability objective has been agreed with the investee company as part of stewardship activities and this objective is not achieved, escalation measures (e.g. collective engagement) will be initiated. Divestment, although an action that can be taken, will be the last resort.

The Investment Manager will assess companies using norms-based evaluation and their compliance with its policy on assessing breaches of United Nations Global Compact Principles for Business as outlined in Baillie Gifford's Stewardship Principles and Guidelines document. As such, all the companies in which the Fund invests in are expected to operate in accordance with the principles set out in the United Nations Global Compact and related standards, including the Organisation for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises and the United Nations Guiding Principles on Business and Human Rights.

Environmental or social characteristics of the financial product

The Fund promotes the following environmental and/or social characteristics:

- Responsible business practices in accordance with the United Nations Global Compact Principles for Business.
- Minimum environmental and social standards achieved through exclusion of business activities that the Investment Manager has deemed to be harmful to the environment and society.
- Active consideration of environmental and social issues through proxy voting applied in line with the Investment Manager's Stewardship Principles and Guidelines document.
- Managed greenhouse gas emissions intensity as measured by the Fund's Carbon Footprint and an aim for this to be lower than MSCI ACWI EU Paris Aligned Requirements Index (the 'Index').
- Contribution towards transition to a low carbon future through a qualitative assessment.

While the Fund aims to have a Carbon Footprint lower than the Index, this Index is not used as a reference index to attain the promoted environmental and/or social characteristics as the Fund does not align its environmental and/or social characteristics with that of the Index.

Investment strategy

The Fund is actively managed and invests in global equities which are listed, traded or dealt on Regulated Markets while considering environmental, social and governance factors. When researching companies for potential inclusion in the portfolio, the Investment Manager uses a research framework to consider how environmental, social or governance factors may affect the sustainability of a company's profit growth. The Fund uses norms-based evaluation, business activity-based exclusion (both quantitatively and qualitatively) and active ownership to support the attainment of the promoted environmental and/or social characteristics.

The Investment Manager will manage the Fund in order to align the Fund's holdings with the goal of net zero GHG emissions by 2050 or sooner, in line with global efforts to limit warming to 1.5C ("net zero"). As part of this process, all portfolio companies are actively assessed and prioritised for engagement for their alignment with net zero on an ongoing basis.

The Fund will comply with the Investment Manager's policy on assessing breaches of the United Nations Global Compact Principles for Business as outlined in Baillie Gifford's Stewardship Principles and Guidelines document and will exclude companies that derive more than 10% of their annual revenues from (i) the production and/or sale of alcohol; (ii) the production and/or sale of firearms and/or small arms ammunition for the civilian market and/or the production of military weapon systems and components, and provision of support systems and services for production of military weapon systems and components; (iii) the production and/or distribution of adult entertainment; (iv) the provision of gambling services; or (v) the retail sale of tobacco. The investment manager also excludes companies involved in the production of tobacco.

The investment manager exerts the right to vote by voting according to its voting policy, unless impediments occur (e.g. Share blocking). The investment manager's voting policy is available publicly on its website.

The strategy will be consistent with the objectives of the Paris Climate Agreement and aims to have a Carbon Footprint lower than that of the Index. Details of the measurement of the Fund's Carbon Footprint against that of the Index will be provided in the annual report and will include an explanation should this aim not be achieved.

Finally, the investment manager employs an additional assessment to ensure that the Fund invests in a way which is, in the investment manager's opinion, in alignment with the Paris Climate Agreement by excluding carbon intensive companies that do not, or will not, play a role in the transition to a low-carbon future.

This assessment includes: (a) a quantitative screening to exclude: (i) companies that derive 1 per cent. or more of revenues from the exploration, mining, extraction, distribution or refining of thermal coal; (ii) companies that derive 10 per cent. or more of revenues from the exploration, extraction, distribution or refining of oil and/or gas; (iii) companies that derive 50 per cent. or more (in aggregate) of revenues from either the manufacturing of gas and/or the provision of services to thermal coal, oil and/or gas extraction and/or production; (iv) companies that derive 50 per cent. or more of their revenues from electricity generation with a GHG intensity of more than 100g CO2 e/kWh; and (b) qualitative assessment framework to identify those companies that do not, in the Investment Manager's opinion, align with the objectives of the Paris Climate Agreement. The methodology for the qualitative assessment framework has been developed by the Investment Manager's in-house climate team and builds upon relevant industry standard for measuring alignment with the objectives of the Paris Climate Agreement. The framework allows the Investment Manager to assess each portfolio company individually in terms of the role it is playing the transition to net zero GHG emission and its alignment with the objectives of the Paris Climate Agreement.

Companies that do not meet the requirements of the qualitative assessment framework and which the Investment Manager does not believe to have a credible potential to become aligned with the objectives of the Paris Climate Agreement, will be excluded from inclusion in the portfolio. Companies that do not currently meet the requirements of the qualitative assessment framework, but where the Investment Manager believes there is credible potential for the companies to become aligned with objectives of the Paris Climate Agreement or where the potential to become aligned is unknown, may be excluded at the discretion of the Investment Manager.

SFDR requires that products promoting environmental and/or social characteristics do not invest in companies who do not follow good governance practices. As such, the investment manager has adopted a policy to apply 'good governance tests' on areas covering sound management structures, employee relations, remuneration of staff and tax compliance. Companies that do not pass these tests will not be held in the fund.

The investment manager believes that good governance works best when there are diverse skillsets and perspectives, paired with an inclusive culture and strong independent representation to assist, advise and constructively challenge the thinking of management. However, the investment manager also believes that there is no fixed formula to create a constructive and purposeful board but it expects that boards have the resources, information, cognitive and experiential diversity they need to fulfil its responsibilities. More detail on the investment manager's policy to assess good governance practices of investee companies can be found in Baillie Gifford's Stewardship Principles and Guidelines document, which is publicly available on its website.

Proportion of investment

To meet the environmental and/or social characteristics promoted, the Fund will invest primarily in equity securities that are aligned with these same characteristics. The remaining proportion of investments may be invested in cash. Cash is a residual element of the investment process. Cash may be held on deposit and cash equivalents may also be held from time to time. As cash is a residual element of the investment process, it does not affect the delivery of the environmental and/or social characteristics promoted. The assessment of counterparties and issuers for cash management (including cash and near cash) focuses on creditworthiness of these parties, which can be impacted by sustainability risks.

The Fund commits to having a minimum proportion of sustainable investments of 20%, 10% of which relates to sustainable investments with an environmental objective but which do not qualify as environmentally sustainable under the EU Taxonomy. The remaining 10% will be allocated between other environmental and/or socially sustainable investments but with no fixed allocation as this will depend on the availability of sustainable investment opportunities. Economic activities that are not aligned with the EU Taxonomy are not necessarily environmentally harmful or unsustainable. In addition, not all economic activities are covered by the EU Taxonomy Regulation and its Delegated Acts as it was not possible to develop criteria for all sectors where activities could conceivably make a substantial contribution.

There is no commitment for the portfolio to make investments that take into account the EU criteria for environmentally sustainable economic activities. If at the end of the accounting period, investments are made in economic activities contributing to an environmental objective aligned with the EU Taxonomy, compliance of those investments with the requirements laid down under the EU Taxonomy will not be subject to an assurance or review provided by an auditor or third party.

Monitoring of environmental or social characteristics

The environmental and/or social characteristics are monitored internally and externally in a variety of ways. The Fund uses norms-based evaluation, business activity-based exclusion (both quantitatively and qualitatively) and active ownership to support the attainment of the promoted environmental and/or social characteristics and these are implemented on a continuous basis through ongoing compliance with, and monitoring of, the binding commitments. A nominated committee has overall responsibility for ensuring compliance with the environmental and/or social characteristics the Fund is promoting, and exceptions-based reporting is sent to this committee quarterly for challenge and oversight.

- The designated investment restrictions team monitors compliance with the policy on assessing breaches of United Nations Global Compact Principles for Business (norms-based evaluation), working in conjunction with ESG analysts and/or the investment managers and using a third-party data feed (which is updated quarterly), supplemented by internal research.
- Exclusion of business activities deemed harmful to the environment and society (business activity-based exclusions) is monitored by the designated investment restrictions team on a daily basis, working in conjunction with ESG analysts and/or the investment managers and using a live third-party data feed, supplemented by internal research where required.
- Voting is monitored and actioned by voting analysts as and when votes are due, working in conjunction with other ESG analysts and/or the investment managers and reported to clients on a quarterly basis.
- The Fund's Carbon Footprint is calculated and monitored against the index on a monthly basis.

A qualitative screening approach is used to identify those companies that, in the Investment Manager's opinion, will not play a role in the transition to a low carbon future. As part of this screening, the Investment Manager will consider whether the company provides an essential service (meaning those services that are not discretionary, do not currently have low carbon alternatives, and are crucial to the way individuals currently live), and also whether it can and has shown a commitment to preparing for the low-carbon economy through, for example, its emissions reporting, carbon policies and targets. Carbon intensive companies that do not fulfil the qualitative screening process will be excluded from the portfolio.

Methodologies

The following sustainability indicators are used to measure the attainment of the promoted environmental and/or social characteristics:

- The % of investments that comply with the Investment Manager's policy on assessing breaches of United Nations Global Compact Principles for Business.
- The % of investments that comply with the business activity-based exclusions.
- The % of holdings voted.
- The Fund's Carbon Footprint is lower than the Index.
- The % of investments that have been qualitative assessed to play a role in the transition to a low carbon future.

The methodologies in relation to these indicators are outlined below:

Ethical exclusions – norms – and business activity-based exclusions – The Fund minimises the existence of adverse impacts by formally excluding companies from its investable universe by applying ethical screens: a norms-based evaluation of investee companies, and business activity-based exclusions. Initial negative screening is done using a variety of third-party data sources (such as Sustainalytics and MSCI), supplemented by additional research from ESG analysts and/or investment managers as required.

See the Investment Strategy section for further details on the business activity-based screening applied to the Fund. Holdings which are inconsistent with the business activity-based exclusions will be excluded.

Norms-based evaluation: The Fund will assess equities using a norms-based evaluation which is based on the ten principles of the United Nations Global Compact, which cover areas including human rights, labour rights, environmental safeguards and combating bribery
and corruption. If a holding is identified as having breached the Principles, based on the Investment Manager's judgement, supported by internal research alongside data feeds from third-party sources, a formal engagement and monitoring process will be implemented. Material improvement is expected within a reasonable timeframe (a maximum of three years), and should a company fail to demonstrate progress then the Fund will divest.

Voting – The Voting team oversee voting analysis and execution in conjunction with investment managers and use voting as a tool to consider environmental and/or social issues via stewardship. Unlike many peers, the Investment Manager does not outsource the responsibility for voting to third-party suppliers. Research from proxy advisers is used for information only. The Investment Manager analyses all meetings in-house and endeavours to vote every clients' holdings in all markets (when given voting rights and in line with the Voting Policy outlined in Baillie Gifford's Stewardship Principles and Guidelines document).

Carbon Footprint – The Fund's Carbon Footprint is calculated and measured against the MSCI ACWI EU Paris Aligned Requirements Index. Only those investments for which we have estimated or reported figures from our third-party data provider will be included in the calculation, covering Scope 1, 2 and 3 emissions. Scope 3 emissions will be phased in according to the schedule which prioritises certain sectors (e.g. oil, gas and mining sectors) ahead of others, as set out in the Supplementing Regulation for EU Climate Transition Benchmarks and EU Paris-Aligned Benchmarks. As this metric is based on a weighted average, the Fund might include single companies with higher intensities provided they do not breach any business activity-based exclusions or fail the qualitative assessment.

ESG-focused investment research

The quantitative screening process is focused only on excluding companies with particular levels of revenue exposure to fossil fuels and other sin-sectors, carbon-intensive companies from other industries or sectors will remain within the possible investment universe. The Fund then applies its qualitative screening process to the remaining companies. The purpose of this screening process is to identify those companies that, in the Investment Manager's opinion, face significant challenges from the transition to a low-carbon future. This qualitative screening consists of three questions:

- **Does the company provide an essential product or service?**

  This question captures the idea of a carbon budget. We accept that not all emissions are equal. Some high-emission industries produce products and services that are essential (e.g. agriculture), while others deliver products and services that are discretionary or only benefit a small group of people (e.g. cruise liners). Companies in the latter category are more exposed to climate risk.

- **Can emissions be mitigated in an economically viable way?**

  This question addresses whether products and services can be delivered in a better manner – specifically, if there are technologies which can significantly reduce the carbon intensity of a business in an economically viable way. Examples might include the use of renewable inputs (e.g. fuel and feedstock), improved product design (e.g. extending the life of products), the use of carbon capture techniques, or the adoption of radically different technology. Companies where green alternatives are readily available, feasible and economic are most at risk.

- **Is the company part of the problem or solution?**

  If the second question is about a company's ability to mitigate, the third question is about its willingness. Is there a desire and preparedness for a low-carbon transition? Here we assess company policy, emissions reporting and future targets. We consider how the company's carbon performance now and in future might compare to others in the sector, as well as to the commitments made under the Paris Agreement. We seek evidence that carbon management is a part of the corporate culture, integrated into decision making. We use frameworks such as the Financial Stability Board (FSB) Taskforce on Climate-related Financial Disclosures (TCFD) and the Transition Pathway Initiative (TPI) to assist our assessment. Companies which score highly are those that take a leadership role in the low-carbon transition. They can help accelerate the transition for the whole industry.

The companies that fail this screen are excluded.

Data sources and processing

The Investment Manager uses a combination of internal research (informed by publicly available sources disclosed by investee companies) and third-party data sources to attain each of the environmental and/or social characteristics promoted by the Fund. The environmental and/or social characteristics promoted by the Fund are listed below as well as the data sources.

UN Global Compact policy	Internal proprietary research, public disclosures, Sustainalytics, MSCI
Business activity-based exclusions	Internal proprietary research, public disclosures, Sustainalytics, MSCI
Holdings voted in line with Baillie Gifford's Stewardship Principles and Guidelines document	Internal proprietary research, aided by Glass Lewis, ISS, BoardEx, ZD Proxy, IiAS, and public disclosures
Carbon Footprint	MSCI
Investments that have been qualitatively assessed to play a role in a low carbon future	Internal proprietary research, public disclosures

Where data is extracted from third party providers, the Investment Manager evaluates their methodology and coverage at the outset (initial due diligence) and then carries out spot checks of the data each month, escalating issues to the third-party provider where necessary. A dedicated team is tasked with ensuring effective relationships and operational interactions with key third-party providers, recognising that effective use of third-party vendors can support client service and stewardship activities. The level of oversight depends on the nature of the services provided. Providers of critical or important services and those that have access to sensitive data are subject to a vendor management framework.

The Investment Manager is regularly adding more automated quality checking of third-party data. Data metrics required for reporting are currently calculated in house in line with recognised guidance and regulations. The Investment Manager is actively improving data processing, introducing automation where possible and looking for ways to receive and ingest data from a wider set of data providers. However, there is sometimes a reliance on estimated data when it comes to the business activity-based exclusions and Carbon Footprint commitments of the Fund. Third party-providers occasionally make estimates of revenue exposures relating to business activity-based exclusions where disclosure is lacking.

Regarding Carbon Footprint, a large proportion of data is estimated by third-party providers due to general lack of disclosure of Scope 3 emissions.

Due to this the Investment Manager is wary of using third-party data sources as the sole input. Third-party data sources are used to flag any potential issues and to focus work on companies or issues may be supplemented with further research.

Limitation to methodologies and data

The ESG data landscape is rapidly developing, and data quality and methodology currently face industry-wide challenges such as lack of corporate disclosures and evolving regulatory requirements. Specifically, the data used in the Fund may be provided by third-party sources and is based on backward-looking analysis, while the subjective nature of ESG criteria means a wide variety of outcomes are possible. There is a risk that the data provided may not adequately address the underlying detail around material ESG considerations. The analysis is also dependent on companies disclosing relevant data and the availability of data can be limited.

These limitations are mitigated primarily through the Investment Manager's own in-house research and active engagement with companies, as well as cross-referencing key metrics against different data providers. Due to this mitigation, the Investment Manager believes that the promotion of the environmental and social characteristics is not appreciably altered.

Due diligence

The starting point for all Baillie Gifford strategies is bottom-up fundamental research. This process focuses on understanding each company, the sector it operates in and its approach to material (or likely to be material) issues. Investment ideas for inclusion in the strategy will undergo a critical assessment in the form of a question framework that will seek to capture the pertinent investment considerations. Supporting this are bespoke pieces of investment and ESG research that allows the investment managers to easily compare and contrast potential new purchases with competing ideas and existing holdings.

The Fund's investment management approach is focused on company-level research and analysis, with the assistance of dedicated ESG and risk specialists working across the firm. Access to external data from independent providers helps add further detail to understanding each holding, and great value is placed on seeking the perspectives and insights of external experts and researchers to help inform the Fund's approach. This information is used primarily as an aid to engage with companies to ascertain how they are mitigating risks and maximising opportunities. If it is felt that companies are not making enough progress in mitigating risks, then the option of exercising voting rights in shareholder resolutions and ultimately divesting from holdings is considered.

External to the Fund, ongoing due diligence is carried out by the Investment Manager across the business to monitor the commitments being made, as specified in the Monitoring section, with oversight provided by a nominated committee.

Engagement policies

Engaging with and monitoring investments the Investment Manager makes on behalf of clients is an integral element of the investment process and core to how the Investment Manager discharges its stewardship responsibilities. All investment managers, investment analysts and ESG analysts are involved in this process. These individuals and teams may meet with management and other executive staff, heads of divisions and non-executive board members as part of engagement activities.

As a patient, active owner, the Investment Manager aims to engage with the companies in which it invests on behalf of its clients, encouraging a long-term focus and meaningful change when needed. Engagement is preferable to divestment, which is typically the tool of last resort. There are three primary reasons for engaging with a company: to fact find, to assess progress, and to influence. It is important to note that influence is only one of these three aims. The Investment Manager firmly believes in taking time to understand companies and making its own, long-term agenda known to management. This is an important foundation of being responsible holders and over time makes it easier to advocate for changes, as both sides have a better understanding of and appreciation for what the other party is trying to achieve.

On an annual basis, investments that are subject to formal engagement and monitoring processes under the Investment Manager's policy on assessing breaches of United Nations Global Compact Principles for Business will be disclosed.

More information on the Investment Manager's engagement policy can be found within Baillie Gifford's ESG Principles and Guidelines document, which is publicly available on its website.

Designated reference benchmark

No index has been designated as a reference benchmark to attain the environmental and/or social characteristics promoted by the product.

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This disclosure was last updated In July 2025.

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