Baillie Gifford

SDR Sustainability-related Disclosure Document - December 2025

Baillie Gifford & Co Limited

Baillie Gifford Defensive Growth Fund

Sustainability Approach

This Fund has explicit commitments to integrate ESG factors into the investment research and decision-making process. The following commitments have a material impact on the composition of the Fund.

Investment Objective: The Fund aims to have a carbon footprint that is lower than that of the Fund's stated carbon budget. The carbon budget is set in absolute terms and will decrease at a steady rate of 7 percent per annum.

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UNGC: The Fund will assess companies using a Norms-based Evaluation and will comply with the Investment Adviser's policy on assessing breaches of the United Nations Global Compact Principles (UNGC). Where breaches occur, the preferred approach is to use engagement in the first instance to encourage improvement.

Propriety Assessment Framework: The Investment Adviser applies its proprietary qualitative investment process to assess whether investments are compatible with a sustainable economy. In making this assessment, relevant investments will be assessed against each of the five dimensions of the Sustainable Accounting Standards Board's Materiality Map: Environment, Human Capital, Social Capital, Leadership & Governance and Business Model & Innovation.

Exclusions: The Fund applies a combination of revenues- and norms-based exclusions for directly held companies. The Exclusions will be companies which derive a significant proportion of their annual revenues from (i) the production of military weapon systems (10%), (ii) fossil fuel extraction and production (10%), (iii) tobacco production (5%), or (iv) thermal coal distribution (30%).

No Sustainable Investment Label

Sustainable investment labels help investors find products that have a specific sustainability goal. Further information on sustainable investment labels can be found on the FCA website: https://www.fca.org.uk/firms/climate-change-and-sustainablefinance/sustainability-disclosure-and-labelling-regime.

This product does not have a UK sustainable investment label.

Using a label imposes significant obligations on in-scope products, including (without limitation) requiring a specific aim to achieve positive environmental and/or social outcomes.

The Fund does not explicitly aim to achieve positive environmental and/or social outcomes (beyond having a carbon footprint lower than the carbon budget), but it promotes environmental and/or social characteristics through the integration of sustainability factors in investment decisions, and the application of negative screens through its quantitative screening process and norms-based screening process.

Sustainability Metrics

Exposure to fossil fuel activities		
These metrics show the exposure of the portfolio to any companies generating at least 5% of their revenues from fossil fuel activities. This is a broad metric which can include companies in fossil fuel sectors and those operating mainly in other sectors.	30 September 2025	
	Portfolio	
% of total AUM invested in companies with > 5% revenues from oil and/or gas activities ¹	16	
% of total AUM invested in companies with > 5% revenues from thermal coal mining and sale ²	0	
% of total AUM invested in companies with > 5% revenues from thermal coal power generation	8	

Source: Baillie Gifford, MSCI.

¹ Includes oil and/or gas extraction and production, distribution, retail, equipment and services, petrochemicals, pipelines and transportation and refining. Excludes biofuel production and sales, and trading activities.

² Includes the mining of thermal coal (including lignite, bituminous, anthracite and steam coal) and its sale to external parties. Excludes metallurgical coal, coal mined for internal power generation, intra-company sales of mined thermal coal and revenue from coal trading.

United Nations Global Compact

This fund is committed to complying with the Investment Adviser's policy on assessing breaches of the UNGC. Companies directly held in the portfolio are monitored and assessed against the 10 principles of the UNGC and, if any breaches are identified, a formal engagement and monitoring plan will be implemented.

Material improvements are expected within three years of the commencement of our engagement. Should a company fail to demonstrate progress within expected timescales, the Fund would divest.

30 September 2025
Portfolio

More details can be found in our firmwide Stewardship Principles and Guidelines.	
Number of companies in the portfolio that the Investment Adviser has assessed as breaching the United	

Nations Global Compact, and have been subject to formal engagement and monitoring

0

Number of companies the Fund has sold due to their failure to demonstrate improvements during the formal engagement and monitoring process, within a reasonable timeframe (a maximum of three years from the date of engagement)

0

Source: Baillie Gifford

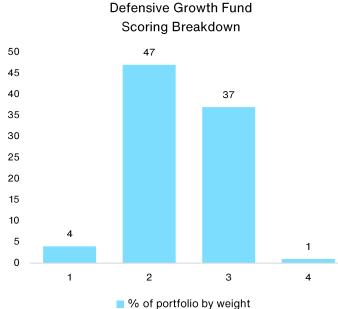
Defensive Growth Fund Proprietary Assessment Framework

The Fund uses a proprietary assessment framework to ensure compatibility with a sustainable economy. In making this assessment, the Investment Adviser will apply different evaluation frameworks, depending on issuer type. All asset types in which the Fund invests are assessed, with the exception of cash and cash-like instruments, derivatives and currency forwards.

Each investment is assigned a score from 0 to 4, with 4 indicating the highest compatibility with a sustainable economy. Investments scoring 0 are deemed unsustainable and are not eligible for inclusion in the portfolio, as they do not demonstrate sufficient willingness or ability to align with a sustainable economy within an appropriate timeframe.

This scoring framework is designed to ensure that the fund's portfolio is consistent with sustainable economic objectives.

For more information on the scoring criteria applied to each type of issuer, visit the Fund's prospectus.



Source: Baillie Gifford. Data as at 30 September 2025. Assessment excludes cash and cash-like instruments, derivatives and currency forwards.

More Information

For more information please refer to below relevant documents:

Prospectus | KIID | Factsheet | TCFD | Stewardship

Further information on sustainable investment labels can be found on the FCA website.

For our legal notices and disclosures please visit bailliegifford.com/disclaimers

Contact Us

For further information about the Fund or Baillie Gifford's range of OEICs, please contact our Client Relations Team on 0800 917 2113, visit our website at bailliegifford.com, or email enquiries@bailliegifford.com.