



BERENBERG
PARTNERSHIP SINCE 1590

BERENBERG WEALTH AND ASSET MANAGEMENT

ESG Exclusion Policy

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Introduction

At Berenberg Wealth and Asset Management (WAM), we believe that it is important to integrate Environmental, Social and Governance (ESG) aspects into the investment process. This includes, as a basic instrument, the exclusion of certain investments based on our ethical and moral beliefs as well as risk assessments. We have continuously developed our exclusion criteria at Berenberg WAM over the last years while considering developments and standards in the market, client demand, and regulatory requirements. Based on the criteria described in further detail in the next section, we avoid investments in specific products, sectors, and countries as well as business activities.

ESG Exclusion Approach

Scope and Implementation

Our ESG exclusion approach, as described within this document, is applied to all funds and mandates¹ in Berenberg WAM on the level of:

- single investments (equities, corporate bonds, sovereign bonds, derivatives)
- investments in active third-party funds and Exchanged-Traded Funds (ETFs).

Our funds and mandates can be categorized into three distinct internal ESG categories², within which specific sets of pre-defined ESG exclusion criteria are applied:

- Funds and mandates in the category *ESG screened* apply our general exclusion criteria.
- Fund and mandates in the category *ESG integrated* apply our general exclusion criteria.³
- Funds and mandates in the category *ESG targeted & Impact focused* apply our extended exclusion criteria.

Beyond our own ESG exclusion approach, we can provide clients with specific exclusion filters following their individual requests on various screening criteria in special mandates and special funds. Our ESG experts can support our clients by providing them with advice on how to define and implement individual ESG exclusion criteria in their dedicated special mandates or funds.

Our own as well as our client's specific ESG exclusion criteria are implemented through automated data feeds into our internal systems via our third-party data ESG provider.

¹ Except for systematic solutions in the area of Multi Asset as well as for special mandates or funds in case of specific client preferences.

² For further information on our internal ESG categories please refer to our Berenberg WAM ESG Policy and our website www.berenberg.de/en/esg. For the internal ESG categories of our mutual funds please refer to our website at www.berenberg.de/en/esg-investments.

³ In specific cases, mandates or special funds categorized as *ESG screened* or *ESG integrated* may also apply extended exclusion criteria, either due to the specific investment strategy setup or due to client-specific preferences.



Exclusion Criteria for Equities and Corporate Bonds⁴

We consider the following exclusion criteria when investing in equities and corporate bonds:

Table 1: Exclusion Criteria for Equities and Corporate Bonds⁵

Our exclusion criteria	Parameter	
	General exclusion criteria All funds & mandates	Extended exclusion criteria <i>ESG targeted & Impact focused</i> funds & mandates ⁶
Weapons		
Controversial weapons	Fully excluded	Fully excluded
Weapons / Defence	>5% share of revenues	>5% share of revenues
Weapons for civil use		Fully excluded
Energy		
Nuclear power incl. uranium mining	>5% share of revenues	>5% share of revenues
Thermal coal mining	>5% share of revenues	>5% share of revenues
Thermal coal power generation	>25% share of revenues	>5% share of revenues
Unconventional oil & gas	>5% share of revenues	Fully excluded
Addiction		
Tobacco products	>5% share of revenues	Fully excluded
Pornography		>5% share of revenues
Alcoholic beverages		>5% share of revenues
Gambling		>5% share of revenues
Norms		
UN Global Compact Principles	Violation	Violation
International Labor Organization Standards	Violation	Violation
UN Principles for Business and Human Rights	Violation	Violation
ESG controversies	In case of red flag	In case of red flag

Weapons

We fully exclude in all funds and mandates **producers of controversial weapons** as well as suppliers of critical components (i.e., without revenue threshold). Furthermore, we exclude companies that derive more than 5% of their revenues from the **production of conventional weapons, weapons systems and weapons components**. In *ESG targeted & Impact focused* funds and mandates we fully exclude companies that produce and/or distribute **weapons for civil use**.

⁴ On the level of single investments.

⁵ For funds in application for or awarded with an external ESG label or subject to specific local regulatory requirements, additional exclusion criteria may apply in line with the respective label's and/or regulatory framework's requirements applicable at the time.

⁶ Extended exclusion criteria are applied to funds and mandates with dedicated ESG or positive impact focus (*ESG targeted & Impact focused*), to, among others, support positive impact. In specific cases, extended exclusion criteria may also be applied to mandates or special funds categorized as *ESG screened* or *ESG integrated*, either due to the specific investment strategy or client-specific preferences.



Energy

In the light of progressing climate change and to achieve the goals of the Paris Climate Agreement, a far-reaching energy transition towards low-emission energy sources and uses is needed. As part of this necessary transition, we exclude companies that generate more than 5% of their revenues from the **mining of thermal coal** or more than 25% (for all funds and mandates) and 5% (for *ESG targeted & Impact focused* funds and mandates) of their revenues from **thermal coal power generation**. Due to the particularly detrimental impact on the environment of so-called **unconventional oil & gas** (e.g., oil sand extraction), we exclude companies with more than 5% of their revenue derived from these sources. In *ESG targeted & Impact focused* funds and mandates we fully exclude these companies.

Nuclear energy represents a low-carbon energy source; however, it is widely viewed as critical from a societal and political perspective due to concerns about reactor safety and the disposal of remaining residues. Considering this, we exclude companies which derive more than 5% of their revenues from **nuclear power** activities (incl. uranium mining).

Tobacco

The consumption of tobacco products has significant individual and public health implications. Therefore, we exclude in all funds and mandates companies that derive more than 5% of their revenues from manufacturing **tobacco products** such as cigarettes, cigars and chewing tobacco. We fully exclude tobacco producers in *ESG targeted & Impact focused* funds and mandates.

Alcohol, Adult Entertainment and Gambling

We exclude in *ESG targeted & Impact focused* funds and mandates all companies that derive more than 5% of their revenues from **adult entertainment, gambling** or the **production and/or distribution of alcoholic beverages**.

Controversial Behaviour

To respond to or to prevent, among other things, violations of human rights, labour and environmental concerns or corruption, we exclude in all funds and mandates companies that violate the **United Nations Global Compact Principles** as well as companies that exhibit a red ESG controversy flag as marked by MSCI ESG Research and are thus directly involved in ongoing **very severe ESG controversies**. Within its ESG controversy analysis, MSCI ESG Research reviews companies' adherence to international standards such as the Conventions of the International Labour Organization and the United Nations Guiding Principles on Business and Human Rights and flags them in case of violations.



Exclusion Criteria for Sovereign Bonds

We consider the following ESG exclusion criteria when investing in sovereign bonds:

Table 2: Exclusion Criteria for Sovereign Bonds⁷

Our exclusion criteria	Parameter	
	General exclusion criteria All funds & mandates	Extended exclusion criteria <i>ESG targeted & Impact focused</i> funds & mandates ⁸
Freedom		
General freedom	Not free <i>according to Freedom House Index⁹</i>	Not free <i>according to Freedom House Index</i>
Religious freedom		Particular concern <i>according to US Commission on International Religious Freedom</i>
Environment		
UN Biodiversity Convention		Not ratified
Paris Climate Agreement		Not ratified
Kyoto Protocol		Not ratified
Basel Convention		Not ratified
Politics		
Ownership of nuclear weapons		Yes
Nuclear energy		>33% <i>of electricity production</i>
Legality of death penalty		Yes
Corruption		High <i>according to Transparency International</i>
Political stability & peace		Weak <i>based on World Bank Worldwide Governance Indicators (WGI)</i>
General		
MSCI Government ESG Rating	CCC	CCC

Freedom

In all funds¹⁰ and mandates, we exclude countries that exhibit severe violations of **civil liberties and political rights**¹¹. In *ESG targeted & Impact focused* funds and mandates, we further exclude countries that exhibit severe violations of **religious freedom**¹².

⁷ For funds in application for or awarded with an external ESG label or subject to specific local regulatory requirements, additional exclusion criteria may apply in line with the respective label's and/or regulatory framework's requirements applicable at the time.

⁸ Extended exclusion criteria are applied to funds and mandates with dedicated ESG or positive impact focus (*ESG targeted and Impact focused*), to, among others, support positive impact. In specific cases, the set of extended exclusion criteria may also be applied to mandates or special funds categorized as *ESG screened* or *ESG integrated*, either due to the specific investment strategy or client-specific preferences.

⁹ Exclusion criterion "Not free" according to Freedom House Index is not applied to the fund Berenberg EM Bonds and special funds with emerging markets focus.

¹⁰ Not applied to Berenberg EM Bonds and special funds with emerging markets focus.

¹¹ "Not free" based on analysis and benchmarks from Freedom House, provided by our ESG data provider.

¹² "Tier 1 Country of Particular Concern" based on analysis and benchmarks from the US Commission on International Religious Freedom, provided by our ESG data provider.



Environment

In *ESG targeted & Impact focused* funds and mandates, we exclude countries that have not ratified or are in violation of one or more international climate and environmental agreements such as the **Paris Climate Agreement**, the **Kyoto Protocol**, the **UN Biodiversity Convention** or the **Basel Convention**. Additionally, we do not invest in countries that generate more than 33% of their **electricity from nuclear energy**.

Political situation

In *ESG targeted & Impact focused* funds and mandates, we exclude countries that lack **political stability and peace**¹³, exhibit high levels of **corruption**¹⁴, practice the **death penalty**, or possess **nuclear weapons**.

General

In all funds and mandates, we exclude countries that have a **Government ESG Rating by MSCI ESG Research of CCC**¹⁵ and thus present high risks in terms of socioeconomic and political factors as well as their use of resources.

Exclusion Criteria for Commodities

We consider the following ESG exclusion criteria when investing in commodities:

Table 3: Exclusion Criteria for Commodities¹⁶

Our exclusion criteria	Parameter	
	General exclusion criteria All funds & mandates	Extended exclusion criteria <i>ESG targeted & Impact focused</i> funds & mandates ¹⁷
Commodities		
Soft commodities ¹⁸	Fully excluded	Fully excluded
Energy commodities ¹⁹		Fully excluded

We fully exclude in all funds and mandates financial securities with **soft commodities/staple foods** as an underlying as we want to prevent any involvement in speculation on staple food prices. Furthermore, in *ESG targeted & Impact focused* funds and mandates we fully exclude financial securities with **energy commodities** (e.g., crude oil, natural gas) as an underlying.

¹³ “Weak management” based on analysis and benchmarks from the World Bank WGI, provided by our ESG data provider.

¹⁴ According to “Corruption Perception Index” based on analysis and benchmarks from Transparency International, provided by our ESG data provider.

¹⁵ Seven-level scale from AAA to CCC

¹⁶ For funds in application for or awarded with an external ESG label or subject to specific local regulatory requirements, additional exclusion criteria may apply in line with the respective label’s and/or regulatory framework’s requirements applicable at the time.

¹⁷ Extended exclusion criteria are applied to respective funds and mandates with dedicated ESG or positive impact focus (*ESG targeted & Impact focused*), to, among others, support positive impact. In specific cases, extended exclusion criteria may also be applied to mandates or special funds categorized as *ESG screened* or *ESG integrated*, either due to the specific investment strategy setup or due to client-specific preferences.

¹⁸ Referring to staple foods as an underlying of financial securities (incl. forwards, futures, exchange-traded commodities (ETCs) and options).

¹⁹ Referring to energy commodities as an underlying of financial securities (incl. forwards, futures, ETCs and options).



Exclusion Criteria for Active Third-party Funds and ETFs

We apply ESG exclusion criteria when investing in active third-party funds and ETFs. Exclusion criteria are applied in the asset manager selection (i.e., criteria the external asset manager must comply with) and in the product selection (i.e., criteria the external asset manager must bindingly apply to the product's portfolio):

Asset Manager - Active Third-party Funds & ETFs

Table 4: Exclusion Criteria for External Asset Managers

Our exclusion criteria	Parameter	
	Active third-party funds	ETFs
Principles for Responsible Investments (PRI)	Not signed	Not signed
UN Global Compact principles	Violation	Violation
ESG controversies	In case of red flag	In case of red flag

In all funds and mandates we exclude third-party funds and ETFs by asset managers who are not signatories to the UN-supported **Principles for Responsible Investment (PRI)**, that violate the **UN Global Compact Principles** or that exhibit a red ESG controversy flag as marked by MSCI ESG Research and are directly involved in ongoing **very severe ESG controversies**.

External Product Portfolios

Table 5: Minimum Exclusion Criteria in External Product Portfolios

	Parameter	
	Active third-party funds	ETFs
Controversial weapons	Fully excluded	Fully excluded
Thermal coal mining		>5% share of revenues
Thermal coal power generation		>25% share of revenue
Tobacco production		>5% share of revenues
Oil sands or unconventional oil & gas extraction		>5% share of revenues
UN Global Compact principles	Violation	Violation

Active third-party funds

To be eligible for investment in all funds and mandates, third-party funds need to fully exclude producers of controversial weapons as well as companies in violation of the **UN Global Compact Principles** from their portfolios²⁰.

Furthermore, an ESG analysis of active third-party funds is carried out in an internal process based on a proprietary ESG questionnaire, which among others considers potential further exclusion criteria applied by the respective asset manager.

²⁰ If applicable to the product's investment strategy, i.e. in case of investments in equities or corporate bonds.



ETFs

Within our funds and mandates, ETFs are primarily chosen for tactical exposure to specific asset classes or market segments. In *ESG screened* funds and mandates, ETFs with an underlying ESG index are chosen, where possible²¹. In *ESG integrated* as well as *ESG targeted & Impact focused* funds and mandates, only investments in ETFs with an underlying ESG index are permitted and further ESG analysis on these ETFs is conducted.

All ETFs with an underlying ESG index must apply the following minimum exclusion criteria on a portfolio level in a binding manner to be investible:

- Full exclusion of producers of **controversial weapons** as well as suppliers of critical components (i.e. without revenue threshold),
- exclusion of companies that derive more than 5% of their revenues from the **mining of thermal coal** or more than 25% of their revenues from **thermal coal power generation**,
- exclusion of companies that derive more than 5% of their revenues from manufacturing **tobacco products**, and
- exclusion of companies that derive more than 5% of their revenues either from oil sands extraction or from oil extraction from other unconventional oil & gas.
- exclusion of companies that violate the **UN Global Compact Principles**.

Exclusion Criteria for Derivatives and Certificates

We apply ESG exclusion criteria when investing in derivatives and certificates on the level of the counterparty/issuer as well as on the level of the underlying.

- In all funds and mandates we exclude over-the-counter (OTC) derivatives and certificates of counterparties/issuers, that violate the **UN Global Compact Principles** or that exhibit a red ESG controversy flag as marked by MSCI ESG Research and are thus directly involved in ongoing **very severe ESG controversies**. Exclusion criteria on the counterparty/issuer-level are not applied for exchange-traded derivatives.
- For short positions no exclusion criteria are applied to the underlying.
- For long positions in derivatives or certificates on individual securities, the exclusion criteria for single investments per ESG category are applied to the underlying.
- For long positions in index derivatives and certificates the approach to ETFs applies.

²¹ I.e. if a suitable ETF with an underlying ESG index is available to achieve the envisioned tactical exposure.



Process of Defining our Exclusion Criteria

At Berenberg WAM, we have a dedicated process of defining and updating our exclusion criteria. This process involves the Berenberg WAM ESG Office, portfolio management and ESG Committee. The ESG Committee forms the Berenberg WAM ESG governance body, meets at least quarterly, and is composed of WAM members and executives.

The ESG Office discusses with the portfolio management if or when a criteria/parameter needs to be updated or changed. Together, the portfolio management and the ESG Office examine the rationale behind the exclusion of companies and countries, considering sustainable, ethical and moral reasons as well as examining ESG aspects such as investment risk and also the benefits for clients. The reviewed screen is then sent to the ESG Committee for a final approval before implementation.



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