

**NEI**

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# **RESPONSIBLE INVESTMENT POLICY**



# Contents

- Purpose of this policy 3
- Definitions 3
- Responsible investment thesis 3
- Statement on climate risk and net-zero ambition 3
- Statement on human rights 4
- Statement on nature and biodiversity 4
- Responsible investment strategies 5
- Policy advocacy 9
- Governance 9
- Appendix A: Affiliations 11
- Appendix B: Resources 13



## Purpose of this policy

NEI Investments is committed to helping our clients grow their wealth while advancing the environmental, social, and governance (ESG) performance of publicly traded companies wherever we invest. This Responsible Investment Policy (RI Policy) sets out the philosophy that guides our efforts and describes our responsible investment program, encompassing strategies, procedures, and lines of accountability that ensure we keep our promises and advance toward our goals. It also highlights the different organizations and groups we collaborate with in order to achieve these goals. These affiliations are detailed in Appendix A.

## Definitions

### Responsible investing

Responsible investing (RI) incorporates ESG analysis of company performance into the investment decision-making process. Responsible investing seeks to generate sustainable value for investors, for other company stakeholders, and for society.

### ESG factors

These are non-financial factors investors consider in their analysis of a company's investment potential. ESG factors can help to identify risks and growth opportunities. Among many other factors, environmental factors would include climate change, waste management, and biodiversity; social factors would include diversity, human rights, and equitable pay; and governance factors would include executive compensation, board composition, and corruption.

### Sustainable value creation

Sustainable value creation describes strategies and programs designed to help companies, investors, and the economy prosper over the long term while contributing to human rights, social equity, and a clean environment. The concept emerges from the term sustainable development: a state of society where resource use meets human needs today without undermining the ability of future generations to meet their needs.

### ESG risk

Environmental, social, and governance factors that present a risk to the value of an investment.

### Stakeholders

The stakeholder constituency will vary by company and may include employees, customers, suppliers, communities, regulators, creditors, financiers, and investors. The "stakeholder theory of the firm" holds that the purpose of the public company is to create value for all its stakeholders.

### Responsible investment thesis

We believe that companies can mitigate risk and take advantage of emerging business opportunities by integrating best ESG practices into their strategies and operations.

### Statement on climate risk and net-zero ambition

We believe that climate change is one of the biggest systemic challenges facing our society. Mitigating climate change risk should be an imperative for all Canadian investors regardless of which sectors of the economy they invest in. As investors, we bear a responsibility to actively address climate change through all the tools we have at hand. We will strive to respond strategically and with a focus on driving real-world reductions in greenhouse gas emissions.

The [NEI Climate Strategy](#) establishes six pillars intended to align our portfolio with the global goal of achieving net-zero global greenhouse gas emissions by 2050. We are a signatory to the Net Zero Asset Managers initiative and founding signatory to and contributing author of the RIA Canadian Investor Statement on Climate Change.

As such, we commit to:

- Align our investment fund lineup with the global goal of achieving net-zero greenhouse gas emissions across all assets under management by 2050. This includes working with our sub-advisors on net-zero aligned pathways.
- Publicly support the Task Force on Climate-related Financial Disclosures (TCFD) and report annually in line with the TCFD framework on our efforts to measure and address climate-related risks; encourage companies in our funds to align their public reporting with the TCFD framework.
- Strive to assess company performance on climate change issues prior to investing and exclude from our funds companies that do not meet our minimum expectations. In particular, companies whose lobbying activities we deem to be explicitly impeding the development of climate policy will be excluded.
- Encourage companies in our funds to develop strategies and business models that are resilient in a low-carbon future through engagement and proxy voting.
- Continue to participate and lead engagements in climate-related investor collaborations such as Climate Action 100+ and Climate Engagement Canada, and to increase our participation in nature-related engagements and collaborations.
- Engage policymakers and standard setters to support and foster progressive climate-related regulations, policies, and standards, including regulations that put a price on carbon, while also reporting on our policy submissions and activities.
- Identify and exploit investment opportunities in technologies and companies helping to advance the energy transition.
- Support innovative efforts to develop nature-based solutions.

## Statement on human rights

NEI supports the principles contained in the Universal Declaration of Human Rights, the Geneva Conventions on International Humanitarian Law, the International Covenant on Economic, Social and Cultural Rights, the International Covenant on Civil and Political Rights, the OECD Guidelines for Multinational Enterprises, the UN Guiding Principles on Business and Human Rights, the UN Declaration on the Rights of Indigenous Peoples, and the eight fundamental International Labour Organization conventions. We recognize that human rights issues include issues such as digital rights, and free, prior and informed consent of Indigenous peoples.

Our commitment to these principles means we will strive to have processes in place to assess companies for any negative human rights impacts prior to making our investment decision. We also commit to engaging policymakers and standard setters with the goal of enshrining respect for human rights in their work.

We will monitor fund holdings to identify any companies that are causing or contributing to human rights impacts and take action to address them. We will strive to use our influence, either alone or in collaboration with peers and other stakeholders, to engage the companies in our funds to mitigate, prevent, or provide remedy for negative human rights impacts caused by their activities. Our approach to engagement on human rights issues includes understanding companies' human rights governance and oversight mechanisms, and their approach to assessing human rights issues through human rights due diligence.

## Statement on nature and biodiversity

We believe that nature-related risks and biodiversity loss are systemic issues that threaten the well-being of the planet and our ability to thrive, and that they are inherently connected to other ESG concerns. Ensuring we reduce and eventually reverse the rate of nature and biodiversity loss is critical to a sustainable society, to achieving net-zero, and to meeting the objectives of the UN Sustainable Development Goals. We commit to working toward understanding the impacts and dependencies of our investment funds on nature, and to engaging with companies about nature-positive approaches to their operations.

We acknowledge the Kunming-Montreal Global Biodiversity Framework and seek to support its ambitions through our approach to responsible investment. We also note the evolving state of nature-related reporting and disclosure. Therefore, we undertake to engage companies, policymakers, standard-setters and other stakeholders on improving performance, target-setting and disclosure on this issue. Specifically, we have committed to engaging companies with the goal of using our best efforts to eliminate commodity-driven deforestation in our investment funds by 2025, in line with the interim targets and timelines set out in the Financial Sector Commitment Letter on Eliminating Commodity-driven Deforestation. As part of this commitment, we engage companies on making and implementing their own commitments to eliminating commodity-driven deforestation.

## Responsible investment strategies

NEI has actively contributed to the development of multiple and complementary strategies in Canada to support our responsible investment thesis. These RI strategies are exclusionary screens, ESG integration, active ownership, and impact and thematic investments.

While the RI Policy applies across the entire lineup of NEI funds, the RI strategies will vary by fund. In all cases NEI will make clear to investors and advisors the applicable RI strategy or strategies.

### Exclusionary screens

*The 2023 updates to our exclusionary screening policy are in effect as of March 31, 2023.*

NEI considers both the risks and opportunities arising from material environmental, social, and governance factors as part of our holistic investment process.

As part of this approach to responsible investment, we may exclude investments in certain companies where the irreconcilable risk posed by societal or environmental harm outweighs any potential benefits of investing.

### Firm-wide exclusions

We have identified exceptional circumstances where we automatically exclude investment in certain companies with specific types of involvement in certain industries.

As part of this approach, we will not invest in companies where

- their products intrinsically cause grievous harm to society that cannot be mitigated;
- there exists an international treaty or convention aimed at eliminating the product;
- no level of engagement can influence positive change given the company's business model.

Firm-wide exclusions apply to funds over which NEI has full portfolio management discretion. NEI does not have full portfolio management discretion over third-party funds (such as exchange-traded funds) or derivatives, both of which may be held in certain NEI funds. Companies with direct revenues generated from the following activities are automatically excluded from our funds:

- Production and manufacture of:
  - Automatic and semi-automatic weapons
  - Tobacco
- Any involvement in the production, manufacture, and sale of:
  - Cluster munitions
  - Anti-personnel landmines
  - Biological and chemical weapons
  - Nuclear weapons

### Fossil fuel exclusions

The investment landscape has seen an increasing number of products that are described as "fossil fuel free." Despite the inherent challenges in having multiple definitions in the marketplace of what that means, we recognize that investors benefit from knowing if a fund takes an exclusionary approach to fossil fuel companies.

Several NEI funds exclude oil, gas, and coal exploration and production companies, as well as companies with significant carbon reserves on their balance sheets. The funds may also exclude midstream, pipeline, refining, and processing companies; natural gas distribution utilities and liquefied natural gas operations; and service companies whose primary business is supporting the fossil fuel industry.

## Other exclusions

In addition to the firm-wide exclusions, for all funds designated “RS” (Responsible Screens), as well as select other funds (hereafter referred to collectively as “designated NEI funds”), NEI automatically excludes companies with sustained revenues of more than 10% in the industries identified below. These additional exclusions apply where NEI has full portfolio management discretion; NEI does not have full portfolio management discretion over third-party funds or derivatives.

- **Tobacco.** In addition to the firm-wide exclusion of tobacco producers and manufacturers, designated NEI funds exclude companies with sustained revenues of more than 10% from the sale of tobacco and tobacco-related products.
- **Weapons.** NEI recognizes the need for access to guns for hunting and sustenance purposes, and we support access for civilians and in particular people in Indigenous communities to weapons of this nature for these purposes. NEI does not support civilian access to automatic or semi-automatic weapons. In addition to the firm-wide exclusion of the production of the weapons stated above, designated NEI funds exclude companies with sustained revenues of more than 10% from the sale or distribution of automatic or semi-automatic weapons.
- **Nuclear power.** Designated NEI funds exclude companies with sustained revenues of more than 10% from uranium mining or the supply of products or services to nuclear facilities. Exposure to a material level of existing nuclear energy generation is acceptable if the company meets both of the following expectations:
  - The company has no plans for developing new conventional nuclear reactors/facilities.
  - The company has an explicit business strategy to increase its exposure to renewable energy and/or other non-nuclear low-carbon solutions.

We do not exclude companies for buying electricity generated by nuclear power, or for involvement in decommissioning nuclear sites or nuclear medicine.

- **Gambling.** Designated NEI funds exclude companies with sustained revenues of more than 10% from the ownership or operation of gambling establishments, and from the manufacture of equipment used exclusively for gambling.

## ESG integration

For designated NEI funds, NEI and/or our sub-advisors conduct proprietary ESG evaluations of investment prospects and integrate ESG considerations throughout the decision-making process. The aim is to ensure that companies held in these funds have taken or are taking meaningful steps to manage the ESG risks they face. Companies that fail to address their ESG risks and are deemed unsuitable for engagement may be deemed ineligible for inclusion in our funds.

In undertaking our ESG evaluations for designated NEI funds, we work closely with our sub-advisors to advance integration of ESG considerations with their respective investment processes. Depending on the fund, some ESG evaluations are primarily conducted in-house, by NEI’s Responsible Investing & ESG Services Team (RI Team). These are based on research and analysis of information disclosed by corporate issuers, which is supported by information provided by ESG research firms and news tracking services.

## ESG evaluation methodology

When applied, our in-house ESG evaluation methodology follows these steps:

- **Identification of industry-specific material ESG risks.** Some material ESG risks vary from industry group to industry group; some industries inherently carry more ESG risk than others. The RI Team analyzes these risks and produces material risk assessments specific to industry groups.
- **Establishment of baseline expectations.** Baseline expectations are measures that companies in an industry group must fulfill to satisfy us that they are managing material ESG risks appropriately. As noted, for designated NEI funds, companies must satisfy baseline expectations to be eligible for investment.

- **Broad-based benchmarking.** We also conduct, through the establishment of key performance indicators (KPIs) relative to specific ESG risks, industry group-specific and broad-based benchmarking to assess each company's ESG performance relative to its peers. The benchmarking may be performed qualitatively or quantitatively for certain NEI funds. Companies are categorized based on their ESG performance. These performance categorizations do not in and of themselves determine eligibility for investment. Rather, they are useful for determining potential corporate engagement opportunities:
  - An engagement with a leader can help raise the bar for the entire sector.
  - An engagement with a company with average performance could focus on improving specific ESG deficiencies that are hindering sector leadership.
  - Engagements with companies with room to improve will seek to address material, unmitigated ESG risks.
- **Headline risk assessment.** Finally, we scan for headline risk to identify unethical or illegal business practices or involvement in controversial situations. Exposure to controversy leads to further scrutiny of the severity of the incident or issue and the company's efforts to manage it. Depending on the severity of the risk, we may seek to engage the company on the topic or deem it ineligible for investment until the risk is mitigated.

### Partnering with our sub-advisors

To bolster its responsible investment program, NEI partners with a global network of asset managers who sub-advise our funds. With those managers that have engagement expertise and RI programs of their own, NEI confers on strategy, shares information, and in some cases meets jointly with companies to enhance the effectiveness of our engagement activities.

While NEI has final authority over which companies are allowed in designated NEI funds, there are two distinct processes in place for sub-advisors based on the quality of their ESG processes.

Sub-advisors with a robust ESG process are permitted to invest without pre-clearance from us. We do

perform a limited assessment of the companies after they are in our fund(s).

All other sub-advisors are required to submit the companies they wish to invest in prior to investment and must obtain clearance from us before making the purchase. These securities are assessed based on our ESG evaluation methodology described above.

While mitigating ESG risks continues to be the focus of much of our activity, we also partner with sustainability-focused asset managers capable of identifying investment opportunities related to companies directly involved in providing business solutions to many environmental and social challenges.

### Monitoring ESG risks

NEI funds are monitored for headline risks, management breaches, and other ESG-related risks. As part of this process, the RI Team identifies, evaluates, and monitors stories published in credible media sources that portray a company in a negative manner. In cases where an incident identified falls outside the range of issues normally captured by a company evaluation and is not being addressed through corporate dialogue (see below), a management breach investigation may be conducted. We define a management breach as a significant transgression of management ethics or a situation indicating a corporate culture that is inconsistent with our responsible investment thesis. While a headline risk report records and assesses controversial or negative media coverage about a company, the management breach process examines the fundamentals of an incident to determine if a company has violated our baseline expectations. A management breach determination results in one of three potential outcomes: enhanced monitoring, engagement, or divestment.

### Active ownership

NEI believes it is more effective to advance ESG practices through active ownership, sometimes referred to as stewardship, than through exclusion and divestment. Our active ownership activities include corporate dialogues, proxy voting, and to a lesser extent, shareholder resolutions (also called shareholder proposals).

## Corporate dialogue

We encourage companies to improve their ESG performance by alerting them to ESG risks and proposing solutions to the tough challenges they face. Our conversations help companies maintain and grow their reputations and limit exposure to risk, thus improving overall value for shareholders. These dialogues keep companies accountable to all their stakeholders, including the communities in which they operate.

Our [Focus List](#) is an annual program of targeted, in-depth dialogues with companies on specific ESG issues and themes set out at the beginning of each year. Examples of Focus List dialogues include

- dialogues with sector leaders capable of breakthroughs in corporate sustainability practice and disclosure, and with sector laggards that need to catch up;
- dialogues at specific companies in response to emerging risks and opportunities.

The companies selected for engagement are chosen based on a review of three factors:

- Investment exposure, meaning the weight of the holdings within our funds.
- Risk and opportunity exposure, determined by the significance of the ESG issues identified.
- Impact potential, where our intervention is most likely to result in change or where we can leverage existing relationships and collaborations to effect change.

The Focus List is published at the start of the year. Updates on our progress with each company are published in our quarterly [Active Ownership Reports](#), respecting business confidentiality where necessary.

The Focus List does not preclude us from initiating additional engagements over the course of the year. We will seek dialogue with companies outside of those mentioned in the Focus List to advance broader corporate action on material ESG issues, and as part of our effort to facilitate meaningful systemic change. We may also initiate engagements in response to acute, timely or newly developing ESG risks, or in response to proactive outreach from portfolio companies.

## Proxy voting

We believe it is our responsibility to vote at companies' annual general meetings (AGMs) on their boards of directors, ratification of auditors, and other business matters. NEI has in-house proxy voting analysts that oversee the process. Shareholders are also entitled to vote on key issues at AGMs and special meetings. Issues can include management proposals and shareholder proposals, which appear in the company's management proxy circular.

Our voting is guided by our Proxy Voting Guidelines. The RI Team will research and discuss voting decisions that are more nuanced, such as decisions to be made regarding complex or contentious shareholder proposals. Our proxy voting activity reports detail how proxies were voted for each company in our funds. Where possible, we endeavour to provide companies with constructive feedback. Our Proxy Voting Guidelines and results can be found on the NEI website.

## Shareholder proposals

When dialogue is not advancing, NEI may seek the views of other shareholders on the ESG issue facing the company. This is done by filing or co-filing a shareholder proposal that is included in the management proxy circular and submitted to a vote at the company's AGM.

Shareholder proposals can be a powerful tool for raising awareness of ESG issues among company directors and senior executives, as well as other shareholders. The time between filing the proposal and the company finalizing the management proxy circular for publication is often fruitful for dialogue, because companies often wish to see shareholder proposals removed from the AGM agenda. This can sometimes prompt companies to allocate more resources to ESG concerns. As a result of this, shareholder proposals do not always go to a vote. In general, NEI will withdraw a shareholder proposal in the following situations:

- The company agrees to substantially adopt the proposal without a vote.



- The company agrees to partially adopt our proposal and commit to a series of meetings between the RI Team and key operational personnel, company decision-makers, and appropriate stakeholders to explore the issue further.
- The company provides us with evidence demonstrating the proposal is “moot” because it is already dealing with the issue.

If the proposal goes ahead, NEI may issue a proxy alert challenging the company’s response and offering additional reasons for investors to support it. More details about [the shareholder proposals NEI has filed](#) can be found on our website.

## Impact investing

Certain NEI funds may employ strategies intended to provide positive environmental or social impacts in addition to investment returns. In order for an investment to qualify as an impact investment, it must meet three criteria:

- **Intention.** Investments must seek to generate positive social and/or environmental impact, preferably aligned to the UN Sustainable Development Goals.
- **Measurement.** Investments must be able to measure their intended impact.
- **Financial return.** Investments must seek to generate a positive return.

## Policy advocacy

Public policy and standards affect the rules by which all companies must operate. Our efforts in this area enable us to promote change on a broader scale, beyond individual companies, to remove barriers to sustainability disclosure and performance on an industry-wide basis. Changing the public policy and standards landscape can improve corporate performance across an array of ESG areas, as well as facilitating responsible investment. NEI believes all companies should disclose lobbying and public policy positions if and when taken. More details about [NEI’s policy submissions](#) can be found on the NEI website.

## Governance

### Responsible Investing & ESG Services Team

NEI’s Responsible Investing & ESG Services Team (RI Team), led by the Vice President, Head of Responsible Investing & ESG Services, is responsible for the strategy, management, and implementation of NEI’s RI program. Depending on the fund, either the RI Team or the sub-advisor will conduct ESG evaluations of companies held. The RI Team engages companies and policymakers in proactive dialogue for change, and directs NEI’s thought leadership on responsible investment matters.

### Reporting structure

The Vice President, Head of Responsible Investing & ESG Services reports to the Senior Vice President, Head of Asset Management of NEI Investments and Aviso Wealth. Aviso Wealth is the parent company of NEI Investments. The Vice President, Head of Responsible Investing & ESG Services is a member of NEI’s Investment Management Committee and Asset Management Executive Committee.

### Responsible Investment Committee

NEI’s RI program is overseen by the Responsible Investment Committee (RIC). The RIC is made up of members of the senior leadership team of the asset management and credit union wealth businesses of Aviso Wealth, and is chaired by the Vice President, Head of Responsible Investing & ESG Services.

The mandate of the RIC is to monitor NEI’s approach to responsible investing and, in particular, review reports, briefs, and other documents relating to NEI’s implementation of its approach, along with any other matters brought forth to the committee for review and/or approval. Specifically, the RIC will

- review and approve the RI Policy;
- review and approve the structure of the RI program designed to implement the RI Policy;
- review NEI’s annual submission in adherence to the United Nations endorsed Principles for Responsible Investment (the PRI);
- oversee the implementation of NEI’s Climate Strategy and net-zero commitment.

## Investment Committee

The Investment Committee reviews and approves all investment-related initiatives undertaken by NEI. This includes oversight of NEI's RI program and amendments to the RI Policy. The committee also reviews the assessment report produced annually by the PRI.

The committee is chaired by the Senior Vice President, Head of Asset Management of NEI Investments and Aviso Wealth. Other members include members of the Aviso Wealth Executive Team and members of the Aviso Wealth Board of Directors.

## Reporting

NEI is committed to transparency so that investors, advisors, and other stakeholders can hold us accountable for our actions. Our annual Focus List, quarterly Active Ownership Reports, Proxy Voting Guidelines, voting record, shareholder proposals, policy submissions and thought leadership are published on [www.neiinvestments.com](http://www.neiinvestments.com).

## Policy review

NEI's RI Policy is reviewed on an annual basis and revised as necessary, and is subject to the governance outlined above.

## Appendix A: Affiliations

NEI Investments is an active member of several organizations created to help advance the field of responsible investment and specific ESG topics of concern.

<b>Industry group</b>	<b>Themes &amp; topics</b>	<b>Primary activity</b>
<a href="#">Access to Medicines</a>	Inequality – medicines	Engagement
<a href="#">Access to Nutrition</a>	Inequality – nutrition	Engagement
<a href="#">As You Sow/ Plastic Solution Investor Alliance</a>	Biodiversity, Climate – plastics	Engagement
<a href="#">Boreal Champions</a>	Biodiversity, Climate – conservation, Human Rights – Indigenous rights	Policy
<a href="#">Business Benchmark for Farmed Animal Welfare</a>	Human rights – animal welfare	Engagement
<a href="#">Canadian Coalition for Good Governance</a>	Corporate governance and ESG	Engagement, policy
<a href="#">CDP</a>	Environmental disclosure on climate change, forests, water	Engagement, policy
<a href="#">Climate Action 100+</a>	Biodiversity, Climate – net zero	Engagement
<a href="#">CERES</a>	Biodiversity, Climate – net zero	Engagement, policy
<a href="#">Circular Economy Leadership Canada</a>	Biodiversity, Climate – plastics	Policy
<a href="#">Climate Engagement Canada</a>	Biodiversity, Climate – net zero	Engagement
<a href="#">Energy Futures Lab</a>	Energy sector	Policy
<a href="#">FAIRR Initiative</a>	Human rights – supply chain	Policy
<a href="#">Global Network Initiative</a>	Human rights – digital rights	Engagement, policy
<a href="#">Initiative for Responsible Mining Assurance (IRMA)</a>	Biodiversity, Climate, Human rights – supply chain	Policy
<a href="#">International Corporate Governance Network (ICGN)</a>	Corporate governance and ESG	Policy
<a href="#">Investor Alliance for Human Rights (IAHR)</a>	Human rights – digital rights	Engagement, policy

<b>Industry group</b>	<b>Themes &amp; topics</b>	<b>Primary activity</b>
<a href="#">Interfaith Center on Corporate Responsibility (ICCR)</a>	Corporate governance and ESG	Engagement, policy
<a href="#">Investors for Opioid and Pharmaceutical Accountability (IOPA)</a>	Inequality – corporate accountability	Engagement
<a href="#">Responsible Investment Association</a>	Corporate governance and ESG	Policy
<a href="#">Task Force on Inequality-related Financial Disclosures</a>	Inequality	Policy
<a href="#">United Nations' Principles for Responsible Investment</a>	Corporate governance and ESG	Engagement, policy
<a href="#">World Benchmarking Alliance</a>	Human rights – digital rights	Engagement, policy

## Appendix B: Resources

Internationally agreed conventions, guidelines, and principles provide standards and help identify the priorities for NEI's RI program. Key documents are listed below.

### CCGG Stewardship Principles

The [Canadian Coalition for Good Governance's Stewardship Principles](#) are intended to help institutions investing in Canadian public equities be active and effective stewards of their investments. For CCGG, stewardship means fulfilling investor responsibilities to clients and enhancing long-term value creation so companies and their investors can prosper and, in the process, benefit the market and society as a whole.

### Global Reporting Initiative

Founded in 1997, the [Global Reporting Initiative \(GRI\)](#) is an international independent standards organization that helps businesses, governments, and other organizations understand and communicate their impacts on issues such as climate change, human rights, and corruption.

### ICGN Global Governance Principles

The [International Corporate Governance Network's Global Governance Principles](#) describe the responsibilities of boards of directors and investors respectively, and aim to enhance dialogue between the two parties. They embody ICGN's mission to inspire effective standards of governance and to advance efficient markets worldwide.

### ICGN Global Stewardship Principles

The ICGN defines investor stewardship as the preservation and enhancement of long-term value as part of a responsible investment approach. This includes the consideration of wider ethical, environmental, and social factors as core components of fiduciary duty. The [ICGN Global Stewardship Principles](#) set out the ICGN's view of best practices in relation to investor stewardship obligations, policies, and processes.

### Net Zero Asset Managers initiative

The [Net Zero Asset Managers initiative](#) is an international group of asset managers committed to supporting the goal of net-zero greenhouse gas

emissions by 2050 or sooner, and to supporting investing aligned with net-zero emissions by 2050 or sooner.

### Net Zero Investment Framework

The [Net Zero Investment Framework](#) is a key tool for supporting investors globally to implement net-zero commitments and align with the Paris goals. The Net Zero Investment Framework is a project of the Paris Aligned Investment Initiative.

### OECD Principles of Corporate Governance

The [Organization for Economic Co-operation and Development's](#) Principles of Corporate Governance provide a globally recognized benchmark for assessing and improving corporate governance.

### OECD Guidelines for Multinational Enterprises

The [OECD](#) is working with public companies and investment institutions to define more precisely ESG risk due diligence.

### International Sustainability Standards Board

The [ISSB](#), as formed by the International Financial Reporting Standards (IFRS) Foundation Trustees, will deliver a global baseline of sustainability-related disclosure standards to provide investors and capital markets participants with information about companies' sustainability-related risks and opportunities.

### Task Force on Climate-related Financial Disclosures

The [TCFD](#) has developed recommendations on the types of information that companies (including financial institutions and asset managers) should disclose to allow the market to appropriately assess and price risks related to climate change.

## Sustainable Development Goals

Officially known as the 2030 Agenda for Sustainable Development, the [SDGs](#) are a set of 17 goals to advance sustainable development. The SDGs were developed by the United Nations involving its 194 member states as well as global civil society organizations. The SDGs were adopted by the UN in September 2015.

## United Nations Global Compact

The aim of the [United Nations Global Compact](#) is to mobilize a global movement of sustainable companies and stakeholders. The UN Global Compact supports companies to align their strategies and operations with ten principles on human rights, labour, environment, and anti-corruption. The compact also supports companies to advance the UN Sustainable Development Goals (see above).

## United Nations Guiding Principles on Business and Human Rights

The [UN Guiding Principles on Business and Human Rights](#) is a set of guidelines for states and companies to prevent, address, and remedy human rights abuses committed in business operations. They were endorsed by the UN Human Rights Council in June 2011.

**This Responsible Investment Policy was last updated on January 31, 2023.**



To learn more about NEI's approach to responsible investing, visit [neiinvestments.com](http://neiinvestments.com)

# NEI

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