



RI TRANSPARENCY REPORT

2020

RBC Global Asset Management

About this report

The PRI Reporting Framework is a key step in the journey towards building a common language and industry standard for reporting responsible investment (RI) activities. This RI Transparency Report is one of the key outputs of this Framework. Its primary objective is to enable signatory transparency on RI activities and facilitate dialogue between investors and their clients, beneficiaries and other stakeholders. A copy of this report will be publicly disclosed for all reporting signatories on the [PRI website](#), ensuring accountability of the PRI Initiative and its signatories.

This report is an export of the individual Signatory organisation's response to the PRI during the reporting period specified above. It includes their responses to mandatory indicators, as well as responses to voluntary indicators the signatory has agreed to make public. The information is presented exactly as it was reported. Where an indicator offers a response option that is multiple-choice, all options that were available to the signatory to select are presented in this report. Presenting the information exactly as reported is a result of signatory feedback which suggested the PRI not summarise the information.

PRI disclaimer

This document presents information reported directly by signatories. This information has not been audited by the PRI Secretariat or any other party acting on their behalf. While this information is believed to be reliable, no representations or warranties are made as to the accuracy of the information presented, and no responsibility or liability can be accepted for any error or omission.

Usage restrictions

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OO 01.1 Select the services and funds you offer

Select the services and funds you offer	% of asset under management (AUM) in ranges
Fund management	<input type="radio"/> 0% <input type="radio"/> <10% <input type="radio"/> 10-50% <input checked="" type="radio"/> >50%
Fund of funds, manager of managers, sub-advised products	<input type="radio"/> 0% <input checked="" type="radio"/> <10% <input type="radio"/> 10-50% <input type="radio"/> >50%
Other	<input checked="" type="radio"/> 0% <input type="radio"/> <10% <input type="radio"/> 10-50% <input type="radio"/> >50%
Total 100%	

Further options (may be selected in addition to the above)

- Hedge funds
- Fund of hedge funds

OO 01.2 Additional information. [Optional]

RBC Global Asset Management (RBC GAM)* is a global asset manager that provides a comprehensive range of investment management services and solutions to individual, high-net-worth and institutional investors through mutual funds, exchange-traded funds, hedge funds and pooled funds, separate accounts and specialty investment strategies.

Each of our 23 investment teams located in the United States, Canada, Europe and Asia share a common philosophy rooted in the pursuit of deep fundamental knowledge and the need to innovate in rapidly changing financial markets. We recognize the advantages of integrating advanced investment tools into our investment process to encourage rigor and efficiency, while minimizing the threats posed by behavioural bias. Our teams create value through their own specialized disciplines and unique processes, while being individually accountable for their results. Our culture demands excellence and innovation in investment and risk management, while always ensuring that our clients' interests are central to every decision we make.

In regard to hedge funds, and our response to indicator OO 01.1, RBC GAM offers a broad selection of alternative strategies to Canadian investors, including Market Neutral and Absolute Return strategies.

BlueBay Asset Management LLP (BlueBay) also offers a selection of alternative strategies.

* In this report, references to "RBC GAM", "we", and "us" include the following unless specifically indicated: RBC Global Asset Management Inc. (including its business division Phillips, Hager & North Investment Management), RBC Global Asset Management (U.S.) Inc., RBC Global Asset Management (UK) Limited, BlueBay Asset Management LLP (BlueBay) and RBC Global Asset Management (Asia) Limited.

OO 02.1 Select the location of your organisation's headquarters.

Canada

OO 02.2 Indicate the number of countries in which you have offices (including your headquarters).

- 1
- 2-5
- 6-10
- >10

OO 02.3 Indicate the approximate number of staff in your organisation in full-time equivalents (FTE).

1432

OO 03.1 Indicate whether you have subsidiaries within your organisation that are also PRI signatories in their own right.

- Yes

OO 03.2 List your subsidiaries that are separate PRI signatories and indicate if you would like to report their RI activities in your organisation's consolidated report.

Name of PRI signatory subsidiary (Up to six subsidiaries may be reported)	RI implementation reported here on a consolidated basis

BlueBay Asset Management LLP	<input checked="" type="radio"/> Yes <input type="radio"/> No
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No

OO 03.3 Additional information. [Optional]

In addition to BlueBay's activities being included in this report, BlueBay has also filed a separate RI transparency report as a signatory to the PRI. BlueBay is a wholly-owned subsidiary of RBC and BlueBay may be considered to be related and/or connected to RBC and its other affiliates.

OO 04 Mandatory Gateway/Peering General

OO 04.1 Indicate the year end date for your reporting year.

31/12/2019

OO 04.2 Indicate your total AUM at the end of your reporting year.

Total AUM
 474,387,286,954 CAD
 356760806984 USD

OO 04.4 Indicate the assets which are subject to an execution and/or advisory approach. Provide this figure based on the end of your reporting year

Not applicable as we do not have any assets under execution and/or advisory approach

OO 05 Mandatory to Report, Voluntary to Disclose Gateway General

OO 05.1 Provide an approximate percentage breakdown of your AUM at the end of your reporting year using the following asset classes and investment strategies:

	Internally managed (%)	Externally managed (%)
Listed equity	10-50%	<10%
Fixed income	>50%	0
Private equity	0	0
Property	0	0
Infrastructure	0	0
Commodities	0	0
Hedge funds	<10%	0
Fund of hedge funds	0	0
Forestry	0	0
Farmland	0	0
Inclusive finance	0	0
Cash	0	0
Money market instruments	<10%	0
Other (1), specify	<10%	0
Other (2), specify	0	0

Internally managed 'Other (1)' description

Others include derivatives, private lending and holdings in external funds

OO 06 Mandatory Descriptive General

OO 06.1 Select how you would like to disclose your asset class mix.

- as percentage breakdown
- as broad ranges

OO 06.3 Indicate whether your organisation has any off-balance sheet assets [Optional].

Yes

No

OO 06.5 Indicate whether your organisation uses fiduciary managers.

- Yes, we use a fiduciary manager and our response to OO 5.1 is reflective of their management of our assets.
- No, we do not use fiduciary managers.

OO 07 Mandatory to Report, Voluntary to Disclose Gateway General

OO 07.1 Provide to the nearest 5% the percentage breakdown of your Fixed Income AUM at the end of your reporting year, using the following categories.

Internally managed	60	SSA
	15	Corporate (financial)
	25	Corporate (non-financial)
	0	Securitised

OO 08 Mandatory to Report, Voluntary to Disclose Peering General

OO 08.1 Provide a breakdown of your organisation's externally managed assets between segregated mandates and pooled funds or investments.

Asset class breakdown	Segregated mandate(s)	Pooled fund(s) or pooled investment(s)	Total of the asset class (each row adds up to 100%)
[a] Listed equity	<input type="checkbox"/> 0% <input checked="" type="checkbox"/> <10% <input type="checkbox"/> 10-50% <input type="checkbox"/> >50 %	<input type="checkbox"/> 0% <input type="checkbox"/> <10% <input type="checkbox"/> 10-50% <input checked="" type="checkbox"/> >50 %	100%

OO 09 Mandatory Peering General

OO 09.1 Indicate the breakdown of your organisation's AUM by market.

88.5	Developed Markets
10.75	Emerging Markets
0.75	Frontier Markets
0	Other Markets

OO 09.2 Additional information. [Optional]

Values for OO 09.1 rounded to closest 0.25% increment.

OO 10 Mandatory Gateway General

OO 10.1 Select the active ownership activities your organisation implemented in the reporting year.

Listed equity – engagement
<input checked="" type="checkbox"/> We engage with companies on ESG factors via our staff, collaborations or service providers. <input type="checkbox"/> We require our external managers to engage with companies on ESG factors on our behalf. <input type="checkbox"/> We do not engage directly and do not require external managers to engage with companies on ESG factors.
Listed equity – voting
<input checked="" type="checkbox"/> We cast our (proxy) votes directly or via dedicated voting providers <input checked="" type="checkbox"/> We require our external managers to vote on our behalf. <input type="checkbox"/> We do not cast our (proxy) votes directly and do not require external managers to vote on our behalf
Fixed income SSA – engagement

- We engage with SSA bond issuers on ESG factors via our staff, collaborations or service providers.
- We do not engage directly and do not require external managers to engage with SSA bond issuers on ESG factors. Please explain why you do not.

Fixed income Corporate (financial) – engagement

- We engage with companies on ESG factors via our staff, collaborations or service providers.
- We do not engage directly and do not require external managers to engage with companies on ESG factors. Please explain why you do not.

Fixed income Corporate (non-financial) – engagement

- We engage with companies on ESG factors via our staff, collaborations or service providers.
- We do not engage directly and do not require external managers to engage with companies on ESG factors. Please explain why you do not.

OO 11	Mandatory	Gateway	General
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OO 11.1 Select the internally managed asset classes in which you addressed ESG incorporation into your investment decisions and/or your active ownership practices (during the reporting year).

Listed equity

- We address ESG incorporation.
- We do not do ESG incorporation.

Fixed income - SSA

- We address ESG incorporation.
- We do not do ESG incorporation.

Fixed income - corporate (financial)

- We address ESG incorporation.
- We do not do ESG incorporation.

Fixed income - corporate (non-financial)

- We address ESG incorporation.
- We do not do ESG incorporation.

Hedge funds

- We address ESG incorporation.
- We do not do ESG incorporation.

Money market instruments

- We address ESG incorporation.
- We do not do ESG incorporation.

Other (1)

- We address ESG incorporation.
- We do not do ESG incorporation.

Other (1) [as defined in OO 05]

Others include derivatives, private lending and holdings in external funds

OO 11.2 Select the externally managed assets classes in which you and/or your investment consultants address ESG incorporation in your external manager selection, appointment and/or monitoring processes.

Asset class	ESG incorporation addressed in your external manager selection, appointment and/or monitoring processes
Listed equity	<p style="background-color: #0070C0; color: white; margin: 0;">Listed equity - ESG incorporation addressed in your external manager selection, appointment and/or monitoring processes</p> <ul style="list-style-type: none"> <input type="checkbox"/> We incorporate ESG into our external manager selection process <input type="checkbox"/> We incorporate ESG into our external manager appointment process <input type="checkbox"/> We invest only in pooled funds and external manager appointment is not applicable <input checked="" type="checkbox"/> We incorporate ESG into our external manager monitoring process <input type="checkbox"/> We do not do ESG incorporation

OO 11.4 Provide a brief description of how your organisation includes responsible investment considerations in your investment manager selection, appointment and monitoring processes.

We have provided the RBC GAM Proxy Voting Guidelines to all of our external equity managers, so they understand our approach, while recognizing their fiduciary duty to proxy vote in the best interests of their clients. All external equity managers provide quarterly reporting on proxy voting which we incorporate into the RBC GAM vote disclosure. In addition, we also provide them with our Approach to Responsible Investment. Lastly, we advise that RBC GAM is a signatory to the PRI and are committed to putting its Principles into practice. We ask that if external managers are not currently signatories, that they review the PRI's website and consider becoming a signatory as well.

OO 12.1 Below are all applicable modules or sections you may report on. Those which are mandatory to report (asset classes representing 10% or more of your AUM) are already ticked and read-only. Those which are voluntary to report on can be opted into by ticking the box.

Core modules	
<input checked="" type="checkbox"/>	Organisational Overview
<input checked="" type="checkbox"/>	Strategy and Governance
RI implementation directly or via service providers	
Direct - Listed Equity incorporation	
<input checked="" type="checkbox"/>	Listed Equity incorporation
Direct - Listed Equity active ownership	
<input checked="" type="checkbox"/>	Engagements
<input checked="" type="checkbox"/>	(Proxy) voting
Direct - Fixed Income	
<input checked="" type="checkbox"/>	Fixed income - SSA
<input checked="" type="checkbox"/>	Fixed income - Corporate (financial)
<input checked="" type="checkbox"/>	Fixed income - Corporate (non-financial)
Direct - Other asset classes with dedicated modules	
<input type="checkbox"/>	Hedge Funds and/or Fund of Hedge Funds
RI implementation via external managers	
Indirect - Selection, Appointment and Monitoring of External Managers	
<input type="checkbox"/>	Listed Equities
Closing module	
<input checked="" type="checkbox"/>	Closing module

OO LE 01.1 Provide a breakdown of your internally managed listed equities by passive, active - quantitative (quant), active - fundamental and active - other strategies.

0	Passive
3	Active - quantitative (quant)
97	Active - fundamental and active - other

OO FI 01.1 Provide a breakdown of your internally managed fixed income securities by active and passive strategies

SSA	Passive	0.3
	Active - quantitative (quant)	0
	Active - fundamental and active - other	99.7
Corporate (financial)	Passive	0.5
	Active - quantitative (quant)	0
	Active - fundamental and active - other	99.5

Corporate (non-financial)	0.2	Passive
	0	Active - quantitative (quant)
	99.8	Active - fundamental and active - other

OO FI 03 Mandatory Descriptive General

OO FI 03.1 Indicate the approximate (+/- 5%) breakdown of your SSA investments, by developed markets and emerging markets.

SSA	93	Developed markets
	7	Emerging markets

OO FI 03.2 Indicate the approximate (+/- 5%) breakdown of your corporate and securitised investments by investment grade or high-yield securities.

Type	Investment grade (+/- 5%)	High-yield (+/- 5%)	Total internally managed
Corporate (financial)	<input checked="" type="checkbox"/> >50% <input type="checkbox"/> 10-50% <input type="checkbox"/> <10% <input type="checkbox"/> 0%	<input type="checkbox"/> >50% <input checked="" type="checkbox"/> 10-50% <input type="checkbox"/> <10% <input type="checkbox"/> 0%	100%

OO SAM 01 Mandatory to Report, Voluntary to Disclose Gateway General

OO SAM 01.1 Provide a breakdown of your externally managed listed equities and fixed income by passive, active quant and, active fundamental and other active strategies.

Listed equity (LE)	39	Passive
	0	Active - quantitative (quant)
	61	Active - fundamental and active - other

OO HF 01 Mandatory to Report, Voluntary to Disclose Descriptive General

OO HF 01.1 Please describe your hedge fund strategies and classification

Options presented for hedge funds		
Main strategy	Strategy as % of hedge fund AUM	Sub-strategy
Equity Hedge	<input type="checkbox"/> >50% <input type="checkbox"/> 10-50% <input checked="" type="checkbox"/> <10% <input type="checkbox"/> 0%	<input checked="" type="checkbox"/> Equity Market Neutral <input type="checkbox"/> Fundamental Growth <input type="checkbox"/> Fundamental Value <input checked="" type="checkbox"/> Quantitative Directional <input type="checkbox"/> Sector: Energy/Basic Materials <input type="checkbox"/> Sector: Healthcare <input type="checkbox"/> Sector: Technology <input type="checkbox"/> Short Bias <input type="checkbox"/> Multi-Strategy

Event Driven	<input type="radio"/> >50% <input type="radio"/> 10-50% <input checked="" type="radio"/> <10% <input type="radio"/> 0%	<input type="checkbox"/> Activist <input type="checkbox"/> Credit Arbitrage <input type="checkbox"/> Distressed / Restructuring <input type="checkbox"/> Merger Arbitrage <input type="checkbox"/> Private Issue / Regulation D <input checked="" type="checkbox"/> Special Situations <input type="checkbox"/> Multi-Strategy
Global Macro	<input type="radio"/> >50% <input type="radio"/> 10-50% <input checked="" type="radio"/> <10% <input type="radio"/> 0%	<input type="checkbox"/> Active Trading <input type="checkbox"/> Commodity: Agriculture <input type="checkbox"/> Commodity: Energy <input type="checkbox"/> Commodity: Metals <input type="checkbox"/> Commodity: Multi <input checked="" type="checkbox"/> Currency: Discretionary <input type="checkbox"/> Currency: Systematic <input checked="" type="checkbox"/> Discretionary Thematic <input type="checkbox"/> Systematic Diversified <input checked="" type="checkbox"/> Multi-Strategy
Relative Value	<input checked="" type="radio"/> >50% <input type="radio"/> 10-50% <input type="radio"/> <10% <input type="radio"/> 0%	<input checked="" type="checkbox"/> Fixed Income - Asset Backed <input type="checkbox"/> Fixed Income - Convertible Arbitrage <input checked="" type="checkbox"/> Fixed Income - Corporate <input checked="" type="checkbox"/> Fixed Income - Sovereign <input type="checkbox"/> Volatility <input type="checkbox"/> Yield Alternatives: Energy Infrastructure <input type="checkbox"/> Yield Alternatives: Real Estate <input checked="" type="checkbox"/> Multi-Strategy
Risk Parity	<input type="radio"/> >50% <input type="radio"/> 10-50% <input type="radio"/> <10% <input checked="" type="radio"/> 0%	
Blockchain	<input type="radio"/> >50% <input type="radio"/> 10-50% <input type="radio"/> <10% <input checked="" type="radio"/> 0%	
Total 100% (of internal Hedge Fund AUM)		

OO Checks

Checks

If there are any messages below, please review them before continuing. If there are no messages below, please save this page and continue.

SG 01.1 Indicate if you have an investment policy that covers your responsible investment approach.

✓ Yes

SG 01.2 Indicate the components/types and coverage of your policy.

Policy components/types	Coverage by AUM
<input checked="" type="checkbox"/> Policy setting out your overall approach <input checked="" type="checkbox"/> Formalised guidelines on environmental factors <input type="checkbox"/> Formalised guidelines on social factors <input type="checkbox"/> Formalised guidelines on corporate governance factors <input checked="" type="checkbox"/> Fiduciary (or equivalent) duties <input checked="" type="checkbox"/> Asset class-specific RI guidelines <input type="checkbox"/> Sector specific RI guidelines <input checked="" type="checkbox"/> Screening / exclusions policy <input type="checkbox"/> Other, specify (1) <input type="checkbox"/> Other, specify(2)	<input checked="" type="checkbox"/> Applicable policies cover all AUM <input type="checkbox"/> Applicable policies cover a majority of AUM <input type="checkbox"/> Applicable policies cover a minority of AUM

SG 01.3 Indicate if the investment policy covers any of the following

- Your organisation’s definition of ESG and/or responsible investment and it’s relation to investments
- Your investment objectives that take ESG factors/real economy influence into account
- Time horizon of your investment
- Governance structure of organisational ESG responsibilities
- ESG incorporation approaches
- Active ownership approaches
- Reporting
- Climate change
- Understanding and incorporating client / beneficiary sustainability preferences
- Other RI considerations, specify (1)
- Other RI considerations, specify (2)

SG 01.4 Describe your organisation’s investment principles and overall investment strategy, interpretation of fiduciary (or equivalent) duties, and how they consider ESG factors and real economy impact.

At RBC GAM, our purpose is to deliver exceptional investment outcomes and valued insights to clients. This inspires everything we do and provides the foundation for our four core values:

1. Put our clients’ interests first
2. Foster a strong culture of collaboration and diversity
3. Offer expansive global capabilities and a diversified breadth of investment solutions
4. Embrace innovation and harness the power of human and machine

Our approach to responsible investment builds on these four core values and recognizes that being an active, engaged and responsible owner empowers us to enhance the long-term, risk-adjusted performance of our portfolios and is part of our fiduciary duty. It outlines the specific actions we take within our responsible investment activities to deliver on our duty to maximize our clients’ investment returns without undue risk of loss, within the investment limits described in the relevant investment mandate. This includes integrating environmental, social and governance issues throughout our investment processes, working as active, engaged owners, and putting our clients first by developing investment solutions and providing reporting that meet their investment needs.

SG 01.5 Provide a brief description of the key elements, any variations or exceptions to your investment policy that covers your responsible investment approach. [Optional]

Our responsible investment policy builds on RBC GAM’s four core values and is informed by the following additional responsible investment beliefs:

- Being an active, engaged and responsible owner empowers us to enhance the long-term, risk-adjusted performance of our portfolios and is part of our fiduciary duty
- Issuers that manage their material ESG risks and opportunities effectively are more likely to outperform on a risk-adjusted basis, over the long term
- Engagement through private dialogue is often most effective at facilitating change
- Initiatives that increase transparency and foster fair and efficient markets benefit all investors and clients globally
- Collaboration with like-minded investors may give us greater influence on issues that are material to our investments

The policy is applied firm-wide. It is reviewed on an annual basis and changes are approved by the Chief Investment Officer (CIO).

The following are some of the key elements covered by our policy:

Fully Integrated ESG
 We believe that the proper disclosure and consideration of material ESG risks and opportunities by the companies or countries in which we are invested will enhance the long term, sustainable performance of those investments. Accordingly, we integrate ESG factors into our investment process when doing so may have a material impact on our investment risk or return. As a general rule, we will not exclude any particular investment or industry based on ESG factors alone. We believe it is important to consider those factors within our overall investment process rather than unduly narrowing the universe of potential investments.

Active Stewardship - Proxy Voting
 Proxy voting is a key part of our active stewardship activities, as it provides an important way for us to convey our views to boards and

management. Voting responsibly is part of our fiduciary duty, and we make our voting decisions independently and in accordance with our custom Proxy Voting Guidelines. Those voting guidelines are updated annually and outline the corporate governance principles we support and how we will vote on ESG-related issues.

Active Stewardship - Engagement

Engaging with management or directors of the companies in which we are invested is another tool we use to maximize our investment returns and lower our risk. Portfolio managers and analysts meet with the issuers in which they invest on an ongoing basis and often discuss risks and opportunities relating to ESG factors. Our ESG-focused engagements are chosen and prioritized using a risk-based approach, focusing on the materiality of the ESG risks and opportunities facing each company and the size of our investment in it. In general, the goals of our engagements are to effectively communicate our views as an investor and gain insights on how our investee issuers are managing the ESG risks and opportunities material to their business models. This enables us to better understand our investee companies, which will better inform our proxy voting and investment decisions.

Client-Driven Solutions and Reporting - Specialist Socially Responsible Investment (SRI) Strategies

We offer our clients a number of socially responsible investment (SRI) strategies which exclude investments based on ESG factors. Those strategies integrate values into the investment process by screening potential investments based on their ESG policies and practices or the industries in which they operate (e.g. tobacco, alcohol, gambling). We also offer thematic strategies that apply positive and/or negative screening, such as our Canadian Equity Women's Leadership investment strategy in Canada and our fossil fuel free strategies, available in Canada, the U.S., and Europe. We also offer our institutional clients the ability to create a custom ESG screen for their segregated portfolios.

Client-Driven Solutions and Reporting - Publications

We believe that transparency and accountability is as important for institutional investors as it is for the companies in which we are invested. We provide our clients with regular reporting of our voting and stewardship activities, and we publish semi-annual Corporate Governance & Responsible Investment (CGRI) reports to more fully describe our activities as a responsible and engaged shareholder.

No

SG 01 CC	Mandatory to Report, Voluntary to Disclose	Descriptive	General
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SG 01.6 CC	Indicate whether your organisation has identified transition and physical climate-related risks and opportunities and factored this into the investment strategies and products, within the organisation's investment time horizon.
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Yes

	Describe the identified transition and physical climate-related risks and opportunities and how they have been factored into the investment strategies/products.
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Each of our investment teams integrates ESG factors into their investment processes in a manner that adds value for their respective processes. Accordingly, the integration of climate-related factors is largely executed on a team-by-team basis. Some of the ways our teams consider climate-related risks and opportunities are as follows:

Equities

Equity investors are most concerned about the value of the businesses they invest in, as well as the risks that may negatively affect that value. All companies in all sectors will be affected by climate change, to varying degrees. The type and extent of climate risk faced by companies will depend on their geography, asset location, product mix and inputs, and mitigation strategies. In our view, companies with less emissions-intensive products and operations or companies strategically planning to reduce the emissions of their products or operations will be better positioned for a low-carbon economic transition.

Fixed Income

Fixed income investors focus on debt issuers' ability to pay their debts, as well as any risks to issuers' reputation in capital markets, which could impact the market value of that debt. The impacts of climate change on fixed income securities depend on the nature of the issuer (corporate versus sovereign), the nature of the security, and the time horizon of the investment. We expect climate change is unlikely to impact most fixed income securities in the short-to-medium term, but that all issuers are likely to be affected to some degree over the long term.

Real Estate and Mortgages

Real estate and mortgage investors consider the value of the buildings that underlie their investments, as well as the income these assets produce. The effects of climate change to real estate and mortgage investments depend primarily on the geographic location of these assets. Acute and chronic physical risks, like flooding, are typically the biggest climate-related risks for these assets, regardless of asset type. For direct real estate investments specifically, reputation and market risk may also play a role in attracting and retaining operational income from tenants.

We also note the climate-related risks and opportunities identified by the recommendations of the Financial Stability Board's Task Force for Climate-related Financial Disclosures (TCFD).

No

SG 01.7 CC	Indicate whether the organisation has assessed the likelihood and impact of these climate risks?
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Yes

	Describe the associated timescales linked to these risks and opportunities.
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While the strategies we manage may differ in timescales depending on the specific investment mandate, we are generally long-term investors and our investment teams largely manage long-term portfolios. For climate-related risks and opportunities, the timescale of the specific risk or opportunity varies depending on sector, geography, and the issuer's specific operations and business model. However, most of the risks and opportunities identified in SG 01.6 CC are long-term.

Each team manages its exposure to these risks and opportunities in a manner that complements its investment process. All teams have access to emissions data, climate-related risk and performance metrics, and research from external providers. Some teams have also completed climate scenario analysis or integrated carbon pricing models in their fundamental analysis.

No

SG 01.8 CC	Indicate whether the organisation publicly supports the TCFD?
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Yes

No

SG 01.9 CC	Indicate whether there is an organisation-wide strategy in place to identify and manage material climate-related risks and opportunities.
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Yes

Describe
<p>Our approach to climate change is based on the same foundational pillars as our overall responsible investment policy. Our climate-related activities and commitments are supported by our belief that climate change will have impacts on economies, markets and societies, posing both risks and opportunities. Therefore, understanding and considering climate change is part of our fiduciary duty.</p> <p>Our climate strategy states:</p> <p>Fully Integrated ESG All investment teams integrate climate-related risks and opportunities into their investment processes. This means building climate expertise across our investment teams, assessing climate risks and opportunities using advanced data and tools (including scenario analysis), and measuring and managing climate metrics for portfolios.</p> <p>Active Stewardship We convey our views through thoughtful proxy voting, engagement with issuers and regulatory bodies, and collaboration with other like-minded investors to consider climate mitigation and adaptation. This means conducting thoughtful proxy voting on climate change, actively engaging with companies on the topics of climate mitigation and adaptation (where material), and collaborating on initiatives to support climate change engagements and disclosures.</p> <p>Client-Driven Solutions & Reporting We align our climate-based solutions with client demand and provide transparent and meaningful reporting on climate-related issues. This means delivering insights on climate-related topics, providing climate-based solutions that meet clients' investment goals, and providing transparent and effective reporting on our approach to climate change.</p> <p><input type="radio"/> No</p>

SG 1.10 CC	Indicate the documents and/or communications the organisation uses to publish TCFD disclosures.
	<p><input checked="" type="checkbox"/> Public PRI Climate Transparency Report</p> <p><input type="checkbox"/> Annual financial filings</p> <p><input checked="" type="checkbox"/> Regular client reporting</p> <p><input type="checkbox"/> Member communications</p> <p><input type="checkbox"/> Other</p> <p><input type="checkbox"/> We currently do not publish TCFD disclosures</p>

SG 02	Mandatory	Core Assessed	PRI 6
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SG 02.1	Indicate which of your investment policy documents (if any) are publicly available. Provide a URL and an attachment of the document.		
<input checked="" type="checkbox"/>	<p>Policy setting out your overall approach</p> <table border="1" style="width: 100%;"> <thead> <tr> <th style="background-color: #0070C0; color: white;">URL/Attachment</th> </tr> </thead> <tbody> <tr> <td> <p><input checked="" type="checkbox"/> URL https://www.rbcgam.com/documents/en/articles/approach-to-responsible-investment.pdf</p> <p><input type="checkbox"/> Attachment (will be made public)</p> </td> </tr> </tbody> </table>	URL/Attachment	<p><input checked="" type="checkbox"/> URL https://www.rbcgam.com/documents/en/articles/approach-to-responsible-investment.pdf</p> <p><input type="checkbox"/> Attachment (will be made public)</p>
URL/Attachment			
<p><input checked="" type="checkbox"/> URL https://www.rbcgam.com/documents/en/articles/approach-to-responsible-investment.pdf</p> <p><input type="checkbox"/> Attachment (will be made public)</p>			
<input type="checkbox"/>	Formalised guidelines on environmental factors		
<input checked="" type="checkbox"/>	<p>Fiduciary (or equivalent) duties</p> <table border="1" style="width: 100%;"> <thead> <tr> <th style="background-color: #0070C0; color: white;">URL/Attachment</th> </tr> </thead> <tbody> <tr> <td> <p><input checked="" type="checkbox"/> URL https://www.rbcgam.com/documents/en/articles/approach-to-responsible-investment.pdf</p> <p><input type="checkbox"/> Attachment (will be made public)</p> </td> </tr> </tbody> </table>	URL/Attachment	<p><input checked="" type="checkbox"/> URL https://www.rbcgam.com/documents/en/articles/approach-to-responsible-investment.pdf</p> <p><input type="checkbox"/> Attachment (will be made public)</p>
URL/Attachment			
<p><input checked="" type="checkbox"/> URL https://www.rbcgam.com/documents/en/articles/approach-to-responsible-investment.pdf</p> <p><input type="checkbox"/> Attachment (will be made public)</p>			
<input checked="" type="checkbox"/>	<p>Asset class-specific RI guidelines</p> <table border="1" style="width: 100%;"> <thead> <tr> <th style="background-color: #0070C0; color: white;">URL/Attachment</th> </tr> </thead> <tbody> <tr> <td> <p><input checked="" type="checkbox"/> URL https://www.rbcgam.com/documents/en/articles/approach-to-responsible-investment.pdf</p> <p><input type="checkbox"/> Attachment (will be made public)</p> </td> </tr> </tbody> </table>	URL/Attachment	<p><input checked="" type="checkbox"/> URL https://www.rbcgam.com/documents/en/articles/approach-to-responsible-investment.pdf</p> <p><input type="checkbox"/> Attachment (will be made public)</p>
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<input checked="" type="checkbox"/>	<p>Screening / exclusions policy</p> <table border="1" style="width: 100%;"> <thead> <tr> <th style="background-color: #0070C0; color: white;">URL/Attachment</th> </tr> </thead> <tbody> <tr> <td> <p><input checked="" type="checkbox"/> URL https://www.rbcgam.com/documents/en/articles/approach-to-responsible-investment.pdf</p> <p><input type="checkbox"/> Attachment (will be made public)</p> </td> </tr> </tbody> </table>	URL/Attachment	<p><input checked="" type="checkbox"/> URL https://www.rbcgam.com/documents/en/articles/approach-to-responsible-investment.pdf</p> <p><input type="checkbox"/> Attachment (will be made public)</p>
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<input checked="" type="checkbox"/>	<p>Engagement policy</p> <table border="1" style="width: 100%;"> <thead> <tr> <th style="background-color: #0070C0; color: white;">URL/Attachment</th> </tr> </thead> <tbody> <tr> <td> <p><input checked="" type="checkbox"/> URL https://www.rbcgam.com/documents/en/articles/approach-to-responsible-investment.pdf</p> <p><input type="checkbox"/> Attachment (will be made public)</p> </td> </tr> </tbody> </table>	URL/Attachment	<p><input checked="" type="checkbox"/> URL https://www.rbcgam.com/documents/en/articles/approach-to-responsible-investment.pdf</p> <p><input type="checkbox"/> Attachment (will be made public)</p>
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<p><input checked="" type="checkbox"/> URL https://www.rbcgam.com/documents/en/articles/approach-to-responsible-investment.pdf</p> <p><input type="checkbox"/> Attachment (will be made public)</p>			

(Proxy) voting policy

URL/Attachment	
<input checked="" type="checkbox"/> URL	https://www.rbcgam.com/documents/en/other/rbc-gam-proxy-voting-guidelines.pdf
<input type="checkbox"/> Attachment (will be made public)	

We do not publicly disclose our investment policy documents

SG 02.2 Indicate if any of your investment policy components are publicly available. Provide URL and an attachment of the document.

Your organisation's definition of ESG and/or responsible investment and it's relation to investments

URL/Attachment	
<input checked="" type="checkbox"/> URL	https://www.rbcgam.com/documents/en/articles/approach-to-responsible-investment.pdf
<input type="checkbox"/> Attachment	

Time horizon of your investment

URL/Attachment	
<input checked="" type="checkbox"/> URL	https://www.rbcgam.com/documents/en/articles/approach-to-responsible-investment.pdf
<input type="checkbox"/> Attachment	

Governance structure of organisational ESG responsibilities

URL/Attachment	
<input checked="" type="checkbox"/> URL	https://www.rbcgam.com/documents/en/articles/approach-to-responsible-investment.pdf
<input type="checkbox"/> Attachment	

ESG incorporation approaches

URL/Attachment	
<input checked="" type="checkbox"/> URL	https://www.rbcgam.com/documents/en/articles/approach-to-responsible-investment.pdf
<input type="checkbox"/> Attachment	

Active ownership approaches

URL/Attachment	
<input checked="" type="checkbox"/> URL	https://www.rbcgam.com/documents/en/articles/approach-to-responsible-investment.pdf
<input type="checkbox"/> Attachment	

Reporting

URL/Attachment	
<input checked="" type="checkbox"/> URL	https://www.rbcgam.com/documents/en/articles/approach-to-responsible-investment.pdf
<input type="checkbox"/> Attachment	

Climate change

URL/Attachment	
<input checked="" type="checkbox"/> URL	https://www.rbcgam.com/documents/en/other/our-approach-to-climate-change.pdf
<input type="checkbox"/> Attachment	

We do not publicly disclose any investment policy components

SG 02.3 Additional information [Optional].

BlueBay has its own RI policies that are detailed in its RI Transparency Report.

Please note that the screened investment fund vehicles referenced in the screening/exclusions policy are predominantly only available in Canada. A fossil fuel free strategy is also available in the U.S. and a fossil fuel free strategy also incorporating values-based screens is available in Europe. In addition, we offer our Access Capital Community Investment strategy and Impact Bond strategy in the U.S. Additional information on our SRI strategies can be found on the CGRI website.

RBC GAM also employs norms-based screening to all of its investments. No RBC GAM investment team will knowingly invest in companies associated with the production, use or distribution of anti-personnel land mines or cluster munitions. These exclusions only apply when we control the investment policy for a

portfolio. For mandates where we do not control the investment policy, our clients may request different exclusions or no exclusions. We have engaged an independent third party research provider to provide us with a list of companies that should be excluded on the basis of this policy, which is updated monthly.

Where there are full economic sanctions that prohibit any financial dealings with a foreign state, including investment in entities operating under the authority of the foreign state, we will not invest in securities that fall within the sanctions. Where sanctions have been imposed against foreign countries that do not prohibit financial dealings we will identify and assess any risk and consider whether the investment would still be in the best interests of our clients.

SG 03	Mandatory	Core Assessed	General
SG 03.1	Indicate if your organisation has a policy on managing potential conflicts of interest in the investment process.		
<input checked="" type="radio"/> Yes			
SG 03.2	Describe your policy on managing potential conflicts of interest in the investment process.		
<p>With respect to our investment process, RBC GAM has a fiduciary duty to act in the best interests of the portfolios we manage, and we have robust policies and procedures designed to prevent or manage conflicts of interest. Our conflict of interest policies establish the standards required to be followed by RBC GAM to ensure compliance with all applicable securities laws and regulations of the jurisdictions in which we operate.</p> <p>Our conflict of interest policies cover all potential conflicts that may arise, including conflicts relating to the bank-owned structure of RBC GAM, trading with related parties, personal trading, payments, gifts and entertainment, external directorships/outside activities, proxy voting and engagement. Our policies recognize that a conflict of interest arises when the interests of an individual or the firm are inconsistent with the interests of a client, including an investment fund unitholder, or when there is a conflict between the interests of our clients. We consider conflicts of interest to include actual conflicts, potential conflicts where there is a reasonable probability that an actual conflict will arise, and perceived conflicts where the perceived conflict could cause reputational damage to RBC GAM.</p>			
<input type="radio"/> No			

SG 04	Voluntary	Descriptive	General
SG 04.1	Indicate if your organisation has a process for identifying and managing incidents that occur within investee entities.		
<input checked="" type="radio"/> Yes <input type="radio"/> No			
SG 04.2	Describe your process on managing incidents		
<p>Our management of ESG incidents at our investee entities consists of issue identification, response, and reporting, where warranted.</p> <p>We identify incidents mostly via news alerts, portfolio monitoring, and external research providers. For example, we access ESG controversy research from Sustainalytics, MSCI ESG, and TruValue Labs. Our investment teams are able to monitor ESG-related news in their strategies based on the SASB materiality matrix or on specific ESG issues via the TruValue Labs platform. We also receive notices from ISS and Glass Lewis when there has been a significant governance-related event. Finally, portfolio managers and analysts set up alerts as part of their regular portfolio monitoring via Bloomberg and other news sources.</p> <p>Our response to identified incidents depends on the severity of the incident, materiality of the factor(s) that led to the incident, and our overall investment position. Our investment teams and/or the Corporate Governance & Responsible Investment (CGRI) team may choose to engage with the company directly or as part of a collaboration in order to get more insight into the circumstances surrounding the incident, to encourage future and/or better disclosure on the topic at hand, and/or to encourage the company to adopt certain practices. The outcomes of such engagements inform the investment team's overall investment decision.</p> <p>Reporting on such incidents is done as part of our regular client reporting, wherein examples of our engagements are provided on a semi-annual and sometimes quarterly basis. For example, in our 2019 CGRI Annual Report, we provide an example of a collaborative engagement with companies in the mining sector regarding tailings management, which arose from an incident at a tailings facility of an investee company. Individual investment teams may also provide reporting to clients on particular ESG incidents.</p>			

SG 05	Mandatory	Gateway/Core Assessed	General
SG 05.1	Indicate if and how frequently your organisation sets and reviews objectives for its responsible investment activities.		
<input type="radio"/> Quarterly or more frequently <input type="radio"/> Biannually <input checked="" type="radio"/> Annually <input type="radio"/> Less frequently than annually <input type="radio"/> Ad-hoc basis <input type="radio"/> It is not set/reviewed			
SG 05.2	Additional information. [Optional]		
<p>Our strategic objectives for our responsible investment activities are set annually by the RBC GAM Executive Committee as part of our regular strategy-setting sessions for the entire business, and performance against these objectives is measured both quarterly and annually. We report publicly on the results of our responsible investment activities in our annual and semi-annual CGRI reports, as at December 31st and June 30th of each year.</p> <p>All policy documents related to responsible investment are reviewed annually and updated as required. These include our Approach to Responsible Investment and RBC GAM Proxy Voting Guidelines.</p>			

SG 06	Voluntary	Descriptive	General
SG 06.1	List the main responsible investment objectives that your organisation set for the reporting year.		
Responsible investment processes			
<input checked="" type="checkbox"/> Provide training on ESG incorporation			

Key performance indicator
Provide ESG training opportunities to all investment teams and portfolio managers.
Progress achieved
<p>Key performance indicator (KPI) was achieved. In 2019, educational sessions were conducted on:</p> <ul style="list-style-type: none"> • ESG research providers: MSCI, Sustainalytics and TruValue Labs • TCFD and investment considerations related to climate change • Sector-specific sessions on materiality of ESG factors • UN Sustainable Development Goals <p>In addition, some of investment team members participated in the CFA UK's pilot ESG certification program to enhance their understanding and knowledge of ESG factors and ESG integration.</p> <p>We also initiated monthly ESG Champion calls in 2019 for members of our investment teams to share updates and increase knowledge on ESG topics.</p>

- Provide training on ESG engagement

Key performance indicator
Provide investment teams with resources to assist their engagements on ESG topics.
Progress achieved
<p>KPI was achieved. In an effort to provide our investment teams with topical ESG research and guides, an internal webpage is managed by our CGRI team to share ESG-related content. Included on the webpage are resources dedicated specifically to engaging on ESG issues.</p> <p>In addition, investment teams had the opportunity to be trained on leveraging the research of our ESG research providers to identify potential targets for ESG-related engagements. For example, as a member of the SASB Alliance, our investment teams are able to participate in SASB's monthly Industry Deep Dive Series.</p> <p>Finally, several investment teams, such as the North American Equity team, improved their ESG-specific question banks to assist in their engagements with investee companies on these topics.</p>

- Improved communication of ESG activities within the organisation

Key performance indicator
Grow commitment to transparency and reporting on ESG issues and activities, both internally and externally.
Progress achieved
<p>KPI was achieved. Improvements in communication and reporting on ESG activities in 2019 included:</p> <ul style="list-style-type: none"> • Creation of an ESG Champion network, which shares updates on ESG activities and participates in monthly calls on ESG topics • The CGRI team held dedicated ESG integration review sessions with every investment team to update documentation of ESG integration processes • Updated proxy voting watch lists for alerting investment teams of proxy voting activities of interest • Enhanced client reporting to present engagement case studies on a quarterly basis <p>Individual investment teams, such as our Asian Equity team, produced first iterations of ESG reports while investment teams such as our Emerging Markets Equity and Global Equity teams continued producing their regular reporting to clients on ESG topics.</p>

- Improved engagement to encourage change with regards to management of ESG issues

Key performance indicator
Assess role of ESG engagement in the investment process of each investment team.
Progress achieved
<p>The CGRI team held dedicated ESG integration review sessions with every investment team in 2019, which included a review of the role ESG engagement played in each team's overall investment process, how engagements are tracked, and opportunities for technological improvements to complement the investment process. In addition, this provided a firm-wide picture of ESG engagement activities.</p> <p>Through the ESG Champion network, our investment teams have shared best practices as it relates to ESG engagement, with several teams updating their ESG engagement tracking specifically to better monitor company progress over time and report out to clients.</p>

- Improved ESG incorporation into investment decision making processes

Key performance indicator
Continue developing custom processes and ESG integration methods aligned with existing investment processes.
Progress achieved
<p>KPI achieved. Our investment teams continued to develop specific ESG integration methods that work best with their unique investment processes. Improvements made in 2019 include:</p> <ul style="list-style-type: none"> • Dedicated ESG integration sessions were conducted to update documentation on each team's ESG integration process and enhancements made (see below) • Created an ESG Champion network, which participates in monthly calls on ESG topics and shares ESG integration best practice case studies • Expansion of climate scenario analysis capabilities by certain teams, including conducting geospatial analysis to assess physical risks in our mortgages and municipal bond investments in the U.S. • Development of a proprietary ESG database, which allows portfolio engineers and investment teams to directly embed ESG information into their investment and technology platforms <p>Our individual investment teams made notable progress in the incorporation of ESG factors into their respective investment processes. For example, our North American Equity team further refined its ESG questionnaire and utilized the aforementioned ESG database to seamlessly pull in material ESG data on individual company stock sheets. As another example, our U.S. Equity team updated its initiation reports to systematically include a section on the material ESG risks and opportunities facing a company.</p>

- Other, specify (1)
- Other, specify (2)
- Other, specify (3)
- None of the above

Financial performance of investments

- Increase portfolio performance by consideration of ESG factors
- Other, specify (1)
- Other, specify (2)
- Other, specify (3)
- None of the above

ESG characteristics of investments

- Over or underweight companies based on ESG characteristics
- Improve ESG ratings of portfolio
- Setting carbon reduction targets for portfolio
- Other, specify (1)
- Other, specify (2)
- Other, specify (3)
- None of the above

Other activities

- Joining and/or participation in RI initiatives

Key performance indicator

Continue to be an active member in RI organizations and initiatives

Progress achieved

KPI achieved. RBC GAM participated in the following organizations throughout 2019. For most, we go beyond regular membership/signatory expectations and are active participants on association Boards and/or Committees.

- 30% Club Canadian Investor Group
- Canadian Coalition for Good Governance (CCGG)
- CDP
- Council of Institutional Investors (CII)
- Global Impact Investor Network (GIIN)
- International Corporate Governance Network (ICGN)
- Investor Stewardship Group (ISG)
- Responsible Investment Association (RIA)
- Sustainability Accounting Standards Board (SASB)
- UN PRI

Additionally, we continue to commit to the UK Stewardship Code and the Japanese Stewardship Code, and we support the efforts and recommendations of the TCFD.

- Encouraging others to join a RI initiative
- Documentation of best practice case studies
- Using case studies to demonstrate engagement and ESG incorporation to clients
- Other, specify (1)
- Other, specify (2)
- Other, specify (3)
- None of the above

SG 06.2 Additional information.

Although not formal objectives for the reporting year, RBC GAM achieved additional objectives listed under SG 06.1.

Over or underweight companies based on ESG characteristics

By integrating ESG into their respective investment processes, material ESG characteristics can contribute to an overall investment case resulting in an investment team over- or under-weighting the issuer relative to peers or benchmark.

For our SRI strategies, securities may be over- or underweight relative to the benchmark should they be deemed ineligible for the investment mandate or exhibit positive characteristics positively screened in the investment mandate.

Encouraging others to join RI initiatives

We reach out to our external asset managers to encourage them to review the PRI's six principles and consider becoming a signatory.

Documentation of best practice case studies

Our CGRI team continues to compile case studies on ESG integration and engagement from investment teams.

Using case studies to demonstrate engagement and ESG incorporation to clients

Case studies on the ESG integration and engagement activities of our investment teams were published in our semi-annual CGRI reports, and presentations were delivered directly to clients and prospects.

BlueBay provides detail on its specific responsible investment objectives in its RI Transparency Report.

SG 07.1

Indicate the internal and/or external roles used by your organisation, and indicate for each whether they have oversight and/or implementation responsibilities for responsible investment.

Roles

- Board members or trustees
- Oversight/accountability for responsible investment
 - Implementation of responsible investment
 - No oversight/accountability or implementation responsibility for responsible investment
- Internal Roles (triggers other options)

Select from the below internal roles

- Chief Executive Officer (CEO), Chief Investment Officer (CIO), Chief Operating Officer (COO), Investment Committee
- Oversight/accountability for responsible investment
 - Implementation of responsible investment
 - No oversight/accountability or implementation responsibility for responsible investment
- Other Chief-level staff or head of department, specify
- Head, Corporate Governance & Responsible Investment
- Oversight/accountability for responsible investment
 - Implementation of responsible investment
 - No oversight/accountability or implementation responsibility for responsible investment
- Portfolio managers
- Oversight/accountability for responsible investment
 - Implementation of responsible investment
 - No oversight/accountability or implementation responsibility for responsible investment
- Investment analysts
- Oversight/accountability for responsible investment
 - Implementation of responsible investment
 - No oversight/accountability or implementation responsibility for responsible investment
- Dedicated responsible investment staff
- Oversight/accountability for responsible investment
 - Implementation of responsible investment
 - No oversight/accountability or implementation responsibility for responsible investment
- Investor relations
- Other role, specify (1)
- Other role, specify (2)
- External managers or service providers
- Oversight/accountability for responsible investment
 - Implementation of responsible investment
 - No oversight/accountability or implementation responsibility for responsible investment

SG 07.2

For the roles for which you have RI oversight/accountability or implementation responsibilities, indicate how you execute these responsibilities.

RBC GAM's relevant Boards of Directors oversee the overall performance of the firm, which includes strategic priorities related to responsible investment.

Our Chief Executive Officer (CEO) oversees and manages the firm's activities and strategies. He approves our organization-wide responsible investment priorities and strategy.

Our CIO is responsible for overseeing and managing the investment side of the business, which includes responsible investment. All investment teams and the CGRI team report to the CIO.

The Executive Committee of RBC GAM is comprised of the CEO, CIO, and leaders across CGRI, fixed income, and equities teams, among others. This committee oversees the strategic decisions and risk management of the firm. It also develops annual strategic priorities related to responsible investment.

The CGRI and investment teams, which include portfolio managers and investment analysts, are responsible for the majority of the implementation of our responsible investment activities.

The responsibilities of the CGRI team include:

- Developing cohesive responsible investment strategies and policies for Executive Committee approval
- Executing and managing RBC GAM's proxy voting activities, including voting proxies and leading the annual review and update of the RBC GAM Proxy Voting Guidelines
- Supporting the ESG integration of RBC GAM's investment teams, including by providing ESG-related research, maintaining vendor relationships, and updating teams on new tools, evolving trends, and best practices regarding ESG integration

- Supporting the engagement program by liaising with investee companies and investment teams, where appropriate
- Maintaining a high level of expertise on material and emerging ESG trends, and preparing or assisting in preparing client reporting and thought leadership pieces related to RBC GAM's RI activities and insights
- Collaborating with like-minded investors and national or international organizations/coalitions on ESG-related issues, where appropriate

The responsibilities of our investment teams include:

- Integrating ESG factors into their investment process in a way that adds value to their unique strategies
- Evaluating the material ESG risks and opportunities of each investment
- Engaging with issuers on material ESG issues, where appropriate
- Collaborating with the CGRI team on firm-wide initiatives and strategies
- Continually increasing knowledge of material ESG topics
- Where appropriate, assisting with client reporting on RI activities, including updates to their ESG integration processes, engagement case studies, and team insights on emerging ESG topics and trends

SG 07.3	Indicate the number of dedicated responsible investment staff your organisation has.
---------	--

6

SG 07 CC	Mandatory to Report, Voluntary to Disclose	Descriptive	General
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SG 07.5 CC	Indicate the roles in the organisation that have oversight, accountability and/or management responsibilities for climate-related issues.
------------	---

Board members or trustees

- Oversight/accountability for climate-related issues
- Assessment and management of climate-related issues
- No responsibility for climate-related issues

Chief Executive Officer (CEO), Chief Investment Officer (CIO), Chief Risk Officer (CRO), Investment Committee

- Oversight/accountability for climate-related issues
- Assessment and management of climate-related issues
- No responsibility for climate-related issues

Other Chief-level staff or heads of departments

- Oversight/accountability for climate-related issues
- Assessment and management of climate-related issues
- No responsibility for climate-related issues

Portfolio managers

- Oversight/accountability for climate-related issues
- Assessment and management of climate-related issues
- No responsibility for climate-related issues

Investment analysts

- Oversight/accountability for climate-related issues
- Assessment and management of climate-related issues
- No responsibility for climate-related issues

Dedicated responsible investment staff
--

- Oversight/accountability for climate-related issues
- Assessment and management of climate-related issues
- No responsibility for climate-related issues

External managers or service providers
--

- Oversight/accountability for climate-related issues
- Assessment and management of climate-related issues
- No responsibility for climate-related issues

SG 07.6 CC	For board-level roles that have climate-related issue oversight/accountability or implementation responsibilities, indicate how these responsibilities are executed.
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At RBC GAM, our climate change strategy falls within the scope of our wider approach to responsible investment. As a result, board and executive oversight of climate-related issues is executed as part of their oversight of the firm's responsible investment activities.

SG 07.7 CC	For management-level roles that assess and manage climate-related issues, provide further information on the structure and processes involved.
------------	--

The governance of our climate change strategy is conducted under the same governance model as our responsible investment activities, as outlined in SG 07.2. Namely, the CGRI and investment teams have management and implementation responsibilities for our climate-related activities. The Head of Corporate Governance & Responsible Investment and Heads of Equities and Fixed Income all report directly to the CIO. The CIO manages firm-level climate-related initiatives and oversight, and reports directly to the CEO, who then reports into RBC GAM's relevant Boards of Directors.

SG 07.8 CC	Indicate how your organisation engages external investment managers and/or service providers on the TCFD recommendations and their implementation.
<input type="checkbox"/> Request that external managers and/or service providers incorporate TCFD into mainstream financial filings (annual financial reports, other regulatory reporting or similar) <input type="checkbox"/> Request incorporation of TCFD into regular client reporting <input type="checkbox"/> Request that external managers complete PRI climate indicator reporting <input type="checkbox"/> Request responses to TCFD Fund Manager questions in the PRI Asset Owner Guide <input type="checkbox"/> Other <input checked="" type="checkbox"/> We do not engage with external managers and/or service providers on the TCFD recommendations and their implementation	

SG 08	Voluntary	Additional Assessed	General
SG 08.1 Indicate if your organisation's performance management, reward and/or personal development processes have a responsible investment element.			
Board members/Board of trustees			
SG 08.1b RI in personal development and/or training plan			
<input type="checkbox"/> Responsible investment included in personal development and/or training plan <input checked="" type="checkbox"/> None of the above			
Chief Executive Officer (CEO), Chief Investment Officer (CIO), Chief Operating Officer (COO), Investment Committee			
SG 08.1a RI in objectives, appraisal and/or reward			
<input checked="" type="checkbox"/> Responsible investment KPIs and/or goals included in objectives <input checked="" type="checkbox"/> Responsible investment included in appraisal process <input checked="" type="checkbox"/> Variable pay linked to responsible investment performance <input type="checkbox"/> None of the above			
SG 08.1b RI in personal development and/or training plan			
<input type="checkbox"/> Responsible investment included in personal development and/or training plan <input checked="" type="checkbox"/> None of the above			
Other C-level staff or head of department			
SG 08.1a RI in objectives, appraisal and/or reward			
<input checked="" type="checkbox"/> Responsible investment KPIs and/or goals included in objectives <input checked="" type="checkbox"/> Responsible investment included in appraisal process <input checked="" type="checkbox"/> Variable pay linked to responsible investment performance <input type="checkbox"/> None of the above			
SG 08.1b RI in personal development and/or training plan			
<input checked="" type="checkbox"/> Responsible investment included in personal development and/or training plan <input type="checkbox"/> None of the above			
Portfolio managers			
SG 08.1a RI in objectives, appraisal and/or reward			
<input checked="" type="checkbox"/> Responsible investment KPIs and/or goals included in objectives <input checked="" type="checkbox"/> Responsible investment included in appraisal process <input type="checkbox"/> Variable pay linked to responsible investment performance <input type="checkbox"/> None of the above			
SG 08.1b RI in personal development and/or training plan			
<input checked="" type="checkbox"/> Responsible investment included in personal development and/or training plan <input type="checkbox"/> None of the above			
Investment analysts			
SG 08.1a RI in objectives, appraisal and/or reward			
<input checked="" type="checkbox"/> Responsible investment KPIs and/or goals included in objectives <input checked="" type="checkbox"/> Responsible investment included in appraisal process <input type="checkbox"/> Variable pay linked to responsible investment performance <input type="checkbox"/> None of the above			

SG 08.1b	RI in personal development and/or training plan
<input checked="" type="checkbox"/> Responsible investment included in personal development and/or training plan <input type="checkbox"/> None of the above	
Dedicated responsible investment staff	
SG 08.1a	RI in objectives, appraisal and/or reward
<input checked="" type="checkbox"/> Responsible investment KPIs and/or goals included in objectives <input checked="" type="checkbox"/> Responsible investment included in appraisal process <input checked="" type="checkbox"/> Variable pay linked to responsible investment performance <input type="checkbox"/> None of the above	
SG 08.1b	RI in personal development and/or training plan
<input checked="" type="checkbox"/> Responsible investment included in personal development and/or training plan <input type="checkbox"/> None of the above	

SG 09	Mandatory	Core Assessed	PRI 4,5
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SG 09.1	Select the collaborative organisation and/or initiatives of which your organisation is a member or in which it participated during the reporting year, and the role you played.
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Principles for Responsible Investment

Your organisation's role in the initiative during the reporting period (see definitions)
Moderate

Provide a brief commentary on the level of your organisation's involvement in the initiative. [Optional]
--

RBC GAM is a signatory to the UN PRI and a signatory to the PRI Statement on ESG in Credit Ratings, which encourages credit agencies to proactively take ESG factors into consideration for relevant issuers. In addition, the Head of our CGRI team serves as a member of the PRI Global Policy Reference Group, and RBC GAM participates in both Toronto and North American Responsible Investment working groups, which collaborate on and discuss PRI initiatives.

Apart from this, we also participated in the following collaborative engagements:

- Signed the investor statement on deforestation and forest fires in the Amazon, organized by the PRI
- Concluded a collaborative engagement between about 50 institutional investors, the PRI, and companies' boards regarding the oversight of their cyber and privacy risk management. In particular, we led an engagement with the board and management of a FTSE 100 companies to discuss areas of risk related to cybersecurity.

BlueBay also actively participated in the following fixed income and ESG working groups: ESG bondholder engagement, Advisory Committee on Credit Risks, ESG Sovereign Working Group (chairing the ACCR), and Private Debt ESG Project.

- Asian Corporate Governance Association
- Australian Council of Superannuation Investors
- AVCA: Sustainability Committee
- France Invest – La Commission ESG
- BVCA – Responsible Investment Advisory Board
- CDP Climate Change

Your organisation's role in the initiative during the reporting period (see definitions)
Moderate

Provide a brief commentary on the level of your organisation's involvement in the initiative. [Optional]
--

BlueBay participates in follow-up engagements for non-responders across all focus areas and companies listed.

BlueBay utilizes and shares the insights from reports internally with its investment teams.

CDP Forests

Your organisation's role in the initiative during the reporting period (see definitions)
Basic

Provide a brief commentary on the level of your organisation's involvement in the initiative. [Optional]
--

BlueBay participates in follow up engagements for non-responders across all focus areas and companies listed.

BlueBay utilizes and shares the insights from reports internally with its investment teams.

CDP Water

Your organisation's role in the initiative during the reporting period (see definitions)
Basic

Provide a brief commentary on the level of your organisation's involvement in the initiative. [Optional]
--

BlueBay participates in follow-up engagements for non-responders across all focus areas and companies listed.

BlueBay utilizes and shares the insights from reports internally with its investment teams.

- CFA Institute Centre for Financial Market Integrity
- Climate Action 100+

Your organisation's role in the initiative during the reporting period (see definitions)

Basic

Provide a brief commentary on the level of your organisation's involvement in the initiative. [Optional]

RBC GAM signed on to the Climate Action 100+ in early 2020.

- Code for Responsible Investment in SA (CRISA)
- Council of Institutional Investors (CII)

Your organisation's role in the initiative during the reporting period (see definitions)

Basic

Provide a brief commentary on the level of your organisation's involvement in the initiative. [Optional]

As a member of the Council of Institutional Investors (CII), RBC GAM looks for opportunities to contribute to the advancement of corporate governance practices in U.S. market.

- Eumedion
- Extractive Industries Transparency Initiative (EITI)
- ESG Research Australia
- Invest Europe Responsible Investment Roundtable
- Global Investors Governance Network (GIGN)
- Global Impact Investing Network (GIIN)

Your organisation's role in the initiative during the reporting period (see definitions)

Basic

- Global Real Estate Sustainability Benchmark (GRESB)
- Green Bond Principles
- HKVCA: ESG Committee
- Institutional Investors Group on Climate Change (IGCC)
- Interfaith Center on Corporate Responsibility (ICCR)
- International Corporate Governance Network (ICGN)

Your organisation's role in the initiative during the reporting period (see definitions)

Moderate

Provide a brief commentary on the level of your organisation's involvement in the initiative. [Optional]

RBC GAM is a member of the ICGN and RBC GAM's Head of Corporate Governance & Responsible Investment sits on the Disclosure and Transparency committee.

- Investor Group on Climate Change, Australia/New Zealand (IGCC)
- International Integrated Reporting Council (IIRC)
- Investor Network on Climate Risk (INCR)/CERES
- Local Authority Pension Fund Forum
- Principles for Financial Action in the 21st Century
- Principles for Sustainable Insurance
- Regional or National Social Investment Forums (e.g. UKSIF, Eurosif, ASRIA, RIAA), specify

Responsible Investment Association (RIA), Canada's leading responsible investment association.

Your organisation's role in the initiative during the reporting period (see definitions)

Advanced

Provide a brief commentary on the level of your organisation's involvement in the initiative. [Optional]

RBC GAM is a Sustaining Member of the RIA, the highest level of membership. The Head of Corporate Governance & Responsible Investment is on the board.

During 2019, we participated in many collaborative initiatives with the RIA, including the association's submission of letters to the Prime Minister of Canada, the Minister of Environment and Climate Change, the Minister of Finance, and the Minister of Natural Resources, reiterating RIA members' support for the recommendations of Canada's Expert Panel on Sustainable Finance.

RBC GAM is also a member of another regional social investment forum: US SIF (the Forum for Sustainable and Responsible Investment).

- Responsible Finance Principles in Inclusive Finance
- Shareholder Association for Research and Education (Share)
- United Nations Environmental Program Finance Initiative (UNEP FI)
- United Nations Global Compact
- Other collaborative organisation/initiative, specify

Canadian Coalition for Good Governance (CCGG)

Your organisation's role in the initiative during the reporting year (see definitions)

Advanced

Provide a brief commentary on the level of your organisation's involvement in the initiative. [Optional]

RBC GAM is a founding member of the CCGG and our CIO is the past Chair of the board. Our CIO is a current director of the board, and our Head of Corporate Governance & Responsible Investment is a member of the Public Policy Committee.

RBC GAM is an active participant in CCGG's collective engagement program. In 2019, CCGG completed 34 collective engagements. We also actively participated in a variety of regulatory initiatives relating to corporate governance and shareholder rights, including the following:

- Letter to the Canadian Securities Administrators (CSA) on proposed amendments to the business acquisition report (BAR) requirements
- Letter to Ontario Ministry of Government and Consumer Services on amendments to the Ontario Business and Corporations Act
- Letter to Ontario Securities Commission on its Draft 2019-2020 Statement of Priorities
- Letter to the U.S. Securities and Exchange Commission on Proxy Advisors
- Submission to the Ontario Securities Commission: Burden Reduction

Other collaborative organisation/initiative, specify

Sustainability Accounting Standards Board (SASB)

Your organisation's role in the initiative during the reporting year (see definitions)

Advanced

Provide a brief commentary on the level of your organisation's involvement in the initiative. [Optional]

RBC GAM is a member of the SASB Alliance and the Head of Corporate Governance & Responsible Investment participates in quarterly meetings as part of SASB's Investor Advisory Group.

Other collaborative organisation/initiative, specify

Investor Stewardship Group (ISG)

Your organisation's role in the initiative during the reporting year (see definitions)

Advanced

Provide a brief commentary on the level of your organisation's involvement in the initiative. [Optional]

RBC GAM is a founding member of the ISG, a collaboration of institutional investors working to establish a framework of standards for institutional investors and corporate governance principles at US-listed companies. The Head of Corporate Governance & Responsible Investment is a member of the board.

In 2019, the ISG held its first annual ISG/Corporate Issuers Conference, bringing together investors and corporate issuers to discuss corporate governance and stewardship. During the conference, we also met with other ISG members to discuss the strategic direction of the initiative as well as the Commonsense Principles 2.0 released in 2018 and the Business Roundtable's 2019 Statement on the Purpose of a Corporation.

Other collaborative organisation/initiative, specify

Canadian 30% Club Investor Group

Your organisation's role in the initiative during the reporting year (see definitions)

Advanced

Provide a brief commentary on the level of your organisation's involvement in the initiative. [Optional]

RBC GAM is a signatory to a coalition of Canada's largest institutional investors known as the Canadian 30% Club Investor Group. As communicated in its Statement of Intent, the group's objective is to achieve a minimum of 30% of women on the boards and in senior management roles of S&P/TSX Composite Index companies by 2022.

In 2019, we led three engagements with companies to encourage boards that may be lagging on gender diversity at the board and management level.

SG 09.2 Mandatory to Report, Voluntary to Disclose Descriptive PRI 1

Indicate approximately what percentage (+/- 5%) of your externally managed assets under management are managed by PRI signatories.

90%

SG 10 Mandatory Core Assessed PRI 4

SG 10.1 Indicate if your organisation promotes responsible investment, independently of collaborative initiatives.

Yes

SG 10.2 Indicate the actions your organisation has taken to promote responsible investment independently of collaborative initiatives. Provide a description of your role in contributing to the objectives of the selected action and the typical frequency of your participation/contribution.

Provided or supported education or training programmes (this includes peer to peer RI support) Your education or training may be for clients, investment managers, actuaries, broker/dealers, investment consultants, legal advisers etc.)

Description

RBC GAM conducts numerous education sessions for clients and advisors year round via webinars and presentations. For example, RBC GAM hosted an advisor-facing webinar in partnership with RIA Canada during their 2019 RI week, which focused on the "Power of Proxy

Voting* for which advisors were able to earn continuing education credits for their applicable accreditations. We were also part of several panel discussions for advisors on RI. For our clients, we regularly discuss ESG topics during roadshow presentations and other functions. For instance, in 2019, our Canadian Institutional Roadshow featured a session on ESG; our Global Equity team hosted multiple functions in order to foster discussions on topical ESG content; and BlueBay held educational sessions with investors, consultants and media on ESG and ESG integration in Fixed Income. A senior portfolio manager on our Global Equity team was also the author of a module in the Certificate in ESG Investing Official Training Manual, which was designed as educational material for the CFA Society United Kingdom's Certificate in ESG Investing exam.

Frequency of contribution	
<input type="radio"/>	Quarterly or more frequently
<input type="radio"/>	Biannually
<input type="radio"/>	Annually
<input type="radio"/>	Less frequently than annually
<input checked="" type="radio"/>	Ad hoc
<input type="radio"/>	Other

Provided financial support for academic or industry research on responsible investment

Description	
RBC GAM annually conducts a survey of institutional asset owners and investment consultants across the US, Europe and Canada on responsible investment. In 2019, we received responses from almost 800 participants globally, and the results are available publicly on our website at www.rbcgam.com . Further, we held a series of learning events in relation to the survey as well as webinars for remote access. In 2019, we also launched RBC GAM's first Canadian retail investor survey to gauge these investors' attitudes and understanding of responsible investment. With 1,500 responses in our first year, the survey generated several material insights on the Canadian RI landscape and created a strong baseline for tracking changes in these investors' attitudes and knowledge of RI topics over time.	

Frequency of contribution	
<input type="radio"/>	Quarterly or more frequently
<input type="radio"/>	Biannually
<input checked="" type="radio"/>	Annually
<input type="radio"/>	Less frequently than annually
<input type="radio"/>	Ad hoc
<input type="radio"/>	Other

Provided input and/or collaborated with academia on RI related work

Description	
In 2019, we collaborated with two Canadian universities to support the development of sustainable finance courses for their MBA programs, to be launched in 2020. Additionally, our Global Equity team hosts regular ESG events, including ESG dinners and supper clubs, where members of academia are invited to share their insights with the group. In 2019, one of the team's senior portfolio managers was also the author of a module in the Certificate in ESG Investing Official Training Manual, which was designed as educational material for the CFA Society United Kingdom's Certificate in ESG Investing exam.	

Frequency of contribution	
<input type="radio"/>	Quarterly or more frequently
<input type="radio"/>	Biannually
<input type="radio"/>	Annually
<input type="radio"/>	Less frequently than annually
<input checked="" type="radio"/>	Ad hoc
<input type="radio"/>	Other

Encouraged better transparency and disclosure of responsible investment practices across the investment industry

Description	
RBC GAM regularly requests improved transparency and disclosure by our investee companies through ESG engagements. In addition, we regularly collaborate with other investors through numerous groups and initiatives in order to encourage better transparency and disclosure on responsible investing practices. Some of the groups and initiatives include our membership in the Council of Institutional Investors, Canadian Coalition for Good Governance, Responsible Investment Association, the Sustainability Accounting Standards Board, and the Canadian 30% Club Investor Group.	

Frequency of contribution	
<input checked="" type="radio"/>	Quarterly or more frequently
<input type="radio"/>	Biannually
<input type="radio"/>	Annually
<input type="radio"/>	Less frequently than annually
<input type="radio"/>	Ad hoc
<input type="radio"/>	Other

Spoke publicly at events and conferences to promote responsible investment

Description	
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Members of the CGRI team participated in numerous speaking engagements, including at conferences and educational seminars. Speaking engagements include panels, presentations, webinars and podcasts, primarily focused on ESG integration but also focused on specific ESG topics such as board gender diversity. In addition, our investment teams often serve as speakers for responsible investment events and conferences. For example, in 2019, members of our Global Equity team presented at the CFA UK Conference, the PRI in Person conference, and ICGN. Additionally, our institutional investment teams are also regularly invited to speak publicly on ESG-related topics. For instance, our institutional teams speak about ESG as part of their annual client roadshows.

Frequency of contribution

- Quarterly or more frequently
- Biannually
- Annually
- Less frequently than annually
- Ad hoc
- Other

- Wrote and published in-house research papers on responsible investment

Description

In addition to the publicly available semi-annual CGRI reports, the CGRI team also publishes papers on various ESG issues for our clients. For instance, in 2019, the team published reports on the financial implications of climate-related risk, cyber security and privacy, and responsible investment implications of palm oil. Similarly, our investment teams write papers on a range of ESG topics. For example, in 2019, our teams published pieces on whether or not markets are pricing in environmental risks, ESG findings for sovereign debt investing and the implications of third-party ESG scoring. In addition, the work of our investment teams is often featured in responsible investment publications. For example, in 2019, a case study on the integration of ESG analysis in emerging market equities was published in the Responsible Investment Association of Canada's online magazine. In 2019, our Asian Equity team published its first annual ESG report that takes a deep dive into relevant ESG topics, engagement, proxy voting and its own unique approach to integrating ESG factors into its investment process. BlueBay and our Global Equity, Emerging Markets Equity and Impact Bond teams continue to publish regular ESG reports and thought pieces.

Frequency of contribution

- Quarterly or more frequently
- Biannually
- Annually
- Less frequently than annually
- Ad hoc
- Other

- Encouraged the adoption of the PRI

Description

RBC GAM encourages fellow investors to adopt the principles of the PRI, where appropriate. In addition, we encourage our external managers to become signatories to the PRI and adhere to the PRI's six principles.

Frequency of contribution

- Quarterly or more frequently
- Biannually
- Annually
- Less frequently than annually
- Ad hoc
- Other

- Responded to RI related consultations by non-governmental organisations (OECD, FSB etc.)

Description

The CGRI team responds to numerous requests from non-governmental organisations (NGOs) per year related to our responsible investing activities. For example, in 2019, we engaged with a Canadian NGO to answer their questions about our approach to investment in certain foreign entities. BlueBay also provided feedback to public consultations by the European Commission and Church of England Investor Mining and Tailings Safety Summit, among others.

Frequency of contribution

- Quarterly or more frequently
- Biannually
- Annually
- Less frequently than annually
- Ad hoc
- Other

- Wrote and published articles on responsible investment in the media

Description

Both the CGRI team and our investment teams contributed to articles on responsible investment in the media throughout 2019. For

example, in 2019, we published articles in IR Magazine, Corporate Secretary, Sustainable Brands, Board Agenda, and other media outlets on topics such as why company leaders should care about ESG, how investors can effectively select an investment manager to measure ESG, and how to accelerate gender diversity on boards of directors.

Frequency of contribution
<input type="radio"/> Quarterly or more frequently
<input type="radio"/> Biannually
<input type="radio"/> Annually
<input type="radio"/> Less frequently than annually
<input checked="" type="radio"/> Ad hoc
<input type="radio"/> Other

A member of PRI advisory committees/ working groups, specify

Description
As a member of the PRI-coordinated Cyber Security Engagement Group, RBC GAM collaboratively engaged with target companies viewed to be particularly susceptible to cyber security threats by committee members. In 2019, we completed the engagement we were leading with a FTSE 100 company as part of our role in this committee. The Head of Corporate Governance & Responsible Investment also sits on the PRI's Global Policy Reference Group. BlueBay's Head of ESG Investment Risk serves as chair of the Advisory Committee on Credit Risks and as a member of the Sovereign Working Group and Private Debt ESG project. BlueBay participated in the collaborative investor forum (e.g. cybersecurity, issuer specific initiatives).

Frequency of contribution
<input checked="" type="radio"/> Quarterly or more frequently
<input type="radio"/> Biannually
<input type="radio"/> Annually
<input type="radio"/> Less frequently than annually
<input type="radio"/> Ad hoc
<input type="radio"/> Other

On the Board of, or officially advising, other RI organisations (e.g. local SIFs)

Description
RBC GAM's CIO is a past Chair and a current director of the Canadian Coalition for Good Governance's (CCGG) board and the Head of Corporate Governance & Responsible Investment is a member of the Public Policy Committee. The Head of Corporate Governance & Responsible Investment also sits on the International Corporate Governance Network's (ICGN's) Disclosure and Transparency committee, is a member of the Investor Advisory Group of the Sustainability Accounting Standards Board (SASB) and sits on the boards of the Responsible Investment Association of Canada (RIA) and the Investor Stewardship Group (ISG). In addition, a Senior Portfolio Manager on our Global Equity team sits on advisory committees for a set of sustainability UK investment trusts, the IASB, and the Green Finance Institute.

Frequency of contribution
<input checked="" type="radio"/> Quarterly or more frequently
<input type="radio"/> Biannually
<input type="radio"/> Annually
<input type="radio"/> Less frequently than annually
<input type="radio"/> Ad hoc
<input type="radio"/> Other

Other, specify

No

SG 10.3 Describe any additional actions and initiatives that your organisation has taken part in during the reporting year to promote responsible investment [Optional]

RBC GAM provides ongoing educational seminars to institutional and retail clients which have included an ESG and responsible investment components. RBC GAM also organizes and coordinates seminars, luncheons and other gatherings to bring together clients and like-minded investors to discuss and promote responsible investment.

Members of RBC GAM's CGRI and investment teams participated in numerous speaking engagements on ESG throughout 2019, including at conferences and direct invitations from investee companies, clients and other organizations.

Our proxy voting and engagement activities also play a key role in our promotion of responsible investment. By engaging with our investee companies on material ESG issues, we seek to enhance the risk-adjusted returns for our clients through the adoption of best practices, enhanced disclosure and appropriate management of ESG risks. For example, we regularly encourage investee companies to consider the recommendations of the TCFD and consult the SASB framework when assessing materiality. We also engage with regulators, government and policymakers on ESG in order to promote responsible investment.

A key focus for RBC GAM in 2019 was on market education within responsible investment. RBC GAM published content on social media platforms and our public website to provide readers with a further understanding of responsible investing. In addition, over the course of 2019, we developed a comprehensive practice management guide for our financial advisors in the U.S. to foster integration of responsible investment in client portfolios. The guide includes a number of modules to assist advisors in having meaningful conversations with clients about dispelling myths and uncovering interest in RI through advisor- and client-facing questionnaires. These questionnaires were subsequently tailored for a Canadian advisor audience.

In addition, our U.S. impact bond team sometimes acts as a conduit for bringing together stakeholders interested in similar impact investing outcomes, bringing together local government with institutional investors (e.g., foundations and endowments) and public companies. Thus, the team improves the responsible investment, and specifically impact investment, ecosystem within local communities.

In addition to the publicly available semi-annual CGRI reports, the CGRI team and our investment teams also publish papers on various ESG issues for clients and those working directly with clients. We aim to be transparent in all our activities and inform our clients of the methods through which we integrate ESG factors into the investments they have entrusted us to manage.

SG 11	Voluntary	Additional Assessed	PRI 4,5,6						
SG 11.1	Indicate if your organisation - individually or in collaboration with others - conducted dialogue with public policy makers or regulators in support of responsible investment in the reporting year.								
<input checked="" type="checkbox"/> Yes									
<table border="1"> <tr> <td colspan="2">If yes</td> </tr> <tr> <td><input checked="" type="checkbox"/></td> <td>Yes, individually</td> </tr> <tr> <td><input checked="" type="checkbox"/></td> <td>Yes, in collaboration with others</td> </tr> </table>				If yes		<input checked="" type="checkbox"/>	Yes, individually	<input checked="" type="checkbox"/>	Yes, in collaboration with others
If yes									
<input checked="" type="checkbox"/>	Yes, individually								
<input checked="" type="checkbox"/>	Yes, in collaboration with others								
SG 11.2	Select the methods you have used.								
<input checked="" type="checkbox"/> Endorsed written submissions to governments, regulators or public policy-makers developed by others <input checked="" type="checkbox"/> Drafted your own written submissions to governments, regulators or public-policy markers <input checked="" type="checkbox"/> Participated in face-to-face meetings with government members or officials to discuss policy <input type="checkbox"/> Other, specify									
SG 11.3	Where you have made written submissions (individually or collaboratively) to governments and regulatory authorities, indicate if these are publicly available.								
<input checked="" type="checkbox"/> Yes, publicly available https://ccgg.ca/regulatory-submissions/ https://www.riacanada.ca/research-advocacy/policy-advocacy/ https://www.bluebay.com/en/investment-expertise/esg/resources/ <input type="checkbox"/> No									
<input type="checkbox"/> No									
SG 11.4	Provide a brief description of the main topics your organisation has engaged with public policy-makers or regulators on.								
<p>We actively participated in a variety of regulatory initiatives through Canadian Coalition for Good Governance relating to corporate governance and shareholder rights, including the following submissions:</p> <ul style="list-style-type: none"> • Letter to Canadian Securities Administrators (CSA) on proposed amendments to the business acquisition report (BAR) requirements • Letter to Ontario Ministry of Government and Consumer Services on amendments to the Ontario Business and Corporations Act • Letter to Ontario Securities Commission on its Draft 2019-2020 Statement of Priorities • Letter to U.S. Securities and Exchange Commission on Proxy Advisors • Submission to the Ontario Securities Commission: Burden Reduction <p>In addition, as a sustaining member of the Responsible Investment Association of Canada (RIA), we participated in the association's submission of letters to the Prime Minister of Canada, the Minister of Environment and Climate Change, the Minister of Finance, and the Minister of Natural Resources, which reiterated members' support for the recommendations of Canada's Expert Panel on Sustainable Finance.</p> <p>The CGRI team also engaged with the Financial Reporting Council (FRC) regarding modifications to the UK Stewardship Code in 2019, and our Global Equity team met with the Bank of England as part of a group of asset managers and owners.</p> <p>Finally, BlueBay inputted its responses to the IOSCO consultation on sustainable finance in emerging markets and the role of securities regulators. All four documents are publicly available at the BlueBay site quoted in SG 11.3.</p>									
SG 12	Mandatory	Core Assessed	PRI 4						
SG 12.1	Indicate whether your organisation uses investment consultants.								
<input type="checkbox"/> Yes, we use investment consultants <input checked="" type="checkbox"/> No, we do not use investment consultants.									
SG 13	Mandatory	Descriptive	PRI 1						
SG 13.1	Indicate whether the organisation carries out scenario analysis and/or modelling, and if it does, provide a description of the scenario analysis (by asset class, sector, strategic asset allocation, etc.).								
<input checked="" type="checkbox"/> Yes, in order to assess future ESG factors									
		Describe							
<p>Our individual investment teams may integrate ESG factors into their modelling and scenario analysis. For instance, our Global Equity team may consider base-case, ESG asset (upside) and liability (downside) scenarios in their Discounted Cash Flow modelling. In addition, the team has conducted carbon tax/assessment modelling on individual stocks.</p>									
<input checked="" type="checkbox"/> Yes, in order to assess future climate-related risks and opportunities									
		Describe							
<p>Our investment teams are at varying stages of employing climate-related scenario analysis. For example, our Global Equity team has embedded climate scenario analysis into its bottom up analysis; our Private Markets and U.S. Fixed Income teams have also conducted geospatial analysis of their mortgage and municipal bond investments.</p>									
<input type="checkbox"/> No, our organisation does not currently carry out scenario analysis and/or modelling									

SG 13.2	Indicate if your organisation considers ESG issues in strategic asset allocation and/or allocation of assets between sectors or geographic markets.
We do the following	
<input type="checkbox"/> Allocation between asset classes <input type="checkbox"/> Determining fixed income duration <input checked="" type="checkbox"/> Allocation of assets between geographic markets <input checked="" type="checkbox"/> Sector weightings <input type="checkbox"/> Other, specify <input type="checkbox"/> We do not consider ESG issues in strategic asset allocation	

SG 13.3	Additional information. [OPTIONAL]
<p>Our strategic asset allocation process is not designed to incorporate granular factors such as ESG issues, focusing instead on macro shifts in market conditions over the short and medium-term. As such, we consider ESG factors to be most relevant to individual issuers, and in some instances, for certain sub-sectors.</p> <p>Accordingly, individual investment teams' ESG integration processes may result in changes in the allocation between geographic markets and sector weightings. Examples include:</p> <ul style="list-style-type: none"> • Emerging Markets Sovereign Bond team incorporates ESG factors in a quantitative manner in the sovereign bond selection process, considering factors including corruption, inequality, human development, ease of doing business and environmental considerations, including climate change. • Canadian Investment Grade Corporate Bond team considers ESG risks including environmental, political and regulatory risks in the context of geographical and sector allocation (e.g. coal and nuclear involvement). • European Equity team is generally underweight carbon-intensive sectors due to its view on the sectors' climate-related risks. • U.S. and Impact Fixed Income teams have used climate analysis to inform specific investment decisions <p>Other teams may integrate ESG factors into their modelling and/or scenario analysis. For instance, our North American Equity team's overall fundamental analysis includes ESG factors, which contributes to the overall model and buy/sell recommendations.</p>	

SG 13 CC	Mandatory to Report, Voluntary to Disclose	Descriptive	General
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SG 13.4 CC	Describe how your organisation is using scenario analysis to manage climate-related risks and opportunities, including how the analysis has been interpreted, its results, and any future plans.
<input type="checkbox"/> Initial assessment <input checked="" type="checkbox"/> Incorporation into investment analysis	
Describe	
<p>Throughout 2019, we continued to expand our expertise in understanding the potential impacts of climate change on our investments. As an example, during the year, we engaged with climate data vendors to explore climate scenario analysis tools that can be applied across all our portfolios and will be continuing this work in 2020.</p> <p>Our individual investment teams have also continued to work on incorporating climate-related scenario analysis in their respective investment processes. For instance, our Global Equity team has applied carbon tax/assessment modelling on an individual stock basis. Our U.S. Fixed Income teams have also used geospatial and carbon data to conduct climate scenario analysis on their mortgage and municipal bond investments. This analysis has informed specific investment decisions to improve the resiliency of portfolios to climate-related physical and migration risks.</p> <p>Further, ESG factors, including climate change factors, are considered in several teams' financial models. For instance, the North American Equity team considers the exposure of oil and gas companies to particularly carbon-intensive assets in the context of regulatory, political and reputational risks.</p>	
<input checked="" type="checkbox"/> Inform active ownership	
Describe	
<p>Our Global Equity team is in the process of engaging with their investee companies to encourage a carbon net zero target across its portfolio. Other investment teams may also use results from carbon and energy mix analysis to inform specific ESG engagements with investee companies.</p>	
<input type="checkbox"/> Other	

SG 13.5 CC	Indicate who uses this analysis.
<input type="checkbox"/> Board members, trustees, C-level roles, Investment Committee <input checked="" type="checkbox"/> Portfolio managers <input checked="" type="checkbox"/> Dedicated responsible investment staff <input type="checkbox"/> External managers <input type="checkbox"/> Investment consultants/actuaries <input type="checkbox"/> Other	

SG 13.6 CC	Indicate whether your organisation has evaluated the potential impact of climate-related risks, beyond the investment time horizon, on its investment strategy.
<input type="radio"/> Yes <input checked="" type="radio"/> No	
Please explain the rationale	
<p>Climate-related analysis is largely executed by our individual investment teams, often at the company-level. For example, our North American Equity team considers the emissions intensity of power generation companies' energy mix and our European Equity team considers the impact of electric vehicle uptake in its assessment of companies deemed exposed to this trend. With most climate-related risks posing long-term concerns, the</p>	

information integrated into the teams' analyses may have lasting effects beyond an individual security's investment horizon. However, as long-term investors, our general investment horizon aligns with the long-term nature of climate-related risks.

SG 13.7 CC	Indicate whether a range of climate scenarios is used.
<input checked="" type="checkbox"/> Analysis based on a 2°C or lower scenario <input type="checkbox"/> Analysis based on an abrupt transition, consistent with the Inevitable Policy Response <input checked="" type="checkbox"/> Analysis based on a 4°C or higher scenario <input type="checkbox"/> No, a range is not used	

SG 13.8 CC	Indicate the climate scenarios your organisation uses.	
Provider	Scenario used	
IEA		
IEA	<input checked="" type="checkbox"/> Energy Technology Perspectives (ETP) 2 Degrees scenario	
IEA		
IEA		
IEA		
IRENA		
Greenpeace		
Institute for Sustainable Development		
Bloomberg		
IPCC	<input checked="" type="checkbox"/> Representative Concentration Pathway (RCP) 8.5	
IPCC	<input checked="" type="checkbox"/> RPC 6	
IPCC	<input checked="" type="checkbox"/> RPC 4.5	
IPCC	<input checked="" type="checkbox"/> RPC 2.6	
Other	<input checked="" type="checkbox"/> Other (1)	Other (1) please specify: Carbon tax modelling
Other	<input checked="" type="checkbox"/> Other (2)	Other (2) please specify: Carbon credit modelling
Other		

SG 14	Mandatory to Report, Voluntary to Disclose	Additional Assessed	PRI 1
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SG 14.1	Some investment risks and opportunities arise as a result of long term trends. Indicate which of the following are considered.	
<input checked="" type="checkbox"/> Changing demographics <input checked="" type="checkbox"/> Climate change <input checked="" type="checkbox"/> Resource scarcity <input checked="" type="checkbox"/> Technological developments <input checked="" type="checkbox"/> Other, specify(1)		
	other description (1)	
	BlueBay also focuses on governance/corruption trends and cyber security.	
<input type="checkbox"/> Other, specify(2) <input type="checkbox"/> None of the above		

SG 14.2	Indicate which of the following activities you have undertaken to respond to climate change risk and opportunity	
<input checked="" type="checkbox"/> Established a climate change sensitive or climate change integrated asset allocation strategy		

- Targeted low carbon or climate resilient investments

Specify the AUM invested in low carbon and climate resilient portfolios, funds, strategies or asset classes.	
Total AUM	
	487,995,952 CAD
	366995142 USD

Specify the framework or taxonomy used.	
<p>Please note that only thematic low carbon or climate-resilient strategies are included in the AUM calculation for SG 14.2. Our Global Equity Fossil Fuel Free strategies, for instance, exclude investments in companies involved in extracting, processing or transporting coal, oil or natural gas or those included in 'The Carbon Underground 200'. In addition, the RBC Impact Bond strategy, offered to U.S. investors, considers the net environmental and social impacts of its investments, including climate change considerations.</p> <p>As part of their ESG integration processes, several of our investment teams consider the carbon intensity of investee companies for non-thematic strategies. For instance, our Global Equity team estimates its portfolio to have a carbon intensity less than 40% of its benchmark, and is currently in the process of engaging with investee companies to encourage a carbon net zero target across the team's portfolio.</p> <p>In addition, many of our investment teams consider investee companies' contributions to sustainability solutions in their analysis. As a result, the strategy may not be categorized thematically as low carbon or climate resilient, but the investment teams invest in companies viewed as low carbon or climate resilient due to their lines of business or solutions they provide to climate-related risks.</p>	

- Phase out your investments in your fossil fuel holdings
- Reduced portfolio exposure to emissions intensive or fossil fuel holdings
- Used emissions data or analysis to inform investment decision making
- Sought climate change integration by companies
- Sought climate supportive policy from governments
- Other, specify

other description	
We have also exercised our proxy voting rights in favour of companies improving their disclosure of emissions data.	

- None of the above

SG 14.3 Indicate which of the following tools the organisation uses to manage climate-related risks and opportunities.

- Scenario analysis
- Disclosures on emissions risks to clients/trustees/management/beneficiaries
- Climate-related targets
- Encouraging internal and/or external portfolio managers to monitor emissions risks
- Emissions-risk monitoring and reporting are formalised into contracts when appointing managers
- Weighted average carbon intensity
- Carbon footprint (scope 1 and 2)
- Portfolio carbon footprint
- Total carbon emissions
- Carbon intensity
- Exposure to carbon-related assets
- Other emissions metrics
- Other, specify

other description	
Numerous investment teams engage with companies on emission risks and we regularly engage with companies on the impacts and disclosure of climate-related issues.	

- None of the above

SG 14.4 If you selected disclosure on emissions risks, list any specific climate related disclosure tools or frameworks that you used.

We provide carbon footprint analysis of several strategies to clients on request. Disclosure is aligned with the TCFD recommendations, using TCFD-recommended metrics. The analysis includes the portfolio's exposure to carbon-related assets and conducts an attribution of emissions intensity compared to the strategy's benchmark.

SG 14.5 Additional information [Optional]

Managed by RBC GAM's Global Equity team, the Fossil Fuel Free Global Equity strategy is designed for investors that are concerned about climate change and policy response, business models that may be considered unsustainable, allocating capital to extractive industries, and the potential financial risks of stranded assets. Available to investors in Canada, the strategy invests primarily in equity securities of companies that operate in different countries around the world while avoiding companies that are directly involved in extracting, processing or transporting coal, oil or natural gas or those included in 'The Carbon Underground 200' - a list of the 'top global 200 publicly-owned coal, oil, and gas reserve owners ranked by the carbon emissions embedded in their reserves.'^[1]

A similar fossil fuel free global equity strategy is also available in the U.S. on a segregated basis and to European investors with additional SRI-based exclusionary screens. Lastly, we manage climate-related strategies on a segregated basis for clients in Canada.

Although a formal target may not be in place, we do expect some strategies to be less carbon-intensive than the benchmark. The RBC Impact Bond strategy, available to U.S. investors, incorporates climate-related targets in an aim to create portfolios that are resilient to a variety of climate-related scenarios.

At the sector and issuer level, BlueBay has adopted qualitative metrics to evaluate companies where climate is considered a material risk (these are

contained in its sector ESG briefing documents).

[1] Fossil Free Indexes™. The Carbon Underground 200™. <http://fossilfreeindexes.com/research/the-carbon-underground/>.

SG 14 CC	Voluntary				General
SG 14.6 CC		Provide further details on the key metric(s) used to assess climate-related risks and opportunities.			
Metric Type	Coverage	Purpose	Metric Unit	Metric Methodology	
Climate-related targets	Minority of assets	Target issuers and investments with below average emissions for specific strategies pursuing net-positive social and/or environmental impacts.	tons CO2e (thousands)	Total CO2 Emissions of the company, in thousands of metric tons. Where the company does not report Total CO2 emissions, this field is populated with the sum of the company Direct CO2 Emissions and Indirect CO2 Emissions. Emissions reported as generic Greenhouse Gas emissions or CO2 equivalents (CO2e) will not be captured in this field.	
Weighted average carbon intensity	Minority of assets	Determine portfolio exposure to carbon-intensive companies	tons CO2e / \$M revenue	After determining the issuer's Scope 1 and Scope 2 emissions per \$M of revenues, this figure is multiplied by the issuer's percentage weight in the portfolio. The issuer-level results are then summed to arrive a portfolio level metric.	
Carbon footprint (scope 1 and 2)	Minority of assets	Normalize portfolio carbon emissions based on the dollar value invested	tons CO2e / \$M invested	Taking the current value of our investment in an issuer as a fraction of its market cap, this figure is multiplied by the issuer's Scope 1 and Scope 2 emissions. The sum of these products is then divided by the portfolio's total dollar value.	
Portfolio carbon footprint	Minority of assets	Same as response for Weighted average carbon intensity	Same as response for Weighted average carbon intensity	Same as response for Weighted average carbon intensity	
Total carbon emissions	Minority of assets	Determine absolute greenhouse gas emissions associated with a portfolio, expressed in tons CO2e	tons CO2e	Taking the current value of our investment in an issuer as a fraction of its market cap, this figure is multiplied by the issuer's Scope 1 and Scope 2 emissions. Summing these values determines total carbon emissions for the portfolio.	
Carbon intensity	Minority of assets	Similar to that of Weighted Average Carbon Intensity, but using an equity ownership approach as opposed to portfolio weight	tons CO2e / \$M revenue	Taking the current value of our investment in an issuer as a fraction of its market cap, this figure is multiplied by the issuer's Scope 1 and Scope 2 emissions. The sum of these products is then divided by the summed product of our current investment in the issuer as a fraction of its market cap.	
Exposure to carbon-related assets	Minority of assets	Determine exposure to carbon-intensive assets in the context of potential regulatory, political and reputation risks facing the investee company and/or industry.	Various (tons CO2e, tons CO2e/\$M revenue)	Our analysis of this factor differs by investment team, but will generally consider the emissions potential of an investee company, its reserves or its operations.	
SG 14.7 CC		Describe in further detail the key targets.			
Target type	Baseline year	Target year	Description	Attachments	
Absolute target	Ongoing		We generally seek for relevant strategies' overall emissions and emissions intensity to be less than the appropriate benchmark on an ongoing basis.		
SG 14.8 CC		Indicate whether climate-related risks are integrated into overall risk management and explain the risk management processes used for identifying, assessing and managing climate-related risks.			
<input checked="" type="checkbox"/> Processes for climate-related risks are integrated into overall risk management					
Please describe					
<p>In 2019, we began developing an internal climate strategy which includes integrating climate risk analysis and monitoring into the overall investment risk management framework. We are continuing to develop our approach, which includes scenario analysis and integrating material climate-related risk metrics into regular investment risk reporting at the executive management level.</p> <p>Most climate-related risks to our firm stem from risks at our investee companies, so ESG integration, including the integration of climate-related risks and opportunities analysis, is our primary risk management tool. In 2019, teams continued to develop their understanding and approaches to evaluating climate-related risks in their investment processes. For example, we held education sessions on the recommendations of the TCFD and their implications to companies and investors. In addition, we began exploring the integration of climate scenario analysis across all portfolios, and expanded our use of tools such as geospatial analysis for evaluating the physical risks of climate change on our mortgage and municipal bond investments.</p>					
<input type="checkbox"/> Processes for climate-related risks are not integrated into overall risk management					
SG 14.9 CC		Indicate whether your organisation, and/or external investment manager or service providers acting on your behalf, undertake active ownership activities to encourage TCFD adoption.			

✓ Yes

Please describe
<p>In our Proxy Voting Guidelines, we encourage companies to consider the TCFD recommendations in order to provide consistent and material climate-related financial disclosures. We also communicate that we will generally support resolutions requesting an issuer to disclose information on the risks it faces related to climate change on its operations and investments, or on how the company identifies, measures, and manages such risks.</p> <p>In addition, we regularly engage with our investee companies on climate change. In 2019, numerous engagements dealt directly with the disclosure of climate-related risks and opportunities and we encouraged issuers to consider the recommendations of the TCFD.</p> <p>BlueBay engages on climate-related risks and opportunities where it is material. In such instances, BlueBay aims to gain further insights into the issuer's exposure and mitigation efforts on carbon. BlueBay believes it is important that issuers disclose climate-related risks where material, and that they do so in a consistent and public manner to facilitate investor understanding and benchmarking efforts. BlueBay highlights the TCFD framework as a global framework for which there is broad consensus this is a good basis for reporting on such matters.</p>
<p><input type="radio"/> No, we do not undertake active ownership activities.</p> <p><input type="radio"/> No, we do not undertake active ownership activities to encourage TCFD adoption.</p>

SG 15	Mandatory to Report, Voluntary to Disclose	Descriptive	PRI 1
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SG 15.1	Indicate if your organisation allocates assets to, or manages, funds based on specific environmental and social themed areas.
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✓ Yes

SG 15.2	Indicate the percentage of your total AUM invested in environmental and social themed areas.
	0.4%

SG 15.3	Specify which thematic area(s) you invest in, indicate the percentage of your AUM in the particular asset class and provide a brief description.
----------------	---

	Area																		
	<input type="checkbox"/> Energy efficiency / Clean technology <input type="checkbox"/> Renewable energy <input type="checkbox"/> Green buildings <input type="checkbox"/> Sustainable forestry <input type="checkbox"/> Sustainable agriculture <input type="checkbox"/> Microfinance <input checked="" type="checkbox"/> SME financing																		
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Affordable housing

Asset class invested	
<input type="checkbox"/>	Listed equity
<input checked="" type="checkbox"/>	Fixed income - SSA
	0.3Percentage of AUM (+/-5%) per asset class invested in the area
<input type="checkbox"/>	Fixed income - Corporate (financial)
<input type="checkbox"/>	Fixed income - Corporate (non-financial)
<input type="checkbox"/>	Fixed income - Securitized
<input type="checkbox"/>	Hedge funds
<input type="checkbox"/>	Other (1)

Brief description and measures of investment	
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Education

Asset class invested	
<input type="checkbox"/>	Listed equity
<input checked="" type="checkbox"/>	Fixed income - SSA
	0.3Percentage of AUM (+/-5%) per asset class invested in the area
<input type="checkbox"/>	Fixed income - Corporate (financial)
<input type="checkbox"/>	Fixed income - Corporate (non-financial)
<input type="checkbox"/>	Fixed income - Securitized
<input type="checkbox"/>	Hedge funds
<input type="checkbox"/>	Other (1)

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Global health

Asset class invested	
<input type="checkbox"/>	Listed equity
<input checked="" type="checkbox"/>	Fixed income - SSA
	0.3Percentage of AUM (+/-5%) per asset class invested in the area
<input type="checkbox"/>	Fixed income - Corporate (financial)
<input type="checkbox"/>	Fixed income - Corporate (non-financial)
<input type="checkbox"/>	Fixed income - Securitized
<input type="checkbox"/>	Hedge funds
<input type="checkbox"/>	Other (1)

Brief description and measures of investment	
<p>RBC GAM's Access Capital Community Investment strategy is offered through our U.S. operations to clients in the U.S. Access Capital aids underserved communities while seeking to earn a market rate of return through the support of low and moderate income home buyers, affordable rental housing units, small business administration loans and economic development projects.</p>	

Investments must serve a low to moderate income family or community; home owners who earn 80% or less of the area-median income or multi-family rental housing that is 51% or more subsidized; nursing homes that serve a high percentage of medicare patients; small business loans in low to moderate income census tracks; or taxable municipal bonds that serve low to moderate income communities or populations.

- Water
- Other area, specify

Fossil fuel free global equity strategy

Asset class invested

- Listed equity
 - 0.1Percentage of AUM (+/-5%) per asset class invested in the area
- Fixed income - SSA
- Fixed income - Corporate (financial)
- Fixed income - Corporate (non-financial)
- Fixed income - Securitised
- Hedge funds
- Other (1)

Brief description and measures of investment
--

RBC GAM offers a fossil fuel free global equity strategy in the U.S. and Canada. The strategies do not invest in issuers or vehicles that include issuers that are directly involved in extracting, processing or transporting coal, oil or natural gas, or issuers included in the Carbon Underground 200.

In 2018, we launched a similar strategy, available to European investors, which applies the same fossil fuel-based screens as our other fossil fuel free strategies. However, this strategy also excludes investments in companies whose primary business is in adult entertainment, alcohol, armaments, or gambling.

Lastly, we manage segregated fossil free strategies for our clients.

No

SG 16	Mandatory	Descriptive	General
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SG 16.1	Describe how you address ESG issues for internally managed assets for which a specific PRI asset class module has yet to be developed or for which you are not required to report because your assets are below the minimum threshold.
---------	--

Asset Class	Describe what processes are in place and the outputs or outcomes achieved		
Hedge funds - DDQ	<table border="1"> <thead> <tr> <th style="background-color: #0070C0; color: white;">Select whether you have responded to the PRI Hedge Fund DDQ</th> </tr> </thead> <tbody> <tr> <td> <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No </td> </tr> </tbody> </table>	Select whether you have responded to the PRI Hedge Fund DDQ	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Select whether you have responded to the PRI Hedge Fund DDQ			
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No			
Hedge funds	<p>Our Quantitative Investment team finds governance factors to be most material to its investments and has therefore integrated several governance factors into its internal investment scoring methodology. They also monitor their assets for any emerging ESG risks, using news alerts and Sustainalytics and MSCI ESG research. The team regularly back tests ESG information from third party research providers in order to ensure it is incorporating the most material factors in their investment process.</p> <p>Our alternative investment strategies incorporate ESG primarily by avoidance of operations that pose a significant risk to the business, its stakeholders and to valuation. In addition, we proxy vote for our alternative investment strategies consistent with the RBC GAM Proxy Voting Guidelines.</p>		
Money market instruments	<p>Lending capital to issuers provides us with the opportunity to engage with management and the board of our investee companies on ESG issues. Accordingly, despite the short-term nature of money market instruments, such investments contribute to our overall influence in ESG engagements. For corporate issuers, our Fixed Income and Currencies team covering money market instruments leverage the research and analysis of our Investment Grade Corporate Credit team as part of its thorough check on credit quality. Our Investment Grade Corporate Credit team integrates ESG factors into its analysis, particularly focusing on the ESG factors that could impact an issuer's credit quality.</p> <p>Additionally, our Fixed Income and Currencies teams have access to the research of our ESG research providers.</p>		
Other (1) [as defined in Organisational Overview module]	<p>ESG research is available to our investment teams in cases of investments in issuer-based derivatives. In the case of private investments and investments in external funds, we exercise our rights as active, engaged owners and will vote our shares in the best interests of the portfolios we manage and in consultation with our investment teams.</p>		

SG 16.2	Additional information [Optional].
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Note that BlueBay responded to the PRI Hedge Fund DDQ.

SG 17	Mandatory	Descriptive	General
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SG 17.1	Describe how you address ESG issues for externally managed assets for which a specific PRI asset class module has yet to be developed or for which you are not required to report because your assets are below the minimum threshold.
---------	--

Asset Class	Describe what processes are in place and the outputs or outcomes achieved
-------------	---

Listed equities - ESG incorporation	<p>External managers are provided with our Proxy Voting Guidelines, which communicate how we will vote on both environmental and social issues. Additionally, we receive quarterly reports of their proxy voting, disclosing 100% of the proxy votes made by our sub-advisors on our behalf.</p> <p>Further, we provide them with our Approach to Responsible Investment, our primary responsible investment policy, which includes details on how we incorporate ESG issues throughout our investment process and how we work as active, engaged owners. It addresses the core components of our ESG integration, including principles we apply and key ESG factors we consider, where material.</p> <p>We also encourage external managers to become signatories to the PRI and to adhere to the six Principles.</p> <p>Lastly, we ensure that our sub-advisors comply with our firm-wide policy prohibiting any investments in companies associated with the production, use or distribution of anti-personnel land mines or cluster munitions.</p>
Listed equities - engagement	<p>We provide external managers with our Approach to Responsible Investment, our primary responsible investment policy, which includes details on our active stewardship activities, including the considerations we use for engagement with issuers and regulatory bodies on material ESG issues.</p> <p>We also encourage external managers to become signatories to the PRI and to adhere to the six Principles.</p>
Listed equities - (proxy) voting	<p>We have provided the RBC GAM Proxy Voting Guidelines to all of our external equity managers. All external equity managers provide quarterly reporting on 100% of the proxy votes made by our sub-advisors on our behalf, which we incorporate into the RBC GAM vote disclosure.</p>

SG 18	Voluntary	Descriptive	General
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SG 18.1 Indicate whether any specific features of your approach to responsible investment are particularly innovative.

Yes

SG 18.2 Describe any specific features of your approach to responsible investment that you believe are particularly innovative.

Embracing innovation and the power of human and machine is one of the four core values that underlie everything we do at RBC GAM. We believe that integrating advanced investment and risk management tools allows us to extend our field of analysis, reinforces discipline, limits behavioural finance challenges and bolsters results – ultimately leading to better decisions and more efficient portfolios.

Our approach to responsible investment is a key part of this. By employing a bottom-up approach where our 23 investment teams have developed and continuously hone their own unique ESG integration processes, we are able to maximize the value added to each investment process and mandate. This approach also enables us to multiply our efforts to identify and develop innovative, value-add RI solutions across our teams. For example, recent developments have included:

- Using proprietary geospatial analysis to evaluate portfolios' exposure to some of the physical risks of climate change
- Creating a firm-wide ESG database that portfolio engineers on investment teams can leverage directly in their teams' investment and technology platforms
- Creating an ESG Champion network where our CGRI and investment teams discuss emerging RI trends, material ESG factors, and new approaches to responding to them
- Evaluating applications of AI technology in ESG integration

With the responsible investment industry evolving at such a rapid pace, it is paramount that we remain at the forefront of emerging trends and practices in order to ensure we fulfil our duty to our clients over the long term. For this reason, we continually evaluate new data sources, ESG integration methodologies, approaches to engagement, enhancements to our proxy voting guidelines, and opportunities to collaborate on systemic RI and ESG matters with like-minded investors and associations.

We are proud that our investment teams are often recognized for these efforts with industry awards relating to sustainable investment. For more details, please refer to our website and CGRI annual reports at:

- <https://www.rbcgam.com/en/ca/about-us/responsible-investment/>
- <https://global.rbcgam.com/corporate-governance-and-responsible-investment/content/default.fs>

No

SG 19	Mandatory	Core Assessed	PRI 2, 6
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SG 19.1 Indicate whether your organisation typically discloses asset class specific information proactively. Select the frequency of the disclosure to clients/beneficiaries and the public, and provide a URL to the public information.

Listed equity - Incorporation

Do you disclose?

- We do not proactively disclose it to the public and/or clients/beneficiaries
- We disclose to clients/beneficiaries only.
- We disclose it publicly

The information disclosed to clients/beneficiaries is the same

- Yes
- No

Disclosure to public and URL

Disclosure to clients/beneficiaries

Disclosure to public and URL	Disclosure to clients/beneficiaries
<input type="radio"/> Broad approach to ESG incorporation <input checked="" type="checkbox"/> Detailed explanation of ESG incorporation strategy used	<input type="radio"/> Broad approach to ESG incorporation <input checked="" type="checkbox"/> Detailed explanation of ESG incorporation strategy used
Biannually	Quarterly or more frequently
https://global.rbcgam.com/sitefiles/live/documents/cgri/approach-to-responsible-investment.PDF https://global.rbcgam.com/sitefiles/live/documents/cgri/approach-to-responsible-investment.PDF	

Listed equity - Engagement

Do you disclose?

We do not disclose to either clients/beneficiaries or the public.
 We disclose to clients/beneficiaries only.
 We disclose to the public

The information disclosed to clients/beneficiaries is the same

Yes
 No

Disclosure to public and URL	Disclosure to clients/beneficiaries
<p>Disclosure to public and URL</p> <input checked="" type="checkbox"/> Details on the overall engagement strategy <input checked="" type="checkbox"/> Details on the selection of engagement cases and definition of objectives of the selections, priorities and specific goals <input checked="" type="checkbox"/> Number of engagements undertaken <input checked="" type="checkbox"/> Breakdown of engagements by type/topic <input type="checkbox"/> Breakdown of engagements by region <input type="checkbox"/> An assessment of the current status of the progress achieved and outcomes against defined objectives <input checked="" type="checkbox"/> Examples of engagement cases <input checked="" type="checkbox"/> Details on eventual escalation strategy taken after the initial dialogue has been unsuccessful (i.e. filing resolutions, issuing a statement, voting against management, divestment etc.) <input type="checkbox"/> Details on whether the provided information has been externally assured <input checked="" type="checkbox"/> Outcomes that have been achieved from the engagement <input checked="" type="checkbox"/> Other information <p>A general overview of the types of engagements over the course of the period is disclosed in our semi-annual CGRI reports.</p>	<p>Disclosure to clients/beneficiaries</p> <input checked="" type="checkbox"/> Details on the overall engagement strategy <input checked="" type="checkbox"/> Details on the selection of engagement cases and definition of objectives of the selections, priorities and specific goals <input checked="" type="checkbox"/> Number of engagements undertaken <input checked="" type="checkbox"/> Breakdown of engagements by type/topic <input type="checkbox"/> Breakdown of engagements by region <input checked="" type="checkbox"/> An assessment of the current status of the progress achieved and outcomes against defined objectives <input checked="" type="checkbox"/> Examples of engagement cases <input checked="" type="checkbox"/> Details on eventual escalation strategy taken after the initial dialogue has been unsuccessful (i.e. filing resolutions, issuing a statement, voting against management, divestment etc.) <input type="checkbox"/> Details on whether the provided information has been externally assured <input checked="" type="checkbox"/> Outcomes that have been achieved from the engagement <input checked="" type="checkbox"/> Other information <p>Some clients may receive more detailed engagement information or receive engagement information on a more frequent basis directly from our investment teams.</p>
Biannually	Quarterly or more frequently
https://www.rbcgam.com/documents/en/other/2019-cgri-annual-report.pdf https://www.rbcgam.com/documents/en/other/2019-cgri-annual-report.pdf	

Listed equity – (Proxy) Voting

Do you disclose?

We do not disclose to either clients/beneficiaries or the public.
 We disclose to clients/beneficiaries only.
 We disclose to the public

The information disclosed to clients/beneficiaries is the same

Yes
 No

Disclosure to public and URL

Disclosure to public and URL
<input checked="" type="radio"/> Disclose all voting decisions <input type="radio"/> Disclose some voting decisions <input type="radio"/> Only disclose abstentions and votes against management
Quarterly or more frequently
https://www.rbcgam.com/en/ca/products/proxy-voting/records https://east-webd.proxydisclosure.com/WebDisclosure/wdFundSelection?token=3e7b526ad0bf448fb121b76c33c91853

Fixed income

Do you disclose?
<input type="radio"/> We do not disclose to either clients/beneficiaries or the public. <input type="radio"/> We disclose to clients/beneficiaries only. <input checked="" type="radio"/> We disclose to the public
The information disclosed to clients/beneficiaries is the same
<input type="radio"/> Yes <input checked="" type="radio"/> No

Disclosure to public and URL	Disclosure to clients/beneficiaries
Disclosure to public and URL	Disclosure to clients/beneficiaries
<input type="radio"/> Broad approach to RI incorporation <input checked="" type="radio"/> Detailed explanation of RI incorporation strategy used	<input type="radio"/> Broad approach to RI incorporation <input checked="" type="radio"/> Detailed explanation of RI incorporation strategy used
Biannually	Quarterly
https://us.rbcgam.com/investment-strategies/impact-investing/content/default.fs https://www.bluebay.com/esg	

Hedge Funds

Do you disclose?
<input checked="" type="radio"/> We do not disclose to either clients/beneficiaries or the public. <input type="radio"/> We disclose to clients/beneficiaries only. <input type="radio"/> We disclose to the public

SG 19.2 Additional information [Optional]

In regard to proxy voting, we discuss select voting decisions through our Semi-Annual CGRI reports, where we also summarize voting statistics on for the periods ending June 30 and December 31. Full voting records for applicable funds are provided quarterly through our vote disclosure site at rbcgam.com/cgri, where we also post the most recent version of the RBC GAM Proxy Voting Guidelines.

Please note that our proxy voting records are posted on the appropriate regional webpages at rbcgam.com/CGRI. The two hyperlinks provided in indicator SG 19.1 link directly to our proxy voting disclosure webpage in Canada and the U.S.

SG Checks	Checks
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If there are any messages below, please review them before continuing. If there are no messages below, please save this page and continue.

LEI 01	Mandatory	Gateway	PRI 1
LEI 01.1	Indicate which ESG incorporation strategy and/or combination of strategies you apply to your actively managed listed equities; and the breakdown of your actively managed listed equities by strategy or combination of strategies.		
<input type="checkbox"/> Screening alone (i.e., not combined with any other strategies) <input type="checkbox"/> Thematic alone (i.e., not combined with any other strategies) <input type="checkbox"/> Integration alone (i.e., not combined with any other strategies) <input checked="" type="checkbox"/> Screening and integration strategies			
		Percentage of active listed equity to which the strategy is applied – you may estimate +/- 5%	99.8%
<input type="checkbox"/> Thematic and integration strategies <input type="checkbox"/> Screening and thematic strategies <input checked="" type="checkbox"/> All three strategies combined			
		Percentage of active listed equity to which the strategy is applied – you may estimate +/- 5%	0.2%
<input type="checkbox"/> We do not apply incorporation strategies			
LEI 01.3	If assets are managed using a combination of ESG incorporation strategies, briefly describe how these combinations are used. [Optional]		
See description in LEI 01.2.			

LEI 02	Voluntary	Additional Assessed	PRI 1
LEI 02.1	Indicate what ESG information you use in your ESG incorporation strategies and who provides this information.		
<input checked="" type="checkbox"/> Raw ESG company data			
<input checked="" type="checkbox"/> ESG research provider <input checked="" type="checkbox"/> Sell-side <input type="checkbox"/> In-house – specialised ESG analyst or team <input checked="" type="checkbox"/> In-house – analyst or portfolio manager			
<input checked="" type="checkbox"/> Company-related analysis or ratings			
<input checked="" type="checkbox"/> ESG research provider <input checked="" type="checkbox"/> Sell-side <input checked="" type="checkbox"/> In-house – specialised ESG analyst or team <input checked="" type="checkbox"/> In-house – analyst or portfolio manager			
<input checked="" type="checkbox"/> Sector-related analysis or ratings			
<input checked="" type="checkbox"/> ESG research provider <input checked="" type="checkbox"/> Sell-side <input checked="" type="checkbox"/> In-house – specialised ESG analyst or team <input type="checkbox"/> In-house – analyst or portfolio manager			
<input checked="" type="checkbox"/> Country-related analysis or ratings			
<input checked="" type="checkbox"/> ESG research provider <input checked="" type="checkbox"/> Sell-side <input type="checkbox"/> In-house – specialised ESG analyst or team <input type="checkbox"/> In-house – analyst or portfolio manager			
<input checked="" type="checkbox"/> Screened stock list			
<input checked="" type="checkbox"/> ESG research provider <input type="checkbox"/> Sell-side <input type="checkbox"/> In-house – specialised ESG analyst or team <input checked="" type="checkbox"/> In-house – analyst or portfolio manager			
<input checked="" type="checkbox"/> ESG issue-specific analysis or ratings			
<input checked="" type="checkbox"/> ESG research provider <input checked="" type="checkbox"/> Sell-side <input checked="" type="checkbox"/> In-house – specialised ESG analyst or team <input checked="" type="checkbox"/> In-house – analyst or portfolio manager			
<input type="checkbox"/> Other, specify			
LEI 02.2	Indicate whether you incentivise brokers to provide ESG research.		
<input checked="" type="checkbox"/> Yes			

LEI 02.3	Describe how you incentivise brokers.
<p>Some of our investment teams are more systematic in incentivizing brokers to provide ESG research. For example, our Global Equity team has a process whereby portfolio managers can vote on which research to purchase. These portfolio managers specifically allocate their votes towards ESG focused research. Other teams are more focused on specialized ESG research and their own proprietary ESG-related research.</p>	
<input type="radio"/> No	

LEI 02.4	Additional information. [Optional]
<p>Our screened stock lists are used for our norms-based screening to all of its investments. No RBC GAM investment team will knowingly invest in companies associated with the production, use or distribution of anti-personnel land mines or cluster munitions. These exclusions only apply when we control the investment policy for a portfolio. For mandates where we do not control the investment policy, our clients may request different exclusions or no exclusions. We have engaged an independent third party research provider to provide us with a list of companies that should be excluded on the basis of this policy, which is updated monthly.</p>	

LEI 03	Voluntary	Additional Assessed	PRI 1
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LEI 03.1	Indicate whether your organisation has a process through which information derived from ESG engagement and/or (proxy) voting activities is made available for use in investment decision-making.
<input checked="" type="checkbox"/> Engagement <ul style="list-style-type: none"> <input checked="" type="checkbox"/> We have a systematic process to ensure the information is made available. <input type="radio"/> We occasionally make this information available. <input type="radio"/> We do not make this information available. 	
<input checked="" type="checkbox"/> (Proxy) voting <ul style="list-style-type: none"> <input checked="" type="checkbox"/> We have a systematic process to ensure the information is made available. <input type="radio"/> We occasionally make this information available. <input type="radio"/> We do not make this information available. 	

LEI 04	Mandatory	Descriptive	PRI 1
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LEI 04.1	Indicate and describe the type of screening you apply to your internally managed active listed equities.		
<input checked="" type="checkbox"/> Negative/exclusionary screening <ul style="list-style-type: none"> <input checked="" type="checkbox"/> Product <input checked="" type="checkbox"/> Activity <input checked="" type="checkbox"/> Sector <input checked="" type="checkbox"/> Country/geographic region <input checked="" type="checkbox"/> Environmental and social practices and performance <input checked="" type="checkbox"/> Corporate governance 			
<table border="1"> <thead> <tr> <th>Description</th> </tr> </thead> <tbody> <tr> <td> <p>Our designated SRI strategies apply negative screens for products (ex: alcohol, tobacco, and gambling) and against lagging ESG performance. The product-based exclusionary screening criteria are based on percentage thresholds of annual revenues. Any company that meets any of the exclusionary screening criteria is placed on a prohibited securities list and is not eligible for inclusion in our designated SRI strategies. For our fossil fuel free global equity strategies, we exclude all companies that extract, process, and transport fossil fuels, and one strategy also applies SRI screens.</p> <p>For all investment portfolios where we control the investment policy, we will not knowingly invest in companies whose business activities would contravene the prohibitions contained in the Anti-Personnel Landmines Convention or the Convention on Cluster Munitions.</p> <p>Where there are full economic sanctions that prohibit any financial dealings with a foreign state, including investment in entities operating under the authority of the foreign state, we will not invest in securities that fall within the sanctions. Where sanctions have been imposed against foreign countries that do not prohibit financial dealings we will identify and assess any risk and consider whether the investment would still be in the best interests of our clients.</p> </td> </tr> </tbody> </table>		Description	<p>Our designated SRI strategies apply negative screens for products (ex: alcohol, tobacco, and gambling) and against lagging ESG performance. The product-based exclusionary screening criteria are based on percentage thresholds of annual revenues. Any company that meets any of the exclusionary screening criteria is placed on a prohibited securities list and is not eligible for inclusion in our designated SRI strategies. For our fossil fuel free global equity strategies, we exclude all companies that extract, process, and transport fossil fuels, and one strategy also applies SRI screens.</p> <p>For all investment portfolios where we control the investment policy, we will not knowingly invest in companies whose business activities would contravene the prohibitions contained in the Anti-Personnel Landmines Convention or the Convention on Cluster Munitions.</p> <p>Where there are full economic sanctions that prohibit any financial dealings with a foreign state, including investment in entities operating under the authority of the foreign state, we will not invest in securities that fall within the sanctions. Where sanctions have been imposed against foreign countries that do not prohibit financial dealings we will identify and assess any risk and consider whether the investment would still be in the best interests of our clients.</p>
Description			
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<input checked="" type="checkbox"/> Positive/best-in-class screening <ul style="list-style-type: none"> <input checked="" type="checkbox"/> Product <input checked="" type="checkbox"/> Activity <input checked="" type="checkbox"/> Sector <input type="checkbox"/> Country/geographic region <input checked="" type="checkbox"/> Environmental and social practices and performance <input checked="" type="checkbox"/> Corporate governance 			
<table border="1"> <thead> <tr> <th>Description</th> </tr> </thead> <tbody> <tr> <td> <p>Qualitative screening criteria are applied to our designated SRI strategies, where it is possible for a company to perform both positively and negatively. The application of qualitative criteria involves evaluating each company's overall performance, both positive and negative, in each issue area and balancing strengths and concerns. Our qualitative screening criteria include: community, corporate governance, employee relations, environment, human rights and product/business practices. In the specific areas of occupational health and safety and environmental performance, we apply the qualitative screening criteria using a best-of-sector approach, where each company's record is evaluated relative to that of its industry counterparts. The standards for performance are best industry practices.</p> <p>In addition, our Canadian Equity Women's Leadership investment strategy only invests in companies domiciled in Canada that have demonstrated commitment to gender diversity as part of their approach to corporate governance. As a result, eligible companies must either have three female</p> </td> </tr> </tbody> </table>		Description	<p>Qualitative screening criteria are applied to our designated SRI strategies, where it is possible for a company to perform both positively and negatively. The application of qualitative criteria involves evaluating each company's overall performance, both positive and negative, in each issue area and balancing strengths and concerns. Our qualitative screening criteria include: community, corporate governance, employee relations, environment, human rights and product/business practices. In the specific areas of occupational health and safety and environmental performance, we apply the qualitative screening criteria using a best-of-sector approach, where each company's record is evaluated relative to that of its industry counterparts. The standards for performance are best industry practices.</p> <p>In addition, our Canadian Equity Women's Leadership investment strategy only invests in companies domiciled in Canada that have demonstrated commitment to gender diversity as part of their approach to corporate governance. As a result, eligible companies must either have three female</p>
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directors on the board, a combination of two female directors and one woman in an executive leadership role, or have 30% of its board represented by female directors.

Norms-based screening

- UN Global Compact Principles
- The UN Guiding Principles on Business and Human Rights
- International Labour Organization Conventions
- United Nations Convention Against Corruption
- OECD Guidelines for Multinational Enterprises
- Other, specify

Anti-Personnel Landmines Convention and Convention on Cluster Munitions

Description
As described above, when we control the investment policy for a portfolio, we will not knowingly invest in companies whose business activities would contravene the prohibitions contained in the Anti-Personnel Landmines Convention or the Convention on Cluster Munitions.
These exclusions apply to direct equity and corporate credit holdings, but do not apply to derivatives or other index exposures where our exposure is indirect and outside of our control and which would not meaningfully impact the ability of these companies to obtain capital.

LEI 04.2 Describe how you notify clients and/or beneficiaries when changes are made to your screening criteria.

Our screened strategies employ specific investment principles and screening criteria that are periodically reviewed. If substantial changes are made, we notify our clients in compliance with regulatory requirements and best practice. For example, we provide detailed disclosure to our investors describing any changes and their effects.

LEI 05 **Mandatory** **Core Assessed** **PRI 1**

LEI 05.1 Indicate which processes your organisation uses to ensure ESG screening is based on robust analysis.

- Comprehensive ESG research is undertaken or sourced to determine companies' activities and products.
- Companies are given the opportunity by you or your research provider to review ESG research on them and correct inaccuracies.
- External research and data used to identify companies to be excluded/included is subject to internal audit by ESG/RI staff, the internal audit function or similar.
- Third-party ESG ratings are updated regularly to ensure that portfolio holdings comply with fund policies.
- Trading platforms blocking / restricting flagged securities on the black list.
- A committee, body or similar with representatives independent of the individuals who conduct company research reviews some or all screening decisions.
- A periodic review of internal research is carried out.
- Review and evaluation of external research providers.
- Other; specify
- None of the above

LEI 05.2 Indicate the proportion of your actively managed listed equity portfolio that is subject to comprehensive ESG research as part your ESG screening strategy.

- <10%
- 10-50%
- 51-90%
- >90%

LEI 05.3 Indicate how frequently third party ESG ratings are updated for screening purposes.

- Quarterly or more frequently
- Bi-Annually
- Annually
- Less frequently than annually

LEI 05.4 Indicate how frequently you review internal research that builds your ESG screens.

- Quarterly or more frequently
- Bi-Annually
- Annually
- Less frequently than annually

LEI 05.5 Additional information. [Optional]

External research and data used to identify companies to be excluded/included is subject to an internal review by RBC GAM staff. In addition, portfolio managers of the SRI strategies review new inclusions and exclusions to determine if inaccurate information is included in the research providers' analysis.

When we control the investment policy for a portfolio, we will not knowingly invest in companies whose business activities would contravene the prohibitions contained in the Anti-Personnel Landmines Convention or the Convention on Cluster Munitions.

Where there are full economic sanctions that prohibit any financial dealings with a foreign state, including investment in entities operating under the authority of the foreign state, we will not invest in securities that fall within the sanctions. Where sanctions have been imposed against foreign countries that do not prohibit financial dealings we will identify and assess any risk and consider whether the investment would still be in the best interests of our clients.

LEI 06	Voluntary	Additional Assessed	PRI 1
LEI 06.1	Indicate which processes your organisation uses to ensure fund criteria are not breached.		
	<input checked="" type="checkbox"/> Systematic checks are performed to ensure that stocks meet the fund's screening criteria <input checked="" type="checkbox"/> Automated IT systems prevent investment managers from investing in excluded stocks or those that do not meet positive screening criteria <input type="checkbox"/> Audits of fund holdings are undertaken regularly by internal audit function <input checked="" type="checkbox"/> Periodic auditing/checking of the organisations RI funds by external party <input type="checkbox"/> Other; specify <input type="checkbox"/> None of the above		
LEI 06.2	If breaches of fund screening criteria are identified, describe the process followed to correct those breaches.		
	Should there be a breach of fund screening criteria, ineligible securities would be sold immediately and our error review process would be activated, which includes an assessment of the root cause of the error and taking appropriate steps to prevent similar errors in the future. The client would also be compensated for any loss incurred as a result of the error.		

LEI 07	Mandatory	Descriptive	PRI 1
LEI 07.1	Indicate the type of sustainability thematic funds or mandates your organisation manages.		
	<input checked="" type="checkbox"/> Environmentally themed funds <input checked="" type="checkbox"/> Socially themed funds <input checked="" type="checkbox"/> Combination of themes		
LEI 07.2	Describe your organisation's processes relating to sustainability themed funds. [Optional]		
	<p>The investment process for our sustainability themed funds is as follows:</p> <ol style="list-style-type: none"> 1. Thematic and norms-based screens are applied to determine investable universe of stocks 2. Investment teams decide on portfolio construction and stock over-/under-weighting based on own investment analysis and ESG integration conducted within that analysis <p>The specific thematic strategies we offer include:</p> <p>Climate Change: Fossil Fuel Free</p> <p>RBC GAM offers fossil fuel free global equity strategies in the U.S. and Canada. The strategies do not invest in issuers or vehicles that include issuers directly involved in extracting, processing or transporting coal, oil or natural gas, or issuers included in the Carbon Underground 200.</p> <p>We also manage fossil fuel free or environmentally-themed strategies for clients on a segregated basis.</p> <p>Gender Diversity: Women's Leadership</p> <p>Our Canadian Equity Women's Leadership investment strategy, available in Canada, focuses on companies domiciled in Canada that have demonstrated commitment to gender diversity as part of their approach to corporate governance. Eligible companies must either have three female directors on the board, a combination of two female directors and one woman in an executive leadership role, or have 30% of its board represented by female directors.</p> <p>Combination of Themes: Global Horizon</p> <p>One of our Global Equity strategies, available to European investors, eliminates fossil fuel producers from the portfolio, in addition to companies involved in the business areas of adult entertainment, alcohol, armaments, gambling and tobacco.</p>		

LEI 08	Mandatory	Core Assessed	PRI 1
LEI 08.1	Indicate the proportion of actively managed listed equity portfolios where E, S and G factors are systematically researched as part of your investment analysis.		
	ESG issues	Proportion impacted by analysis	
	Environmental	Environmental	
		<input type="radio"/> <10% <input type="radio"/> 10-50% <input type="radio"/> 51-90% <input checked="" type="radio"/> >90%	
	Social	Social	
		<input type="radio"/> <10% <input type="radio"/> 10-50% <input type="radio"/> 51-90% <input checked="" type="radio"/> >90%	

Corporate Governance	Corporate Governance	
	<input type="radio"/> <10% <input type="radio"/> 10-50% <input type="radio"/> 51-90% <input checked="" type="radio"/> >90%	

LEI 09	Mandatory	Core Assessed	PRI 1
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LEI 09.1 Indicate which processes your organisation uses to ensure ESG integration is based on robust analysis.

- Comprehensive ESG research is undertaken or sourced to determine companies' activities and products
- Companies are given the opportunity by you or your research provider to review ESG research on them and correct inaccuracies
- Third-party ESG ratings are updated regularly
- A periodic review of the internal research is carried out
- Structured, regular ESG specific meetings between responsible investment staff and the fund manager or within the investments team
- ESG risk profile of a portfolio against benchmark
- Analysis of the impact of ESG factors on investment risk and return performance
- Other; specify
- None of the above

LEI 09.2 Indicate the proportion of your actively managed listed equity portfolio that is subject to comprehensive ESG research as part your integration strategy.

- <10%
- 10-50%
- 51-90%
- >90%

LEI 09.3 Indicate how frequently third party ESG ratings that inform your ESG integration strategy are updated.

- Quarterly or more frequently
- Bi-Annually
- Annually
- Less frequently than annually

LEI 09.4 Indicate how frequently you review internal research that builds your ESG integration strategy.

- Quarterly or more frequently
- Bi-Annually
- Annually
- Less frequently than annually

LEI 09.5 Describe how ESG information is held and used by your portfolio managers.

- ESG information is held within centralised databases or tools, and it is accessible by all relevant staff
- ESG information or analysis is a standard section or aspect of all company research notes or industry/sector analysis generated by investment staff
- Systematic records are kept that capture how ESG information and research were incorporated into investment decisions
- Other; specify
- None of the above

LEI 09.6 Additional information. [Optional]

This year, we held dedicated ESG integration review sessions with every investment team to update documentation of their ESG processes. We confirmed that every team has an articulated ESG integration process, implemented in a way that the respective teams believe adds value to their unique investment processes.

Every team integrates ESG factors into their due diligence and portfolio monitoring, as well as in direct engagements with issuers, where applicable. All teams have access to comprehensive ESG research and data, and ESG scores are integrated into our standard and proprietary trade management software/applications.

Examples of ESG integration within various teams include:

- Our Global Equity and Emerging Market Equity teams utilize a disciplined, fundamental investment process and keep records that capture how ESG information and research was incorporated into each investment decision.
- Our North American Equity team systematically tracks material ESG factors at their investee companies, supported by the SASB materiality framework and other ESG research sources in addition to analyst and portfolio manager insights.
- Our Asian Equity team holds regular team meetings and discussions on potential investments as part of its due diligence process, which includes a discussion of material ESG factors facing the issuer

LEI 10	Mandatory to Report, Voluntary to Disclose	Core Assessed	PRI 1
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LEI 10.1 Indicate which aspects of investment analysis you integrate material ESG information into.

- Economic analysis

Proportion of actively managed listed equity exposed to investment analysis
<input type="radio"/> <10% <input type="radio"/> 10-50% <input type="radio"/> 51-90% <input checked="" type="radio"/> >90%

Industry analysis

Proportion of actively managed listed equity exposed to investment analysis
<input type="radio"/> <10% <input type="radio"/> 10-50% <input type="radio"/> 51-90% <input checked="" type="radio"/> >90%

Quality of management

Proportion of actively managed listed equity exposed to investment analysis
<input type="radio"/> <10% <input type="radio"/> 10-50% <input type="radio"/> 51-90% <input checked="" type="radio"/> >90%

Analysis of company strategy

Proportion of actively managed listed equity exposed to investment analysis
<input type="radio"/> <10% <input type="radio"/> 10-50% <input type="radio"/> 51-90% <input checked="" type="radio"/> >90%

Portfolio weighting

Proportion of actively managed listed equity exposed to investment analysis
<input type="radio"/> <10% <input type="radio"/> 10-50% <input type="radio"/> 51-90% <input checked="" type="radio"/> >90%

Security sensitivity and/or scenario analysis

Proportion of actively managed listed equity exposed to investment analysis
<input type="radio"/> <10% <input checked="" type="radio"/> 10-50% <input type="radio"/> 51-90% <input type="radio"/> >90%

Fair value/fundamental analysis

Proportion of actively managed listed equity exposed to investment analysis
<input type="radio"/> <10% <input type="radio"/> 10-50% <input type="radio"/> 51-90% <input checked="" type="radio"/> >90%

Other; specify

LEI 10.2 Indicate which methods are part of your process to integrate ESG information into fair value/fundamental analysis.

- Adjustments to forecasted company financials (sales, operating costs, earnings, cash flows)
- Adjustments to valuation-model variables (discount rates, terminal value, perpetuity growth rates)
- Valuation multiples
- Other adjustments; specify

LEI 10.3 Describe how you integrate ESG information into portfolio weighting.

The methods used to integrate ESG information into portfolio construction depend on the particular investment team. For example, our Emerging Markets Equity team uses a scorecard with a wide range of questions as the prime determinant of portfolio weights. ESG questions comprise a significant percentage of the scorecard. Our Global Equity team integrates ESG factors in their portfolio construction. Our Canadian equity team has developed

checklists to identify material risks, and these factors are used as a guide to determine materiality of ESG factors. Our European Equity team monitors the ESG performance of investee companies for deterioration which often prompts engagement with management or the board. As part of its approach to ESG integration, material ESG factor performance can affect the team's buy/sell decisions and security weight in a given strategy.

Our SRI strategies integrate ESG factors as part of the portfolio construction through the selection of qualifying securities.

LEI 10.4 Describe the methods you have used to adjust the income forecast/valuation tool.

Some of our investment teams are more advanced in adjusting the income forecast or valuation based on ESG factors. For example, our Emerging Markets Equity team takes into account sustainability factors, which may include, for example, companies that invest in infrastructure or research and development, and may adjust income statements to capitalize on these investments. In addition, the Emerging Markets Equity team makes adjustments where margins are artificially increased in the short-term by factors such as a low tax rate, squeezing suppliers or employees, or overcharging customers. Our Global Equity team adjusts factors in the income statement depending on its scenario analysis, and our North American team may adjust model inputs for its Global Resources investments based on ESG factors, like the implications of carbon regulation or stakeholder engagement scenarios.

LEI 10.5 Describe how you apply sensitivity and /or scenario analysis to security valuations.

Approaches to sensitivity or scenario analysis using ESG factors differ by investment team. For instance, our Global Equity team will consider an ESG factor's potential impacts on cash flows and incorporate it into its discounted cash flow modelling scenarios. As another example, ESG factors are considered in our North American Equity team's fundamental analysis and will thus contribute to its overall assessment and eventual models.

LEI Checks

Checks

If there are any messages below, please review them before continuing. If there are no messages below, please save this page and continue.

LEA 01.1 Indicate whether your organisation has an active ownership policy (includes engagement and/or voting).

Yes

LEA 01.2 Attach or provide a URL to your active ownership policy.

Attachment provided:

URL provided:

<https://global.rbcgam.com/sitefiles/live/documents/cgri/approach-to-responsible-investment.PDF>

LEA 01.3 Indicate what your active engagement policy covers:

General approach to Active Ownership

- Conflicts of interest
- Alignment with national stewardship code requirements
- Assets/funds covered by active ownership policy
- Expectations and objectives
- Engagement approach

Engagement

- ESG issues
- Prioritisation of engagement
- Methods of engagement
- Transparency of engagement activities
- Due diligence and monitoring process
- Insider information
- Escalation strategies
- Service Provider specific criteria
- Other; (specify)

We provide further detail on our approach to engaging as fixed income investors

(Proxy) voting approach

Voting

- ESG issues
- Prioritisation and scope of voting activities
- Methods of voting
- Transparency of voting activities
- Regional voting practice approaches
- Filing or co-filing resolutions
- Company dialogue pre/post-vote
- Decision-making processes
- Securities lending processes
- Other; (specify)

<https://www.rbcgam.com/documents/en/other/rbc-gam-proxy-voting-guidelines.pdf>

Other

None of the above

No

LEA 01.4 Do you outsource any of your active ownership activities to service providers?

Yes

LEA 01.5 Where active ownership activities are conducted by service providers, indicate whether your active ownership policy covers any of the following:

- Outline of service provider's role in implementing your organisation's active ownership policy
- Description of considerations included in service provider selection and agreements
- Identification of key ESG frameworks which service providers must follow
- Outline of information sharing requirements of service providers
- Description of service provider monitoring processes
- Other; (specify)
- None of the above

No

LEA 01.6	Additional information [optional]
<p>Due to the volume and diversity of securities held, RBC GAM has retained Institutional Shareholder Services (ISS) to provide administrative services as a proxy voting agent. We utilize ISS proxy voting research and have implemented custom proxy voting procedures to ensure that the votes ISS recommends are aligned with the RBC GAM Proxy Voting Guidelines, where applicable, and are in the best interests of the portfolios we manage. Each proposal and recommendation is then reviewed and submitted by the CGRI team with investment teams' input, where material. Our CIO is responsible for overseeing the implementation of the proxy voting procedures.</p>	

LEA 02	Mandatory	Core Assessed	PRI 1,2,3
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LEA 02.1	Indicate the method of engagement, giving reasons for the interaction.
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Type of engagement	Reason for interaction
Individual / Internal staff engagements	<input checked="" type="checkbox"/> To influence corporate practice (or identify the need to influence it) on ESG issues <input checked="" type="checkbox"/> To encourage improved/increased ESG disclosure <input checked="" type="checkbox"/> To gain an understanding of ESG strategy and/or management <input type="checkbox"/> We do not engage via internal staff
Collaborative engagements	<input checked="" type="checkbox"/> To influence corporate practice (or identify the need to influence it) on ESG issues <input checked="" type="checkbox"/> To encourage improved/increased ESG disclosure <input checked="" type="checkbox"/> To gain an understanding of ESG strategy and/or management <input type="checkbox"/> We do not engage via collaborative engagements
Service provider engagements	<input type="checkbox"/> To influence corporate practice (or identify the need to influence it) on ESG issues <input type="checkbox"/> To encourage improved/increased ESG disclosure <input type="checkbox"/> To gain an understanding of ESG strategy and/or management <input checked="" type="checkbox"/> We do not engage via service providers

LEA 02.4	Additional information. [Optional]
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As part of our wider approach to ESG integration, our preference is to engage directly with our investee companies. This is especially beneficial in cases where we have developed an open dialogue with the company or where channels to ESG-specific engagements have been opened through years of dialogue on other financial and/or strategic topics. In the past, we have served as the connecting party to put companies in touch with our ESG research providers where there was previously a gap in communication. The goals of our engagements are generally to improve company disclosure and the accuracy of ESG research, to gain a fuller understanding of material ESG factors, and/or to encourage companies to address material ESG-related risks.

LEA 03	Mandatory	Core Assessed	PRI 2
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LEA 03.1	Indicate whether your organisation has a formal process for identifying and prioritising engagements.
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Yes

LEA 03.2	Indicate the criteria used to identify and prioritise engagements for each type of engagement.
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Type of engagement	Criteria used to identify/prioritise engagements
Individual / Internal staff engagements	Individual / Internal staff engagements
	<input checked="" type="checkbox"/> Geography/market of the companies <input checked="" type="checkbox"/> Materiality of the ESG factors <input checked="" type="checkbox"/> Exposure (size of holdings) <input checked="" type="checkbox"/> Responses to ESG impacts that have already occurred <input type="checkbox"/> Responses to divestment pressure <input type="checkbox"/> Consultation with clients/beneficiaries <input checked="" type="checkbox"/> Consultation with other stakeholders (e.g. NGOs, trade unions, etc.) <input checked="" type="checkbox"/> Follow-up from a voting decision <input checked="" type="checkbox"/> Client request <input checked="" type="checkbox"/> Breaches of international norms <input type="checkbox"/> Other; (specify) <input type="checkbox"/> We do not outline engagement criteria for our individual engagements

	Collaborative engagements
Collaborative engagements	<input type="checkbox"/> Potential to enhance knowledge of ESG issues through other investors <input checked="" type="checkbox"/> Ability to have greater impact on ESG issues <input checked="" type="checkbox"/> Ability to add value to the collaboration <input checked="" type="checkbox"/> Geography/market of the companies targeted by the collaboration <input checked="" type="checkbox"/> Materiality of the ESG factors addressed by the collaboration <input checked="" type="checkbox"/> Exposure (size of holdings) to companies targeted by the collaboration <input checked="" type="checkbox"/> Responses to ESG impacts addressed by the collaboration that have already occurred <input type="checkbox"/> Responses to divestment pressure <input checked="" type="checkbox"/> Follow-up from a voting decision <input type="checkbox"/> Alleviate the resource burden of engagement <input type="checkbox"/> Consultation with clients/beneficiaries <input checked="" type="checkbox"/> Consultation with other stakeholders (e.g. NGOs, trade unions, etc.) <input type="checkbox"/> Other; (specify) <input type="checkbox"/> We do not outline engagement criteria for our collaborative engagement providers
<input type="radio"/> No	

LEA 03.3	Additional information. [Optional]
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The majority of our ESG engagements are executed by our investment teams and each teams' approach to ESG engagements will differ. That said, our investment teams ESG engagements are chosen and prioritized using a risk-based approach, which focuses on the materiality of the ESG risks and opportunities facing each company. The size of our investment in a company also plays a significant role, but we regularly engage with prospective holdings. In addition, we continue to see an increase in the number of issuers proactively engaging with us, in part due to past voting decisions.

LEA 04	Mandatory	Core Assessed	PRI 2
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LEA 04.1	Indicate whether you define specific objectives for your organisation's engagement activities.
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Individual / Internal staff engagements	<input checked="" type="checkbox"/> All engagement activities <input type="checkbox"/> Majority of engagement activities <input type="checkbox"/> Minority of engagement activities <input type="checkbox"/> We do not define specific objectives for engagement activities carried out by internal staff
Collaborative engagements	<input checked="" type="checkbox"/> All engagement activities <input type="checkbox"/> Majority of engagement activities <input type="checkbox"/> Minority of engagement activities <input type="checkbox"/> We do not define specific objectives for engagement activities carried out through collaboration

LEA 04.2	Additional information. [Optional]
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We monitor the progress of a company in implementing its plans to address ESG-related issues by continuing to communicate with the company and analysing data and research related to the company and/or industry. Since each engagement is unique, the measurement of any tangible outcomes will depend on the particular circumstances. Similarly, the established process we will follow in the case of unachieved goals or unfulfilled issuer commitments is evaluated on a case-by-case basis.

In addition, the CGRI team tracks our ESG engagements for monitoring and reporting purposes, logging cases where the company has committed to take action on ESG issues and ensuring those commitments are met, and tracking which ESG topics are raised at individual meetings. Individual investment teams have developed proprietary engagement tracking systems that fit best into the existing investment process.

LEA 05	Mandatory	Core Assessed	PRI 2
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LEA 05.1	Indicate whether you monitor and/or review engagement outcomes.
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Individual / Internal staff engagements	<input checked="" type="checkbox"/> Yes, in all cases <input type="checkbox"/> Yes, in a majority of cases <input type="checkbox"/> Yes, in a minority of cases <input type="checkbox"/> We do not monitor, or review engagement outcomes when the engagement is carried out by our internal staff.
Collaborative engagements	<input checked="" type="checkbox"/> Yes, in all cases <input type="checkbox"/> Yes, in a majority of cases <input type="checkbox"/> Yes, in a minority of cases <input type="checkbox"/> We do not monitor, or review engagement outcomes when the engagement is carried out through collaboration.

LEA 05.2	Indicate whether you do any of the following to monitor and/or review the progress of engagement activities.
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Individual / Internal staff engagements	<input checked="" type="checkbox"/> Define timelines/milestones for your objectives <input checked="" type="checkbox"/> Track and/or monitor progress against defined objectives and/or KPIs <input checked="" type="checkbox"/> Track and/or monitor the progress of action taken when original objectives are not met <input checked="" type="checkbox"/> Revisit and, if necessary, revise objectives on a continuous basis <input type="checkbox"/> Other; specify
Collaborative engagements	<input checked="" type="checkbox"/> Define timelines/milestones for your objectives <input checked="" type="checkbox"/> Track and/or monitor progress against defined objectives and/or KPIs <input checked="" type="checkbox"/> Track and/or monitor the progress of action taken when original objectives are not met <input checked="" type="checkbox"/> Revisit and, if necessary, revise objectives on a continuous basis <input type="checkbox"/> Other; specify

LEA 05.3 Additional information. [Optional]

Individual / internal staff engagements

We monitor the progress of a company in implementing its plans to address ESG-related issues by continuing to communicate with the company and analysing data and research related to the company and/or industry. Since each engagement is unique, the measurement of any tangible outcomes will depend on the particular circumstances. Similarly, the established process we will follow in the case of unachieved goals or unfulfilled issuer commitments is evaluated on a case-by-case basis.

In addition, the CGRI team tracks our ESG engagements for monitoring and reporting purposes, logging cases where the company has committed to take action on ESG issues and ensuring those commitments are met, and tracking which ESG topics are raised at individual meetings. Many of our investment teams also track their own engagements and the outcomes associated with them. For example, our Emerging Markets Equity team conducts thematic engagements with portfolio companies on material issues such as board gender diversity and board independence and tracks progress towards specific ESG targets.

It should be noted that not all ESG engagements involve a request to the company. The objective of many engagements is to gather additional information on companies' management of, exposure to or thoughts on existing or emerging ESG risks and opportunities.

Collaborative engagements

RBC GAM is an active member of the Canadian Coalition for Good Governance (CCGG), a member-based organization that collectively engages with Canadian public companies regarding governance issues on behalf of its members. CCGG reaches out to its members for input on companies where engagement on governance issues would be warranted. Prior to an engagement, CCGG asks members whether there are any specific issues they would like addressed.

RBC GAM's CIO is a past Chair and a current director of CCGG and RBC GAM is an active participant in these collaborative engagements.

For collaborative engagements done through CCGG, CCGG always engages with companies over a 2-3 year period in order to monitor progress. Following each engagement, CCGG provides reports to members outlining the company's plan to address each ESG issue raised. In subsequent years, CCGG issues follow-up reports outlining the progress of the company.

In addition, RBC GAM will continue to track and monitor the progress of our collaborative engagements outside of CCGG with other investors or organisations such as the PRI. For example, a member of the CGRI team participated in the UN PRI Cyber Security collaborative engagement and RBC GAM has previously led engagements through this committee. Similarly, RBC GAM has led collaborative engagements in Canada through the 30% Club Canadian Investor Group.

LEA 06 Mandatory Additional Assessed PRI 2,4

LEA 06.1 Indicate whether your organisation has an escalation strategy when engagements are unsuccessful.

Yes

LEA 06.2 Indicate the escalation strategies used at your organisation following unsuccessful engagements.

- Collaborating with other investors
- Issuing a public statement
- Filing/submitted a shareholder resolution
- Voting against the re-election of the relevant directors
- Voting against the board of directors or the annual financial report
- Submitting nominations for election to the board
- Seeking legal remedy / litigation
- Reducing exposure (size of holdings)
- Divestment
- Other; specify

No

LEA 06.3 Additional information. [Optional]

Where our engagement efforts have been unsuccessful and the issue being discussed is material, we may comment publicly or take more formal steps, such as filing a shareholder resolution, when we determine that it is in the best interest of our portfolios. Our engagement efforts often inform our voting decisions, and in cases where the company is unwilling to improve its practices, we may communicate our views through our proxy voting.

Our preferred avenues for influencing positive changes at our investee companies are direct or collaborative engagements and proxy voting. However, in some circumstances, we have been left with no option aside from reduced exposure or divestment, specifically where the investment teams view inaction on a material ESG risk to compromise the investment case. We view divestment as a last resort, as we believe acting as an active, engaged shareholder (including the use of shareholder proposals, in rare circumstances) can lead to positive changes to create additional value at our investee companies, whereas outright divestment may reduce opportunities to facilitate those changes.

LEA 07.1 Indicate whether insights gained from your organisation's engagements are shared with investment decision-makers.

Type of engagement	Insights shared
Individual / Internal staff engagements	<input checked="" type="checkbox"/> Yes, systematically <input type="checkbox"/> Yes, occasionally <input type="checkbox"/> No
Collaborative engagements	<input checked="" type="checkbox"/> Yes, systematically <input type="checkbox"/> Yes, occasionally <input type="checkbox"/> No

LEA 07.2 Indicate the practices used to ensure that information and insights gained through engagements are shared with investment decision-makers.

- Involving investment decision-makers when developing an engagement programme
- Holding investment team meetings and/or presentations
- Using IT platforms/systems that enable data sharing
- Internal process that requires portfolio managers to re-balance holdings based on interaction and outcome levels
- Other; specify
- None

LEA 07.3 Indicate whether insights gained from your organisation's engagements are shared with your clients/beneficiaries.

Type of engagement	Insights shared
Individual/Internal staff engagements	<input checked="" type="checkbox"/> Yes, systematically <input type="checkbox"/> Yes, occasionally <input type="checkbox"/> No
Collaborative engagements	<input checked="" type="checkbox"/> Yes, systematically <input type="checkbox"/> Yes, occasionally <input type="checkbox"/> No

LEA 07.4 Additional information. [Optional]

At RBC GAM, we engage with the issuers in which we invest on an ongoing basis. The purpose of these ESG-related engagements is to better understand how issuers are managing their ESG risks and opportunities in order to make fully informed investment decisions.

Engagements are conducted by our investment teams and/or the CGRI team. Therefore, all information is either directly acquired by the investment decision maker, or is passed on in the form of engagement notes. The insights gained from this information are then incorporated into the relevant team's investment process. For example, our North American Equity team directly inputs ESG engagement notes into their proprietary ESG research platform. Other teams, like our Emerging Markets Equity team, report on their engagement activities as part of their annual ESG report and record the status of their engagement efforts in an internal engagement tracker.

Investment teams are responsible for tracking their own engagement activity, which is aggregated at the firm-level and reported to clients as part of their regular reporting. Updates on engagements are also provided in our public CGRI annual and semi-annual reports.

LEA 08.1 Indicate whether you track the number of your engagement activities.

Type of engagement	Tracking engagements
Individual/Internal staff engagements	<input type="checkbox"/> Yes, we track the number of our engagements in full <input checked="" type="checkbox"/> Yes, we partially track the number of our engagements <input type="checkbox"/> We do not track
Collaborative engagements	<input checked="" type="checkbox"/> Yes, we track the number of collaborative engagements in full <input type="checkbox"/> Yes, we partially track the number of our collaborative engagements <input type="checkbox"/> We do not track

LEA 08.2 Additional information. [Optional]

Our investment teams are at varying stages of tracking their engagement activities. Many teams improved their tracking processes in 2019. For example, the North American Equity team created a proprietary platform in which they added an engagement tracking module alongside other ESG research. We continue to improve engagement tracking for all teams in ways that complement their respective investment processes.

Team engagement data is then aggregated in the CGRI team's engagement tracking system quarterly for the purposes of firm-level tracking and client reporting.

LEA 09.1 Indicate the proportion of companies in your listed equities portfolio with which your organisation engaged during the reporting year.			
	We did not complete any engagements in the reporting year.	Number of companies engaged (avoid double counting, see explanatory notes)	Proportion of companies engaged with, out of total listed equities portfolio
Individual / Internal staff engagements	<input type="checkbox"/> We did not complete any engagements in the reporting year.	677	19
Collaborative engagements	<input type="checkbox"/> We did not complete any engagements in the reporting year.	37	1

LEA 09.2 Indicate the breakdown of engagements conducted within the reporting year by the number of interactions (including interactions made on your behalf).

No. of interactions with a company	% of engagements
One interaction	<input type="radio"/> >76%
	<input checked="" type="radio"/> 51-75%
	<input type="radio"/> 11-50%
	<input type="radio"/> 1-10%
	<input type="radio"/> None
2 to 3 interactions	<input type="radio"/> >76%
	<input type="radio"/> 51-75%
	<input checked="" type="radio"/> 11-50%
	<input type="radio"/> 1-10%
	<input type="radio"/> None
More than 3 interactions	<input type="radio"/> >76%
	<input type="radio"/> 51-75%
	<input checked="" type="radio"/> 11-50%
	<input type="radio"/> 1-10%
	<input type="radio"/> None
Total	100%

LEA 09.3 Indicate the percentage of your collaborative engagements in which you were the leading organisation during the reporting year.

Type of engagement	% leading role
Collaborative engagements	<input type="radio"/> >50%
	<input type="radio"/> 10-50%
	<input checked="" type="radio"/> <10%
	<input type="radio"/> None

LEA 09.5 Additional information. [Optional]

The majority of our ESG engagements are executed by our investment teams. Our investment teams are at varying stages of tracking their engagement activities and many teams improved their tracking processes in 2019. This alone has led to a significant increase in the number of engagements reported under this indicator from our 2019 RI Transparency Report.

Team engagement data is aggregated in the CGRI team's engagement tracking system quarterly for the purposes of firm-level tracking and client reporting. However, with engagement tracking developments occurring throughout 2019, the level of granularity required to complete indicators under LEA 09 is not yet feasible across all investment teams. As a result, the avoidance of double-counting (LEA 09.1), the proportion of companies engaged with (LEA 09.1) and the breakdown of engagement interactions (LEA 09.2) was completed on a best efforts basis. The number of individual engagements reported under LEA 09.1 is a conservative estimate.

In regard to the proportion of companies engaged with, we divided the number of reported engagements by our total number of equity holdings. This differs from our approach in 2019, which was based on AUM.

We continue to improve engagement tracking for all teams in ways that complement their respective investment processes. These continued improvements will allow RBC GAM to more accurately report on this indicator moving forward.

LEA 10	Voluntary	Additional Assessed	PRI 2
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LEA 10.1 Indicate which of the following your engagement involved.

- Letters and emails to companies
 - In a minority of cases
 - In a majority of cases
 - In all cases

- Meetings and/or calls with board/senior management
 - In a minority of cases
 - In a majority of cases
 - In all cases
- Meetings and/or calls with the CSR, IR or other management
 - In a minority of cases
 - In a majority of cases
 - In all cases
- Visits to operations
 - In a minority of cases
 - In a majority of cases
 - In all cases
- Visits to supplier(s) in supplier(s) from the company's supply chain
 - In a minority of cases
 - In a majority of cases
 - In all cases
- Participation in roadshows
 - In a minority of cases
 - In a majority of cases
 - In all cases
- Other

LEA 10.2 Additional information. [Optional]

When appropriate, we will initially engage with an issuer through an engagement letter, outlining the relevant issues and communicating our desire to engage. Most often, we initiate engagement with investee companies over email, outlining the desire to engage, the rationale behind the engagement and any background information required to facilitate a dedicated engagement session on the identified issues. We then arrange a meeting or call with the appropriate stakeholder at the company – usually a member of the Board of Directors, management team, or corporate sustainability group. Finally, we capture notes on the discussion points and outcomes of the meeting in our internal tracking systems, and monitor the issue over time with follow-up engagements or escalations as required.

In some cases, our investment teams conduct site visits as part of investment due diligence or monitoring, and will discuss numerous topics, including ESG, during meetings with management.

LEA 11 Voluntary Descriptive PRI 2

LEA 11.1 Provide examples of the engagements that your organisation or your service provider carried out during the reporting year.

Add Example 1

ESG Topic	<input checked="" type="checkbox"/> Climate Change
Conducted by	Individual / Internal
Objectives	Understand the company's strategies and intentions regarding mitigating climate-related risks and setting emissions-reduction targets.
Scope and Process	The North American Equity Team engaged with an integrated oil and gas company on their strategies and intentions regarding setting emissions-reduction targets amidst calls from shareholders for improvements in this area. Through this engagement, the company revealed that it was in the process of setting targets and was focused on an initiative to tie those targets to its capital plan, thus delaying public release. The company also revealed it was considering the recommendations of both the TCFD and the Expert Panel on Sustainable Finance in Canada, and determining how these recommendations might shape the targets they put in place. Given the company's ongoing work and commitment at the board level, the team considers this an ongoing engagement and is continuing to monitor progress.
Outcomes	Disclosure / report published

Add Example 2

ESG Topic	<input checked="" type="checkbox"/> Executive Remuneration
Conducted by	Individual / Internal
Objectives	Discuss concerns surrounding alignment between executive compensation structure with company performance.

Scope and Process	<p>Our Canadian Equity team noted several red flags in its analysis of the executive compensation package at a Canadian energy company.</p> <p>The team engaged with the company's board and raised issues concerning severance packages, and whether the compensation structure properly aligned executive compensation with company performance.</p> <p>The board provided additional context regarding its severance packages and listened to the team's feedback on compensation plan structure.</p> <p>This engagement is ongoing, and the team is monitoring the company's progress.</p>
Outcomes	Ongoing

Add Example 3

ESG Topic	<input checked="" type="checkbox"/> Other governance
Conducted by	Individual / Internal
Objectives	Assess competitiveness and strength of issuer's 'customer-oriented' culture by engaging with the issuer's stakeholders directly.
Scope and Process	<p>Our Global Equity team used a unique approach to assess the culture at a U.S. technology company.</p> <p>The team set up a series of calls via its expert to understand the customer experience at the company. This entailed one-on-one interviews with a number of the company's clients, including a call with the Chief Information Officer of a U.S. state university.</p> <p>The exercise strengthened the team's confidence in the company's culture and its focus on customer satisfaction.</p>
Outcomes	Increased understanding / information

Add Example 4

ESG Topic	<input checked="" type="checkbox"/> Plastics
Conducted by	Individual / Internal
Objectives	Encourage issuer to reduce its plastic waste by lowering the usage of plastic bags across its chain of stores
Scope and Process	<p>Our Asian Equity team engaged with the management team of a Southeast Asian convenience store chain about lowering the usage of plastic bags.</p> <p>The company noted it is aware that the use of plastic bags is a significant contributor to worldwide plastics waste and is a material risk for the company itself.</p> <p>Since the engagement, our team has witnessed notable improvement in the company's practices: staff are now trained to ask whether a customer requires a plastic bag rather than automatically bagging purchases, and the company has committed to banning the use of plastic bags across the entire chain by early 2020.</p>
Outcomes	Company changed practice

Add Example 5

ESG Topic	<input checked="" type="checkbox"/> Plastics
Conducted by	Individual / Internal
Objectives	Understand and assess the company's approach to plastic packaging and waste
Scope and Process	<p>Our Emerging Markets Equity team engaged with a consumer goods company on its approach to plastic packaging.</p> <p>Beyond the company's commitment to 100% recycled plastic packaging by 2025, the team was particularly encouraged to learn of the company's drive to help create an industry-wide plastics protocol. This included their sharing of recycling solutions with the broader industry.</p> <p>The company's efforts have been particularly focused on coastal areas due to the risk of plastics leaking into the ocean, providing further evidence that the company is taking a nuanced and thoughtful approach to this material issue.</p>
Outcomes	Increased understanding / information

Add Example 6

Add Example 7

Add Example 8

Add Example 9

Add Example 10

LEA 12	Mandatory	Descriptive	PRI 2
LEA 12.1	Indicate how you typically make your (proxy) voting decisions.		
	Approach		

- We use our own research or voting team and make voting decisions without the use of service providers.
- We hire service providers who make voting recommendations and/or provide research that we use to guide our voting decisions.

Based on
<input type="radio"/> The service-provider voting policy we sign off on <input checked="" type="radio"/> Our own voting policy <input type="radio"/> Our clients' requests or policies <input type="radio"/> Other (explain)

- We hire service providers who make voting decisions on our behalf, except in some pre-defined scenarios where we review and make voting decisions.
- We hire service providers who make voting decisions on our behalf.

LEA 12.2	Provide an overview of how you ensure that your agreed-upon voting policy is adhered to, giving details of your approach when exceptions to the policy are made.
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RBC GAM has a detailed process to manage the review and approval of proxies from the receipt of the proxy to the communication of the vote to the tabulator. RBC GAM retains the services of a proxy voting service provider to manage and vote proxies through its online voting platform. In addition, the service provider provides custom vote recommendations for all proxies based on the RBC GAM Proxy Voting Guidelines.

The CGRI team manages the internal review of each ballot to ensure that the custom recommendations made by the service provider correctly reflect the intentions of the RBC GAM Proxy Voting Guidelines for each meeting proposal. All shareholder meetings are tracked and monitored with relevant notes and indicators for each meeting. Meeting research and all custom vote recommendations are reviewed by the CGRI team.

In exceptional circumstances, where we find the custom voting recommendations do not reflect the best interests of our portfolios, a vote change process is initiated. This process can be prompted through the review process of the CGRI team, direct input from the investment teams, or through solicitation by the issuers. First, the investment teams that manage the specific investment are consulted and the request is submitted and approved by the five-member Proxy Voting Committee (which includes the RBC GAM CIO). In order for a vote change request to be accepted, majority approval from the Proxy Voting Committee is required.

Every year, we conduct an extensive review process to ensure that our Proxy Voting Guidelines continue to reflect the best interests of our portfolios and the current market reality. Any updates to the Proxy Voting Guidelines are reviewed and approved by the Proxy Voting Committee. We then work with our service provider to update the custom voting policy and implementation guide they use to generate proxy voting recommendations for RBC GAM.

LEA 14	Voluntary	Additional Assessed	PRI 2
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LEA 14.1	Does your organisation have a securities lending programme?
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- Yes

LEA 14.3	Indicate how the issue of voting is addressed in your securities lending programme.
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- We recall all securities for voting on all ballot items
 - We maintain some holdings, so that we can vote at any time
 - We systematically recall some securities so that we can vote on their ballot items (e.g., in line with specific criteria)
 - We recall some securities so that we can vote on their ballot items on an ad-hoc basis
 - We empower our securities-lending agent to decide when to recall securities for voting purposes
 - We do not recall our securities for voting purposes
 - Other (specify)
- No

LEA 14.4	Additional information. [Optional]
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Some RBC GAM funds participate in securities lending programs. In order to allow for proxy voting for securities that have been loaned by these funds, we will recall all of these securities in North America on or before the record date to ensure vote eligibility. For loaned shares outside of North America, we will recall all of the securities of an issuer where we manage at least 1% of the outstanding shares of that issuer or there is a significant voting issue where RBC GAM's position could impact the result.

LEA 15	Mandatory	Descriptive	PRI 2
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LEA 15.1	Indicate the proportion of votes participated in within the reporting year in which where you or the service providers acting on your behalf raised concerns with companies ahead of voting.
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- 100%
- 99-75%
- 74-50%
- 49-25%
- 24-1%
- Neither we nor our service provider(s) raise concerns with companies ahead of voting

LEA 15.2	Indicate the reasons for raising your concerns with these companies ahead of voting.
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- Vote(s) concerned selected markets
- Vote(s) concerned selected sectors
- Vote(s) concerned certain ESG issues
- Vote(s) concerned companies exposed to controversy on specific ESG issues

- Vote(s) concerned significant shareholdings
- Client request
- Other

LEA 15.3 Additional information. [Optional]

Due to the volume of votes submitted and meetings reviewed, the CGRI and investment teams are not able to engage with our investee companies on every vote. However, because of the open dialogue we have fostered with our investee companies, we are provided with the opportunity to engage on pending votes ahead of companies' meetings.

In general, these engagements are prompted by the CGRI team or investment team(s) but investee companies often initiate engagements in order to gain further clarity on our position pertaining to particular voting items or general practices. Most commonly, we engage with boards on upcoming votes related to board independence, board gender diversity or executive compensation.

By discussing our concerns with investee companies ahead of voting, we are often able to inform companies of what we view as best practice and encourage their adoption. In addition, engagement can often reveal exceptional circumstances or pending improvements to practices and policies that may warrant that we vote contrary to the initial recommendations of the RBC GAM Proxy Voting Guidelines.

Our service providers may engage with companies ahead of their meetings in order to inform their research reports and voting recommendations to clients. All issuers are able to receive a copy of upcoming research reports and the vendor's benchmark voting recommendations, allowing the issuers to provide feedback and note where adjustments are required. Because this service is made available to all issuers, we have selected the '99-75%' option under LEA 15.1. Our response to LEA 15.2 refers to instances in which RBC GAM may raise concerns with investee companies ahead of voting.

LEA 16 Mandatory Core Assessed PRI 2

LEA 16.1 Indicate the proportion of votes where you, and/or the service provider(s) acting on your behalf, communicated the rationale to companies for abstaining or voting against management recommendations. Indicate this as a percentage out of all eligible votes.

- 100%
- 99-75%
- 74-50%
- 49-25%
- 24-1%
- We do not communicate the rationale to companies
- Not applicable because we and/or our service providers did not abstain or vote against management recommendations

LEA 16.2 Indicate the reasons why your organisation would communicate to companies, the rationale for abstaining or voting against management recommendations.

- Vote(s) concern selected markets
- Vote(s) concern selected sectors
- Vote(s) concern certain ESG issues
- Vote(s) concern companies exposed to controversy on specific ESG issues
- Vote(s) concern significant shareholdings
- Client request
- Other

LEA 16.3 In cases where your organisation does communicate the rationale for abstaining or voting against management recommendations, indicate whether this rationale is made public.

- Yes
- No

LEA 16.4 Additional information. [Optional]

Due to the volume of votes submitted and meetings reviewed, the CGRI team and our investment teams are not able to communicate to our investee companies the rationale behind each vote against management's recommendations. We publicly disclose our voting record and voting outcomes are often discussed through our direct engagements with investee companies.

Where we think it is appropriate and in the best interests of the portfolios we manage, we will disclose in advance how we intend to vote on a particular issue and provide the rationale for our voting decision.

Our service providers may engage with companies ahead of their meetings in order to inform their research reports and voting recommendations to clients. All issuers are able to receive a copy of upcoming research reports and the vendor's benchmark voting recommendations for free, allowing the issuers to provide feedback and note where adjustments are required.

LEA 17 Mandatory Core Assessed PRI 2

LEA 17.1 For listed equities in which you or your service provider have the mandate to issue (proxy) voting instructions, indicate the percentage of votes cast during the reporting year.

- We do track or collect this information

Votes cast (to the nearest 1%)
99%

Specify the basis on which this percentage is calculated

- Of the total number of ballot items on which you could have issued instructions
- Of the total number of company meetings at which you could have voted

- Of the total value of your listed equity holdings on which you could have voted
- We do not track or collect this information

LEA 17.2 Explain your reason(s) for not voting on certain holdings

- Shares were blocked
- Notice, ballots or materials not received on time
- Missed deadline
- Geographical restrictions (non-home market)
- Cost
- Conflicts of interest
- Holdings deemed too small
- Administrative impediments (e.g., power of attorney requirements, ineligibility due to participation in share placement)
- Client request
- Other (explain)

LEA 17.3 Additional information. [Optional]

It is our policy not to vote in shareblocking markets due to the resulting restrictions on trading. Shareblocking accounts for the majority of ballot items not voted on which we could have issued instructions during the reporting year. We issued instructions on the remaining ballot items not voted during the reporting year, but our vote instructions may have been rejected due to administrative impediments or late ballots.

LEA 18 Voluntary Additional Assessed PRI 2

LEA 18.1 Indicate whether you track the voting instructions that you or your service provider on your behalf have issued.

- Yes, we track this information

LEA 18.2 Of the voting instructions that you and/or third parties on your behalf have issued, indicate the proportion of ballot items that were:

Voting instructions Breakdown as percentage of votes cast For (supporting) management recommendations
 87%
 Against (opposing) management recommendations
 13%
 Abstentions
 0%

- No, we do not track this information

LEA 18.3 In cases where your organisation voted against management recommendations, indicate the percentage of companies which you have engaged.

5

LEA 18.4 Additional information. [Optional]

Due to the volume of votes submitted and meetings reviewed, our CGRI and investment teams are not able to communicate to our investee companies the rationale behind each vote against management's recommendations. We publicly disclose our voting record after the vote.

We use votes against management as a form of engagement to share our views with the company and its Board of Directors. Voting outcomes are often discussed through our direct engagements with investee companies. Matters that are especially material to the investment case may warrant ongoing targeted engagement.

Please note that our response to LEA 18.3 is a conservative calculation, based on the current status and granularity of our engagement tracking data across the firm.

LEA 19 Mandatory Core Assessed PRI 2

LEA 19.1 Indicate whether your organisation has a formal escalation strategy following unsuccessful voting.

- Yes
- No

LEA 19.2 Indicate the escalation strategies used at your organisation following abstentions and/or votes against management.

- Contacting the company's board
- Contacting the company's senior management
- Issuing a public statement explaining the rationale
- Initiating individual/collaborative engagement
- Directing service providers to engage
- Reducing exposure (holdings) / divestment
- Other

LEA 19.3 Additional information. [Optional]

In the RBC GAM Proxy Voting Guidelines, we communicate that when the board fails to implement a proposal that has received a majority of shareholder support (or majority dissent in the case of management proposals), and does not demonstrate a valid reason for this action, we will generally withhold votes for all board members who served on the board during the period in question.

Beyond this, we may engage directly with the board or management, or disclose details of the vote and/or engagement process to our clients, either through

the disclosures of our individual investment teams or the semi-annual CGRI reports. In addition, as communicated in our Approach to Responsible Investment, where our engagement efforts have been unsuccessful and the issue being discussed is material, we may comment publicly or take more formal steps, such as filing a shareholder resolution, when we determine that it is in the best interests of the portfolios we manage.

Board and/or management quality and responsiveness are key factors considered in the investment analysis of our investment teams. Accordingly, failure to respond to shareholder concerns may inform our investment decisions and could potentially result in a reduction of exposure or divestment based on the analysis of our individual investment teams.

LEA 20	Voluntary	Descriptive	PRI 2
LEA 20.1	Indicate whether your organisation, directly or through a service provider, filed or co-filed any ESG shareholder resolutions during the reporting year.		
	<input type="radio"/> Yes <input checked="" type="radio"/> No		
LEA 20.7	Additional information. [Optional]		
	Filing shareholder proposals is something that we will consider when it is in the best interests of the portfolios we manage and the shareholders of the corporation.		

LEA 21	Voluntary	Descriptive	PRI 2
LEA 21.1	Provide examples of the (proxy) voting activities that your organisation and/or service provider carried out during the reporting year.		
	<input checked="" type="checkbox"/> Add Example 1		
ESG Topic	<input checked="" type="checkbox"/> Executive Remuneration <input checked="" type="checkbox"/> Diversity		
Conducted by	Individual/Internal		
Objectives	Encourage clear, enhanced disclosure on how companies intend to increase diversity in addition to how executives will be held accountable for progress.		
Scope and Process	<p>Gender diversity has been a controversial area for the technology sector for several years and it continued to make its way onto the voting ballots at technology companies during the 2019 proxy season. Two U.S. tech giants had shareholders filing proposals requesting that the companies report on the feasibility of integrating sustainability metrics, including metrics regarding diversity among senior executives, into the companies' executive compensation plans. Proponents of both proposals requested clarity regarding how the companies intended to improve their diversity and how the strategy was supported by executive accountability.</p> <p>In general, RBC GAM supports proposals that request enhanced disclosure on material ESG issues, as well as those that promote diversity in the workplace. We supported both aforementioned proposals, as we believe that diversity is a material issue at both companies and that shareholders would benefit from additional disclosure on how the companies intend to increase diversity in addition to how executives will be held accountable for progress.</p>		
Outcomes	Voting		
	<input checked="" type="checkbox"/> Add Example 2		
ESG Topic	<input checked="" type="checkbox"/> Human rights <input checked="" type="checkbox"/> Labour practices and supply chain management		
Conducted by	Individual/Internal		
Objectives	Support efforts to increase disclosure on the use of prison labour in the supply chain		
Scope and Process	<p>Another area that received much attention in 2019 was the use of prison labour in the supply chain. For example, RBC GAM supported a shareholder proposal filed at a U.S. home improvement retailer requesting more disclosure on prison labour, including the extent of known usage of prison labour in the company's supply chain.</p> <p>Although the company had a seemingly rigorous process in place, as described in its publicly available sourcing report, their audits were not able to identify any supplier that used prison labour. This was despite a lawsuit filed against one of the company's suppliers, alleging forced unpaid labour of men in a drug rehabilitation program who were diverted from overcrowded prisons.</p> <p>Due to the materiality of this issue and the increasing risk to the company of additional litigation or regulation, we believe that enhanced disclosure regarding the company's supply chain was warranted.</p>		
Outcomes	Voting		
	<input checked="" type="checkbox"/> Add Example 3		
ESG Topic	<input checked="" type="checkbox"/> Plastics		
Conducted by	Individual/Internal		
Objectives	Support efforts to increase disclosure and action on sustainable packaging		

Scope and Process	<p>The parent company of a North American fast food chain was one of the organizations that received a shareholder proposal requesting a report on sustainable packaging. The proponent noted that the food chain was cited as the second-largest plastic polluter in Canada by Greenpeace, lagging peers such as its peers on implementing sustainable packaging programs.</p> <p>As there is the potential for increased regulatory oversight, increased costs related to plastic packaging, and increased activism regarding plastics, we believe that companies like this may be faced with increased reputational and environmental risks if they do not address their plastic pollution and recycling programs. As a result, we supported the proposal requesting a report on sustainable packaging at the company.</p>
Outcomes	Voting

Add Example 4

ESG Topic	<input checked="" type="checkbox"/> Other governance
Conducted by	Individual/Internal
Objectives	In our view, it is a matter of good governance practice that an independent director be appointed to the position of chair of the board of directors. Non-independent chairs, generally via the combined Chair/CEO role, are still a common practice, but we frequently communicate our views on the independence of the board chair via shareholder proposals.
Scope and Process	<p>In 2019, we voted on 49 total shareholder proposals calling for an independent board chair; 48 of which were filed at U.S. companies. Consistent our historical voting record on this issue, we supported 100% of the proposals.</p> <p>We generally will not vote against the election of a non-independent chair if the board has also appointed a lead independent director and has a fully independent corporate governance committee. However, even when a board meets this criteria, we will still generally support shareholder proposals calling for an independent board chair. We view this as a distinction between an acceptable corporate governance practice and best practice.</p>
Outcomes	Voting

Add Example 5

ESG Topic	<input checked="" type="checkbox"/> Executive Remuneration
Conducted by	Individual/Internal
Objectives	Communicate our views on poorly structured executive compensation plan.
Scope and Process	<p>In recent years, several executive compensation plans have adopted stretch goals related to share price under the long-term incentive plan that may in fact reward short-term performance. For instance, in 2019, we identified a compensation plan that would grant executives with performance stock options should the share price appreciate 25%. Although shareholders would benefit from this share price appreciation, in order for the options to be granted, that price appreciation would need to be maintained, on average, for 20 consecutive trading days for any period of time during a two-year performance window.</p> <p>At first glance, this pay structure appears to be aligned with the experience of shareholders, given the option grant is performance linked. However, in our view, this structure has the potential to pay executives for short-term price appreciations. This can be especially problematic where executives are granted options rather than shares, due to the asymmetric risk associated with options.</p> <p>Combined with additional concerning features in the compensation plan, including poor disclosure and reduced performance targets as compared to the previous year, we ultimately voted against the say-on-pay proposal.</p>
Outcomes	Voting

Add Example 6

Add Example 7

Add Example 8

Add Example 9

Add Example 10

LEA Checks

Checks

If there are any messages below, please review them before continuing. If there are no messages below, please save this page and continue.

FI 01.1 Indicate (1) Which ESG incorporation strategy and/or combination of strategies you apply to your actively managed fixed income investments; and (2) The proportion (+/- 5%) of your total actively managed fixed income investments each strategy applies to.

SSA	Screening alone	0
	Thematic alone	0
	Integration alone	0
	Screening + integration strategies	99
	Thematic + integration strategies	0
	Screening + thematic strategies	0
	All three strategies combined	1
	No incorporation strategies applied	0
Corporate (financial)	Screening alone	0
	Thematic alone	0
	Integration alone	0
	Screening + integration strategies	99
	Thematic + integration strategies	0
	Screening + thematic strategies	0
	All three strategies combined	1
	No incorporation strategies applied	0
Corporate (non-financial)	Screening alone	0
	Thematic alone	0
	Integration alone	0
	Screening + integration strategies	99
	Thematic + integration strategies	0
	Screening + thematic strategies	0
	All three strategies combined	1
	No incorporation strategies applied	0

FI 01.2 Describe your reasons for choosing a particular ESG incorporation strategy and how combinations of strategies are used.

ESG Integration and Screening

We believe that ESG factors can impact the financial performance of the corporate and sovereign issuers in which we invest. Therefore, we use ESG integration in every investment strategy and portfolio, so we ensure that we are using all material information to inform our investment decisions. ESG factors are integrated in a way that enhances each team's unique investment process, with the aim of enhancing our pricing and management of risk.

RBC GAM also employs norms-based screening to all of its investments. As a result, the majority of fixed income AUM falls under the combined 'Screening + Integration' ESG incorporation strategy.

In addition, our designated SRI strategies also screen out companies that manufacture products and/or provide services that socially responsible investors may wish to avoid, or have poor ESG practices.

All three strategies: ESG Integration, Screening, and Thematic

Thematic investing is additionally applied in our Access Capital Community Investment strategy and Impact Bond strategy in the U.S., which aim to deliver competitive returns while simultaneously having a positive social and/or environmental impact through their investments. These strategies apply the same ESG integration and norms-based screening as above, with the additional thematic investment lens.

FI 01.3 Additional information [Optional].

RBC GAM employs norms-based screening to all of its investments. Specifically, no RBC GAM investment team will knowingly invest in companies associated with the production, use or distribution of anti-personnel land mines or cluster munitions. These exclusions only apply when we control the investment policy for a portfolio. For mandates where we do not control the investment policy, our clients may request different exclusions or no exclusions. We have engaged an independent third party research provider to provide us with a list of companies that should be excluded on the basis of this policy, which is updated monthly.

As well, where there are full economic sanctions that prohibit any financial dealings with a foreign state, including investment in entities operating under the authority of the foreign state, we will not invest in securities that fall within the sanctions. Where sanctions have been imposed against foreign countries that do not prohibit financial dealings we will identify and assess any risk and consider whether the investment would still be in the best interests of our clients.

RBC GAM and BlueBay also apply additional ESG-based exclusionary screens for interested clients.

Full details on BlueBay's approach can be found in its RI Transparency Report.

FI 14 Mandatory to Report, Voluntary to Disclose Core Assessed PRI 2

FI 14.1 Indicate the proportion of your fixed income assets on which you engage. Please exclude any engagements carried out solely in your capacity as a shareholder.

Category	Proportion of assets
SSA	<input type="radio"/> >50% <input type="radio"/> 26-50% <input type="radio"/> 5-25% <input checked="" type="radio"/> More than 0%, less than 5%
	<p>FI 14.2 Indicate your motivations for conducting engagement (SSA fixed income assets).</p> <input checked="" type="checkbox"/> To gain an understanding of ESG strategy and/or management <input checked="" type="checkbox"/> To encourage improved/increased ESG disclosure <input checked="" type="checkbox"/> To influence issuer practice (or identify the need to influence) on ESG issue
Corporate (financial)	<input type="radio"/> >50% <input checked="" type="radio"/> 26-50% <input type="radio"/> 5-25% <input type="radio"/> More than 0%, less than 5%
	<p>FI 14.2 Indicate your motivations for conducting engagement (Corporate, Financial fixed income assets)</p> <input checked="" type="checkbox"/> To gain an understanding of ESG strategy and/or management <input checked="" type="checkbox"/> To encourage improved/increased ESG disclosure <input checked="" type="checkbox"/> To influence issuer practice (or identify the need to influence) on ESG issue
Corporate (non-financial)	<input type="radio"/> >50% <input checked="" type="radio"/> 26-50% <input type="radio"/> 5-25% <input type="radio"/> More than 0%, less than 5%
	<p>FI 14.2 Indicate your motivations for conducting engagement (Corporate, non-financial fixed income assets)</p> <input checked="" type="checkbox"/> To gain an understanding of ESG strategy and/or management <input checked="" type="checkbox"/> To encourage improved/increased ESG disclosure <input checked="" type="checkbox"/> To influence issuer practice (or identify the need to influence) on ESG issue

FI 14.3 Additional information.[OPTIONAL]

Opportunities for engagement are different for fixed income investments, as the relationship between an issuer and a debt holder is quite different to that between an issuer and an equity holder. ESG risks can impact the valuation of both equity and debt, but the bond holder's ability to initiate change in the issuer to reduce risk may be limited when compared with the power of an equity holder. This does not mean that debt investors are unable to influence

management decisions at all. The cost of debt is a key factor for companies and can contribute significantly to the long-term profitability of their investments. Any risks which could potentially impact the likelihood of repayment, including ESG risks, will generally result in investors demanding a higher yield, which increases the cost of debt and creates an incentive for management to reduce those risks.

For example, BlueBay meets with issuers (particularly in relation to primary issuances) as part of its routine investment research process and has an opportunity to raise ESG-related matters. ESG-focused engagements are prioritized using a risk-based approach, which involves analysing material ESG risks facing the issuer, the issuer's ESG score and the size of the investment.

As another example, our European Corporate Credit team's engagement efforts inform its views on the quality of an issuer's management team and governance, as well as the impact of its products and operations on the environment and society.

Finally, our PH&N Fixed Income team conducts regular engagements on certain priority topics, mostly concerning corporate governance, to ensure that issuers are considering considerations important to debtholders, as well as shareholders.

FI 15

Mandatory to Report, Voluntary to Disclose

Additional Assessed

PRI 1,2

FI 15.1 Indicate how you typically engage with issuers as a fixed income investor, or as both a fixed income and listed equity investor. (Please do not include engagements where you are both a bondholder and shareholder but engage as a listed equity investor only.)

Type of engagement	SSA	Corporate (financial)	Corporate (non-financial)
Individual/Internal staff engagements	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Collaborative engagements	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Service provider engagements	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

FI 15.2 Indicate how your organisation prioritises engagements with issuers.

	SSA	Corporate (financial)	Corporate (non-financial)
Size of holdings	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Credit quality of the issuer	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Duration of holdings	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Quality of transparency on ESG	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Specific markets and/or sectors	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Specific ESG themes	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Issuers in the lowest ranks of ESG benchmarks	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Issuers in the highest ranks of ESG benchmarks	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Specific issues considered priorities for the investor based on input from clients and beneficiaries	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Other	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

If 'other' has been selected, please give a description

BlueBay will also prioritize engagements based on whether it is likely to be a long-term/core holding, whether it is likely to be investable, in response to an event or development, or as part of pre-determined ESG work programme.

FI 15.3 Indicate when your organisation conducts engagements with issuers.

	SSA	Corporate (financial)	Corporate (non-financial)
We engage pre-investment.	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
We engage post-investment.	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
We engage proactively in anticipation of specific ESG risks and/or opportunities.	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
We engage in reaction to ESG issues that have already affected the issuer.	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
We engage prior to ESG-related divestments.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Other, describe	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

FI 15.4 Indicate what your organisation conducts engagements with issuers on.

	SSA	Corporate (financial)	Corporate (non-financial)
We engage on ESG risks and opportunities affecting a specific bond issuer or its issuer.	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
We engage on ESG risks and opportunities affecting the entire industry or region that the issuer belongs to.	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

We engage on specific ESG themes across issuers and industries (e.g., human rights).	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Other, describe	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

FI 15.5 Indicate how your organisation ensures that information and insights collected through engagement can feed into the investment decision-making process.

	SSA	Corporate (financial)	Corporate (non-financial)
Ensuring regular cross-team meetings and presentations.	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Sharing engagement data across platforms that is accessible to ESG and investment teams.	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Encouraging ESG and investment teams to join engagement meetings and roadshows.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Delegating some engagement dialogue to portfolio managers/credit analysts.	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Involving portfolio managers when defining an engagement programme and developing engagement decisions.	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Establishing mechanisms to rebalance portfolio holdings based on levels of interaction and outcomes of engagements.	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Considering active ownership as a mechanism to assess potential future investments.	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Other, describe	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
We do not ensure that information and insights collected through engagement can feed into the investment decision-making process.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

FI 15.6 Additional information.[OPTIONAL]

Our fixed income investment teams view direct engagement as a valuable component of the investment process. Typically our fixed income engagements are led by the investment team but may be done in conjunction with our CGRI team. The CGRI team will communicate internally with other investment teams when an engagement may impact the other asset classes of the issuer being engaged.

BlueBay communicates engagement activity internally on an ad hoc basis most commonly by advising relevant individuals or by communicating through the relevant cross desk sector analyst forum groups, where the issues can be discussed in a wider context. For additional details regarding BlueBay's engagement activities, please view BlueBay's RI Transparency Report.

FI 16 Mandatory to Report, Voluntary to Disclose Additional Assessed PRI 1,2

FI 16.1 Indicate if your publicly available policy documents explicitly refer to fixed income engagement separately from engagements in relation to other asset classes.

Yes

FI 16.2 Please attach or provide a URL to your fixed income engagement policy document. [Optional]

<https://global.rbcgam.com/sitefiles/live/documents/cgri/approach-to-responsible-investment.PDF>

No

FI 16.3 Additional information [OPTIONAL]

Our Approach to Responsible Investment has a separate section that addresses fixed income engagement. BlueBay also publishes an ESG Investment Risk Policy[1].

[1] <http://www.bluebay.com/globalassets/documents/esg-investment-risk-policy.pdf>

FI 17 Mandatory to Report, Voluntary to Disclose Additional Assessed General

FI 17.1 Indicate whether your organisation measures how your incorporation of ESG analysis in fixed income has affected investment outcomes and/or performance.

	SSA	Corporate (financial)	Corporate (non-financial)
We measure whether incorporating ESG impacts portfolio risk.	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
We measure whether incorporating ESG impacts portfolio returns.	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
We measure the ESG performance/profile of portfolios (relative to the benchmark).	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
None of the above	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

FI 17.2 Describe how your organisation measures how your incorporation of ESG analysis in fixed income has affected investment outcomes and/or ESG performance. [OPTIONAL]

BlueBay applies both quantitative and qualitative approaches to measure the impact of ESG. For instance, BlueBay monitors strategy-level and individual issuer ESG scores and ESG controversy exposures. Qualitatively, BlueBay monitors the impact of ESG analysis in terms of impact on investment views and outcomes for specific issuers or sectors.

Overall, BlueBay has found that, in the majority of instances, there has not been a change to investment views or allocation decisions based on the ESG data, but the data has contributed to the overall investment process.

In addition, we measure the ESG performance of fixed income corporate holdings as compared to the benchmark at the request of clients.

FI 18	Voluntary	Descriptive	PRI 1,2												
FI 18.1 Provide examples of how your incorporation of ESG analysis and/or your engagement of issuers has affected your fixed income investment outcomes during the reporting year.															
<input checked="" type="checkbox"/> Example 1															
<table border="1"> <tr> <td colspan="2" data-bbox="316 300 1396 338">SSA</td> </tr> <tr> <td data-bbox="316 353 464 383"></td> <td data-bbox="464 353 1396 383">ESG issue and explanation</td> </tr> <tr> <td colspan="2" data-bbox="316 398 1396 481"> Our Emerging Markets Fixed Income team incorporates ESG in a quantitative score in its Global Fundamental Model, as well as in its internal research reports, which serve as an opportunity to review the macroeconomic and qualitative factors influencing the fundamentals of the sovereign issuers the team monitors, including those related to ESG. </td> </tr> <tr> <td colspan="2" data-bbox="316 495 1396 524">Integration</td> </tr> <tr> <td data-bbox="316 539 464 568"></td> <td data-bbox="464 539 1396 568">Impact on investment decision or performance</td> </tr> <tr> <td colspan="2" data-bbox="316 584 1396 772"> As part of its regular investment process, the Emerging Markets Fixed Income team is constantly looking for investment opportunities in sovereign issuers with beneficial valuation propositions relative to fundamentals. The team uses a combination of its fundamental research reports mentioned above and momentum indicators related to the Global Fundamental Model to identify these opportunities. For example, the team tracks 6-month trends in ESG scores to identify where there are significant improvements or deteriorations in country fundamentals. This analysis helps to inform investment decisions in the fund, and the addition of ESG factors in this process has been found to be value-additive, particularly during periods of market anxiety. Some of the specific issuers where in-depth fundamental research was conducted in 2019 include Hungary, Indonesia, Poland and Belize. </td> </tr> </table>				SSA			ESG issue and explanation	Our Emerging Markets Fixed Income team incorporates ESG in a quantitative score in its Global Fundamental Model, as well as in its internal research reports, which serve as an opportunity to review the macroeconomic and qualitative factors influencing the fundamentals of the sovereign issuers the team monitors, including those related to ESG.		Integration			Impact on investment decision or performance	As part of its regular investment process, the Emerging Markets Fixed Income team is constantly looking for investment opportunities in sovereign issuers with beneficial valuation propositions relative to fundamentals. The team uses a combination of its fundamental research reports mentioned above and momentum indicators related to the Global Fundamental Model to identify these opportunities. For example, the team tracks 6-month trends in ESG scores to identify where there are significant improvements or deteriorations in country fundamentals. This analysis helps to inform investment decisions in the fund, and the addition of ESG factors in this process has been found to be value-additive, particularly during periods of market anxiety. Some of the specific issuers where in-depth fundamental research was conducted in 2019 include Hungary, Indonesia, Poland and Belize.	
SSA															
	ESG issue and explanation														
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Integration															
	Impact on investment decision or performance														
As part of its regular investment process, the Emerging Markets Fixed Income team is constantly looking for investment opportunities in sovereign issuers with beneficial valuation propositions relative to fundamentals. The team uses a combination of its fundamental research reports mentioned above and momentum indicators related to the Global Fundamental Model to identify these opportunities. For example, the team tracks 6-month trends in ESG scores to identify where there are significant improvements or deteriorations in country fundamentals. This analysis helps to inform investment decisions in the fund, and the addition of ESG factors in this process has been found to be value-additive, particularly during periods of market anxiety. Some of the specific issuers where in-depth fundamental research was conducted in 2019 include Hungary, Indonesia, Poland and Belize.															
<input checked="" type="checkbox"/> Example 2															
<table border="1"> <tr> <td colspan="2" data-bbox="316 824 1396 853">Corporate (non-financial)</td> </tr> <tr> <td data-bbox="316 869 464 898"></td> <td data-bbox="464 869 1396 898">ESG issue and explanation</td> </tr> <tr> <td colspan="2" data-bbox="316 913 1396 1055"> The North American High Yield Fixed Income team uses external ESG research in combination with its own financial analysis, research and engagement to inform its investment decisions. For several years, the team has been monitoring a prominent pharmaceutical company in its universe, in which the team had chosen not to invest due to severe ESG controversies and concerns that affected the investment case. These included a slew of governance concerns, such as lack of financial transparency, accounting concerns, lack of management disclosure, and questionable acquisition activity in addition to social concerns like controversies over drug pricing. </td> </tr> <tr> <td colspan="2" data-bbox="316 1070 1396 1099">Integration</td> </tr> <tr> <td data-bbox="316 1115 464 1144"></td> <td data-bbox="464 1115 1396 1144">Impact on investment decision or performance</td> </tr> <tr> <td colspan="2" data-bbox="316 1160 1396 1323"> As the team has continued to monitor the issuer closely, it noted significant positive changes related to its ESG practices that the team views as evidence of improving fundamentals at the company. For example, the team noted positive changes in management team that improved overall corporate governance quality, the introduction of a sustainability report to improve transparency on material ESG issues, and the creation of a board subcommittee for environmental, health, safety and sustainability issues. Although some concerns with the issuer remain, the team was encouraged by these improvements and decided to enter the investment on a thoughtful and cautious basis, while continuing to monitor the company's ESG issues at a high degree. </td> </tr> </table>				Corporate (non-financial)			ESG issue and explanation	The North American High Yield Fixed Income team uses external ESG research in combination with its own financial analysis, research and engagement to inform its investment decisions. For several years, the team has been monitoring a prominent pharmaceutical company in its universe, in which the team had chosen not to invest due to severe ESG controversies and concerns that affected the investment case. These included a slew of governance concerns, such as lack of financial transparency, accounting concerns, lack of management disclosure, and questionable acquisition activity in addition to social concerns like controversies over drug pricing.		Integration			Impact on investment decision or performance	As the team has continued to monitor the issuer closely, it noted significant positive changes related to its ESG practices that the team views as evidence of improving fundamentals at the company. For example, the team noted positive changes in management team that improved overall corporate governance quality, the introduction of a sustainability report to improve transparency on material ESG issues, and the creation of a board subcommittee for environmental, health, safety and sustainability issues. Although some concerns with the issuer remain, the team was encouraged by these improvements and decided to enter the investment on a thoughtful and cautious basis, while continuing to monitor the company's ESG issues at a high degree.	
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Engagement															

Impact on investment decision or performance
<p>The team initiated an engagement regarding the discrepancy between the stricter sector methodology used by the rating agency (Power) and the sector more accurately aligned to the combined entity's operational profile (Utility). 70% of combined entity earnings comprise fully regulated utility operations.</p> <p>First, the team met with the issuer to discuss the strategic rationale for the acquisition and associated rating implications. The team encouraged management to obtain a third rating as part of its governance activities, which the CFO of the company agreed they would consider.</p> <p>Then, the team expressed their view to the rating agency's lead Analyst directly. The team discussed the Analyst's rationale for the rating change and the inconsistencies in rating methodology being employed compared to new information released by the company. The Analyst noted that while they understood the updated structure, they would like to see it reflected in an earnings track record before adjusting methodology.</p> <p>While the team does not expect a rating approach change from this agency in the very near term, it believes that such discussions foster better transparency and understanding among issuers, investors, and rating agencies overall and is continuing monitoring and engagement with both the issuer and rating agency over time.</p>

Example 4

SSA
ESG issue and explanation
<p>Part of the U.S. Fixed Income team's investment process includes conducting scenario analysis to better understand the resilience of their investment portfolios relative to systematic market risk. In 2019, the team expanded this analysis to include a number of climate-related scenarios based on geospatial analysis of their mortgage and municipal bond investments.</p>
Integration
Impact on investment decision or performance
<p>As a result of the climate scenario analysis, the team found instances where they had invested in securities that either had higher risks associated with physical impacts of climate change or lower resiliency measures in place to respond to potential climate-related risks. The team uses this analysis on an ongoing basis to identify these higher risk securities, and to discover alternative options for investment that would have similar investment characteristics yet be more resilient to the potential effects of climate change. For example, after the first portfolio review, the team decided to sell certain riskier securities and invested instead in lower risk / higher resiliency ones in another city. This analysis is regularly reviewed and updated, and ultimately informs the team's investment decisions on an ongoing basis.</p>

Example 5

Corporate (financial)
ESG issue and explanation
<p>BlueBay analysed one of Australia's largest banks and assigned it a Fundamental ESG Risk Rating of Medium and an Indicative Investment ESG Score of -1. Following an initial meeting on green bonds/ESG, BlueBay wanted to gain greater clarity regarding the bank's cyber security practices given the bank has experienced multiple breaches in the past, to understand improvements since the breaches and how the bank is adapting to elevated scrutiny over data security and privacy as a result of increased digitalisation.</p> <p>The bank provided an overview of the governance structures in place (to oversee cyber) and how it has refocused efforts to assess non-financial risks (including cyber) alongside credit risks, rather than these being secondary. This included launching a strategy to bolster internal cyber security capabilities and improving communications to senior levels.</p> <p>It also discussed changes implemented including enhanced due diligence where third party providers are used, greater accountability for ensuring standards are followed and ongoing training for employees. Whilst there have been no regulatory impacts from the recent breaches, the bank acknowledged costs in terms of remediation and reputational impacts particularly in terms of retaining customer trust.</p>
Engagement
Impact on investment decision or performance
<p>The company has clearly suffered from cyber security related issues in the past and, as part of the big 4 Australian banks, has needed to strengthen practices to rebuild consumer trust in both the bank and the sector.</p> <p>On balance, BlueBay believes the bank is taking appropriate action to address key ESG risks. However, there remains some performance issues which BlueBay will continue to monitor to track progress and improvement.</p> <p>From an investment perspective, BlueBay continues to have exposure to this issuer as the team believes these matters to be appropriate reflected in valuations. BlueBay found the bank to be very open in their dialogue, providing detailed responses to our questions. However, the team would encourage it to be more transparent in what is reported externally, particularly given the internal efforts made.</p>

CM1 01	Mandatory	Additional Assessed	General		
CM1 01.1	Indicate whether the reported information you have provided for your PRI Transparency Report this year has undergone:				
<input type="checkbox"/> Third party assurance over selected responses from this year's PRI Transparency Report <input type="checkbox"/> Third party assurance over data points from other sources that have subsequently been used in your PRI responses this year <input type="checkbox"/> Third party assurance or audit of the correct implementation of RI processes (that have been reported to the PRI this year) <input type="checkbox"/> Internal audit of the correct implementation of RI processes and/or accuracy of RI data (that have been reported to the PRI this year) <input checked="" type="checkbox"/> Internal verification of responses before submission to the PRI (e.g. by the CEO or the board) <ul style="list-style-type: none"> <input checked="" type="checkbox"/> Whole PRI Transparency Report has been internally verified <input type="checkbox"/> Selected data has been internally verified <input type="checkbox"/> Other, specify <input type="checkbox"/> None of the above					
CM1 02	Mandatory	Descriptive	General		
CM1 02.1	We undertook third party assurance on last year's PRI Transparency Report				
<input type="radio"/> Whole PRI Transparency Report was assured last year <input type="radio"/> Selected data was assured in last year's PRI Transparency Report <input checked="" type="radio"/> We did not assure last year's PRI Transparency report <input type="radio"/> None of the above, we were in our preparation year and did not report last year.					
CM1 03	Mandatory	Descriptive	General		
CM1 03.1	We undertake confidence building measures that are unspecific to the data contained in our PRI Transparency Report:				
<input type="checkbox"/> We adhere to an RI certification or labelling scheme <input type="checkbox"/> We carry out independent/third party assurance over a whole public report (such as a sustainability report) extracts of which are included in this year's PRI Transparency Report <input type="checkbox"/> ESG audit of holdings <input type="checkbox"/> Other, specify <input checked="" type="checkbox"/> None of the above					
CM1 04	Mandatory	Descriptive	General		
CM1 04.1	Do you plan to conduct third party assurance of this year's PRI Transparency report?				
<input type="radio"/> Whole PRI Transparency Report will be assured <input type="radio"/> Selected data will be assured <input checked="" type="radio"/> We do not plan to assure this year's PRI Transparency report					
CM1 07	Mandatory	Descriptive	General		
CM1 07.1	Indicate who has reviewed/verified internally the whole - or selected data of the - PRI Transparency Report . and if this applies to selected data please specify what data was reviewed				
<input checked="" type="checkbox"/> CEO or other Chief-Level staff <table border="1" style="margin-left: 20px;"> <tr> <td>Sign-off or review of responses</td> </tr> <tr> <td> <input checked="" type="checkbox"/> Sign-off <input checked="" type="checkbox"/> Review of responses </td> </tr> </table> <input type="checkbox"/> The Board <input type="checkbox"/> Investment Committee <input checked="" type="checkbox"/> Compliance Function <input checked="" type="checkbox"/> RI/ESG Team <input checked="" type="checkbox"/> Investment Teams <input type="checkbox"/> Legal Department <input type="checkbox"/> Other (specify)				Sign-off or review of responses	<input checked="" type="checkbox"/> Sign-off <input checked="" type="checkbox"/> Review of responses
Sign-off or review of responses					
<input checked="" type="checkbox"/> Sign-off <input checked="" type="checkbox"/> Review of responses					