

## Level 2 SFDR Article 10 Website Disclosures

### AS3A22

#### Overview

This document includes information relating to environmental and social characteristics promoted by AS3A22 in accordance with Level 2 requirements for website disclosures under Article 10 of the Sustainable Finance Disclosure Regulation (SFDR) – Regulation (EU) 2019/2088 of the European Parliament and of the Council of 27 November 2019 on sustainability-related disclosures in the financial services sector.

References to “Investment Manager” below refers to Allspring Global Investments Luxembourg S.A. and its delegate Allspring Global Investments, LLC. The below should be read together with the relevant Investment Management Agreement and the portfolio managed under that Agreement (the “Mandate”).

Item	Section Title/Overview	Description
a)	Summary	<p><b>b) No sustainable investment objective:</b> This financial product promotes environmental or social characteristics but does not have as its objective a sustainable investment.</p> <p><b>c) Environmental or social characteristics of the financial product:</b></p> <ul style="list-style-type: none"><li>• Client Inclusion List:<ul style="list-style-type: none"><li>○ The mandate follows an “inclusion” policy which is based on company classifications (Leaders, Promises, Laggards, unclassified) provided to the Investment Manager by the Client.</li><li>○ The Investment Manager may engage with companies classified as Laggards with the intention of improvements in environmental and/or social aspects, subject to the Client’s approval of an engagement plan which includes asks and objectives.</li></ul></li></ul>

		<ul style="list-style-type: none"> <li>• Client Exclusion List: The Client provides the Investment Manager with its Exclusion List which requires that the Mandate exclude certain securities and such exclusion may be on the basis of social and/or environmental related principles as determined by the Client and communicated to the Manager.</li> </ul> <p>d) <b>Investment strategy:</b> The Mandate has an investment objective to structure and maintain a well-diversified portfolio consisting of specified instruments as defined by the Mandate and to seek to outperform the total rate of return of the MSCI World Small Cap total return (gross dividends) Index by 300 basis points with the Benchmark measured by unhedged in EUR and the MSCI index calculated by MSCI based on the stock Exclusion List defined by the Client, with a typical tracking error in the range of 3% - 8%. The Mandate follows a Client Inclusion and Exclusions List, and also seeks to reduce the carbon footprint of the portfolio, in line with the criteria set out in the Mandate.</p> <p>e) <b>Proportion of Investments:</b> The planned asset allocation of the investments of the financial product will be at least 90% in alignment with the environmental and/or social characteristics promoted.</p> <p>f) <b>Monitoring of environmental or social characteristics:</b> This is undertaken through a combination of compliance systems coding and periodic reviews with the Client.</p> <p>g) <b>Methodologies:</b> The Mandate is managed based on Client directed Inclusion and Exclusion Lists and engagement plans approved by the Client from time to time, depending on issuer classifications applied by the Client.</p>
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a)	Samenvatting	<p><b>b) Geen duurzame beleggingsdoelstelling:</b> Dit financiële product bevordert ecologische of sociale kenmerken, maar heeft duurzaam beleggen niet als doelstelling.</p> <p><b>c) Ecologische of sociale kenmerken van het financiële product:</b></p> <ul style="list-style-type: none"> <li>• Lijst van opgenomen klanten: <ul style="list-style-type: none"> <li>○ Het mandaat volgt een "opnamebeleid" dat gebaseerd is op bedrijfsclassificaties (Leiders, Beloften, Achterblijvers, niet geclassificeerd) die door de Klant aan de Beleggingsbeheerder worden verstrekt.</li> <li>○ De Beleggingsbeheerder kan samenwerken met bedrijven die zijn geclassificeerd als Achterblijvers, met de bedoeling verbeteringen aan te brengen in ecologische en/of sociale aspecten, mits de Klant goedkeuring geeft voor een inzetplan dat vragen en doelstellingen omvat.</li> </ul> </li> <li>• Lijst van uitgesloten klanten: De Klant verstrekt de Beleggingsbeheerder de lijst van uitgesloten klanten die vereist dat het Mandaat bepaalde effecten uitsluit en dat dergelijke uitsluiting kan plaatsvinden op basis van sociale en/of milieugerelateerde principes, zoals bepaald door de Klant en gecommuniceerd aan de Beheerder.</li> </ul> <p><b>d) Beleggingsstrategie:</b> Het Mandaat heeft als beleggingsdoelstelling om een goed gediversifieerde portefeuille te creëren en te onderhouden, die bestaat uit specifieke instrumenten zoals gedefinieerd door het Mandaat en om te trachten een beter rendement te behalen dan het totale rendement van de MSCI World Small Cap Index van 300 basispunten (bruto dividenden). Hierbij wordt de Benchmark</p>
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		<p>gemeten door niet-afgedekt in EUR en de MSCI-index berekend door MSCI op basis van de door de Klant gedefinieerde lijst van uitgesloten aandelen, met een standaard tracking-error binnen de marge van 3% - 8%. Het Mandaat volgt een lijst met opgenomen en uitgesloten klanten en streeft er ook naar de CO2-voetafdruk van de portefeuille te verkleinen, in overeenstemming met de criteria die zijn uiteengezet in het Mandaat.</p> <p>e) <b>Aandeel van beleggingen:</b> De geplande activaspreiding van de beleggingen van het financiële product zal ten minste 90% bedragen in overeenstemming met de gepromote ecologische en/of sociale kenmerken.</p> <p>f) <b>Toezicht op ecologische en/of sociale kenmerken:</b> Dit gebeurt door middel van een combinatie van codering van compliancesystemen en periodieke beoordelingen met de Klant.</p> <p>g) <b>Methodologieën:</b> Het mandaat wordt beheerd op basis van door de Klant aangestuurde lijsten van opname en uitsluiting en inzetplannen die periodiek door de Klant zijn goedgekeurd, afhankelijk van de door de Klant toegepaste classificaties van de emittent.</p> <p>h) <b>Gegevensbronnen en verwerking:</b> De Klant verstrekt de Beleggingsbeheerder regelmatig met de lijsten van opname en uitsluiting, op basis van de eigen gegevensbronnen en verwerking van de Klant. De Beleggingsbeheerder sluit zich aan bij verschillende externe gegevensverstrekkers om de integratie van ESG- en klimaatinformatie in het proces van de Beleggingsbeheerder te vergemakkelijken.</p> <p>i) <b>Beperkingen van methodologieën en gegevens:</b> De belangrijkste beperking van de methodologie of gegevensbron is het ontbreken van gestandaardiseerde informatieverschaffing door het bedrijf.</p>
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b)	No sustainable investment objective	This financial product promotes environmental or social characteristics but does not have as its objective a sustainable investment.
c)	Environmental or social characteristics of the financial product	<p>This financial product promotes the following environmental and/or social characteristics:</p> <ul style="list-style-type: none"> <li>• Inclusion</li> </ul>

		<ul style="list-style-type: none"> <li>○ The mandate follows the Client’s “inclusion” policy which is based on company classifications (Leaders, Promises, Laggards, unclassified) and is provided to the Investment Manager by the Client. These classifications are based on a set of industry and event indicators regarding Environmental, Social and Governance aspects of the companies.</li> <li>○ Engagement: The Investment Manager may engage with companies classified as Laggards utilising a Client approved engagement plan for with the intention of improvements in environmental and/or social aspects.</li> <li>● Exclusion List: The Mandate excludes securities from companies on the basis of a Client Exclusion list which may include exclusion on the basis of social and/or environmental related principles.</li> </ul>
d)	Investment strategy	<p>The Mandate has an investment objective to structure and maintain a well-diversified portfolio consisting of specified instruments as defined by the Mandate. and to seek to outperform the total rate of return of the MSCI World Small Cap total return (gross dividends) Index by 300 basis points with the Benchmark measured by unhedged in EUR and the MSCI index calculated by MSCI based on the stock Exclusion List defined by the Client, with a typical tracking error in the range of 3% - 8%. The Mandate follows a Client Inclusion and Exclusions List, and also seeks to reduce the carbon footprint of the portfolio, in line with the criteria set out in the Mandate.</p>

	<p>The Client provides the Investment Manager with the full set of company classifications as Leaders, Promises, Laggards, unclassified. These classifications are based on a set of industry and event indicators regarding Environmental, Social and Governance aspects of the companies applied by the Client.</p> <p>The Investment Manager may be obliged to take up engagement activities for Promises based on asks and objectives approved by the Client with periodic reports to the Client for such engagement. The Investment Manager may invest in a Laggard without Client approval but may be required to divest if the Client does not approve an engagement plan.</p> <p>The Investment Manager may invest in Unclassified companies under the condition that divestment will occur if the company is considered an ESG-Laggard and engagement is not considered an option by the Client.</p> <p>Where the Investment Manager applies its approach to a review of companies, the Investment Manager takes an intensive research-based approach to ESG assessment. The Investment Manager analyses a company's ESG strategy and initiatives as part of its reward-to-risk framework.</p> <p>ESG research is engrained in the assessment of the Investment Manager's required process characteristics:</p> <ul style="list-style-type: none"> <li>• The Investment Manager believes a management team that is focused on ESG topics salient to their business, will recognise the need to have robust strategies for ESG that ensure durability of its asset base and expand its competitive advantage relative to its competitors.</li> </ul>
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	<ul style="list-style-type: none"> <li>• Strong and sustainable free cash flow can grow and become more resilient, influenced by a company’s adoption of ESG practices. Poor ESG practices can erode the sustainability of free cash flows.</li> <li>• Robust ESG initiatives tend to enhance the flexibility of balance sheets and allow management teams to pursue accretive capital deployment opportunities; creating value that is often not yet recognisable by the market.</li> </ul> <p>At the Client’s request, the Investment Manager may apply its fundamental research and company engagements to enable assessment of the identification and materiality of potential risks and companies experiencing positive inflections in ESG programs. The Investment Manager may align its proxy voting to support appropriate changes at the Client’s request.</p> <p>At the Client’s request, the Investment Manager may apply its proprietary ESG scoring system which looks at third-party ESG scores as well as the Investment Manager’s own analysts’ assessment. This proprietary scoring system focuses on the materiality and management of specific environmental, social and governance-related risks and the directional trend of both the materiality and management of the risk. The Investment Manager’s proprietary scoring system when applied evaluates companies based on: 1) risk exposure, 2) risk management, and 3) trend for each ESG topic. The scoring formula is based on the average of the individual risk scores for each company, weighted 50% to Risk Exposure and 50% to Risk Management. The “trend” is classified as “improving”, “stable” or “declining”.</p> <p>The Investment Manager’s proxy voting policies assess the good governance of companies which</p>
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		includes reference to indicators of sound management structures, employee relations, remuneration of staff and accounting and tax compliance.
e)	Proportion of investments	<p>The financial product does not intend to make any sustainable investments.</p> <p>The planned asset allocation of the investments of these financial products will be at least 90% in alignment with the environmental and/or social characteristics promoted.</p> <p>The Investment Manager may from time to time and within the limits of the Mandate, also hold cash and securities of up to 10% which may not be aligned with the environmental or social characteristics promoted by the Mandate.</p>
f)	Monitoring of environmental or social characteristics	<ul style="list-style-type: none"> <li>• The Investment Manager’s process utilises coded screening for certain quantitative criteria, including global standards screening and post trade checks.</li> <li>• The environmental and social characteristics are reviewed with the client as part of the regular reporting cycle.</li> </ul>
g)	Methodologies	As described in the ‘Monitoring of environmental or social characteristics’ section, the Investment Manager has processes for the oversight of the stated environmental and social characteristics promoted by this product which allow the Investment Manager to assess whether such characteristics are being attained.
h)	Data sources and processing	The Investment Manager subscribes to several third-party data providers to facilitate integration of ESG and climate information into the investment process.

		<p>The Client provides Inclusions and Exclusions lists to the Investment Manager on a regular basis.</p> <p>Vended data may include both reported and estimated data. The proportion of estimated ESG data changes over time depending on availability of data accessible to data providers, process changes and methodological approaches, amongst other factors.</p>
i)	Limitations to methodologies and data	<p>The primary limitation to the methodology or data source is the lack of corporate disclosure. We do not expect the corporate reporting landscape to change significantly until global regulatory requirements come into effect which mandate greater disclosure. Such limitation is, however, not expected to prevent the attainment of the environmental or social characteristics promoted by the product, as a result of the Investment Manager's processes in the above-mentioned "Methodologies" and "Data sources and processing".</p>
j)	Due diligence	<p>As part of its due diligence processes and procedures for the selection and monitoring of investments, the Investment Manager considers the sustainability aspects of the investment strategy for this product, taking into account relevant ESG criteria defined by the Client in its engagement plans. Please see "Investment Strategy" and "Methodologies" above for details on how specific sustainability characteristics are considered as part of the Investment Manager's due diligence process carried out on the product's underlying assets.</p>
k)	Engagement policies	<p>The Investment Manager engages with companies classified as Laggards with the intention of improvements in environmental and/or social aspects based on the Client approved engagement plan.</p> <p>The Client must approve the engagement plan for Laggards. The engagement plan is to contain</p>

		<p>clearly defined asks and objectives. The Client provides the Investment Manager with templates containing various asks and objectives. The Investment Manager may invest in a Laggard until approval is received with divestment where Client approval is not obtained.</p> <p>Allspring’s firm-wide centralised Stewardship Platform is supported by the Allspring Proxy Governance Committee (PGC) and the Quarterly Stewardship and Engagement Forum (QSEF). The PGC is responsible for the Investment Manager proxy voting policy and oversees the Investment Manager proxy voting process to ensure that its implementation conforms to the Allspring Funds Proxy Voting Policies and Procedures. The PGC also oversees the Investment Manager proxy administrator, Institutional Shareholder Services (ISS). The QSEF seeks to enhance coordination and deepen collaboration across the investment platform to engage companies on ESG issues.</p> <p>More information can be found in Allspring’s <a href="#">Engagement Policy</a> and <a href="#">Stewardship Annual Report</a>.</p>
l)	Designated reference benchmark	There are no reference benchmarks designated for the purpose of attaining the environmental or social characteristics promoted by this product.