Level 2 SFDR Article 10 Website Disclosures

AS5V24 Overview

This document includes information relating to environmental and social characteristics promoted by AS5V24 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	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**: The Mandate follows the Customer's Exclusion List. The Customer identifies companies to be excluded on the basis of social and/or environmental related principles outlined in the Customer's Responsible Investment Policy. When excluding companies, the Customer considers a number of criteria listed below. The Customer applies various qualitative and quantitative indicators and thresholds under each of the criteria when assessing (in)eligibility. d) **Investment strategy:** The Investment Manager's philosophy is to provide clients the power of long-term compounding through investing in businesses on the "right side of change". An important criterion for companies on the "right side of change" is the successful allocation of human capital, financial capital, and social capital. Human capital and social capital are the most relevant for assessing a company's environmental and social characteristics. Human capital refers to how well

		a company is managing its workforce. For instance, a company that successfully manages its human capital is one that fosters a diverse and inclusive workforce that feels engaged. Social capital management relates to what impact a company has on society at large. Creating products or services that have a positive impact on society and conducting business ethically are examples of positive social capital management. Companies can also positively affect society through the way in which their business impacts the environment. Therefore, the investment team considers the environmental impact of a company as a key factor in assessing the management of social capital. **e) Proportion of Investments:** The planned asset allocation of the investments of the financial product will be at least 95% in alignment with the environmental and/or social characteristics promoted. **f) Monitoring of environmental or social characteristics:** This is done through a combination of analyst research, quantitative monitoring, and documentation. **g) Methodologies:** 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 Manager's process. The Customer provides an Exclusion List on a regular basis. **i) Limitations to methodologies and data:** The primary limitation to the methodology or data source is the lack of standardised corporate disclosure. **j) Due diligence:** Please see the "Investment Strategy" and "Methodologies" sections for details on how sustainability characteristics are considered as part of the Investment Manager's due diligence process for the Mandate.

		k) Engagement policies: The investment team's active asset management includes on-going dialogue and engagement with portfolio companies, especially when the research team identifies opportunities for improvement. **l) Designated reference benchmark:** No reference benchmarks designated for the purpose of attaining the environmental or social characteristics promoted by this product.
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	This financial product promotes the following environmental and/or social characteristics:
		
		The Mandate follows the Customer's Exclusion List. The Customer identifies companies to be excluded on the basis of social and/or environmental related principles outlined in the Customer's Responsible Investment Policy.
		When excluding companies, the Customer considers a number of criteria listed below. The Customer applies various qualitative and quantitative indicators and thresholds under each of the criteria when assessing (in)eligibility.
		• Violation of international standards, such as:
		    ○ The UN Global Compact
		    ○ The OECD Guidelines for Multinational Enterprises
		    ○ The UN Guiding Principles on Business and Human Rights
		• Exposure to the following controversial activities:
		    ○ Thermal coal
		    ○ Tar sands
		    ○ Shale gas and oil and oil and gas extraction in the Arctic
		    ○ Controversial weapons
		    ○ Tobacco production

d)	Investment strategy	The Investment Manager's philosophy is to provide clients the power of long-term compounding through investing in

		businesses on the "right side of change". An important criterion for companies on the "right side of change" is the successful allocation of human capital, financial capital, and social capital. Human capital and social capital are the most relevant for assessing a company's environmental and social characteristics. Human capital refers to how well a company is managing its workforce. For instance, a company that successfully manages its human capital is one that fosters a diverse and inclusive workforce that feels engaged. Social capital management relates to what impact a company has on society at large. Creating products or services that have a positive impact on society and conducting business ethically are examples of positive social capital management. Companies can also positively affect society through the way in which their business impacts the environment. Therefore, the investment team considers the environmental impact of company as a key factor in assessing the management of social capital. The investment team believes productive allocation of such resources plays a meaningful role in the long-term sustainability of a business. It also has a direct correlation with key indicators of future performance such as market share gains, growth in earnings per share, and superior free cash flow generation. As such, the team strives to populate the portfolio with companies that are positive stewards of human, social and financial capital since they often demonstrate superior financial and extra-financial (ESG) fundamentals that are frequently mispriced in equity markets. The investment team utilizes a quantitative approach to incorporate ESG factors through its risk management process. Applying an ESG lens to our risk process allows us to consistently implement our research process while remaining vigilant for risks that could cause future equity performance to deviate from our expectations. The process with which we monitor ESG issues includes the following: • Review ESG Detail and Risk Summary reports provided by Investment Analytics team. • Identify those holdings which have been flagged for having low overall ESG industry-adjusted scores.

		• Formally review and discuss flagged holdings in the team's regular Portfolio and Risk Management meeting. In addition to quantitative metrics, the team leverages their deep fundamental research to analyze companies' ESG efforts on a qualitative basis. The analysts' comprehensive industry knowledge is an asset when comparing companies within and across sectors. The qualitative approach enables the Discovery Growth Equity Team to determine deficiencies in standard ESG scoring as well as identify the change trajectory in ESG metrics prior to them happening. The value add of a research-based approach is that investment decisions are driven by a forward-looking assessment and not reliant on vended ESG scores which are subject to point-in-time deficiencies. Following the quantitative and qualitative assessments, the team will make a capital allocation decision. Holdings may be divested if the team considers the ESG characteristics to be detrimental to the investment thesis.
e)	Proportion of investments	The financial product does not intend to make any sustainable investments. The planned asset allocation of the investments of these financial products will be at least 95% in alignment with the environmental and/or social characteristics promoted. The Investment Manager may from time to time and within the limits of the Mandate, also hold cash and securities of up to 5% which may not be aligned with the environmental or social characteristics promoted by the Mandate.
f)	Monitoring of environmental or social characteristics	The investment team has multiple steps to its ESG integration. First, analysts write a buy recommendation for a security to enable a capital allocation decision. The buy recommendation contains a section that asks, "Are there any positive or negative ESG attributes to discuss?" The analyst provides insights into ESG factors in this section to aid the capital allocation process. Second, from a risk management perspective, the investment team has developed a formal process to

		evaluate sustainability risks. We apply our criteria to the ESG scores provided by the Allspring Investment Analytics team and flag any companies that fail certain criteria. Next, analysts review the sustainability risks and concerns for the flagged companies to determine their validity. Then, the analyst engages with the company if she/he determines the concerns to be valid. Finally, the analyst documents the interaction with the company into the team internal research note system. Following the application of the team's risk management framework, the portfolio managers may make investment decisions to exit a holding if the sustainability risks are deemed too high.
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. 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. The Customer provides an Exclusion List on a regular basis.
i)	Limitations to methodologies and data	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".

j)	Due diligence	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 Customer in its engagement templates. 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.
k)	Engagement policies	The last step of the investment team’s evaluation process is to engage with companies on ESG issues. The team believes that active asset management includes on-going dialogue and engagement with portfolio companies, especially when the research team identifies opportunities for improvement. It is the goal of the team to help shape companies’ efforts towards ESG progress and to facilitate the improvements to how a company allocates their human, social and financial capital.
l)	Designated reference benchmark	There are no reference benchmarks designated for the purpose of attaining the environmental or social characteristics promoted by this product.