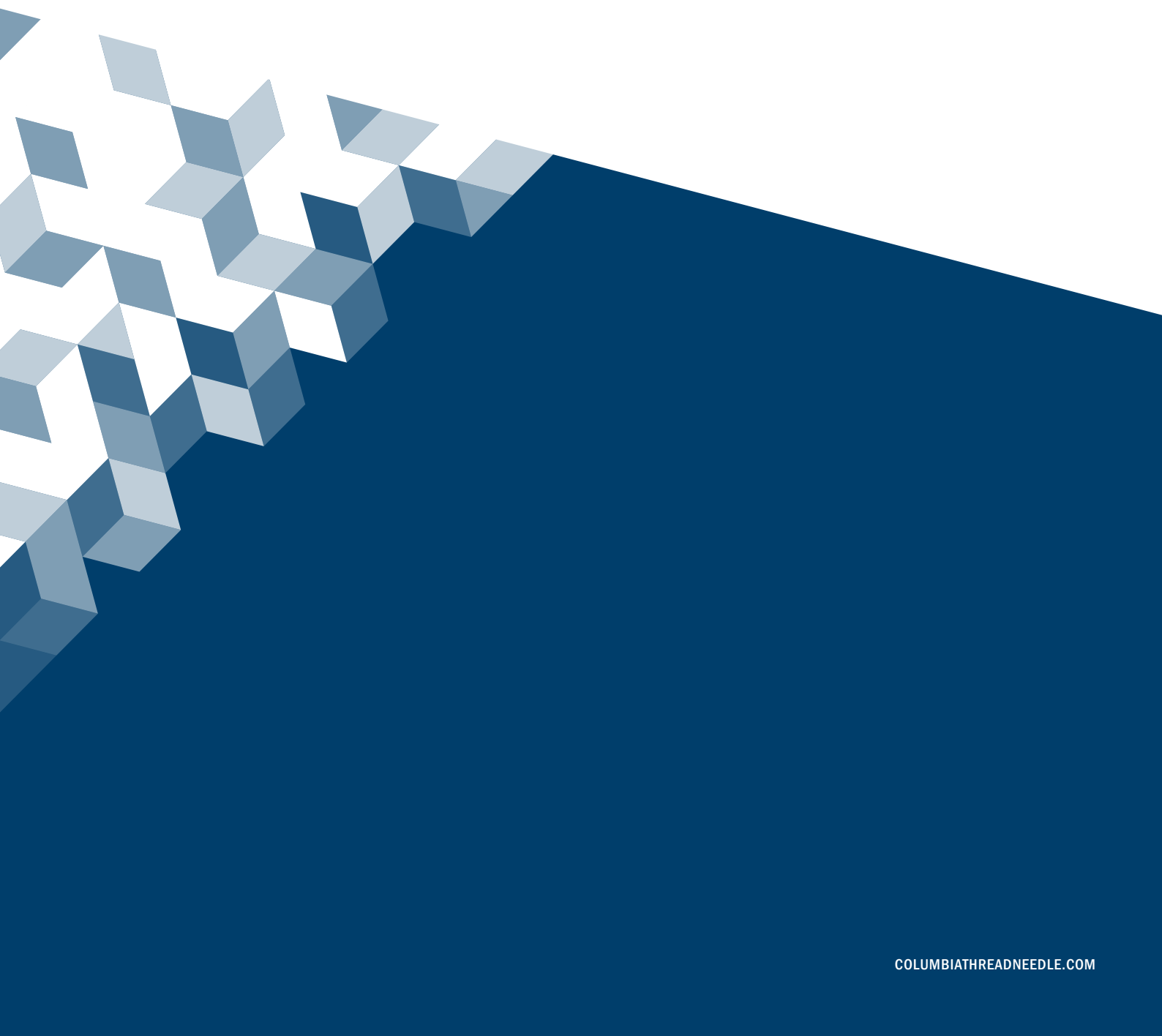


JANUARY 2020



Your success. Our priority.

COLUMBIA THREADNEEDLE INVESTMENTS STEWARDSHIP PRINCIPLES & APPROACH



COLUMBIA THREADNEEDLE INVESTMENTS STEWARDSHIP PRINCIPLES & APPROACH

Introduction

We are a leading global asset manager and, as equity investors, are responsible to our clients for acting on their behalf as shareholders and responsible stewards of the capital they entrust to us, within a framework of good governance and transparency.

Consistent with our values as a responsible business, a transparent responsible and pragmatic approach is integral not only to our investment process but also to our activity in the marketplace.

Responsible investment in practice encompasses a wide range of individual and overlapping activities, including Environmental, Social and Governance (ESG) research, sustainability research, integration, values-based screening, stewardship engagement, proxy voting, portfolio profiling & client reporting.

Philosophy

A key part of our investment philosophy is the belief that well run or improving companies and those that look to the future will be better positioned to manage the risks and challenges inherent in business. It will also help enable them to adapt and capture opportunities that can deliver sustainable growth and returns for our clients over time.

Consistent with this philosophy, our commitment to be a responsible investor and the duty we have to act in the best long-term interests of our clients, we subscribe to and use the stewardship principles (Principles) set out in this document as part of our investment framework and guidelines.

In shaping these Principles, we reference the UK Stewardship Code (the Code), which was first published in 2010 and updated in 2012, as our original benchmark. This Code, maintained by the UK's Financial Reporting Council, sets out a number of commonly agreed upon principles for effective stewardship by institutional investors in respect of their equity shareholdings. Through the application of these principles, the Code aims to enhance the quality of engagement between institutional investors and companies to help improve long-term risk-adjusted returns to shareholders and the efficient exercise of governance responsibilities:

<https://www.frc.org.uk/investors/uk-stewardship-code>

We also reference as an additional benchmark, the equivalent Principles issued by the U.S. Investor Stewardship Group, that took effect on 1 January 2018 (see Appendix):

<https://isgframework.org/stewardship-principles>

Over time, a range of stewardship frameworks (codes and guidance) have been established in markets around the world. However, to ensure clarity and consistency in how we operate and think about our stewardship responsibilities, rather than sign-up to multiple codes with their variations of scope and emphasis, we use one common set of Principles, which are detailed within this document.

PRINCIPLE 1

Institutional investors should publicly disclose their policy on how they will discharge their stewardship responsibilities

In addition to the positions outlined in this document, our related Responsible Investment Policies – in particular, our Corporate Governance and Proxy Voting Principles (Governance Principles) – are published on our website (see Related Documents section for weblinks).

Our Global Chief Investment Officer (CIO), and Deputy Global CIO, maintain oversight and sponsorship of our responsible investment activities globally and for our United States (U.S.) and Europe, the Middle East and Africa (EMEA) stewardship activities respectively. These stewardship activities, which have particular, but not exclusive, relevance to equity given the nature of the asset class, are based around the principles outlined below and form part of our investment process, building on our culture of teamwork, debate and collaboration. The scope of our activities is outlined under Principle 4.

Our portfolio managers, fundamental analysts and Responsible Investment (RI) team work collaboratively in seeking to assess, monitor and engage with the companies and organisations we invest in. This is with a view to understanding the dynamics, opportunities and risks inherent in a business, address concerns, promote good practice and in seeking to act in the best interests of our clients and the capital we invest for them within the risk profile sought within a given strategy (see Principles 3 to 6). As an extension of that, we also have regard to market practice and policy developments that affect the quality of the investment environment in which we operate and the corporate practices to which we are exposed.

In pursuing our approach, we recognize that companies are not homogeneous, that normal and best practices in different markets can vary, and that judgement needs to be applied.

In publicly listed companies, responsibility for stewardship is shared. The primary responsibility rests with the board of the company, which oversees the actions of its management. While it is not the role of shareholders to micro-manage businesses, when we are acting as and on behalf of shareholders we have an important stewardship role to play in assessing and, when appropriate, holding boards to account for the fulfilment of their responsibilities. This is done through engagement and the exercise of shareholder rights, including the use of voting rights, to the extent we have authority to do so.

In approaching these responsibilities, while we are mindful of company, local market and industry specific issues and relevant best practice standards, we will ultimately be guided in our approach by our view of what is in the best long-term interests of our clients and will consider any issues and related practice, disclosure and explanations in that context.

A key focus within these stewardship activities will always be to enhance our investment research in order that we can make informed capital allocation decisions as active investors. Our research, monitoring and decision making is enhanced particularly through engagement with companies on matters such as strategy, capital management and M&A, financial performance, standards of operating practice and management of material risks including those relating to ESG factors, and other activities as discussed in this document.

Asset classes

Equities

- The primary focus of our stewardship activities is on equity investments, where the need to consider capital allocation decisions, risk-adjusted returns and share ownership rights provides a clear context for our activities. As noted under Principle 4, the focus and prioritisation of stewardship activities is dependent on a range of factors that need to be considered in planning and managing the work that is undertaken.

Fixed income

- Fixed income assets offer neither the same rights nor the same scope for engagement as equities. Nevertheless, dialogue and engagement does take place with issuers, not least as part of the management of specialist bond strategies as well as, on occasion, special situations (such as bond restructuring and the formation of creditor committees). To the extent relevant these principles are drawn on and applied.

Real Estate

- Separate arrangements apply in relation to our directly managed property assets, which are maintained and managed by our Property teams. Real estate exposures may arise in various asset classes and shared sector and market research across teams enhances our perspective advantage.

Infrastructure

- Separate arrangements apply in relation to direct infrastructure assets, which given their nature involve more direct hands-on stewardship approach. Cross over can exist with other asset classes in relation to, say, the energy sector, transport or communications and, where we are able, shared sector and market research across teams enhances our perspective advantage.

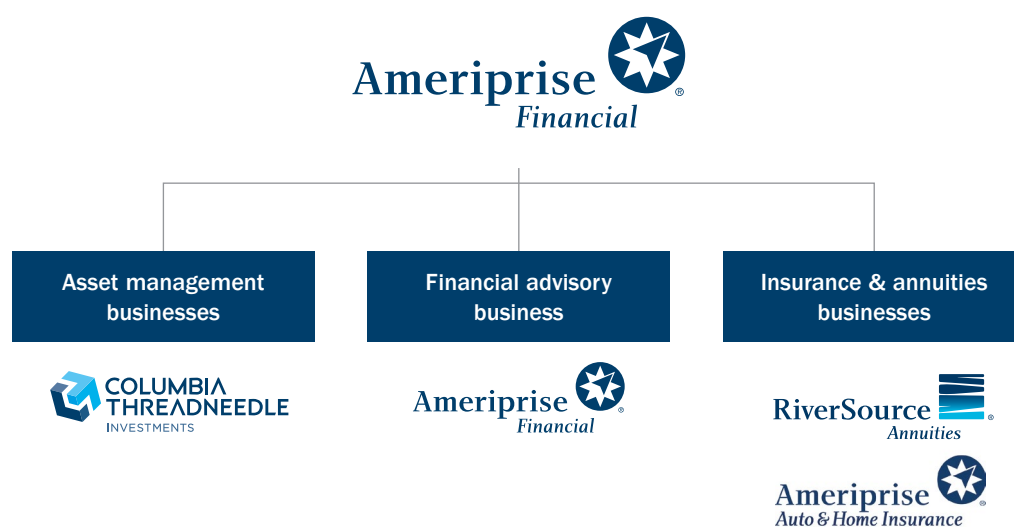
Commodities

- Separate responsible investment arrangements, particular to the asset class, apply to our commodity strategies. Cross over can exist with other asset classes in relation to, say, the energy or mining industries and shared sector and market research across teams enhances our perspective advantage.

PRINCIPLE 2

Institutional investors should have a robust policy on managing conflicts of interest in relation to stewardship and this policy should be publicly disclosed

Columbia Threadneedle Investments is the global asset management arm of Ameriprise Financial, Inc (the Group), a leading U.S.-based financial services provider. With more than 2000 people including over 450 investment professionals around the world, we manage \$469 billion² of client assets across developed and emerging market equities, fixed income, asset allocation solutions and alternatives.



As a result of this and other aspects of our business, conflicts of interest may arise among our different clients and among us, our affiliates and our clients. Columbia Threadneedle Investments must act solely in the best interest of its clients and to make full and fair disclosure of all material facts, including those where the adviser's interests may conflict with the client's. Clients' portfolios are managed in accordance with established investment objectives, client guidelines and regulatory requirements. As conflicts of interest affecting clients could undermine the integrity and professionalism of our business, we seek to identify any conflict situations as early as possible. Such conflicts might arise:

- between companies within the Group;
- between the Group and suppliers;
- between the Group and client(s);
- between employees/agents/directors of, or within, the Group and client(s);
- between client(s) and client(s); and
- between an employee and his or her employing Company and the Group.

² Source: Ameriprise Financial Third Quarter 2019 Results

Appropriate governance and oversight arrangements, including designated responsibilities, policies, procedures, conflict registers, monitoring and reporting, governance committee meetings, staff training and ‘whistleblowing’ arrangements are maintained. Where a conflict situation arises, we seek to mitigate and manage that equitably and in the clients’ interest with appropriate systems and controls. In addition, a compliance program is in place that is intended to identify, mitigate and, in some instances, prevent actual and potential conflicts of interest, as well as to ensure compliance with legal and regulatory requirements and ensure compliance with client investment guidelines and restrictions.

Where potential conflicts of interest may arise, for instance where we are invested on behalf of clients in a listed company that is associated with a client (e.g. the company’s pension plan trustees), we adhere to the following approach and escalation procedure:

- As part of our Group wide conflicts policy, arrangements and procedures are maintained to monitor potential conflicts of interest.
- In line with our normal practice, engagement and proxy voting decisions are agreed between the RI team and relevant portfolio managers, in line with our standard policies and procedures.
- Where decisions involve the pragmatic application of or a deviation from our headline policy, this is documented, and the explanation and rationale recorded.
- In the event of a controversial issue, this is escalated, initially to the relevant team heads, or committee. Where required, the final arbiter in such cases would be the Head of Equities, Global CIO (or their deputies) or another member of the relevant investment department’s senior executive group (the Investment Oversight Committee (US) or Investment Management Committee (EMEA)).
- Where issues require escalation, our legal and compliance teams are consulted as appropriate.

The overriding test at each stage of this process is that the approach and actions taken must be in the interests of those clients on whose behalf they are being taken. In an EMEA context this includes our TCF (“treating customers fairly”) obligations.

PRINCIPLE 3

Institutional investors should monitor their investee companies

Our portfolio managers, fundamental analysts and RI team work to assess, monitor and engage with the companies and organisations we invest in. This is with a view to understanding the dynamics, opportunities and risks inherent in a business, address concerns, promote good practice and in seeking to act in the best interests of our clients and the capital we invest for them within the risk profiles sought within given strategies

In approaching these responsibilities, while we are mindful of company, local market and industry specific issues and relevant best practice standards, we will ultimately be guided in our approach by our view of what is in the best interests of our clients and will consider any issues and relate practice, disclosure and explanations in that context.

Within this approach:

- Equity portfolio managers take lead responsibility for the overall assessment and monitoring of their portfolio companies, in managing the strategies for which they are responsible.

Active managers have a particular role to play in monitoring and assessing the quality of a company's leadership/management, as well as other factors influencing the investment case such as a company's strategy, capital management and M&A, financial performance, standards of operating practice and management of material risks including those relating to ESG factors.
- Equity analysts take lead responsibility for the research, analysis and routine engagement with companies under their coverage.

Fundamental analysts analyse and assess companies with a view to creating actionable insights, framing the related investment case for the companies they cover in terms of risks and opportunities. As part of this, they draw on and collaborate with the credit and RI teams.
- Responsible investment analysts take lead responsibility for monitoring, assessing and engaging on companies' management of material risks relating to ESG factors as well as broader sustainability issues.

Responsible investment analysts analyse and assess companies' ESG risk management performance looking at material exposures and related practice, as well as the sustainability opportunities associated with the products and services offered by the business. RI analysts coordinate proxy voting decisions.
- The Global Proxy Team is responsible for maintaining Columbia Threadneedle's custom voting policies on a day-to-day basis, coordinating the dissemination of related information to the investment departments and implementing internally agreed voting decisions, as well as related administration (e.g. for attendance at shareholder meetings).

The research and analysis emerging from this monitoring and the related, on-going engagement with companies is disseminated globally throughout the firm as part of our culture of idea sharing and provides a key mechanism through which we seek to try to identify potential issues at an early stage.

The combination of financial and non-financial analysis that is undertaken is supported by using external research, data and analytics, which allow us to take a proactive approach to the identification of potential issues and the prioritisation of engagement activities.

Wall Crossing (inside information)

Constructive, two-way dialogue is an important part of this process. As a long-term shareholder, we recognise that there will be circumstances where it may be appropriate to become an “insider” (i.e. receive non-public, price sensitive information) for short periods of time relating to companies in which we invest, i.e. to be ‘wall-crossed’.

Where inside information is received by an individual outside of the Compliance team, Columbia Threadneedle Investments operates a “one inside, all inside” policy, with limited exceptions.

Columbia Threadneedle Investments’ business is an active investment manager and therefore inappropriate receipt of information could prevent dealing in certain investments as a result. For this reason, our default position is that, **unless permission is sought from us first**, we do not wish to be wall-crossed and made party to inside information. If unsolicited inside information is received, Columbia Threadneedle Investments may have to protect its position by requiring immediate publication of the information.

Our related policies operate under the oversight of the relevant regional Risk and Controls Committees. Persons who violate the Code of Ethics or the policies related to the receipt of inside information/Material Non-Public Information may be subject to disciplinary action, which vary depending on the nature of the violation and local law and regulations, but will follow local escalation protocols as appropriate and may lead to termination of employment.

PRINCIPLE 4

Institutional investors should establish clear guidelines on when and how they will escalate their activities as a method of protecting and enhancing shareholder value

Over the course of a year our investment teams meet and engage with thousands of companies. Such dialogue is intended to create and support a mutual understanding of the business, its strategy, objectives and progress. Where this dialogue is no longer sufficient to support and maintain that common understanding, consideration may be given to escalating the engagement. The approach and strategies that will be used in escalating our engagement, short of divesting from an investment, will vary according to the circumstances and context.

The table below illustrates the range of engagement activities we may adopt, in carrying out our stewardship role in clients' interests.

Focus areas for engagement	Levels of engagement	Types of approach	Types of issue
<ul style="list-style-type: none"> ■ Preferred holdings ■ Contentious issues ■ Company initiated dialogue ■ Collaborative initiatives ■ Proxy voting 	<ul style="list-style-type: none"> ■ Monitoring ■ Provision of feedback ■ Investigation ■ Challenging practice ■ Engaging for change ■ Intervention 	<ul style="list-style-type: none"> ■ Electronic or other correspondence ■ Meeting with executives (e.g. CEO, FD, Company Secretary, IR, Sustainability team, or others) ■ Discussions with company advisers, stakeholders and analysts ■ Meetings with the Chairman, and/or non-executive directors ■ Dialogue and collaboration with other shareholders ■ Proxy voting ■ Requisitioning resolutions or general meetings 	<ul style="list-style-type: none"> ■ Leadership and succession planning ■ Board balance and diversity ■ Performance ■ Remuneration and incentives ■ Related party transactions ■ Disclosure and transparency ■ Accounting ■ Audit and internal control ■ Risk management and other operational issues ■ Significant controversies ■ Climate change, pollution and other environmental management issues ■ Health and safety, labour relations and other social issues ■ Human rights, respect for the community and other stakeholder expectations ■ Capital management and dilution ■ Strategy and M&A ■ Minority shareholder protection

While routine dialogue and meetings are part of an ongoing process, more purposeful engagement plans are managed and prioritised by the investment and RI teams based on a range of factors, such as:

- The degree of active shareholding/ownership relative to passive or structured holdings
- The size and significance of the shareholding
- The materiality of the issue(s)
- The perceived risk associated with an issue
- Investment objectives and strategies of the funds and accounts investing in the portfolio company
- Applicable legal and regulatory considerations
- The context in which an issue arises (e.g. event driven, portfolio or stock reviews, annual general meetings, company consultations or roadshows etc)
- The scope to effect meaningful change
- Opportunities to collaborate with, or support other, aligned shareholders
- The relative size of assets in different regions and any practical limitations associated with engagement

Given time and resource implications we do not seek to engage on all issues, while in other cases extensive multi-year engagements may take place. The approach to and prioritisation of issues is an internal one framed within an investment context.

Similarly, while we aim to vote at every company general meeting for which we have authority to exercise voting rights, it is not our practice to attend company general meetings as a matter of course. We will however, attend them where we feel it is appropriate to show support to the board of directors; as follow up to engagement (e.g. where the company has committed to making a statement that is related to that engagement); or where issues of such concern arise that we consider it appropriate, as a last resort, to raise them with the board at the general meeting.

We also have a strong preference for carrying out our Engagement Activities in confidence – particularly initial discussions – to enable honest, open and frank discussions to take place with the companies of which we are shareholders. Nevertheless, we will discuss stewardship issues with other shareholders where appropriate (see Principle 5).

There are also occasions where, as part of the escalation process, we will make our views and concerns known publicly, as a matter of record, such as at an Annual General Meeting (AGM). In exceptional circumstances, where we decide that it is necessary and appropriate, we may comment publicly about a controversial situation at a company. This will generally be in a situation where engagement has proven ineffective in addressing concerns or on significant event driven issues where publicly advancing a minority shareholder perspective has merit and purpose. Such situations are coordinated by our Corporate Communications team in consultation with relevant investment teams and relevant members of investment leadership and relevant management.

Notwithstanding these principles, as an active manager we may otherwise choose to divest from or significantly reduce our capital commitment and exposure to certain holdings where we believe the risk profile is unattractive and/or engagement is unlikely to be able to effectively address our concerns. This is particularly the case should higher quality, alternative investment opportunities be available elsewhere consistent with the investment objectives and strategies of our relevant funds and accounts.

Engagement Escalation

- Routine engagement is undertaken by individual members of the fundamental analyst, portfolio management and responsible investment teams, collaborating with relevant colleagues.
- Where issues emerge that require engagement to be escalated, the above teams will collaborate to agree on an approach and the objectives of engagement (this includes proxy voting pursuant to the procedures and controls applied)
- Where engagement is further escalated, to target change, the relevant investment team heads will be involved in approving and overseeing the approach and objectives of engagement. The Global Head of Equities, Fixed Income or Research (or their deputies), as appropriate, and the heads of other relevant teams (e.g. legal & compliance) are consulted.
- Where engagement is further escalated, to become a public intervention (e.g. requisitioning a resolution) legal and compliance teams will be consulted and involved, with approval sought from the Global Head of Equities, Fixed Income or Research (or their deputies), as appropriate. The Global CIO or deputy CIO are consulted, and the relevant Investment Oversight or Management Committees notified.
- For a major 'intervention' (e.g. requisitioning a general meeting or forming a group to "act in concert") the Global Head of Equities, Fixed Income or Research (or their deputies), as appropriate, as well as the legal and compliance teams are consulted and involved in the planning and assessment. Approval is sought from the Global CIO or deputy CIO and the relevant Investment Oversight or Management Committees notified.

PRINCIPLE 5

Institutional investors should be willing to act collectively with other investors where appropriate

The share ownership of a company is often dispersed and, for a shareholder's voice to have weight, it often (but not always) requires a reasonable number of shareholders to be engaged to address issues effectively. We are, therefore, active supporters of dialogue amongst investors and, when appropriate, collaborative engagement. In the case of interventions, more restrictive and focused approaches are used, to ensure regulatory standards are adhered to and related risks are properly managed.

The potential scope of collaborative activities is described in the table shown under Principle 4 and may, in exceptional circumstances, include us 'acting in concert' with other external shareholders in a formal capacity where we feel appropriate to do so. In considering collaborative engagement, many issues must be considered including prioritisation of activities, trust, alignment of interests, confidentiality, shared objectives, applicable legal and regulatory considerations, agreement on strategy and potential escalation, as well as the potential to enhance the outcome and probability of change.

Where we do not have active or major holdings, but share concerns raised by larger shareholders and support the objectives of their engagement, we may be open to lending those shareholders our support. Similarly, we may support and work collaboratively with bodies such as the Investment Company Institute, Investor Forum, Principles for Responsible Investment (PRI), investor networks and other organisations of which we are members.

Our overriding duty is owed to our clients and the objectives and values they have chosen to integrate in the strategies we deliver for them. Our priorities and focus will reflect this, and our stewardship approach is framed within that context and focus.

Some of the terminology and frameworks used to organise our stewardship and wider responsible investment work have also been adopted by advocacy groups in pursuit of their own goals and objectives. While there may be overlap in the tools used and work undertaken to assess and address the issues around which these dynamics play out, the priorities of advocates (as well as the approach adopted and objectives set) can differ significantly from our own.

PRINCIPLE 6

Institutional investors should have a clear policy on voting and disclosure of voting activity

Our Responsible Investment Policies encompasses Columbia Threadneedle Investment's Voting Principles, which are published on our website.

Our Voting Principles describe our views on key governance issues used to inform our monitoring and assessment of companies; they also underpin and shape the approach we use to make our voting decisions. An internal application guide and underlying market and/or regional voting policy benchmarks have also been developed. Together, these documents provide the framework within which custom voting research is generated to flag issues and inform discussions between the RI team and portfolio managers.

Reflecting our philosophy of integrating ESG considerations into our processes, we may take voting action if we consider risk management practice to be in need of material improvement. For further information and context please see our Responsible Investment Principles which are published on our website (see 'Related Documents' section below for the weblink).

As previously noted, we recognise that companies are not homogeneous and some variation in governance structures and practice is to be expected. Within practical limits we aim, where possible, to raise issues of concern and engage with companies ahead of shareholder (general) meetings (e.g. AGMs). Nevertheless, in making final voting decisions we will be mindful of the overriding best interests of our clients, as well as the role proxy voting has in promoting good standards of corporate governance and signalling areas of potential concern and sensitivity around a company's practices.

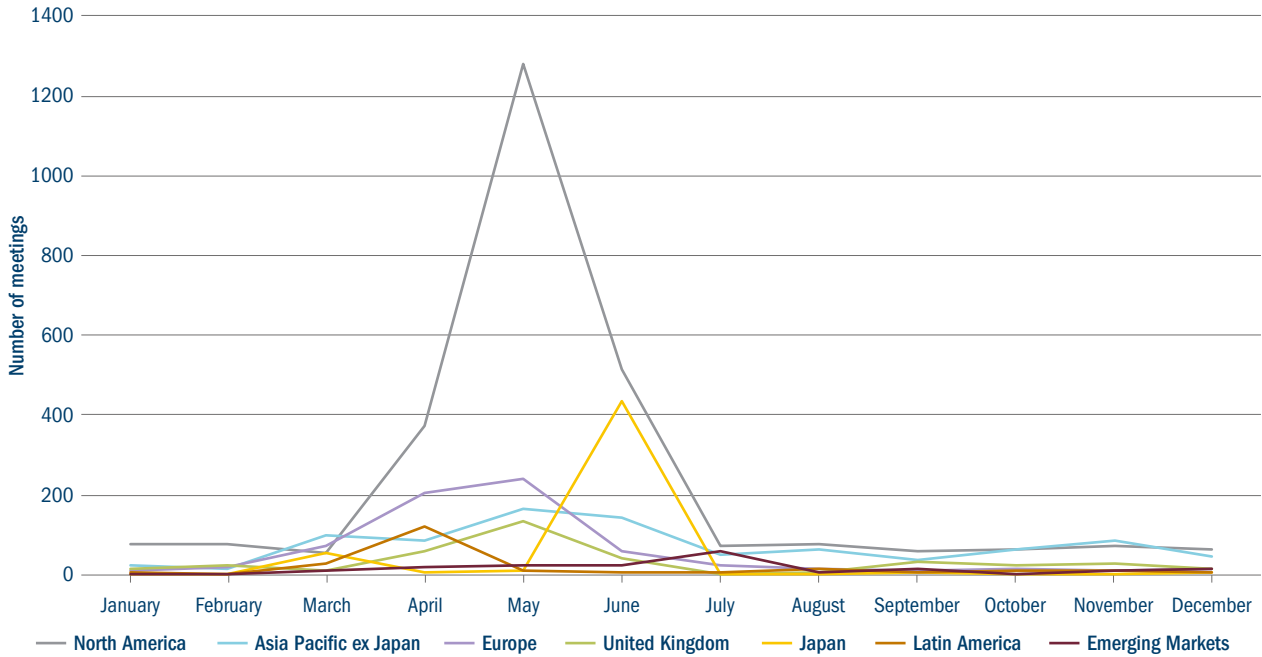
We seek to vote all shares where we have authority to do so – representing across approximately 70 markets – and make quarterly voting reports available to clients as well as publishing our voting decisions (see Principle 7). That said, for practical reasons (e.g. administrative share blocking, record date arrangements, powers of attorney issues, securities are out on loan, etc.) there may be cases where some or all of our holdings are not voted. In practice, we consistently vote at over 99% of meetings where we have voting rights.

General Meeting and proxy voting research and initial voting recommendations are generated to reflect our Voting principles and related internal guidelines. As part of this process, to flag potential issues and supplement our own analysis and assessments, research is sourced from external providers such as the Investment Association's IVIS service (UK) and Institutional Shareholder Services (ISS, globally) and Glass Lewis & Co. Where client mandates are segregated we can also implement voting either in line with a pre-defined bespoke voting arrangement or otherwise under client direction.

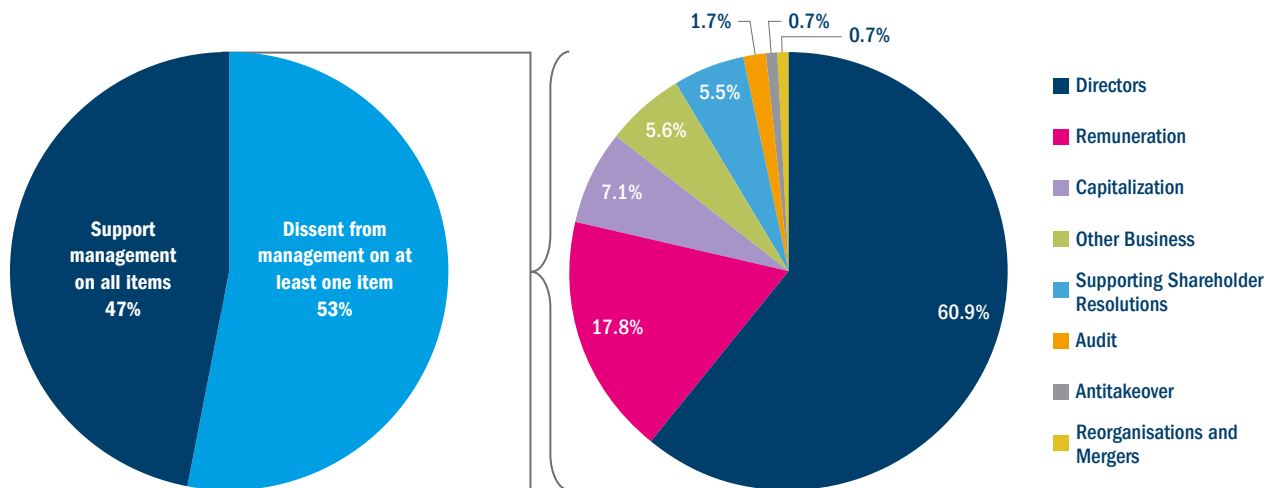
We do not currently undertake stock lending activities on the discretionary accounts we manage. However, our clients may participate in stock lending programs, in their own right. Where clients provide for it, and it is appropriate, we may engage with them to seek the recall of stock loaned out for proxy voting purposes.

Vote administration and execution is undertaken by a specialist team of proxy voting analysts using the ISS's Proxy Exchange platform to transmit our voting instructions. Voting instructions are provided by the RI team; the instructions themselves reflect decisions agreed between the RI team and the relevant investment desk and may be informed by engagement with companies to seek clarification ahead of votes being cast. Arrangements are maintained to monitor, review and confirm the resulting voting instructions issued by the proxy team.

Proxy Voting Activity (2019 calendar year)



Source: Columbia Threadneedle Investments, as at 31 December 2019.



Source: Columbia Threadneedle Investments, ISS ProxyExchange, 31 December 2019.

PRINCIPLE 7

Institutional investors should report periodically on their stewardship and voting activities

We attach considerable importance to ensuring that we are transparent to our clients and that they are kept informed of the types of activities we undertake on their behalf, including related developments. To that end, depending on client and fund requirements, we produce a range of reports such as:

- A quarterly ESG review providing examples of ESG integration activities, engagements and wider investment relevant developments, as well as a summary of our voting activities.
- Fund voting reports (usually quarterly)
- Our voting decisions are disclosed publicly in accordance with regional arrangements and legal and regulatory requirements.
- Ad hoc meetings, client training and briefings.

Our RI team activities and controls are subject to regular review by our external auditors. Our EMEA business, headquartered in the UK, has obtained an independent assurance Opinion on the stewardship and voting policies and practices. The scope of this Opinion included assurance on our application of Principles 1, 2, 4, 6 and 7 of the UK Stewardship Code, in line with the AAF 01/06 framework.

On an ongoing basis, where appropriate, our procedures and controls are subject to independent review under Columbia Threadneedle Investment's EMEA ISAE assurance framework, reflecting the fact that Ameriprise Financial Inc. is regulated under U.S. law. Additional reviews, as part of ongoing internal programs, led for example by internal audit, are periodically undertaken, including for the US Responsible Investment and proxy voting activities, when required by their workplans and priorities.

For further information on our Stewardship policies and practices, please email our teams at:

For EMEA enquiries: emea.stewardship@columbiathreadneedle.com

For U.S. enquiries: us.stewardship@columbiathreadneedle.com

Important Information

Given different market and regulatory contexts, regional practices may vary to reflect regulatory or operational needs. Where appropriate, we draw attention to regional specific arrangements at the end of relevant sections.

Stewardship assessments and the prioritisation of related activities form just one part of an overall investment process. As such, our approach to stewardship should not be relied upon by a third party to assume any assurance around the potential merits or risks inherent in an investment. Nor should there be an expectation that our approach will focus on, assess the materiality of or prioritise issues in the same way or to the same extent that other stakeholders or third parties do.

APPENDIX 1

U.S. Investor Stewardship Group Principles

The Investor Stewardship Group (ISG) is a collective of U.S. and international institutional investors and was formed to establish a framework of basic standards of investment stewardship and corporate governance for the U.S. The result is the framework for U.S. Stewardship and Governance comprising of a set of stewardship principles for institutional investors and corporate governance principles for U.S. listed companies. Columbia Threadneedle Investments is a signatory.

The stewardship framework seeks to articulate a set of fundamental stewardship responsibilities for institutional investors. ISG believes that investors should implement the stewardship principles in a manner they deem appropriate. The ISG encourages institutional investors to be transparent in their proxy voting and engagement guidelines and to align them with the stewardship principles.

ISG Reference	ISG Principle	Columbia Threadneedle Investment's Stewardship Principles & Approach
Principle A	Institutional investors are accountable to those whose money they invest.	See Introduction
Principle B	Institutional investors should demonstrate how they evaluate corporate governance factors with respect to the companies in which they invest.	See Principle 1
Principle C	Institutional investors should disclose, in general terms, how they manage potential conflicts of interest that may arise in their proxy voting and Engagement Activities.	See Principle 2
Principle D	Institutional investors are responsible for proxy voting decisions and should monitor the relevant activities and policies of third parties that advise them on those decisions.	See Principle 6
Principle E	Institutional investors should address and attempt to resolve differences with companies in a constructive and pragmatic manner.	See Principles 3 & 4
Principle F	Institutional investors should work together, where appropriate, to encourage the adoption and implementation of the Corporate Governance and Stewardship principles.	See Principle 5

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