



# STEWARDSHIP STATEMENT 2023 FOR THE MALAYSIAN CODE FOR INSTITUTIONAL INVESTORS

Eastspring Investments Berhad

31 December 2023

#### **INTRODUCTION**

Stewardship has always been strongly connected to our shared purpose – For Every Life, For Every Future. It guides everything we do as an active asset manager to serve our clients' long-term financial interest. This includes putting responsible investment at the core of our investment approach as we acknowledge the importance of accountability to our clients for the stewardship of their assets entrusted to us.

Eastspring group is a signatory to United Nations-supported Principles for Responsible Investment ("PRI") and has been supporting our parent company, Prudential plc towards its ambition to be a net zero asset owner by 2050. Eastspring Investments Berhad is fully committed in this journey and has been a signatory to the Malaysian Code for Institutional Investors ("Code") since January 2021. The Code sets out broad principles of effective stewardship by institutional investors to ensure delivery of sustainable long-term value.

2023 has been a fruitful year for responsible investment at Eastspring. Eastspring group rolled out the group responsible investment policy in January 2023 which was adopted by all business units and reflected in our investment department policies respectively. The group also published its first Responsible Investment Report to showcase achievements in integrating Environmental, Social, and Governance ("ESG") into the way we invest. In Malaysia, we rolled out tools to track our engagement activities and monitor controversies to support the implementation of our ESG engagement strategies, which we formalized this year. In addition, we gained positive momentum from our participation in the ongoing collaborative engagement under the Asian Utilities Engagement Program facilitated by the Asia Investor Group on Climate Change. We are pleased that our efforts in responsible investment continue to translate into trust from our clients with new net inflows for ESG mandates this year, following our first win in the previous year.

This is our third statement describing our approach to responsible investment and stewardship and shares our progress in applying the principles of the Code at Eastspring Investments Berhad. It is prepared in reference to the 2022 edition of the Code issued by the Institutional Investors Council Malaysia and is publicly available on our corporate website.

Raymond Tang

Chief Executive Officer

Eastspring Investments Berhad

#### PRINCIPLE 1

## **Disclosing Policies on Stewardship**

Institutional investors should disclose the policies on their stewardship responsibilities and review the effectiveness of their stewardship activities.

At Eastspring Investments Berhad ("EIB"), responsible investment is an integral part of our asset management activities. Responsible investment includes the explicit incorporation of material ESG issues into our activities as an investor – both before we make investment decisions and during the period an investment is held. Our investment beliefs as they relate to responsible investment are:

- Integrating ESG results in better investment decisions. We believe that incorporating material ESG considerations into the investment process can add value which can result in higher risk-adjusted returns for our clients over the long term.
- ▶ Engaging with investee entities can be constructive. We recognise that responsible investment requires a patient approach and an understanding that improvement in corporate behaviour can support investor value over time. We believe that companies that adopt sustainable business practices are more likely to deliver superior value in the long-term.
- Active ownership is preferable to exclusion. We believe that hard exclusions from our investment universe should be utilised as a last resort, where ESG risks are insurmountable or where continued engagement is considered ineffective. Rather, seeking change in corporate behaviour through engagement is more likely to have real-world impact.
- **Transparency to our clients is important**. We believe that providing transparency on our ESG activities helps our clients understand our priorities and impact.

Our stewardship activities with our investee companies, regulators and other stakeholders are guided by EIB's Responsible Investment Policy ("RI Policy") which is aligned with the Eastspring Group Responsible Investment Policy and our parent company Prudential plc's Group Responsible Investment Policy, where applicable. The RI Policy is applicable to all strategies that we directly manage and supported by Eastspring group ESG Risk Management Framework. In the case of third-party client mandates and funds delegated to third parties, we look to meet client requirements with a close alignment to expectations outlined in the RI Policy.

The Eastspring Group Responsible Investment Policy went into force on 1<sup>st</sup> January 2023 and was thereafter reflected in our RI Policy. The Eastspring Group Responsible Investment Policy can be found on our <u>corporate website</u>. We are committed to an ongoing process of improving our approach to responsible investment. As our internal strategies evolve, or where we notice shifts in external expectations in line with industry best practices, we expect the RI Policy to evolve over time to reflect those changes.

To ensure effective stewardship internally, Eastspring group has a robust governance structure in place to uphold oversight and accountability at all levels:



The Eastspring group Board of Directors ("Board") oversees senior management represented on the Eastspring group Executive Management Committee ("EMC"), which drives the day-to-day operation of

- the firm globally and therefore have ownership and bear ultimate responsibility in the setting of the Eastspring group responsible investment strategy.
- The Eastspring group Sustainability Committee, chaired by the Chief Executive Officer of Eastspring group, is a management committee of the EMC and is designated responsibility by the Board to oversee the execution of Eastspring group's responsible investment activities. This includes serving as a forum for decision making and as a sponsor of resource allocation to strategic sustainability and responsible investment priorities.
- The Sustainability Committee oversees five sustainability workstreams, comprising of cross-functional representation across our business including EIB, that collaborate to build capacity, make progress in priority areas and facilitate ongoing continuous improvement towards our own sustainability ambitions.
- The Head of Sustainability, who sits on the EMC and Sustainability Committee, is the delegated owner of the Eastspring Group Responsible Investment Policy and is responsible for conducting an annual review to ensure that it remains updated. All changes will be approved via the Sustainability Committee.

All investment professionals at EIB are responsible for assessing and integrating ESG risks and opportunities into the investment process, rather than outsourcing this responsibility to dedicated ESG or stewardship specialists.

To maintain the effectiveness of our stewardship activities, we are committed to continue building our capabilities in responsible investment and stewardship. We require the investment team to complete either the Applied Responsible Investment or Advanced Responsible Investment Analysis course from the PRI Academy. We also strongly encourage our staff to undertake the Certificate in ESG Investing from CFA Institute. As part of EIB's standard onboarding process for all new staff, they need to complete an introductory course on responsible investment by WWF. We also regularly keep the investment team abreast of new developments in the ESG field via a weekly ESG bulletin.

## **PRINCIPLE 2**

## **Monitoring Investee Companies**

Institutional investors should monitor their investee companies.

As part of our investment process, we actively research and monitor our investee companies on a wide range of topics which could include financials, governance, corporate strategy, transparency, capital allocation and material ESG-related matters. Our analysts and portfolio managers have significant contact with the management of companies and cross check with suppliers, clients and competitors on these topics.

Our focus in all these regular interactions with our investee companies is on achieving a firm understanding of the underlying drivers of the company's long-term earnings power and how well they are managing material ESG risks and opportunities. These interactions are also instrumental for us to provide shareholder views on areas of concern to the investee companies.

We have identified four ESG themes that are particularly relevant to our responsible investment approach. This list will be expanded as our RI Policy evolves alongside developments in industry standards and in alignment with Eastspring Group Responsible Investment Policy and Prudential plc's Group Responsible Investment Policy. These ESG themes and their respective strategies are as follows:

ESG Theme	Our Strategy
Climate Change & Just Transition	Through engagement, we encourage companies to develop, implement and disclose a credible strategy to transition to a low-carbon future. Our approach may include exclusion based on revenue threshold or as instructed by clients. Examples of climate-related indicators that we actively monitor include weighted average
	carbon emissions ("WACI") and absolute carbon emissions.

Palm Oil	We classify palm oil producers according to the percentage of its palm oil holdings or estates that are certified by the Roundtable of Sustainable Palm Oil ("RSPO").					
	% RSPO Certi	fication	Categorisation			
	0% - 20%		Worst Performers			
	20% - 80%		Improvement Needed			
	80% - 100%		Best in Class			
	We will conduct engagement with palm oil producers if they are not categorized as best in class.					
Human Rights	We seek to identify violators of the ten United Nations Global Compact ("UNGC") principles to improve their conduct and improve compliance with international agreements on four topics: human rights, labour, environment and anticorruption.					
	Assessment	Definition				
	Fail	Violating one or more of the ten UNGC principles				
	Watch List	Close to violating one or more of the ten UNGC principles				
	Pass	Not violatin	g the ten UNGC principles			
	We conduct engagement with companies labelled as "Fail" and will continue to monitor companies labelled as "Watch List" when making investment decisions for both existing and new holdings.					
Business Ethics & Governance	We identify companies that may have outstanding or new controversies in business ethics for engagement.					

This process is complemented by third party ESG data and ratings provider MSCI ESG Research. This year, we rolled out tools to monitor ESG controversies in a timely manner throughout the investment period. This allows us to identify companies for further impact analysis or to develop an engagement plan. Details of our engagement approach can be found in the following section.

We also monitor our investee companies by exercising our voting rights via proxy voting. However, we may also elect to attend meetings if we prefer to pose questions to the board. Details of our voting policy can be found on page 8.

#### **PRINCIPLE 3**

#### **Engaging Investee Companies**

Institutional investors should engage with investee companies as appropriate and collaborate with other investors to enhance engagement outcomes.

Engagement with investee companies is core to our active ownership responsibilities. We aim to encourage business and management practices that support positive enhancement of material ESG traits or mitigation of material ESG risks across our holdings through constructive engagement based on our in-depth knowledge of our investments in the context of their business environment. This includes ESG disclosures which we believe remains a systemic challenge for our market. Thus, where gaps are identified, we encourage our investee companies to make quantitative and qualitative ESG disclosure publicly.

We evaluate material ESG risks, which may differ across companies, sectors and asset classes. The level of engagement will therefore vary based on materiality, the size of investment and the nature of the risks themselves. As long-term investors, we adopt a patient timeframe, as we believe that this can improve the probability of achieving value-added outcomes.

Judgement is applied in all engagements and the strategy for escalation will be determined on a case-by-case basis due to each having unique circumstances. When the outcome of our engagement does not meet with our expectations, we may choose to employ the following engagement escalation measures for our direct holdings:

- Direct Dialogue with Management: We may highlight our concerns on the company's progress in direct dialogues with appropriate management representatives or non-executive directors. By leveraging on our ongoing communication channels, we seek to foster understanding and collaboration in addressing key concerns.
- Collaborative Engagement: We may express our concerns to company management collectively with other investors, as part of a collaborative engagement exercise, where we believe it to be in our client's best interests to do so, while respecting market rules. By harnessing a collective voice with fellow investors, we seek to maximise investor influence to amplify concerns.
- Proxy Voting: By exercising our votes, we seek both to add value and to protect our interests as shareholders. This may include voting against management-supported resolutions, supporting shareholder resolutions or voting against or withholding votes in relation to director re-elections. Where instructed, we will vote according to our client's voting policy.
- **Divestment** as Last Resort: We may choose to exit from the investment as a last resort, where there is evidence to suggest that identified material risks sufficiently impact our conviction and where we believe engagement is likely to fail. By exercising an exit as a last resort, we seek to uphold accountability and protect our clients' interests as investors.

In addition to engagements conducted by EIB, Eastspring group's Central Engagement Programme allows Eastspring as a group to express our expectations on material ESG themes to targeted investee companies, which may include Malaysian companies. Details and progress of the Central Engagement Program can be found in the Eastspring group Responsible Investment Report 2022 on our corporate website.

We believe that collaboration amongst investors is an effective way to address ESG issues and maximise investor influence. Eastspring group is a member of Asia Investor Group on Climate Change ("AIGCC") and Climate Action 100+ and EIB is a member of Institutional Investors Council Malaysia ("IIC").

To facilitate our engagement activities, we adopted the Eastspring group's ESG Engagement dashboard which allows for timely monitoring and escalation. This year, our team conducted a total of 761 engagements respectively, of which 3 were collaborative engagements under AIGCC. Climate change and governance were key material ESG topics discussed with our investee companies. Latest progress on our collaborative engagement through the AIGCC Asian Utilities Engagement Program with a major Malaysian utility company can be found on page 9.

## Case Study – Engagements with a Malaysian major independent power producer on climate change

#### **Background**

In addition to our collaborative engagements with a Malaysian major utility company under AIGCC's Asian Utilities Engagement Program since 2021, we initiated engagement with a Malaysian major independent power producer in December 2022, given its strategic role in decarbonizing the Malaysian economy. At the point of initiation, the company had already established its climate strategy to achieve zero Scope 1 & 2 emissions by 2050 supported by targets to reduce GHG emissions intensity and increase renewable energy capacity by 2031. With this in mind, the objectives of the engagements were to accelerate the company's climate actions towards best practices which included the following:

- 1. Align climate strategy & disclosure with TCFD recommendations supported by near-term GHG emissions reduction targets and commit to the Science-based Targets Initiative (SBTi)
- 2. Enhance climate-related disclosures to include firm-wide carbon inventory and Scope 3 emissions
- 3. Issue sustainable bonds to support its transition

#### Action

In our first engagement, we managed to reach an agreement with the company in setting timebound milestones in line with the above objectives. Subsequently, we conducted follow up meetings with the company this year to understand its progress and challenges based on these milestones.

#### Outcome

Since our first engagement in December 2022, the company has made notable progress towards the agreed milestones. After the company engaged with its internal stakeholders, it began the process of finalising its near-term ESG targets. These targets would be subsequently endorsed by its newly set up Sustainability Committee. The company had also disclosed its carbon emissions with expanded scope in its latest annual report. The company has aimed to account for Scope 1 & 2 emissions within its remaining assets in Malaysia as well as Scope 3 emissions with the plan to onboard a digital carbon accounting system soon. Lastly, the company would continue to actively explore the issuance of sustainable bonds to expand its green portfolio. This year, it was involved in an ASEAN Green SRI Sukuk issuance which would be used to finance small hydropower projects in Kelantan. Moving forward, we will continue our engagement with the company to monitor its progress towards the milestones.

#### **PRINCIPLE 4**

## Managing Conflicts of Interest ("COI")

Institutional investors should adopt a policy on managing conflicts of interest which should be publicly disclosed.

We are committed to engaging in honest and ethical conduct, including the ethical handling of actual or apparent conflicts of interest between personal and professional relationships, as well as conflicts which may affect relationships with our clients. Guided by Prudential plc's Group Code of Business Conduct which is published at its website, Prudential plc's Group Responsible Investment Policy and Eastspring Group Responsible Investment Policy, we have put in place robust company policies to prevent actual, potential or perceived conflict of interest such as insider information, anti-bribery, anti-money laundering and establishment of "Chinese Wall". In this regard our management of conflicts of interest covers the following areas:

- dedicated policy on identification and management of conflicts of interest
- compliance manual which covers obligations, controls and areas of conflicts
- personal investment dealings on approvals and disclosures required
- anti-bribery & corruption on specific controls for gifts & hospitality and the relevant due diligence and monitoring of third party service providers and suppliers
- anti-money laundering and counter-terrorism financing on relevant controls to guard against money laundering and terrorism financing of clients and third parties that we deal with
- information security on controls of clients' data and protection of sensitive information
- dealing and trade management to ensure priority given to trades of clients and fair trade practices in the interest of clients
- soft commission to ensure it is done to benefit the client

These policies are communicated to all affected employees and contractors where applicable. Our Risk, Compliance and Legal ("RCL") Department as the second line function on a risk-based approach performs the relevant oversight on the execution of these policies by the first line functions. Outcomes of oversight are reported to the board on a periodic basis.

From time to time, proxy voting proposals may raise conflicts between the interests of our clients and the interests of EIB and its employees. While we do not get involved in the board or management of our investee companies, our voting policy identifies and manages such conflicts of interest to ensure and demonstrate that our decision to vote is based on the clients' best interest and is not the product of those

conflicts. Where actual, perceived or potential conflicts are identified, the conflicts will be raised, escalated and resolved based on the requirements set in the relevant company's policies on management of COI.

#### **PRINCIPLE 5**

#### **Incorporating Sustainability Considerations**

Institutional investors should incorporate corporate governance and sustainability considerations, including climate-related matters into the investment decision-making process while seeking to deliver sustainable returns in the long-term interest of their beneficiaries or clients.

ESG integration is an essential component of our investment analysis process and it is guided by the following:

- Focus on materiality: The relevance and magnitude of impact pertaining to each material ESG issue across a given investment horizon may be considered in the context of the market, sector, level of ownership and track record of operation. Consideration of the potential impact of the issue should incorporate management's willingness and ability to mitigate material ESG risks and exploit profitable ESG opportunities on a forward-looking basis. Assessments will be monitored and periodically reviewed.
- Active ownership: As active investors, assessments of the impact of material ESG issues on a particular direct holding will be monitored and periodically reviewed. We may play a role in encouraging and motivating changes that improve the material ESG characteristics or mitigate material ESG risks of investments and portfolios.

We utilise internal and external resources to assist in the analysis of material ESG issues which are incorporated into decision making and engagement activities. These include public disclosures and information we acquire from engaging with company management, industry players, regulators and media report. Since 2021, we have been subscribing to third party ESG data and ratings provider MSCI ESG Research to supplement our in-house ESG research on controversies and material ESG issues. In addition, we have included climate risk assessments developed in reference to the Bank Negara Malaysia Climate Change and Principles-based Taxonomy into our research to better understand climate risk management of our investee companies. We are mindful of data quality and availability issues and will factor this into our assessment of materiality. Where possible, we will monitor and engage with data providers and investee companies to address these issues.

In addition to exclusions mandated by our clients, we acknowledge that certain businesses and their activities are of detriment to the communities and wider society that they operate in. We deem investments in these companies as incompatible with our RI Policy and apply the following exclusions to comingled investment vehicles under the direct control of EIB, including unit trusts. To ensure alignment, we utilize independent third party data to identify companies for exclusion. Full list of excluded companies can be found in Eastspring Group Responsible Investment Policy.

Exclusion	Definition
Controversial	Companies identified in accordance with definitions set by international
Weapons	conventions and treaties.

Clu Mu An Mii	uster unitions nti-Personnel ines	Conventions / Treaties  The Convention on Cluster Munitions ("Oslo Treaty")  UN Convention on the Prohibition of the Use, Stockpiling, Production and Transfer of Anti-Personnel Mines and on their Destruction 2997 ("Ottawa Convention")  UN Convention on the Prohibition of the
Min	ological	the Use, Stockpiling, Production and Transfer of Anti-Personnel Mines and on their Destruction 2997 ("Ottawa Convention") UN Convention on the Prohibition of the
27102-201	and the second s	
	eapons	Development, Production and Stockpiling of Bacteriological (Biological) and Toxin Weapons and on their Destruction
	nemical eapons	UN Convention on the Prohibition of the Development, Production, Stockpiling and Use of Chemical Weapons and on Their Destruction
We	uclear eapons on-NPT	UN Treaty on the Non-Proliferation of Nuclear Weapons ("NPT")

#### **PRINCIPLE 6**

## **Publishing Corporate Governance Policy and Voting Guidelines**

Institutional investors should publicly disclose their corporate governance policy and voting guidelines

We exercise our voting rights as shareholders on best effort basis in the companies in which we invest in furtherance of the goal to maximize shareholder value consistent with the funds' investment objectives. We seek to add value for our clients by pursuing an active and informed policy which includes voting on resolutions at general meetings in line with our voting policy, supported by monitoring on company development over time and assessing its progress against objectives.

Considering the latest market developments and Malaysian Code on Corporate Governance, our voting policy follows a principles-based approach to govern our voting actions on board, corporate action, remuneration, related party transactions and other ESG issues for our investee companies and link them with our engagement activities.

Where possible, we would seek to discuss any contentious resolutions before casting our votes in order to ensure that our objectives are understood and our votes are cast in the best interests of our clients. However, we may decide to not vote proxies or abstain from voting where the costs are prohibitive and would not serve the shareholders' interest, or in some cases not allowed to do so under certain regulations.

We subscribe to Institutional Shareholder Inc. ("ISS"), a proxy advisory firm that assists with proxy voting and corporate governance matters. While ISS provides proxy voting recommendations, our voting policy governs how we vote on each resolution. Generally, it is not our policy to accept client standing instructions unless specified by mandate.

A summary of our voting activities for Malaysian securities in 2023 are shown below. Those resolutions we voted against were executed in line with our voting policy.

Voting Overview				
Total number of shareholder meetings at which our clients' shares were voted	198			
Total number of votable items	1,601			
Total number of items voted	1,580			
Percentage of items voted	99%			

Voting Instruction		
Percentage of votes FOR	85%	
Percentage of votes AGAINST	15%	
Percentage of votes ABSTAIN	0%	

as at 31 Dec 2023 (data is rounded to the nearest whole number, with trace amount of abstain votes)

#### PRINCIPLE 7

## **Collaborative Response on Corporate Governance and Sustainability Issues**

We believe that collaboration amongst investors is an effective way to address ESG issues and maximise investor influence. We are active members of collaborative organisations. From time to time, we may participate in collaborative engagement initiatives where we believe it to be in our clients' best interests to do so, while respecting market rules. In 2023, Eastspring group consolidated all groupwide memberships under our group entity, Eastspring Investments Group Private Limited. Full list of memberships and affiliations for Eastspring group can be found in Eastspring Group Responsible Investment Policy.

Asia Investor Group on Climate Change ("AIGCC") is an initiative participated by investor members including asset owners and managers with combined AUM of over US\$32 trillion. It connects, collaborates and advocates on behalf of its member investors to accelerate progress and action on climate change, responsibly manage long term risks and opportunities, and drive sustainable returns for investors and the beneficiaries its members represent across Asia. Since 2021, we have been participating in AIGCC's Asian Utilities Engagement Program, which complements and runs in parallel with the global Climate Action 100+ initiative, to engage with senior management of a Malaysian major utility company to encourage alignment with the Paris Agreement.

## Case Study – Collaborative engagements with a Malaysian major utility company under AIGCC's Asian Utilities Engagement Program

## Background

The Asian electric utility sector is critical to the net zero transition as it contributes to approximately 23% of global carbon dioxide emissions. Seven Asian utility companies, including one in Malaysia, were selected by AIGCC's Asian Utilities Engagement Program due to substantial greenhouse gas emissions, large coal-fired power capacity or due to their strategic role in driving the net zero emissions transition. Our team participated in collaborative engagements with the Malaysian major utility company under this program.

#### Action

Since July 2021, we have conducted 5 collaborative engagements with the company to address its renewable energy ambitions including technology applications, its overseas acquisitions and its plans to reduce reliance on coal via energy transition. This year, we conducted 2 engagements with the company

and shared case studies on carbon capture, climate key performance indicators ("KPI") and possible models for early retirement of coal-fired power plants.

#### Outcome

Following notable progress made in previous years, the company continued its momentum on climate actions this year. The company established climate-related remuneration KPI at executive level with sizable weightage. While the company continues to explore early retirement of its coal-fired power plants, it reaffirmed its capabilities in grid upgrade to accommodate higher RE capacities and announced new RE projects in Malaysia in line with the recently released National Energy Transition Roadmap towards achieving the national target of 70% RE capacity by 2050. Early retirement of its coal-fired power plants will continue to be the priority for our engagement with the company in 2024.

Where appropriate, we engage with regulatory bodies, policymakers and other stakeholders in efforts to improve the ecosystem for investor stewardship in Malaysia. Our CEO, Raymond Tang is currently a board member of IIC and has been contributing to the development of IIC as well as the latest Malaysian Code for Institutional Investors.

This year, we continue to provide feedback via various channels on the development of ESG policies that are relevant to the Malaysia market:

- In June, together with senior leaders from asset owners, asset managers, utilities, regulators and government agencies, we participated in the Malaysia Energy Transition Roundtable organized by AIGCC and Capital Market Malaysia to discuss issues and potential solutions towards Malaysia's energy transition ambition.
- In June, we participated in the International Sustainability Standards Board ("ISSB") consultation for Agenda Priorities via Malaysian Accounting Standards Board Working Group 71 on Sustainability Reporting.
- In November, together with representatives from investors, corporates, regulators and assurance providers, we participated in a consultation session organized by the Advisory Committee on Sustainability Reporting, a national-level inter-agency committee, to provide feedback on the adoption of the ISSB standards in developing the National Sustainability Reporting Framework.

For more information, please contact us via email below: Lim Wei Ren wei.ren.lim@eastspring.com

