

# 2022 SASB Index

24 March 2023

We have aligned our reporting against the Sustainability Accounting Standards Board (SASB) disclosure framework. Reporting is presented in accordance with the SASB Standard for Asset Management and Custody Activities.

Schroders' 2022 SASB Index ('Index') is provided for Schroders plc (together, with its subsidiaries, unless the context otherwise indicates, 'Schroders' or the 'Company' or the 'firm'). All data in this Index is as at or for the year ended 31 December 2022, unless otherwise stated. The contents presented in this Index should not be interpreted as an opinion on the materiality or financial impact of this information.

The table below summarises Schroders' SASB alignment.

## Transparent Information and Fair Advice for Customers

| Code                | Accounting metric  | Details  |
|---------------------|--|--|
| <b>FN-AC-270a.1</b> | (1) Number and (2) percentage of covered employees with a record of investment-related investigations, consumer-initiated complaints, private civil litigations, or other regulatory proceedings | <p>There were no covered employees with a current record of investment-related investigations, consumer-initiated complaints, private civil litigations, or other regulatory proceedings which we consider might adversely impact their role at Schroders.</p> <p>Schroders has policies and procedures designed to ensure compliance with rules and regulations that includes registering employees correctly, and the timely and accurate filing of regulatory returns by the firm and its employees.</p>  |
| <b>FN-AC-270a.2</b> | Total amount of monetary losses as a result of legal proceedings associated with marketing and communication of financial product-related information to new and returning customers             | <p>There were no monetary losses as a result of legal proceedings associated with the marketing and communications of financial product-related information to new and returning customers during the year.</p>  |
| <b>FN-AC-270a.3</b> | Description of approach to informing customers about products and services   | <p><b>General approach</b></p> <p>We communicate with our clients using various methods and processes, depending on the business, information being communicated, type of client, client domicile, type of account, investment strategy being utilised and investment vehicle, all of which can vary by prevailing regulatory framework.</p> <p>Our main communication methods are through our company website, email and regular mail messages, and in-person or virtual meetings.</p> <p>In addition, through the publication of our annual and quarterly Sustainable Investment reports, we demonstrate our engagement activity and progress in relation to sustainability-related activities. We share our research and thought leadership, and provide insights into innovations aimed at maintaining our status as a market leader in sustainability. We also publicly</p> |

| Code | Accounting metric | Details  |
|------|-------------------|--|
|      |                   | <p>disclose our global voting activity. More in-depth reporting on engagement and voting is supplied to clients.</p> <p><b>Client information publicly available</b></p> <p>Schroders provides a wide range of information to clients via our public <a href="#">website</a>. In addition, we have a dedicated <a href="#">Sustainability webpage</a>.</p> <p><b>Communication principles and protocols</b></p> <p>Our approach to mitigating the risk of the misleading marketing of products can be found on page 56 of our <a href="#">Climate Report</a>.</p> <p><b>Policies and procedures in relation to non-financial information</b></p> <p>Our policies and procedures in relation to non-financial information are described on page 48 of our <a href="#">Annual Report and Accounts 2022</a>. This covers information in regard to the environment, employees, social matters, human rights, and anti-bribery and anti-corruption.</p> |

## Employee Diversity and Inclusion

| Code         | Accounting metric   | Details   |
|--------------|---|---|
| FN-AC-330a.1 | Percentage of gender and racial/ethnic group representation for (1) executivemanagement, (2) non-executive management, (3) professionals, and (4) all other employees | Information on our gender representation, as well as our racial/ethnic group representation can be found in our <a href="#">Inclusion at Schroders Report</a> . |

## Incorporation of environmental, social, and governance factors in Investment Management and Advisory

| Code         | Accounting metric  | Details   |
|--------------|--|---|
| FN-AC-410a.1 | Amount of assets under management, by asset class, that employ (1) integration of environmental, social, and governance (ESG) issues, (2) sustainability themed investing, and (3) screening | <p><b>Consideration of ESG factors</b></p> <p>Our sustainability accreditation, proprietary tools and collaborative platform help us to integrate the consideration of ESG factors across our portfolios of managed assets. Please see our <a href="#">Climate Report</a> page 28 for more information.</p> <p><b>Sustainability themed investing</b></p> <p>We have classified a number of funds in our European fund range as either Article 8 or Article 9 under the EU's SFDR, and continue to develop more of these fund ranges. These products represent total AUM of more than £57.9 billion at 31 December 2022. Article 8 funds promote 'environment' or 'social' characteristics. Article 9 funds specifically have sustainable goals as their objective.</p> <p><b>Screening</b></p> <p>We apply screening to our assets under management through internally driven screens, as well as client-requested exclusions. We apply limited exclusionary screens to all managed assets and more extensive screens to many funds and mandates managed on behalf of our clients.</p> |

| Code         | Accounting metric   | Details  |
|--------------|---|--|
| FN-AC-410a.2 | Description of approach to incorporation of environmental, social, and governance (ESG) factors in investment and/or wealth management processes and strategies | <p>We have invested in and developed a range of proprietary tools to assess sustainability-related risks and opportunities. These tools allow fund managers and analysts to assess securities and portfolios to inform investment decisions. They are also used to assess portfolios as part of our compliance with regulations in several markets, as well as to help our clients assess the profile of the portfolios we manage for them.</p> <p>We continue to invest in developing climate scenario models to help our investment teams better understand the threats from climate change, as well as to identify the opportunities arising from the net zero transition. The Climate Analytics Framework aims to explore these specific risks and opportunities through different lenses to provide investment teams with a rounded view on the impacts of their investments.</p> <p><b>Asset Management</b></p> <p>Information on our approach to consideration of ESG factors in Schroders' Asset Management processes and strategies can be found in our <a href="#">Environmental, Social and Governance Policy for Listed Assets</a>.</p> <p><b>Wealth Management</b></p> <p>Information on our approach to consideration of ESG factors in our Wealth Management processes and strategies can be found in our <a href="#">ESG &amp; Stewardship Policy</a>.</p> |
| FN-AC-410a.3 | Description of proxy voting and investee engagement policies and procedures   | <p>Information on our disclosures around proxy voting and investee engagement policies and procedure can be found in our <a href="#">Environmental, Social and Governance Policy for Listed Assets</a>.</p> <p>Our most recent public UK Stewardship Code report can be found here: <a href="#">Stewardship Code 2021</a>. Schroders has been confirmed as a signatory for the latest round of reporting.</p> <p>Information on our voting records, along with our rationale, can be found on our <a href="#">website</a>.</p> <p>Information on our escalation process for engagements when dialogue is failing can be found in our award-winning <a href="#">Engagement Blueprint</a>.</p>   |

## Business Ethics

| Code         | Accounting metric  | Details   |
|--------------|--|---|
| FN-AC-510a.1 | Total amount of monetary losses as a result of legal proceedings associated with fraud, insider trading, anti-trust, anti-competitive behaviour, market manipulation, malpractice, or other related financial industry laws or regulations | <p>There were no monetary losses as a result of legal proceedings associated with fraud, insider trading, anti-trust, anti-competitive behaviour, market manipulation, malpractice, or other related financial industry laws or regulations during the year.</p> <p>From time to time and in common with other managers, Schroders may periodically make payments pursuant to non-judicial consumer complaints handling processes such as the Financial Ombudsman's Service. We have not included such payments in our response, which are immaterial to the group's financial position in any event.</p> |

| Code                | Accounting metric                                     | Details   |
|---------------------|---|---|
| <b>FN-AC-510a.2</b> | Description of whistle-blower policies and Procedures | <p>We promote high ethical standards and have a strong culture of doing the right thing for our clients, our employees, our shareholders and other stakeholders. We have a Whistleblowing Policy under which employees can raise concerns. A 24-hour hotline is available for employees to report concerns anonymously.</p> <p>Schroders regularly reviews and complies with whistleblowing legislation in all jurisdictions in which we operate. Our global policy requires us to apply the highest standards of whistle-blower protections which often exceed local legal or regulatory requirements.</p> |

### Activity metrics

| Code               | Accounting metric   | Details   |
|--------------------|---|---|
| <b>FN-AC-000.A</b> | Total registered and unregistered assets under management (AUM) | <p>We have £190.1 billion of registered assets subject to the regulations of the Investment Company Act of 1940 (1940 Act), ERISA and the UCITS directive. We have £426.4 billion of unregistered assets.</p>   |
| <b>FN-AC-000.B</b> | Total AUM   | <p>Please refer to pages 36 of our <a href="#">Annual Report and Accounts 2022</a> for information on our AUM. Our total AUM including Joint Ventures and Associates as at 31 December 2022 was £737.5 billion.</p> <p>Schroders has modified this metric to 'total assets under management' from 'total assets under custody and supervision' because assets under management is a more relevant activity metric for our business.</p> |