

## SUSTAINABLE FINANCE DISCLOSURE REGULATION: ARTICLE 10

# Global Short Fixed Income Lower Carbon ESG Screened Fund

IE000J2TE3M1 (AUD, Acc.) | IE000JA3S476 (EUR, Acc.) | IE000TIVIXI5 (EUR, Dis.) | IE000MBVK9Q9 (GBP, Acc.) | IE00009DUQ60 (GBP, Dis.) | IE000MYU75H0 (NOK, Dis.) | IE000J1YLV6 (SEK, Acc.) | IE000WXY2TK9 (USD, Acc.) | IE000WM8TSQ7 (USD, Dis.)

## A. Summary

This fund promotes environmental and/or social (E/S) characteristics, but does not have as its objective sustainable investment. No reference benchmark has been designated for the purpose of attaining the E/S characteristics promoted by the fund.

### E/S characteristics and investment strategy

The fund generally seeks to invest in direct holdings and **a minimum of 80% of its investments will be aligned with the E/S characteristics** promoted by the fund:

1. Lower exposure to companies and agency/supranational issuers with high **greenhouse gas emissions**: The fund reduces its weighted average **carbon intensity** exposures to companies relative to the corporate bond market and to agency/supranational issuers relative to the agency/supranational bond market by at least 50%.
2. Lower exposure to companies and agency/supranational issuers owning **coal, oil and gas reserves**: The fund reduces its weighted average **potential emissions from reserves** exposures to companies relative to the corporate bond market and to agency/supranational issuers relative to the agency/supranational bond market by at least 75%.
3. Lower exposure to the **highest emitters among treasury/sovereign/local authority issuers** in aggregate: The fund underweights the highest emitters among treasury/sovereign/local authority issuers relative to their weight in the fund's relevant bond market by at least 5%.
4. Exclusion of companies with **adverse environmental impacts** through material involvement in business activities related to coal, oil, gas, palm oil or factory farming: The exclusions are measured by determining the weight of companies with material involvement in the stated business activities in the fund relative to the corporate bond market.
5. Exclusion of companies with **adverse social impacts** through material involvement in business activities related to adult entertainment, alcohol, gambling, tobacco, civilian firearms, controversial weapons (e.g. cluster munitions, anti-personnel mines, chemical and biological weapons or depleted uranium ammunition and armour), nuclear weapons or private prisons: The exclusions are measured by determining the weight of companies with material involvement in the stated business activities in the fund relative to the corporate bond market.
6. Exclusion of companies identified as operating in a manner inconsistent with **responsible business conduct standards**, such as those defined by the UN Global Compact Principles and the OECD Guidelines for Multinational Enterprises, because of material involvement in severe controversies related to the environment (e.g. land use and biodiversity, toxic spills and releases, operational waste or water management), society (e.g. child labour or human rights) or corporate governance (e.g. corruption or fraud): The exclusions are measured by determining the weight of companies identified as operating in a manner inconsistent with responsible business conduct standards in the fund relative to the corporate bond market.

Potential remaining investments may include additional assets, such as cash, cash equivalents, derivatives and collective investment schemes.

The fund is designed to pursue its promoted E/S characteristics within a broadly diversified, systematic and cost-effective investment framework to provide investors the opportunity to reflect their sustainability values without sacrificing sound investment principles.

The foundation of the fund is an investment strategy that systematically targets drivers of higher expected returns, including the term and/or credit premium. The fund achieves this objective by increasing the exposure to longer-dated bonds (and/or lower-rated bonds) when expected term premiums (and/or expected credit premiums) are higher within the fund's eligible market universe.

The fund uses a combination of security weighting and exclusion criteria to attain the promoted E/S characteristics outlined above.

## A. Summary (cont.)

### E/S characteristics and investment strategy (cont.)

The E/S characteristics and sustainability indicators outlined above are monitored on a regular basis throughout the lifecycle of the fund by Dimensional's Portfolio Management Group. Additionally, our Compliance Department employs controls to verify that the E/S characteristics promoted by the fund are attained on an ongoing basis.

Dimensional has implemented a policy to evaluate the governance practices of portfolio companies. If a company fails the good governance test, Dimensional will cease further investments in the company and will assess whether divestment is merited.

### Data, limitations and due diligence

Dimensional uses data from external vendors, including MSCI ESG Research ("MSCI") and ISS. This data may be cross-referenced and validated in order to create proprietary data sets. Additionally, we may conduct in-house research by using information from Bloomberg, reported financial data, other company filings, company websites, sector affiliations, industry groups or government entities in order to create internal data sets that may supplement the external data sets.

Our Investment Analytics and Data team and Portfolio Management Group actively monitor data quality through a variety of automated validations, including period-to-period data changes, comparisons of data between multiple vendors, and more manual quality assurance mechanisms.

The environmental and social data landscape is still maturing. A lack of company reported data remains one of the primary limitations. For example, the coverage of reported greenhouse gas emissions tends to be lower for small and emerging market companies, although the trend of available reported data in these markets continues to improve. Another limitation is the inconsistency of data and methodologies across vendors and companies. Dimensional avoids relying on third-party ESG ratings, which are often subjective, and instead focuses on more objective and consistently reported metrics. We take commercially reasonable efforts to collect external data sets and develop internal data sets that allow the fund to attain its promoted E/S characteristics.

Dimensional follows a systematic, process-driven investment approach that integrates due diligence checks throughout our implementation and risk management processes. As part of our security review process, Dimensional analyses information from the security's prospectus, official statement, escrow agreement, and certain other relevant documents prior to investing in any fixed income security. As part of our portfolio design, portfolio management and trading processes, we implement due diligence checks in order to attain the E/S characteristics promoted by the fund. The backbone of these checks is the integration of reliable E/S data as outlined above. As part of our risk management process, we monitor all portfolio companies daily for reports of potential involvement in significant controversies, including ESG-related controversies.

### Engagement policies

What drives governance improvements and sets up leverage with which investors can hold boards and management accountable if they fail to respond to engagement is primarily the important mechanism of proxy voting at shareholder meetings. In general, debt holders do not have such a mechanism to influence a company's governance. This said, Dimensional's investment stewardship on behalf of shareholders promotes best governance practices in areas such as board effectiveness, executive compensation and corporate integrity, where interests between equity and debt holders are closely aligned.

More information about Dimensional's general engagement strategy<sup>1</sup> is available in the Investment Stewardship section of our website at <https://www.dimensional.com/who-we-are/investment-stewardship>.

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<sup>1</sup> Dimensional discusses governance matters with portfolio companies to represent client interests; however, Dimensional on behalf of its clients, regardless of such conversations, acquires securities solely for the purpose of investment and not with the purpose or intended effect of changing or influencing the control of any portfolio company.

## B. No sustainable investment objective

This financial product promotes environmental or social characteristics, but does not have as its objective sustainable investment.

## C. Environmental or social characteristics of the financial product

The fund promotes the following E/S characteristics:

1. Lower exposure to companies and agency/supranational issuers with high **greenhouse gas emissions** relative to the corresponding bond markets as further outlined below.
2. Lower exposure to companies and agency/supranational issuers owning **coal, oil and gas reserves** relative to the corresponding bond markets as further outlined below.
3. Lower exposure to the **highest emitters among treasury/sovereign/local authority issuers** in aggregate relative to the fund's relevant bond market as further outlined below.
4. Exclusion of companies with **adverse environmental impacts** through material involvement in business activities related to coal, oil, gas, palm oil or factory farming.
5. Exclusion of companies with **adverse social impacts** through material involvement in business activities related to adult entertainment, alcohol, gambling, tobacco, civilian firearms, controversial weapons (e.g. cluster munitions, anti-personnel mines, chemical and biological weapons or depleted uranium ammunition and armour), nuclear weapons or private prisons.
6. Exclusion of companies identified as operating in a manner inconsistent with **responsible business conduct standards**, such as those defined by the UN Global Compact Principles and the OECD Guidelines for Multinational Enterprises, because of material involvement in severe controversies related to the environment (e.g. land use and biodiversity, toxic spills and releases, operational waste or water management), society (e.g. child labour or human rights) or corporate governance (e.g. corruption or fraud).

The fund uses the following sustainability indicators to measure the attainment of each of the promoted E/S characteristics outlined above:

1. Weighted average **carbon intensity** of companies relative to the corporate bond market and of agency/supranational issuers relative to the agency/supranational bond market.
  - Represents an issuer's recently reported or estimated Scope 1 (direct) + Scope 2 (indirect) greenhouse gas emissions in carbon dioxide equivalents (CO<sub>2</sub>e) normalised by sales in USD (metric tons CO<sub>2</sub>e per USD million sales).
  - Greenhouse gases included are carbon dioxide (CO<sub>2</sub>), methane (CH<sub>4</sub>), nitrous oxide (N<sub>2</sub>O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), sulphur hexafluoride (SF<sub>6</sub>) and nitrogen trifluoride (NF<sub>3</sub>).
2. Weighted average **potential emissions from reserves** of companies relative to the corporate bond market and of agency/supranational issuers relative to the agency/supranational bond market.
  - Represents a theoretical estimate calculated by MSCI of carbon dioxide produced if an issuer's reported reserves of oil, gas and coal were converted to energy.
  - Uses estimated carbon and energy densities of the respective reserves.
3. Weight of **highest emitters among treasury/sovereign/local authority issuers** relative to their weight in the fund's relevant bond market based on greenhouse gas emissions per GDP.
  - Represents an issuer's most recently reported sovereign-level United Nations Framework Convention on Climate Change (UNFCCC) production-based greenhouse gas emissions excluding land use, land-use change and forestry (LULUCF) normalised by the issuer's sovereign-level purchasing power parity (PPP)-adjusted gross domestic product (GDP).
- 4/5. Weight of companies with material involvement in the stated business activities related to **adverse environmental / social impacts** relative to the corporate bond market.
6. Weight of companies identified as operating in a manner inconsistent with **responsible business conduct standards** because of material involvement in severe ESG controversies relative to the corporate bond market.

## D. Investment strategy

### Investment strategy used to meet the E/S characteristics promoted by the fund

The fund is designed to pursue its promoted E/S characteristics within a broadly diversified, systematic and cost-effective investment framework to provide investors the opportunity to reflect their sustainability values without sacrificing sound investment principles.

The foundation of the fund is an investment strategy that systematically targets drivers of higher expected returns, including the term and/or credit premium. The fund achieves this objective by increasing the exposure to longer-dated bonds (and/or lower-rated bonds) when expected term premiums (and/or expected credit premiums) are higher within the fund's eligible market universe.

The fund uses a combination of security weighting and exclusion criteria to attain the promoted E/S characteristics outlined above:

1. The fund reduces its weighted average **carbon intensity** exposures to companies relative to the corporate bond market and to agency/supranational issuers relative to the agency/supranational bond market by at least 50%. To implement this binding element, the fund:
  - Allocates a larger (smaller) proportion of its corporate bond investments to sector leaders (sector laggards) to emphasise best-in-class companies based on carbon intensity.
  - Excludes from purchase companies and agency/supranational issuers with the highest carbon intensity.
2. The fund reduces its weighted average **potential emissions from reserves** exposures to companies relative to the corporate bond market and to agency/supranational issuers relative to the agency/supranational bond market by at least 75%. To implement this binding element, the fund:
  - Excludes from purchase companies and agency/supranational issuers with the largest fossil fuel reserves based on potential emissions from reserves.
3. The fund underweights the **highest emitters among treasury/sovereign/local authority issuers** relative to their weight in the fund's relevant bond market by at least 5%.
- 4/5. The fund excludes companies with material involvement in the stated business activities related to **adverse environmental / social impacts**. The Investment Manager<sup>2</sup> determines material involvement in a business activity by direct evidence (e.g. if annual revenues exceed a defined threshold, such as 0% or 10%) or by indirect evidence (e.g. through ownership), depending on each activity:
  - **Coal:** evidence of owning any proven and probable thermal or metallurgical coal reserves or any revenue from exploration, mining, extraction, distribution or refining of hard coal and lignite.
  - **Oil:** 10% or more revenue from the exploration, extraction, distribution or refining of oil fuels.
  - **Gas:** 50% or more revenue from the exploration, extraction, manufacturing or distribution of gaseous fuels.
  - **Fossil fuel power generation:** 50% or more revenue from electricity generation with a GHG intensity of more than 100g CO<sub>2</sub>e/kWh (fossil fuels and biomass).
  - **Palm oil:** 10% or more revenue from palm oil farming and/or palm oil processing.
  - **Factory farming:** 10% or more revenue from sectors related to factory farming.
  - **Adult entertainment:** 10% or more revenue from the production, distribution or retailing of adult entertainment products.
  - **Alcohol:** 10% or more revenue from the production, distribution, retailing, licensing or supply of alcoholic beverages, key products and services.
  - **Gambling:** 10% or more revenue from the ownership or operation of gambling facilities or from the support or services to the gambling industry.
  - **Tobacco:** any involvement in the cultivation and production of tobacco or 10% or more revenue from the distribution, retailing, licensing or supply of key tobacco products and services.
  - **Civilian firearms:** any revenue from the production of handguns, pistols, shotguns, rifles, revolvers, and ammunition for civilian (nonmilitary) use.
  - **Controversial and nuclear weapons:** any involvement in the manufacture of cluster munitions or anti-personnel mines or their key components, chemical and biological weapons or depleted uranium ammunition and armour, or nuclear weapons or their key components.
  - **Private prisons:** ownership or any revenue from the operation of private prisons and/or immigrant detention facilities.

<sup>2</sup> "Dimensional" and "Investment Manager" may be used interchangeably throughout this document.

## D. Investment strategy (cont.)

Investment strategy used to meet the E/S characteristics promoted by the fund (cont.)

6. The fund excludes companies identified as operating in a manner inconsistent with **responsible business conduct standards** because of material involvement in severe ESG controversies as stated above. The Investment Manager generally determines material involvement in a severe controversy by assessing the perceived nature and scale of a case and a company's role and response:
- The **nature of a case** generally depends on the perceived severity of harm resulting from a controversy. For example, irreparable ecosystem destruction, products or practices being the leading cause of death or evidence of involvement in child labour are serious harms.
  - The **scale of a case** generally depends on the perceived size of its impact, such as the geographical footprint, the level of pollution or the number of people affected. For example, a large oil spill or a large group of people affected over a longer period are considered to be of serious concern.
  - A **company's role**, and thus the materiality of its involvement, generally depends on whether its conduct, products, or operations are believed to have directly contributed to the controversy or have indirectly facilitated the controversy through the actions of affiliates or members of its supply chain. Actions from affiliates are regarded as direct involvement if the company has significant control. Additional considerations include potential intent (e.g. malicious/recurring compared to negligent/reckless behaviour) and implemented controls, amongst others. For example, a controversy resulting from an action over which a company has direct control, and where there was malicious intent, is generally considered to be of serious concern.
  - A **company's response** after the event, involvement in related legal cases, and the Investment Manager's assessment of the proportionality and effectiveness of remediating actions taken since the controversy occurred all feed into the assessment of whether a controversy is still of ongoing concern. Additional considerations include aggravating factors such as actions to hide or conceal involvement. For example, a controversy is generally considered to be of ongoing serious concern if a company has concealed information, failed to acknowledge responsibility and failed to disclose effective remediating actions.

To assess material involvement in a severe ESG controversy, the Investment Manager generally uses an aggregate evaluation, which is a function of all four considerations outlined above.

Additionally, the Investment Manager may consider information from publicly available assessments, such as from Norges Bank Investment Management, in order to determine whether a company should be excluded from the fund. The Investment Manager retains full discretion over the implementation of exclusion criteria and may deviate from third-party assessments on a case-by-case basis.

The binding elements of the investment strategy are implemented by the Investment Manager based on available data. If no relevant information can be obtained from either internal or external sources that would lead a company to be excluded from the fund, the company is deemed to be eligible for investment. Exclusions are not applied to cash, derivatives or third-party fund holdings. Securities lending activities are not expected to impact the attainment of the promoted E/S characteristics.

## D. Investment strategy (cont.)

### Policy to assess good governance practices of portfolio companies

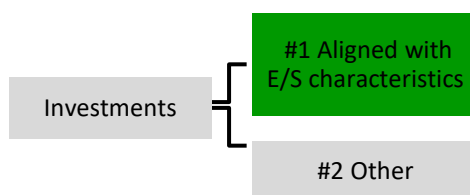
Good corporate governance serves to *protect investors*. Corporate governance standards are assessed as part of the Investment Manager's Exchange Review Process. It includes a qualitative assessment of a given country's governance standards that support investor protection and considers standards related to management structures, employee relations, remuneration of staff, and tax compliance.

Additionally, the Investment Manager's Portfolio Management Group and Investment Stewardship Group regularly monitor and assess corporate governance practices at portfolio companies. Where there are concerns about the governance practices at portfolio companies these are escalated to the Investment Stewardship Committee. In cases where the Investment Stewardship Committee identifies exceptional governance concerns, the Portfolio Management Group will escalate the company to the Manager's Investment Committee, which will decide whether the company fails the good governance practices test for the purposes of Article 8 of the SFDR.

If the company fails the test, the Investment Manager will cease further investments in the company and will assess whether a divestment from the company is merited.

## E. Proportion of investments

The fund generally seeks to invest in direct holdings and a **minimum of 80% of its investments will be aligned with the E/S characteristics (#1)** promoted by the fund. The fund does not intend to achieve a minimum proportion of sustainable investments. Potential remaining investments are included under Other (#2), which may include additional assets, such as cash, cash equivalents, derivatives and collective investment schemes. No specific environmental or social safeguards are applied to Other (#2).



**#1 Aligned with E/S characteristics** includes the investments of the financial product used to attain the E/S characteristics promoted by the financial product.

**#2 Other** includes the remaining investments of the financial product which are neither aligned with the E/S characteristics, nor are qualified as sustainable investments.

## F. Monitoring of environmental or social characteristics

The E/S characteristics and sustainability indicators outlined above are monitored on a regular basis throughout the lifecycle of the fund by Dimensional's Portfolio Management Group. Additionally, our Compliance Department employs controls to verify that the E/S characteristics promoted by the fund are attained on an ongoing basis:

- The Compliance Department monitors the promoted reductions in weighted average carbon intensity exposure and weighted average potential emissions from reserves exposure on a periodic basis and may provide reports to the Board of Dimensional Ireland Limited for further oversight.
- The Compliance Department monitors the promoted E/S exclusions through compliance rules integrated into Dimensional's Order Management System on a daily basis. These rules are evaluated on both a pre-trade and post-trade basis.

## G. Methodologies for environmental or social characteristics

The following methodologies are applied to measure the sustainability indicators outlined above in order to assess whether the promoted E/S characteristics are met:

1. The fund reduces its weighted average **carbon intensity** exposures to companies relative to the corporate bond market and to agency/supranational issuers relative to the agency/supranational bond market by at least 50%: The weighted average carbon intensity is measured by using the carbon intensity (tCO<sub>2</sub>e/USD millions sales) of each issuer in the fund or in the corresponding bond market and multiplying the carbon intensity by the weight of an issuer in the fund or in the corresponding bond market.
2. The fund reduces its weighted average **potential emissions from reserves** exposures to companies relative to the corporate bond market and to agency/supranational issuers relative to the agency/supranational bond market by at least 75%: The weighted average potential emissions from reserves are measured by using the total potential emissions from reserves (MtCO<sub>2</sub>) of each issuer in the fund or in the corresponding bond market and multiplying the potential emissions from reserves by the weight of an issuer in the fund or in the corresponding bond market.
3. The fund underweights the **highest emitters among treasury/sovereign/local authority issuers** relative to their weight in the fund's relevant bond market by at least 5%: To determine "highest emitters", we sort sovereign issuers included in the Bloomberg Global Aggregate Bond Index by emissions per GDP.
- 4/5. The fund excludes companies with material involvement in the stated business activities related to **adverse environmental / social impacts**: The exclusions are measured by determining the weight of companies with material involvement in the stated business activities in the fund relative to the corporate bond market.
6. The fund excludes companies identified as operating in a manner inconsistent with **responsible business conduct standards** because of material involvement in severe ESG controversies as stated above: The exclusions are measured by determining the weight of companies identified as operating in a manner inconsistent with responsible business conduct standards in the fund relative to the corporate bond market.

The relevant corporate bond market and agency/supranational bond market for the fund approximately correspond to the constituents of the Bloomberg Global Aggregate Bond Index 1-5 Years (the fund's relevant bond market) that are classified to the corporate sector and to the agencies/supranational sector, respectively. Bonds are generally weighted according to their market value.

## H. Data sources and processing

Dimensional uses data from external vendors, including MSCI ESG Research ("MSCI") and ISS. This data may be cross-referenced and validated in order to create proprietary data sets. Additionally, we may conduct in-house research by using information from Bloomberg, reported financial data, other company filings, company websites, sector affiliations, industry groups or government entities in order to create internal data sets that may supplement the external data sets.

The following data vendors are used to attain each of the E/S characteristic outlined above:

1. Data for carbon intensity are sourced from external vendors, such as MSCI and ISS.
2. Data for potential emissions from coal, oil and gas reserves are primarily sourced from external vendors, such as MSCI, and may be supplemented with internal data sets.
3. Data for sovereign-level greenhouse gas emissions per GDP are collected from external sources, such as Climate Watch and the World Bank.
- 4/5. Data for the stated adverse environmental / social impacts are primarily sourced from external vendors, such as MSCI and ISS, and may be supplemented with internal data sets.
6. Data for ESG controversies are primarily sourced from external vendors, such as MSCI and ISS, and may be supplemented with internal data sets and/or information from publicly available assessments.

## H. Data sources and processing (cont.)

In our due diligence process, we evaluate data coverage and quality, and review the data methodology of each vendor. Data is acquired and processed automatically through our systems, where possible, to reduce operational risks and unnecessary manual intervention. Vendors typically deliver updates to their respective data sets on a monthly or quarterly basis, depending on the data set. Dimensional's Investment Analytics and Data team (part of the Research Group) handles the integration and curation of these data sets within our internal systems, as well as the integration of data sets into the portfolio construction process and into necessary reporting processes.

Our Investment Analytics and Data team and Portfolio Management Group actively monitor data quality through a variety of automated validations, including period-to-period data changes, comparisons of data between multiple vendors, and more manual quality assurance mechanisms. Issues that surface in the quality controls are escalated to the relevant vendors as necessary and are tracked through remediation.

Evaluating the proportion of sourced data that are estimated is challenging. Dimensional's vendors are continuously developing and integrating company reported data as they become available and may not always disclose the underlying data source. We anticipate the availability of reported data to increase, and therefore the proportion of estimated data to decrease, as companies begin to adopt the EU Corporate Sustainability Reporting Directive (CSRD).

## I. Limitations to methodologies and data

The environmental and social data landscape is still maturing. A lack of company reported data remains one of the primary limitations. For example, the coverage of reported greenhouse gas emissions tends to be lower for small companies, although the trend of available reported data continues to improve. Another limitation is the inconsistency of data and methodologies across vendors and companies. Dimensional avoids relying on third-party ESG ratings, which are often subjective, and instead focuses on more objective and consistently reported metrics. We take commercially reasonable efforts to collect external data sets and develop internal data sets that allow the fund to attain its promoted E/S characteristics.

For example, external vendors provide reported or modelled carbon intensity data for nearly all of the companies eligible for Dimensional sustainability funds when measured by market weight of outstanding bonds. Corporate issuers where carbon intensity data is not available are assigned a sector average value. Agency / supranational issuers where carbon intensity data is not available are not considered in the calculation of the sustainability indicator of the relevant E/S characteristic as no reliable estimate can be assigned (information on data availability for agencies and supranationals will be disclosed in the Annual Report of the fund). Treasury / sovereign / local authority issuers where sovereign-level greenhouse gas emissions per GDP data is not available are included with the highest emitters.

Companies for which data on the screened adverse E/S impacts may not be available are typically very small companies that fall outside the eligible universe of external vendors and for which relevant public information is hard to identify manually. Dimensional believes that the small risk of holding an immaterial exposure to the screened adverse E/S impacts by including potentially involved companies in the fund's eligible universe (instead of making all companies ineligible) is more than offset by the diversification and investment benefits from this expanded investment universe.



## J. Due diligence

Dimensional follows a systematic, process-driven investment approach that integrates due diligence checks throughout our implementation and risk management processes:

- As part of our security review process, Dimensional analyses information from the security's prospectus, official statement, escrow agreement, and certain other relevant documents prior to investing in any fixed income security. The types of information analysed include the security's payment rank, covenants, call provisions, and tax-exempt status. Each security goes through an initial automated review process that identifies keywords and characteristics from official documents and screens out securities with embedded options, covenants, or other terms that would make the security ineligible for our portfolios. Following this initial automated review, a portfolio manager will review information from relevant official documents in order to assess the security's eligibility. As part of this process, we may seek to gain clarification of terms and conditions relevant to eligibility, but we generally do not seek to alter the terms or conditions applicable to fixed income securities. In addition, before making an issuance eligible for investment, a member of Dimensional's portfolio management team will review credit ratings from third-party agencies, for which ESG considerations may be a component.
- As part of our portfolio design, portfolio management and trading processes, we implement due diligence checks in order to attain the E/S characteristics promoted by the fund. The backbone of these checks is the integration of reliable E/S data as outlined above. For example, E/S exclusions are integrated into the fund's portfolio design and prevent portfolio management systems from creating buy orders for companies involved in a screened adverse E/S impact. Additionally, the exclusions are coded into compliance rules by members of our Compliance Department and reviewed by members of the Portfolio Management Group. The system is monitored on a daily basis by members of our Compliance Department at both the pre-trade stage and post-trade stage. The Compliance Department also monitors existing portfolio holdings and potential exposures when exclusion lists are updated. Should existing holdings, compliant at the time of initial purchase, subsequently become flagged for involvement in a screened adverse E/S impact, they will be divested by our Portfolio Management Group within a reasonable period considering turnover, liquidity and associated trading costs.
- As part of our risk management process, we monitor all portfolio companies daily for reports of potential involvement in significant controversies, including ESG-related controversies. If there is evidence of a material ESG-related controversy at a corporate issuer held in our fixed income portfolios we may temporarily exclude that issuer's bonds from purchase while we escalate to the Investment Stewardship Group and assess the investment implications.

## K. Engagement policies

What drives governance improvements and sets up leverage with which investors can hold boards and management accountable if they fail to respond to engagement is primarily the important mechanism of proxy voting at shareholder meetings. In general, debt holders do not have such a mechanism to influence a company's governance. This said, Dimensional's investment stewardship on behalf of shareholders promotes best governance practices in areas such as board effectiveness, executive compensation and corporate integrity, where interests between equity and debt holders are closely aligned. For instance, this may include engagements with companies to encourage the adoption of robust policies and procedures for managing risk (including environmental and social risk) and effective board oversight.

More information about Dimensional's general engagement strategy is available in the Investment Stewardship section of our website at <https://www.dimensional.com/who-we-are/investment-stewardship>.

## L. Designated reference benchmark

No reference benchmark has been designated for the purpose of attaining the E/S characteristics promoted by the fund.

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