Product name:

Appendix 5 Sustainable Finance Disclosure Regulation ("SFDR") (unaudited)

December 31, 2023

### Periodic disclosure for the financial products referred to in Article 8, paragraphs 1, 2 and 2a, of Regulation (EU) 2019/2088 and Article 6, first paragraph, of Regulation (EU) 2020/852

#### Sustainable

investment means an investment in an economic activity that contributes to an environmental or social objective, provided that the investment does not significantly harm any environmental or social objective and that the investee companies follow good governance practices.

The **EU Taxonomy** is a classification system laid down in Regulation (EU) 2020/852, establishing a list of environmentally sustainable economic activities. That Regulation does not include a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

Legal entity identifier: Wellington Global Credit Buy and Maintain 549300B8E4VMSRZZ6612 Fund

### Environmental and/or social characteristics

Does this financial product have a sustainable investment objective ?

| •• | □ Yes   | • • | D 🗵 No  |
|----|---|-----|---|
|    | It made sustainable investments with an environmental objective:%   | X   | It <b>promoted Environmental/Social (E/S) characteristics</b><br>and while it did not have as its objective a sustainable<br>investment, it had a proportion of 1.86% of sustainable<br>investments |
|    | <ul> <li>in economic activities that qualify as<br/>environmentally sustainable under<br/>the EU Taxonomy</li> </ul>        |     | with an environmental objective in economic<br>activities that qualify as environmentally<br>sustainable under the EU Taxonomy  |
|    | <ul> <li>in economic activities that do not<br/>qualify as environmentally<br/>sustainable under the EU Taxonomy</li> </ul> |     | with an environmental objective in economic<br>activities that do not qualify as environmentally<br>sustainable under the EU Taxonomy   |
|    |   |     | $\Box$ with a social objective  |
|    | It made sustainable investments with a social objective:%   |     | It promoted E/S characteristics, but <b>did not make any</b><br>sustainable investments   |



To what extent were the environmental and/or social characteristics promoted by this financial product met?

The following environmental and/or social characteristics were promoted by the Fund during the financial year ending December 31, 2023:

Pre-contractual disclosure commitment:

The Fund invests a portion of its assets in securities that meet the following environmental characteristic.

Companies with science-based targets and commitments to enable the Fund to seek to achieve long term net zero carbon intensity by 2050, by promoting the establishment of net zero science-based targets amongst investee companies. In relation to the net zero commitment, the Science Based Targets initiative ("SBTi") provides a clearly defined pathway for companies to reduce greenhouse gas emissions. Targets are considered 'science-based' if they are in line with what the latest climate science deems necessary to meet the goals of the Paris Agreement -limiting global warming to well-below 2°C above pre-industrial levels and pursuing efforts to limit warming to 1.5°C.

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A reference benchmark has not been designated for the purpose of attaining the environmental and/or social characteristics promoted by the Fund.

# The Management Company is not aware of any significant challenges that prevented the Fund from ensuring adherence to the stated guidelines.

#### How did the sustainability indicators perform?

| Sustainability Indicator                               | December 31, 2023           |
|--|-----------------------------|
| The percentage of the Fund's NAV invested in compar    | iies with                   |
| established or which have committed to establish a tar | get validated by the 33.47% |
| Science Based Targets initiative (SBTi).               |                             |

Represents point-in-time data. Please note that over the course of the reference period, data may vary depending on the overall allocation of asset types in the fund, the level of cash and cash equivalents, market movements, and the amount of holdings for which there is insufficient data. Sustainability indicators are calculated by rescaling exposures based upon available data, where appropriate. Data used to calculate Sustainability indicators may not be available for derivatives and these instruments have been excluded. The data does not provide for look-through to underlying investments. Source: MSCI and Wellington.

#### ... and compared to previous periods?

| Sustainability Indicator                     | December 31, 2023 | December 31, 2022 |
|--|-------------------|-------------------|
| The percentage of the Fund's NAV invested in |                   |                   |
| companies with established or which have     | 33.47%            | 32.78%            |
| committed to establish a target validated by |                   |                   |
| the Science Based Targets initiative (SBTi). |                   |                   |

Represents point-in-time data. Please note that over the course of the reference period, data may vary depending on the overall allocation of asset types in the fund, the level of cash and cash equivalents, market movements, and the amount of holdings for which there is insufficient data. Sustainability indicators are calculated by rescaling exposures based upon available data, where appropriate. Data used to calculate Sustainability indicators may not be available for derivatives and these instruments have been excluded. The data does not provide for look-through to underlying investments. Source: MSCI and Wellington.

Sustainability indicators may vary year over year. Comparison based on sustainable indicators effective at year end.

# What were the objectives of the sustainable investments that the financial product partially made and how did the sustainable investment contribute to such objectives?

Not applicable. This Fund does not commit to invest in sustainable investments.

How did the sustainable investments that the financial product partially made not cause significant harm to any environmental or social sustainable investment objective?

Not applicable. This Fund does not commit to invest in sustainable investments.

*How were the indicators for adverse impacts on sustainability factors taken into account?* Not applicable. This Fund does not commit to invest in sustainable investments.

Were sustainable investments aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights? Details:

Not applicable. This Fund does not commit to invest in sustainable investments.

The EU Taxonomy sets out a "do not significant harm" principle by which Taxonomy-aligned investments should not significantly harm EU Taxonomy objectives and is accompanied by specific Union criteria.

The "do no significant harm" principle applies only to those investments underlying the financial product that take into account the EU criteria for environmentally sustainable economic activities. The investments underlying the remaining portion of this financial product do not take into account the EU criteria for environmentally sustainable economic activities.

Any other sustainable investments must also not significantly harm any environmental or social objectives.

Sustainability indicators measure how the environmental or social characteristics promoted by the

promoted by the financial product are attained.

#### Principal adverse

**impacts** are the most significant negative impacts of investment decisions on sustainability factors relating to environmental, social and employee matters, respect for human rights, anti-corruption and anti-bribery matters.

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#### How did this financial product consider principal adverse impacts on sustainability factors?

Pre-contractual disclosure commitment:

By virtue of the Fund's existing investment guidelines, the Fund takes certain, but not all, of the Principal Adverse Impacts listed in Annex I Table I of the Level II SFDR Regulatory Technical Standards ("PAIs") into consideration either directly or indirectly on all or a portion of the Fund:

1. The Fund will invest in a minimum percentage of companies with targets validated by SBTi or a commitment to establish such targets, and actively engage with companies held in the portfolio to commit to set a science-based target. - PAIs: Carbon Footprint; GHG Emissions, GHG Intensity of Investee Companies.

While these restrictions consider certain of the PAIs, such consideration does not necessarily eliminate the Fund's exposure to such PAIs altogether. In addition, the extent to which these restrictions impact the investment process may be limited where such investments are outside of the scope of the investment objective of the Fund.

The Investment Manager uses internal compliance screening processes to monitor the binding environmental and social characteristics referenced above. Compliance screening is performed pre-trade, intra-day, and in an overnight post-trade process.

| PAIs considered   | December 31, 2023        |
|---|--------------------------|
| 1. GHG emissions  | 26357.53tCO2e            |
| 2. Carbon footprint   | 371.18tCO2e/ €M invested |
| 3. GHG intensity of investee companies                        | 801.95tCO2e/ €M revenue  |
| 4. Exposure to companies active in the fossil fuel sector     | 6.83%                    |
| 5. Share of non - renewable energy consumption and production | 70.16%                   |

Represents point-in-time data. Please note that over the course of the reference period, data may vary depending on the overall allocation of asset types in the fund, the level of cash and cash equivalents, market movements, and the amount of holdings for which there is insufficient data. Principal Adverse Impacts are calculated by rescaling exposures based upon available data, where appropriate. Data used to calculate Principal Adverse Impacts may not be available for derivatives and these instruments have been excluded. The figures above are provided using MSCI data only and may differ from the results of the Investment Manager's compliance screening process based on the Exclusion Policy. The data does not provide look-through for indirect investments. Source: MSCI

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What were the top investments of this financial product?

The list includes the investments constituting the **greatest proportion of investments** of the financial product during the reference period which is: 2023-01 -01/2023-12-31

| Largest investments         | Sector                 | % of net assets | Country |
|-----------------------------|------------------------|-----------------|---------|
| Chubb INA Holdings, Inc.    | Financials             | 1.30%           | US      |
| Marsh & McLennan Cos., Inc. | Financials             | 1.30%           | US      |
| Scentre Group Trust 1       | Real estate            | 1.29%           | AU      |
| Wells Fargo & Co.           | Financials             | 1.25%           | US      |
| JPMorgan Chase & Co.        | Financials             | 1.25%           | US      |
| UBS Group AG                | Financials             | 1.23%           | СН      |
| MetLife, Inc.               | Financials             | 1.21%           | US      |
| Grainger PLC                | Real estate            | 1.08%           | GB      |
| BAWAG Group AG              | Financials             | 1.07%           | AT      |
| JAB Holdings BV             | Financials             | 1.06%           | NL      |
| RAC Bond Co. PLC            | Consumer discretionary | 1.05%           | GB      |
| Toronto-Dominion Bank       | Financials             | 1.05%           | CA      |
| Yorkshire Water Finance PLC | Utilities              | 1.04%           | GB      |
| NatWest Group PLC           | Financials             | 1.04%           | GB      |
| Heathrow Funding Ltd.       | Industrials            | 1.04%           | GB      |

The top investments table is populated based on the largest individual issuers. The weightings do not reflect exposure gained through the use of derivatives. 'Not Classified' includes governments, and government related securities (including supranationals, sub-sovereign and agencies), cash and cash equivalents, and other holdings for which there is insufficient data, which are not classified under the MSCI GICS sector classification hierarchy. Largest Investments as of FYE.

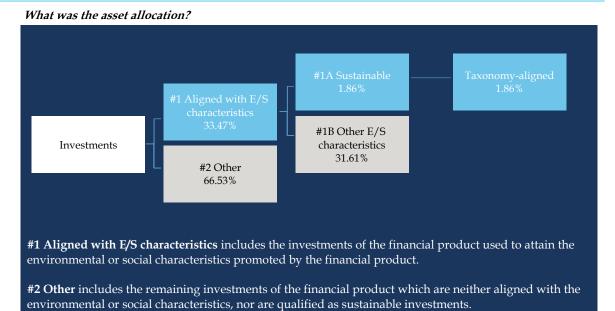
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What was the proportion of sustainability-related investments?

Asset allocation describes the share of investments in specific assets.



The category **#1 Aligned with E/S characteristics** covers:

- The sub-category #1A Sustainable covers environmentally and socially sustainable investments.

- The sub-category **#1B Other E/S characteristics** covers investments aligned with the environmental or social characteristics that do not qualify as sustainable investments.

Pre-contractual disclosure commitment:

During normal market conditions, a minimum of 20% of the Fund's net assets will be aligned to the E/S characteristics of the Fund.

On occasion, due to possible settlement mismatch related to investor flows or market holidays during times when large subscriptions are received, the portion of the Fund which is not aligned with the environmental or social characteristic may affect the Fund's ability to meet the commitment as described above under normal market conditions. The Investment Manager does not consider these short-term fluctuations to materially impact the Fund's ability to attain its environmental or social characteristics.

| Asset allocation overview           | % of net assets as at December 31, 2023 |
|-------------------------------------|---|
| #1 Aligned with E/S characteristics | 33.47%                                  |
| #2 Other                            | 66.53%                                  |

Represents point-in-time data. Please note that over the course of the reference period, data may vary depending on the overall allocation of asset types in the fund, the level of cash and cash equivalents, market movements, and the amount of holdings for which there is insufficient data.

| Sector                 | Sub Sector                          | % of net assets |
|------------------------|-------------------------------------|-----------------|
| Communication services | Media                               | 2.59%           |
|                        | Wireless telecommunication services | 1.35%           |
|                        | Diversified telecommunication svcs  | 1.03%           |
| Consumer discretionary | Automobiles                         | 3.51%           |

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| Consumer discretionary | Diversified consumer services          | 1.05%  |
|------------------------|--|--------|
|                        | Distributors                           | 0.76%  |
|                        | Specialty retail                       | 0.75%  |
|                        | Hotels, restaurants & leisure          | 0.62%  |
|                        | Automobile components                  | 0.26%  |
| Consumer staples       | Food products                          | 1.27%  |
|                        | Personal care products                 | 0.29%  |
|                        | Consumer staples distrib & retail      | 0.27%  |
|                        | Beverages                              | 0.25%  |
| Energy                 | Oil, gas & consumable fuels            | 3.98%  |
| Financials             | Banks                                  | 28.04% |
|                        | Insurance                              | 8.14%  |
|                        | Financial services                     | 4.00%  |
|                        | Capital markets                        | 3.68%  |
|                        | Consumer finance                       | 0.74%  |
| Health care            | Pharmaceuticals                        | 1.52%  |
|                        | Health care providers & services       | 1.01%  |
|                        | Health care equipment & supplies       | 0.58%  |
| Industrials            | Machinery                              | 1.55%  |
|                        | Passenger airlines                     | 1.28%  |
|                        | Transportation infrastructure          | 1.04%  |
|                        | Building products                      | 1.04%  |
|                        | Commercial services & supplies         | 0.81%  |
|                        | Electrical equipment                   | 0.75%  |
|                        | Ground transportation                  | 0.75%  |
|                        | Aerospace & defense                    | 0.74%  |
|                        | Construction & engineering             | 0.42%  |
| Information technology | Communications equipment               | 0.75%  |
|                        | Semiconductors & semiconductor<br>eqpt | 0.74%  |
|                        | Software                               | 0.25%  |
| Materials              | Containers & packaging                 | 1.32%  |
| Not classified         | Not classified                         | 2.28%  |
| Real estate            | Real estate management & develop       | 2.39%  |
|                        | Retail reits                           | 2.30%  |
|                        | Health care reits                      | 1.57%  |
|                        | Specialized reits                      | 1.51%  |
|                        | Industrial reits                       | 1.02%  |
| Sovereign              | Sovereign                              | 3.78%  |
| Utilities              | Electric utilities                     | 4.25%  |
|                        | Water utilities                        | 1.82%  |
|                        | Multi-utilities                        | 1.03%  |

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Represents point-in-time data. Please note that over the course of the reference period, data may vary depending on the overall allocation of asset types in the fund, the level of cash and cash equivalents, market movements, and the amount of holdings for which there is insufficient data. 'Not Classified' includes governments, and government related securities (including supranationals, sub-sovereign and agencies), cash and cash equivalents, and other holdings for which there is insufficient data, which are not classified under the MSCI GICS classification hierarchy. Source: MSCI



To comply with the EU Taxonomy, the criteria for **fossil gas** include limitations on emissions and switching to fully renewable power or lowcarbon fuels by the end of 2035. For **nuclear energy**, the criteria include comprehensive safety and waste management rules.

#### **Enabling activities**

directly enable other activities to make a substantial contribution to an environmental objective.

#### Transitional activities

are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.

Taxonomy-aligned activities are expressed as a share of: -turnover reflecting the share of revenue from green activities of investee companies. - capital expenditure

# To what extent were the sustainable investments with an environmental objective aligned with the EU Taxonomy?

Pre-contractual disclosure commitment:

The Fund does not currently commit to invest in any Sustainable Investments within the meaning of the SFDR, accordingly the minimum share of EU Taxonomy-aligned investments is 0%.

The fund does not have any sustainable investments. However, please see below for taxonomy alignment data, which is stated as a percentage of market value as of December 31, 2023:

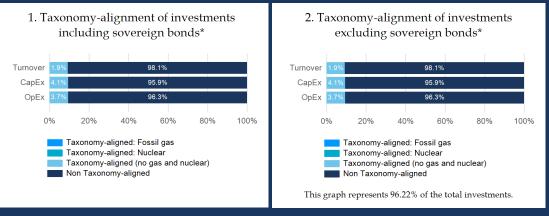
Did the financial product invest in fossil gas and/or nuclear energy related activities complying with the EU Taxonomy <sup>1</sup>?

□ Yes

□ In fossil gas □ In nuclear energy

🗷 No

The graphs below show in light blue the percentage of investments that were aligned with the EU Taxonomy. As there is no appropriate methodology to determine the taxonomy-alignment of sovereign bonds\*, the first graph shows the Taxonomy alignment in relation to all the investments of the financial product including sovereign bonds, while the second graph shows the Taxonomy alignment only in relation to the investments of the financial product other than sovereign bonds.



\* For the purpose of these graphs, 'sovereign bonds' consist of all sovereign exposures.

Represents point-in-time data. Please note that over the course of the reference period, data may vary depending on the overall allocation of asset types in the fund, the level of cash and cash equivalents, market movements, and the amount of holdings for which there is insufficient data. Source: Clarity AI

#### What was the share of investments made in transitional and enabling activities?

Pre-contractual disclosure commitment:

The Fund does not currently commit to invest in any Sustainable Investments within the meaning of the SFDR, accordingly the minimum share of investments in transitional and enabling activities is 0%.

#### Wellington Global Credit Buy and Maintain Fund

<sup>1</sup>Fossil gas and/or nuclear related activities will only comply with the EU Taxonomy where they contribute to limiting climate change("climate change mitigation") and do not significantly harm any EU Taxonomy objectives - see explanatory note in the left hand margin. The full criteria for fossil gas and nuclear energy economic activities that comply with the EU Taxonomy are laid down in Commission Delegated Regulation (EU) 2022/1214.

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(CapEx) showing the green investments made by investee companies, e.g. for a transition to a green economy.
operational expenditure (OpEx) reflecting green operational activities of investee companies.

| Taxonomy aligned investments | % of market value as at December 31, 2023 |
|------------------------------|---|
| Transitional Turnover        | 0.02%                                     |
| Transitional Capex           | 0.00%                                     |
| Transitional Opex            | 0.02%                                     |
| Enabling Turnover            | 0.97%                                     |
| Enabling Capex               | 0.93%                                     |
| Enabling Opex                | 1.49%                                     |

Represents point-in-time data. Please note that over the course of the reference period, data may vary depending on the overall allocation of asset types in the fund, the level of cash and cash equivalents, market movements, and the amount of holdings for which there is insufficient data.

Source: Clarity AI

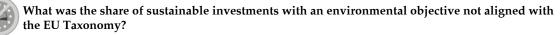
# How did the percentage of investments that were aligned with the EU Taxonomy compare with previous reference periods?

| Asset allocation overview    |       | % of net assets as at December<br>31, 2022 |
|------------------------------|-------|--|
| Taxonomy aligned investments | 1.86% | 0.70%                                      |

Represents point-in-time data. Please note that over the course of the reference period, data may vary depending on the overall allocation of asset types in the fund, the level of cash and cash equivalents, market movements, and the amount of holdings for which there is insufficient data.

Source: Clarity AI

are sustainable investments with an environmental objective that **do not take into account the criteria** for environmentally sustainable economic activities under Regulation (EU) 2020/852.



Not applicable. This Fund does not commit to invest in sustainable investments.

What was the share of socially sustainable investments?

Not applicable. This Fund does not commit to invest in sustainable investments.

# What investments were included under "other", what was their purpose and were there any minimum environmental or social safeguards?

Pre-contractual disclosure commitment:

The investments under '#2 Other' may include cash and cash equivalents for liquidity purposes, derivatives for hedging and/or investment purposes or investments in securities which may create exposure to multiple underlying issuers such as collective investment schemes or index positions. It may also include any securities where data to measure the environmental and/or social characteristics is not available, is not used to meet the environmental or social characteristics, or does not meet the environmental or social characteristics promoted by the Fund.

| Asset allocation overview | % of net assets as at December 31, 2023 |
|---------------------------|---|
| #2 Other                  | 66.53%                                  |

Represents point-in-time data. Please note that over the course of the reference period, data may vary depending on the overall allocation of asset types in the fund, the level of cash and cash equivalents, market movements, and the amount of holdings for which there is insufficient data.

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What actions have been taken to meet the environmental and/or social characteristics during the reference period?

The Investment Manager uses internal compliance screening processes to monitor the binding environmental and social characteristics referenced above. Compliance screening is performed pre-trade, intra-day, and in an overnight post-trade process.

The Fund engaged with companies held in the portfolio to establish or to commit to net zero science-based targets. During the reference period the Fund engaged with 102 companies.



Not applicable.

How did this financial product perform compared to the reference benchmark?

Reference benchmarks are indexes to measure whether the financial product attains the environmental or social characteristics that they promote.

*How does the reference benchmark differ from a broad market index?*Not applicable.*How did this financial product perform with regard to the sustainability indicators to determine the* 

How did this financial product perform with regard to the sustainability indicators to determine the alignment of the reference benchmark with the environmental and social characteristics promoted? Not applicable.

*How did this financial product perform compared with the reference benchmark?* Not applicable.

*How did this financial product perform compared with the broad market index?* Not applicable.