



ENGAGEMENT REPORT  
Q2 2022

# FISHER INVESTMENTS & FISHER INVESTMENTS AUSTRALASIA

## DISCLOSURES

- Fisher Investments Australasia (FIA) delegates portfolio management to its parent company, Fisher Investments (FI).
- This presentation relates to a Fisher Investments Institutional Group (FIIG) strategy managed by FI.
- FIA was established in Sydney, Australia in 2012 as a wholly-owned subsidiary of FI.
- FIA holds an Australian Financial Services Licence 433312 issued by the Australian Securities and Investment Commission (ASIC).
- Data indicated in this report are based on engagement meetings for all of Fisher Investments Institutional clients. For Professional Client Use Only.
- **References to "We", "our", "us" and "the firm" in the following engagement report refer to FI.**

# ENGAGEMENT OVERVIEW

## OUR ESG PHILOSOPHY STATEMENT

We believe ESG investors are best served by an investment process that considers both top-down and bottom-up factors. Integrating ESG analysis at the country, sector and stock levels consistent with clients' investment goals and ESG policies maximises the likelihood of achieving desired performance and improving environmental and social conditions worldwide.

## OUR ENGAGEMENT APPROACH

We engage companies as part of our fundamental analysis, and to clarify or express concerns regarding potential ESG issues. Through engagement, we meet with management to discuss issues we believe are pertinent to the company or to gain a better understanding of its industry. Information learned from engagement can impact our investment decisions. Further details are provided in our Engagement Policy, which can be downloaded from our [website](#) or is available upon request.

## HOW WE SOURCE OUR ENGAGEMENT OPPORTUNITIES



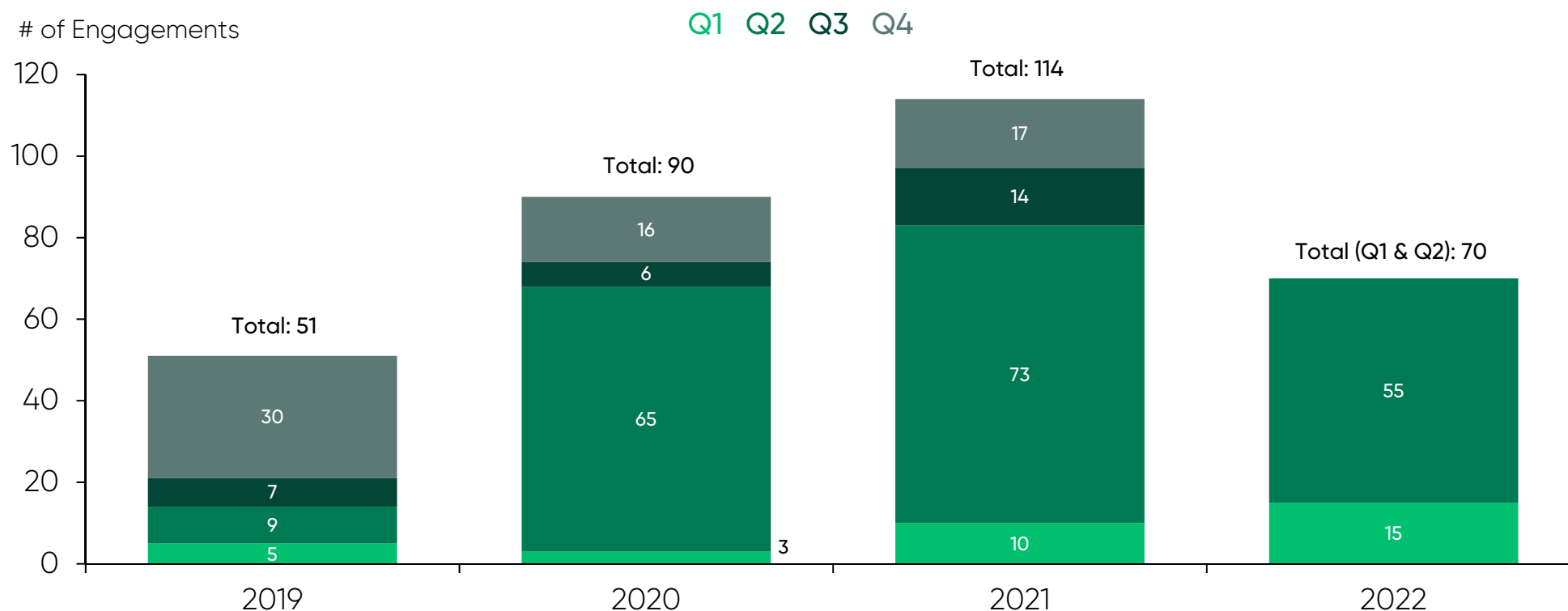
## EACH ENGAGEMENT IS:

- ✓ Researched by our team: **"What are the relevant risks and opportunities?"**
- ✓ Assigned an objective: **"What are we asking the company to do?"**
- ✓ Supported by a business case: **"Why is it important?"**
- ✓ Monitored over time: **"What milestones are achieved?"**

# Q2 2022 ENGAGEMENT HIGHLIGHTS

- **Engagement Milestone:** A Malaysian oil and gas company recently announced a 2050 net-zero emissions ambition. In addition, the company plans to disclose intermediate targets in its 2022 Annual Report. This marks a notable milestone for the company, which FI has encouraged to implement a comprehensive sustainability program.
- **CDP:** FI is participating in CDP's (formerly Carbon Disclosure Project) 2022 Non-Disclosure Campaign. In this collaborative engagement initiative, we asked 38 companies to disclose environmental data using CDP's Climate, Water and Forest questionnaire templates.
- **Proxy Meetings:** During the quarter, FI held 8 meetings with companies to discuss proxy-related ballot items. These meetings help inform our proxy vote, and allow us to provide feedback directly to management.

Year Over Year Engagement Activity, Broken Down by Quarter



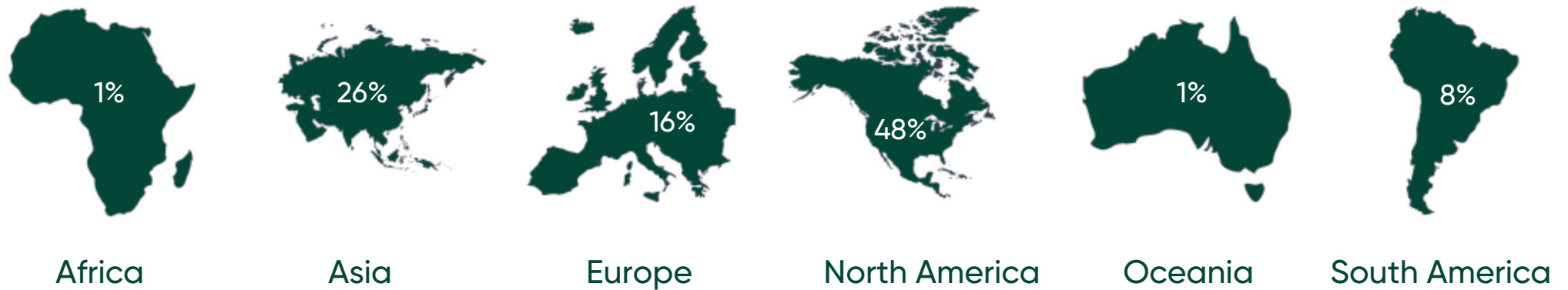
Data indicated above are based on engagement meetings for all institutional clients of Fisher Investments and its subsidiaries from Q1 2019 – Q2 2022.



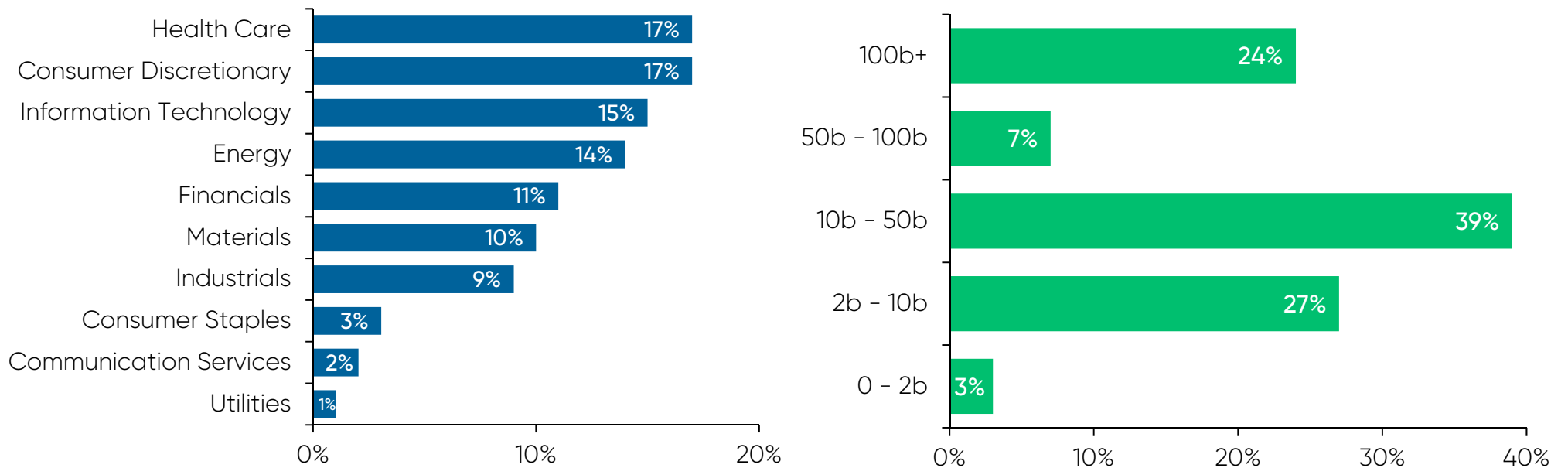
# ENGAGEMENT DISTRIBUTION

We engage across a range of geographies and sectors, as shown below.

Domicile of Engaged Companies, Trailing 1 Year as of Q2 2022



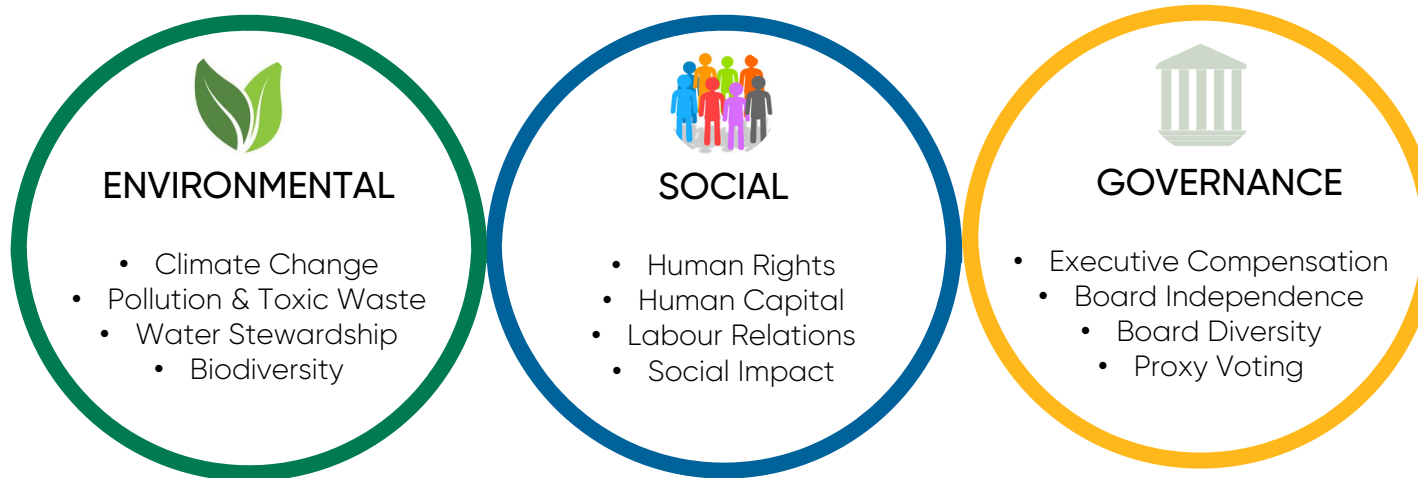
Engaged Companies by Sector & Market Cap (USD billions), Trailing 1 Year as of Q2 2022



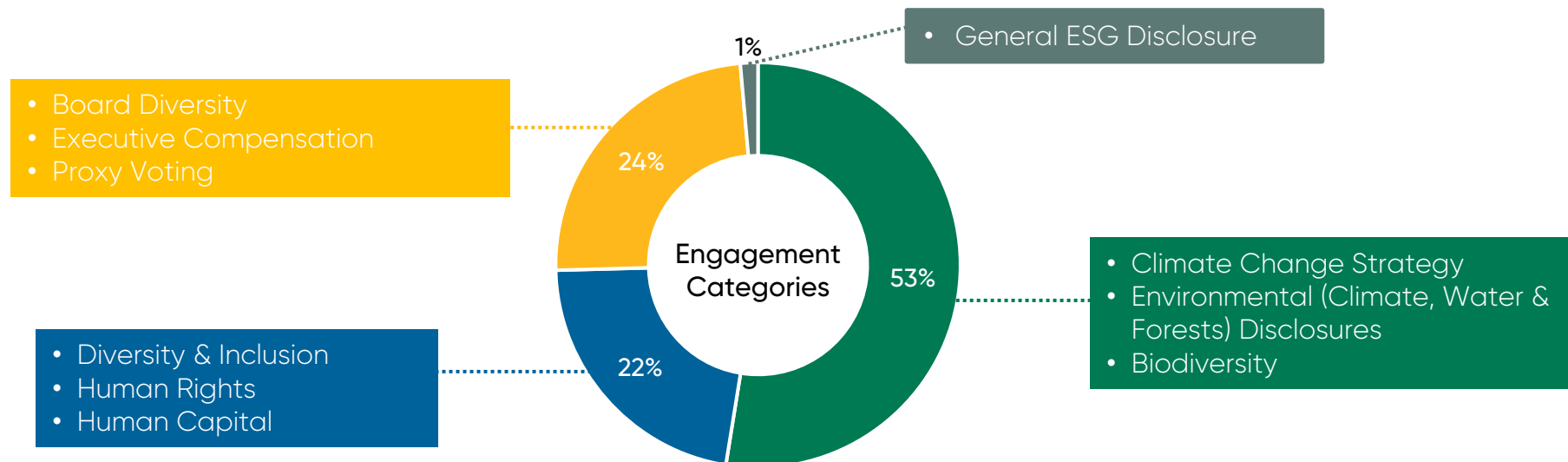
Source: FI data using Factset domicile, sector, and market capitalisation designations. Percentages above may not add up to 100% due to rounding. Data indicated above are based on engagement meetings for all institutional clients of Fisher Investments and its subsidiaries as of Q2 2022. MercadoLibre is listed on the NASDAQ, but headquartered in Argentina. It has operations in Latin America and Portugal, with over 98% of revenues derived from Latin America.

# ESG ENGAGEMENT FOCUS AREAS

We prioritise multiple issues in each ESG category.



Engagement topics by proportion of the E, S, and G categories as of Q2 2022 (Trailing 1 Year)



Data indicated above are based on engagement meetings for all institutional clients of Fisher Investments and its subsidiaries as of Q2 2022. Percentages above may not add up to 100% due to rounding.

# ENGAGEMENT HIGHLIGHTS

## ENVIRONMENTAL, SOCIAL & GOVERNANCE ENGAGEMENT



SECTOR: MATERIALS



MSCI ESG RATING: BBB



TOPIC: CLIMATE CHANGE STRATEGY;  
COMMUNITY IMPACT;  
ESG GOVERNANCE

STATUS: ONGOING

### OBJECTIVE

Gathering information on the company's emissions reduction strategy, management of natural capital and ESG governance structure.

### SUMMARY

In a meeting with a North American steel producer, FI sought information about the company's climate change strategy, programs on biodiversity mitigation and community relations.

*Climate Change Strategy:* The company has announced a commitment to reduce GHG emissions 25% by 2030 from a 2017 baseline. The main strategy to achieve the reduction is retrofitting its furnaces from coal to natural gas for energy inputs, which has resulted in substantial reduction in emissions intensity on a per ton basis, although absolute levels trended higher due to the increased overall production.

FI inquired why the company has not committed to carbon neutrality goal like some industry peers. The company believes that carbon neutrality is not technically achievable in the foreseeable future. Longer term net zero emissions requires large-scale deployment of hydrogen supplemented by other renewables. Carbon capture is another viable option towards the goal. The company is conducting a research program on carbon capture at one of its facilities, which may lead to wider application of the nascent

technology. In addition, the acquisition of a major automotive and industrial scrap processing company helps drive the circular economy for low-carbon intensity steelmaking by sourcing prime scrap for its flat rolled steel products.

*Natural Capital and Community Impact:* To manage its biodiversity and environmental impact, the company has partnerships with wildlife and wetlands initiatives near its facilities and maintains open lines of communication with local stakeholders. The vast majority of water at its facilities is recycled and two projects are underway to reduce the usage of chemicals. The company maintained that its primary community focus is to provide well paying & safe jobs in the industrial heartland of the country.

*ESG Governance:* With recent acquisitions of other steel manufacturers, the company became one of the largest flat rolled steel producer in North America with a much enlarged operational footprint. The governance of the company has kept pace by establishing a dedicated ESG team led by a specialist executive. The strategy and sustainability committee of the board oversees ESG and sustainability programs and disclosures. The company has begun tying ESG metrics to its executive compensation program. The annual bonus program carves out 40% for strategic goals, which includes ESG metrics as a substantial portion.

### OUTCOME

Ongoing engagement. With its expanded North American footprint and recent climate commitment, the primary challenge for the company is to successfully execute emissions intensity reduction. The capex on transforming its existing blast furnaces to the more efficient electric arc furnaces will determine the achievement of the set goals. The sustainability leadership structure is encouraging and requires long-term policy attention. FI will continue to monitor progress on the current goals while encouraging the company to aspire for longer term carbon neutrality.

# ENGAGEMENT HIGHLIGHTS

## ENVIRONMENTAL & SOCIAL ENGAGEMENT



SECTOR: ENERGY

MSCI ESG RATING: BBB



TOPIC: CLIMATE CHANGE STRATEGY;  
LAND USE;  
HEALTH & SAFETY

STATUS: ONGOING

### OBJECTIVE

Follow up on previous engagement encouraging development of sustainability strategy, including reduction of GHG emissions.

### SUMMARY

FI held a follow up engagement with an emerging market energy services company to understand its net zero ambition and receive status updates on its sustainability initiatives. We had previously encouraged the company to address potential risks by setting an emissions reduction strategy.

*Climate Change Strategy:* In a significant engagement milestone, the company recently announced a Net Zero 2050 ambition. It is working on formalizing the reduction target and setting intermediate reduction goals, which will be disclosed in the 2022 Annual Report. Shorter-term priorities include investments in renewable energy sources for the company facilities, improving operational efficiency, and continued conservation programs. In the medium- to long-term the company is evaluating sustainable investments that complement its existing businesses. For example, the company recently invested in a recycling venture to incorporate the circular economy in its operational process.

*Biodiversity Impact:* FI inquired about the company's biodiversity risk mitigation strategy, especially at its biggest operations site. For new projects or expansions, the company conducts detailed environmental impact assessments (DEIA) focused on biodiversity, water pollution, air quality, waste management and noise pollution impacts. The DEIA informs site-specific environmental management plans (EMP), which guide the

annual audits conducted by a consultant. The company stated that the operations site does not have significant environmental impacts on the flora and fauna, or the secondary mangrove forest located approximately 1.2 km away. Other company biodiversity initiatives include a study of seagrass conservation program in collaboration with local university and NGOs.

*Employee Health & Safety:* The company's health, safety & environment governance framework is structured and well-developed with a disclosed commitment to zero harm to people, zero damage to environment, zero damage to assets and zero non-compliance. FI asked if there were set targets to meet its H&S commitment and if incentives were tied to meeting the H&S KPIs. For the 2021 reporting period, the company achieved a total recordable incident rate (TRIR) of 0.72 against a target of 0.519, while the Lost Time Injury Rate was 0.0. The company has introduced an incentive program that encourages employees to report and intervene when confronted with unsafe work conditions. The program is a KPI in employee annual performance scoring.

### OUTCOME

Ongoing engagement. When FI initiated engagement in Q4 2020, the company's ESG initiatives were limited in scope and not driven by a comprehensive sustainability strategy. It has made significant progress and the net zero ambition is a notable milestone. FI encouraged the company to set suitable interim targets and will continue to monitor its progress. In our view, the initiatives on biodiversity and employee health and safety are satisfactory.

Many of the company's global customers are working to lower their GHG emissions intensity, and will likely expect the company to make robust investments in emissions reducing technology. FI provided constructive feedback in order to facilitate the company's ongoing competitiveness.



# ENGAGEMENT HIGHLIGHTS

## ENVIRONMENTAL, SOCIAL & GOVERNANCE ENGAGEMENT



SECTOR: ENERGY



MSCI ESG RATING: B



TOPIC: CLIMATE CHANGE STRATEGY;  
POLLUTION & WASTE;  
EMPLOYEE HEALTH & SAFETY  
EXECUTIVE COMPENSATION

STATUS: ONGOING

### OBJECTIVE

Discuss the company's sustainability strategy and provide feedback on the company's disclosures related to spill management system.

### SUMMARY

FI met with an American energy technology company to discuss its sustainability priorities, with emphasis on GHG emissions reduction goals, employee health & safety and the company's spill management program.

*Emissions Reduction Goals:* The company has set a 5% GHG emissions reduction target for 2022. FI inquired about setting medium- to long-term emissions reduction targets. Medium and long-term targets are currently under evaluation, but as a service provider operating drill rigs based on changing customer requirements, the company finds it difficult to set longer-term emissions reduction targets. The company's current focus is on full alignment with the TCFD recommendations and working with its customers to explore solutions to reduce the carbon footprint of the drilling operations. The company made it clear that it needs to ensure the feasibility of any target that it eventually sets given the proportion of the results that may be beyond its control.

The company quantifies its Scope 1 & 2 emissions data and we inquired on potential Scope 3 reporting. The company is not currently in a position to accurately provide Scope 3 data but the subject is under investigation

internally.

*Spill Management:* Recently, an ESG ratings provider noted that the company lagged its peers in spill management. Given the company highlighted its spill management program in its Sustainability Report, we asked for additional information to assess the discrepancy. In our view, the company's spill management plan is sufficient and we encouraged the company to engage with the data provider. The company welcomed our feedback.

*Employee Health & Safety:* Regarding safety metrics, the company does not use 'TRIR' (Total Recordable Incident Rate) as it believes that this is a lagging indicator and may incentivize underreporting of data. Instead, the company uses 'SIF' (Serious Injury & Fatality), which better prevents serious injury and fatalities through proactive accident prevention and incentivizing employees to report incidents of any kind. SIF actual rates have decreased since 2018 and there were zero SIF actual incidents in fiscal year 2021.

*Executive Compensation:* FI encouraged the company to consider direct integration of the ESG metrics to the compensation program. Safety performance constitutes 15% weight in the short-term incentive program. Environmental impact and employee diversity & equity metrics also feature as part of the company's short-term compensation program but they are not quantified.

### OUTCOME

Ongoing engagement. As a small cap company its sustainability program is focused on its most salient ESG issues. We provided investor feedback regarding setting GHG emissions reduction targets and will monitor the company's progress in these areas.

# ENGAGEMENT HIGHLIGHTS

## ENVIRONMENTAL & SOCIAL ENGAGEMENT



SECTOR: CONSUMER DISCRETIONARY

MSCI ESG RATING: A



TOPIC: CLIMATE CHANGE STRATEGY;  
SUSTAINABLE SOURCING;  
HUMAN RIGHTS POLICY

STATUS: ONGOING

### OBJECTIVE

Discuss the company's sustainability initiatives.

### SUMMARY

FI engaged a North American apparel company to discuss its programs on sustainable sourcing of materials, supply chain labor standards and emissions reduction strategy.

*Sustainable Materials Sourcing:* The company has committed to sustainable sourcing of basic materials such as nylon and cotton. It set a goal to source 100% renewable or recycled nylon, which makes up the largest portion of its sourced materials, by 2030. Currently, there are no available solutions for replacing nylon, so the company is exploring replacing it with recycled polyester and investing to research new innovative materials such as bio-nylon solutions. For cotton, the company committed to 100% sustainable cotton sourcing initiative by 2025. The latest data showed that in 2020, approximately one-third of cotton was sustainably sourced. The company said it is on track to achieve the goal.

*Labour Standards & Human Rights:* FI inquired about company programs to ensure that its suppliers and contract manufacturers adhere to its labor standards and human rights policies. The company responded that it had no direct sourcing or production from the Xinjiang region in China. The company works with its tier 1 and tier 2 suppliers and is continuing drill down the supply chain to ensure compliance with its code of conduct,

human rights policies and labor standards. The process involves both external and internal audits for tier 1 suppliers on an annual basis. It also screens first-time suppliers for labor management performance.

*Path to Net-Zero Emissions:* In 2019, the SBTi (Science Based Target Initiative) approved the company's emission reduction targets, which includes 60% absolute reduction of Scope 1 & 2 emissions and 60% intensity reduction of GHG emissions from its global supply chain. FI inquired about the company's strategy and prioritization to meet these targets. The company responded that its Scope 3 target covers emissions due to manufacturing and materials, transportation & logistics. While the company is exploring all available options, it intends to prioritize manufacturing emissions over transportation and logistics right now. It has launched a program with its manufacturers to assess their carbon footprint and emissions, initiated solar programs with vendors, and begun partnerships to initiate carbon capture from wastewater treatment plan to create polyester. The company achieved a goal of 100% renewable electricity in its owned facilities.

### OUTCOME

Ongoing engagement. The company has set ambitious goals on sustainably sourcing materials as well as long-term reduction of greenhouse gas emissions. FI will continue to monitor the status of its progress towards these sustainability goals.

# ENGAGEMENT HIGHLIGHTS

## ENVIRONMENTAL ENGAGEMENT



SECTOR:	CONSUMER DISCRETIONARY
MSCI ESG RATING:	A
TOPIC:	CLIMATE CHANGE STRATEGY; SUSTAINABLE SOURCING; HUMAN RIGHTS POLICY
STATUS:	ONGOING

### OBJECTIVE

Follow up on a previous engagement regarding the company's climate change strategy and sustainable management of packaging and plastics waste.

### SUMMARY

Due to the recent dramatic growth of the Latin American online retailer, its Scope 1 emissions increased by 225%, Scope 2 by 89%, and Scope 3 by 125% year-over-year. FI inquired how the company aims to address the challenge of emissions reduction. It is using a decentralized approach that sets emissions reduction targets for individual business units, which allows the business units to adjust their initiatives in ways that accommodate growth. Emissions reduction is a strategic imperative for the company and the governance structure reflects the focus. The CFO oversees the company's sustainability performance and is a major driver of a suite of policies. Currently the company is crafting its report per the Taskforce for Climate-related Financial Disclosures (TCFD) and working with third party consultant to set business unit reduction targets.

To reduce emissions, the company has prioritised renewable energy adoption, which has grown tenfold. The headquarters in Buenos Aires and offices in Brazil run on 100% renewable energy. Adoption of electric vehicles is another priority along with measures for operational efficiency gains. The company has leased a fleet of EVs but it is finding that securing vendors for additional EV units is a major challenge. Additionally, the

company is devoting resources to increase reuse and recycling of cardboard boxes and packaging materials.

Since the carbon exchange market is not well developed in Latin America, the company has initiated a unique approach to offsetting its carbon footprint through direct investments in forest conservation and ecosystem preservation projects. In lieu of purchasing carbon offsets, the company has used the funds to purchase land for conservation. The company has invested USD \$18 million since the program's 2021 launch, which runs in partnership with local and global environmental NGOs to support regeneration projects and help preserve the biodiversity in the conservation area.

FI inquired how the company can increase sustainability among its suppliers. The company offers a premium to sustainable suppliers and provides education and incentives to sellers to be more sustainable. However, many sellers are small and may need additional support. More than 900,000 families in Brazil count the company's online marketplace as their main source of income. The company has offered microloans to help keep the suppliers in business, so sustainability may not be the main priority. Hence, the sustainability drive is focused on larger sellers.

### OUTCOME

Ongoing engagement. We appreciate the challenge that the company faces in addressing emissions reduction while it grows at an unprecedented pace. The leadership focus on sustainability as evidenced by linking ESG goals to financial metrics shows that the company is keeping sustainability as a priority. The unique land conservation program is noteworthy.

# ENGAGEMENT HIGHLIGHTS

## GOVERNANCE ENGAGEMENT



SECTOR: INFORMATION TECHNOLOGY

MSCI ESG RATING: BBB

TOPIC: REGULATORY OVERSIGHT & ETHICS

STATUS: CONCLUDED

### OBJECTIVE

Seek details of recent corporate legal action.

### SUMMARY

FI engaged the company after a jury awarded a judgment of more than \$2 billion to the company's rival firm for willful and malicious misappropriation of trade secrets. The lawsuit alleged that the company had accessed the competitor's system and collected proprietary information. The company responded that competitive research is standard practice and the competitor was simply attempting to characterize weaknesses in its products as "trade secrets." FI followed up with the company to request information regarding its next steps. The company said it intends to appeal and noted that the judgement is stayed until appeals have ended.

### OUTCOME

Concluded engagement. The appeals process could take several years and the outcome could be materially different from the initial jury award.

# ENGAGEMENT HIGHLIGHTS

## ENVIRONMENTAL ENGAGEMENT



SECTOR:	ENERGY
MSCI ESG RATING:	A
TOPIC:	WASTE MANAGEMENT
STATUS:	ONGOING

### OBJECTIVE

Seek company updates on environmental impact mitigation and remediation.

### SUMMARY

Through our service provider, FI co-signed an engagement dialogue with a Canadian energy company regarding the environmental impacts of its oil sands project in Alberta, Canada.

Local and federal authorities have cited the company's joint venture project for concerns related to securing the tailings project's ponds. A 2020 report by the Commission for Environmental Cooperation showed scientifically valid evidence of oil sands process water (OSPW) seepage into near-field groundwater around the tailings ponds and that more than 750 million liters of tailings fluid drifted past collection ditches. The company maintains that its solutions to tailings management exceeds the regulatory requirements set by the Alberta Energy Regulator (AER), which oversees and periodically assesses its tailings facilities and the tailings management system.

The engagement inquiry asked the company to outline its remediation measures to secure the tailings ponds, to provide an update on its 10 year water-quality plan, and to comment on its land restoration progress. The company responded that its tailings structures are highly engineered and

managed for long-term integrity and safety. The facilities are built according to strict government regulations and regularly monitored for structural integrity and seepage. The other remediation measures to reduce leakage include a network of groundwater monitoring wells, which are located across its operations. In addition, a series of interceptor ditches and sumps have been installed to ensure any potential seepage or run-off water from rain or snow falling on the pond embankments is collected and pumped back into the pond. Monitoring results are reported to the AER annually.

The company is also working with the Commission for Environment Cooperation to establish regulations that would allow it to release treated water into the local river in an environmentally responsible manner. It is now treating more tailings than it produced at its Base Plant and has reduced the total number of active tailings ponds. The company reported that its water well "capping" initiative is yielding positive results and that water quality is improving.

### OUTCOME

Ongoing engagement. We appreciate that the company has implemented additional remediation measures to reduce leakage of oil sands process water and that its tailings facilities are overseen and regularly assessed by the state energy regulator. FI and the co-signers submitted follow-up inquiries to seek clarity on the company's land restoration rates across its operations.



# ENGAGEMENT HIGHLIGHTS

## GOVERNANCE ENGAGEMENT



SECTOR: FINANCIALS

MSCI ESG RATING: A

TOPIC: EXECUTIVE COMPENSATION;  
SHAREHOLDER PROPOSALS

STATUS: CONCLUDED

### OBJECTIVE

Receive information to inform the voting on proxy proposals related to the company's climate strategy and compensation plan.

### SUMMARY

FI engaged a U.S. bank to understand its climate strategy and progress in light of a "vote no" campaign against some director nominees at the 2022 annual general meeting. The campaign organiser contended that the board had made insufficient progress towards aligning the bank with the goal of limiting global warming to 1.5 degrees Celsius.

The bank has committed to the Paris Agreement and has announced an ambition to achieve net-zero financed emissions by 2050. This ambition is supported by emissions intensity reduction targets for the most GHG-intensive industries, including oil & gas, electric power and auto manufacturing. It has further set a target of \$750 billion to finance sustainable projects over the next decade and it discloses its climate risks and opportunities according to the TCFD framework. FI inquired about the status of drafting credit policies covering additional GHG-intensive sectors. The bank responded that it remains conservative in adding new sectors as it evaluates the implications of how additional targets could be met.

The compensation committee awarded special equity grants to the top 30 executives as disclosed in the proxy say-on-pay proposal. FI inquired

about the rationale for issuing the special grants and asked if it showed the regular compensation program was not functional. The company explained that the special grants constitute stock-based awards with five-year performance goals tied to absolute and relative total shareholder return (TSR) and offer no premature vesting. The performance goals are tied to shareholder value creation and the board has affirmed not to recalibrate the TSR goals that were set when the share price was an all-time-high.

A shareholder proposal sought to lower the Right to Call a Special Meeting threshold to 10%. FI inquired about the board's rationale for maintaining the current threshold of 25%. While the existing threshold falls on the high end of the range among its peers, the board believes that lowering the threshold may be costly as incremental aggregate holdings can easily tally to 10%. Also, given the board's high level of shareholder engagement it has a good connection and understanding of issues with the bank's shareholders. Therefore, the board recommended keeping the current threshold.

### OUTCOME

Concluded engagement. FI appreciated receiving the information, which was incorporated into our Analyst's vote recommendation.

# COLLABORATIVE ENGAGEMENT

## CDP NON-DISCLOSURE CAMPAIGN



REGION:	MULTIPLE
SECTOR:	MULTIPLE
ISSUE:	ENVIRONMENTAL (CLIMATE CHANGE, WATER & FOREST DISCLOSURES)
STATUS:	ONGOING

### OBJECTIVE

Persuade companies to report to CDP (formerly Carbon Disclosure Project) using the organisation's Climate, Water and Forest questionnaire templates.

### ENGAGEMENT SUMMARY

CDP manages a global environmental data disclosure platform—currently, more than 13,000 companies voluntarily report to CDP.

FI participated in CDP's 2022 non-disclosure campaign (NDC), which pools investors to engage global companies. The goal of the engagement is to request companies to report to the CDP using the organisation's Climate, Water and/or Forest disclosure questionnaires, which serve as a valuable resource for comparable data for investors and stakeholders.

On behalf of CDP 2022 NDC, in Q2 2022 FI initiated collaborative engagements with 38 companies in 10 countries listed in the tables to the right and on the following page either as a lead investor or a co-signer.

### OUTCOME

The results of this initiative will be available in Q3 2022.

## FI AS LEAD INVESTOR

*Lead investor denotes FI's role as the primary conductor of engagements in collaboration with a global pool of institutional investors and asset managers.*

Domiciled Country	# of Companies
USA	11
China	6
Japan	2
Israel	1
Republic of Korea	1
UK	1

## FI AS CO-SIGNATORY

Domiciled Country	# of Companies
USA	8
China	4
Brazil	1
Germany	1
Singapore	1
Taiwan	1

# PROXY ENGAGEMENTS



REGION:	MULTIPLE
SECTOR:	MULTIPLE
ISSUE:	GOVERNANCE – PROXY VOTING
STATUS:	CONCLUDED

## OBJECTIVE

Discuss upcoming proxy proposals (gather information and/or provide feedback)

## ENGAGEMENT SUMMARY

To the extent FI is authorised and directed to vote proxies on behalf of a client pursuant to the applicable investment management agreement or confidential client agreement, FI utilises ISS as a third-party proxy service provider. ISS provides vote recommendations and evaluates agenda items in accordance with FI's policy guidelines. ISS also ensures the ballots are counted by the corporate issuer.

Many proxy issues fall into well-defined, standardised categories, and as a result we have developed guidelines in conjunction with ISS for these categories. When FI votes proxies on behalf of clients, we vote with the best interests of our clients in mind. FI's Investment Policy Committee reserves the right to override ISS recommendations as they, and the Research team, see fit.

As an active owner, FI frequently engages with company management on proxy voting issues.

Country	Sector	Proxy Topic
USA	Health Care	Threshold to Call a Special Meeting
USA	Health Care	Threshold to Call a Special Meeting; Stock Purchase Plans
USA	Energy	Executive Compensation
USA	Financials	Executive Compensation
USA	Information Technology	Board Structure - Independent Board Chair
USA	Information Technology	Election of Director and Nominating Committee Chair
USA	Financials	Executive Compensation
UK	Health Care	Executive Remuneration

# DISCLOSURES

Source: Fisher Investments Research, as of June 2022.

MSCI ESG Ratings aim to measure a company's management of financially relevant ESG risks and opportunities. MSCI uses a rules-based methodology to identify industry leaders and laggards according to their exposure to ESG risks and how well they manage those risks relative to peers. MSCI ESG Ratings range from leader (AAA, AA), average (A, BBB, BB) to laggard (B, CCC).

Past performance is never a guarantee of future returns. Investments in securities involve the risk of loss. Any investment programme will always involve the risk of loss. Global investing can involve additional risks, such as the risk of currency fluctuations.

As an asset management firm, Fisher Investments (FI) manages investments in shares of a wide range of companies on behalf of our clients. These shares entitle the holders to vote on various issues put forth by the company and its shareholders at the company's annual meeting or at a special meeting.

The report above demonstrates how FI engages with company management on ESG issues: environmental issues include but not limited to: climate change, toxic emissions & waste, vulnerability to legislation and impact on local communities; social issues include but not limited to: animal rights, human rights, labour relations, involvement with UN, EU and OFAC sanctioned countries, controversial weapons and governance issues include but not limited to: routine business, corporate governance, board independence, executive compensation, corporate stewardship and bribery & corruption.

FI engages according to Fisher Investments Engagement Policy and identifying engagement opportunities is a part of FI's fundamental analysis and to clarify or express concerns over potential ESG issues at the firm or industry level.

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As of 30 June 2022, FI managed over \$165 billion, including assets sub-managed for its wholly-owned subsidiaries. FI and its subsidiaries maintain four principal business units - Fisher Investments Institutional Group (FIIG), Fisher Investments Private Client Group (FIPCG), Fisher Investments International (FI), and Fisher Investments 401(k) Solutions Group (401(k) Solutions). These groups serve a global client base of diverse investors including corporations, public and multi-employer pension funds, foundations and endowments, insurance companies, healthcare organisations, governments and high-net-worth individuals. FI's Investment Policy Committee (IPC) is responsible for investment decisions for all investment strategies. For purpose of defining "years with Fisher Investments," FI was established as a sole proprietorship in 1979, incorporated in 1986, registered with the US SEC in 1987, replacing the prior registration of the sole proprietorship, and succeeded its investment adviser registration to a limited liability in 2005. "Years with Fisher Investments" is calculated using the date on which FI was established as a sole proprietorship through 30 June 2022. FI is wholly owned by Fisher Investments, Inc. Since Inception, Fisher Investments, Inc. has been 100% Fisher-family and employee owned, currently Fisher Investments Inc. beneficially owns 100% of Fisher Investments (FI), as listed in Schedule A to FI's Form ADV Part 1. Ken and Sherrilyn Fisher, as co-trustees of their family trust, beneficially own more than 75% of Fisher Investments, Inc., as noted in Schedule B to FI's Form ADV Part 1.