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ANNEX 1

## ANNEX

to the

**Commission Delegated Regulation (EU) .../...**

**supplementing Regulation (EU) 2019/2088 of the European Parliament and of the Council with regard to regulatory technical standards specifying the details of the content and presentation of the information in relation to the principle of ‘do no significant harm’, specifying the content, methodologies and presentation of information in relation to sustainability indicators and adverse sustainability impacts, and the content and presentation of the information in relation to the promotion of environmental or social characteristics and sustainable investment objectives in pre-contractual documents, on websites and in periodic reports**

## ANNEX I

### **Template principal adverse sustainability impacts statement**

For the purposes of this Annex, the following definitions shall apply:

- (1) 'scope 1, 2 and 3 GHG emissions' means the scope of greenhouse gas emissions referred to in points (1)(e)(i) to (iii) of Annex III to Regulation (EU) 2016/1011 of the European Parliament and of the Council<sup>1</sup>;
- (2) 'greenhouse gas (GHG) emissions' means greenhouse gas emissions as defined in Article 3, point (1), of Regulation (EU) 2018/842 of the European Parliament and of the Council<sup>2</sup>;
- (3) 'weighted average' means a ratio of the weight of the investment by the financial market participant in an investee company in relation to the enterprise value of the investee company;
- (4) 'enterprise value' means the sum, at fiscal year-end, of the market capitalisation of ordinary shares, the market capitalisation of preferred shares, and the book value of total debt and non-controlling interests, without the deduction of cash or cash equivalents;
- (5) 'companies active in the fossil fuel sector' means companies that derive any revenues from exploration, mining, extraction, production, processing, storage, refining or distribution, including transportation, storage and trade, of fossil fuels as defined in Article 2, point (62), of Regulation (EU) 2018/1999 of the European Parliament and of the Council<sup>3</sup>;
- (6) 'renewable energy sources' means renewable non-fossil sources, namely wind, solar (solar thermal and solar photovoltaic) and geothermal energy, ambient energy, tide, wave and other ocean energy, hydropower, biomass, landfill gas, sewage treatment plant gas, and biogas;
- (7) 'non-renewable energy sources' means energy sources other than those referred to in point (6);

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<sup>1</sup> Regulation (EU) 2016/1011 of the European Parliament and of the Council of 8 June 2016 on indices used as benchmarks in financial instruments and financial contracts or to measure the performance of investment funds and amending Directives 2008/48/EC and 2014/17/EU and Regulation (EU) No 596/2014 (OJ L 171, 29.6.2016, p. 1).

<sup>2</sup> Regulation (EU) 2018/842 of the European Parliament and of the Council of 30 May 2018 on binding annual greenhouse gas emission reductions by Member States from 2021 to 2030 contributing to climate action to meet commitments under the Paris Agreement and amending Regulation (EU) No 525/2013 (OJ L 156, 19.6.2018, p. 26).

<sup>3</sup> Regulation (EU) 2018/1999 of the European Parliament and of the Council of 11 December 2018 on the Governance of the Energy Union and Climate Action, amending Regulations (EC) No 663/2009 and (EC) No 715/2009 of the European Parliament and of the Council, Directives 94/22/EC, 98/70/EC, 2009/31/EC, 2009/73/EC, 2010/31/EU, 2012/27/EU and 2013/30/EU of the European Parliament and of the Council, Council Directives 2009/119/EC and (EU) 2015/652 and repealing Regulation (EU) No 525/2013 of the European Parliament and of the Council (OJ L 328, 21.12.2018, p. 1).

- (8) 'energy consumption intensity' means the ratio of energy consumption per unit of activity, output or any other metric of the investee company to the total energy consumption of that investee company;
- (9) 'high impact climate sectors' means the sectors listed in Sections A to H and Section L of Annex I to Regulation (EC) No 1893/2006 of the European Parliament and of the Council<sup>4</sup>;
- (10) 'protected area' means designated areas in the European Environment Agency's Common Database on Designated Areas (CDDA);
- (11) 'area of high biodiversity value outside protected areas' means land with high biodiversity value as referred to in Article 7b(3) of Directive 98/70/EC of the European Parliament and of the Council<sup>5</sup>;
- (12) 'emissions to water' means direct emissions of priority substances as defined in Article 2(30) of Directive 2000/60/EC of the European Parliament and of the Council<sup>6</sup> and direct emissions of nitrates, phosphates and pesticides ;
- (13) 'areas of high water stress' means regions where the percentage of total water withdrawn is high (40-80%) or extremely high (greater than 80%) in the World Resources Institute's (WRI) Water Risk Atlas tool "Aqueduct";
- (14) 'hazardous waste and radioactive waste' means hazardous waste and radioactive waste;
- (15) 'hazardous waste' means hazardous waste as defined in Article 3(2) of Directive 2008/98/EC of the European Parliament and of the Council<sup>7</sup> ;
- (16) 'radioactive waste' means radioactive waste as defined in Article 3(7) of Council Directive 2011/70/Euratom<sup>8</sup>;
- (17) 'non-recycled waste' means any waste not recycled within the meaning of 'recycling' in Article 3(17) of Directive 2008/98/EC;
- (18) 'activities negatively affecting biodiversity-sensitive areas' means activities that are characterised by all of the following:

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<sup>4</sup> Regulation (EC) No 1893/2006 of the European Parliament and of the Council of 20 December 2006 establishing the statistical classification of economic activities NACE Revision 2 and amending Council Regulation (EEC) No 3037/90 as well as certain EC Regulations on specific statistical domains Text with EEA relevance (OJ L 393, 30.12.2006, p. 1–39).

<sup>5</sup> Directive 98/70/EC of the European Parliament and of the Council of 13 October 1998 relating to the quality of petrol and diesel fuels and amending Council Directive 93/12/EEC (OJ L 350, 28.12.1998, p. 58).

<sup>6</sup> Directive 2000/60/EC of the European Parliament and of the Council of 23 October 2000 establishing a framework for Community action in the field of water policy (OJ L 327, 22.12.2000, p. 1).

<sup>7</sup> Directive 2008/98/EC of the European Parliament and of the Council of 19 November 2008 on waste and repealing certain Directives (OJ L 312, 22.11.2008, p. 3).

<sup>8</sup> Council Directive 2011/70/Euratom of 19 July 2011 establishing a Community framework for the responsible and safe management of spent fuel and radioactive waste (OJ L 199, 2.8.2011, p. 48).

- (a) those activities lead to the deterioration of natural habitats and the habitats of species and disturb the species for which a protected area has been designated;
- (b) for those activities, none of the conclusions, mitigation measures or impact assessments adopted pursuant to any of the following Directives or national provisions or international standards that are equivalent to those Directives have been implemented:
  - (i) Directive 2009/147/EC of the European Parliament and of the Council<sup>9</sup>;
  - (ii) Council Directive 92/43/EEC<sup>10</sup>;
  - (iii) an Environmental Impact Assessment (EIA) as defined in Article 1(2), point (g), of Directive 2011/92/EU of the European Parliament and of the Council<sup>11</sup>;
  - (iv) for activities located in third countries, conclusions, mitigation measures or impact assessments adopted in accordance with national provisions or international standards that are equivalent to the Directives and impact assessments listed in points (i), (ii) and (iii);
- (19) ‘biodiversity-sensitive areas’ means Natura 2000 network of protected areas, UNESCO World Heritage sites and Key Biodiversity Areas (‘KBAs’), as well as other protected areas, as referred to in Appendix D of Annex II to Commission Delegated Regulation (EU) 2021/2139<sup>12</sup>;
- (20) ‘threatened species’ means endangered species, including flora and fauna, listed in the European Red List or the IUCN Red List, as referred to in Section 7 of Annex II to Delegated Regulation (EU) 2021/2139;
- (21) ‘deforestation’ means the temporary or permanent human-induced conversion of forested land to non-forested land;
- (22) ‘UN Global Compact principles’ means the ten Principles of the United Nations Global Compact;
- (23) ‘unadjusted gender pay gap’ means the difference between average gross hourly earnings of male paid employees and of female paid employees as a percentage of average gross hourly earnings of male paid employees;

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<sup>9</sup> Directive 2009/147/EC of the European Parliament and of the Council of 30 November 2009 on the conservation of wild birds (OJ L 20, 26.1.2010, p. 7).

<sup>10</sup> Council Directive 92/43/EEC of 21 May 1992 on the conservation of natural habitats and of wild fauna and flora (OJ L 206, 22.7.1992, p. 7).

<sup>11</sup> Directive 2011/92/EU of the European Parliament and of the Council of 13 December 2011 on the assessment of the effects of certain public and private projects on the environment (OJ L 026, 28.1.2012, p. 1).

<sup>12</sup> Commission Delegated Regulation (EU) 2021/2139 of 4 June 2021 supplementing Regulation (EU) 2020/852 of the European Parliament and of the Council by establishing the technical screening criteria for determining the conditions under which an economic activity qualifies as contributing substantially to climate change mitigation or climate change adaptation and for determining whether that economic activity causes no significant harm to any of the other environmental objectives (OJ L 442, 9.12.2021, p. 1).

- (24) 'board' means the administrative, management or supervisory body of a company;
- (25) 'human rights policy' means a policy commitment approved at board level on human rights that the economic activities of the investee company shall be in line with the UN Guiding Principles on Business and Human Rights;
- (26) 'whistleblower' means 'reporting person' as defined in Article 5(7) of Directive (EU) 2019/1937 of the European Parliament and of the Council<sup>13</sup>;
- (27) 'inorganic pollutants' means emissions within or lower than the emission levels associated with the best available techniques (BAT-AEL) as defined in Article 3, point (13) of Directive 2010/75/EU of the European Parliament and of the Council<sup>14</sup>, for the Large Volume Inorganic Chemicals- Solids and Others industry;
- (28) 'air pollutants' means direct emissions of sulphur dioxides (SO<sub>2</sub>), nitrogen oxides (NO<sub>x</sub>), non-methane volatile organic compounds (NMVOC), and fine particulate matter (PM<sub>2,5</sub>) as defined in Article 3, points (5) to (8), of Directive (EU) 2016/2284 of the European Parliament and of the Council<sup>15</sup>, ammonia (NH<sub>3</sub>) as referred to in that Directive and heavy metals (HM) as referred to in Annex I to that Directive;
- (29) 'ozone depletion substances' mean substances listed in the Montreal Protocol on Substances that Deplete the Ozone Layer.

For the purposes of this Annex, the following formulas shall apply:

- (1) 'GHG emissions' shall be calculated in accordance with the following formula:

$$\sum_n^i \left( \frac{\text{current value of investment}_i}{\text{investee company's enterprise value}_i} \times \text{investee company's Scope}(x) \text{ GHG emissions}_i \right)$$

<sup>13</sup> Directive (EU) 2019/1937 of the European Parliament and of the Council of 23 October 2019 on the protection of persons who report breaches of Union law (OJ L305, 26.11.2019, p. 17).

<sup>14</sup> Directive 2010/75/EU of the European Parliament and of the Council of 24 November 2010 on industrial emissions (integrated pollution prevention and control) (OJ L 334, 17.12.2010, p. 17).

<sup>15</sup> Directive (EU) 2016/2284 of the European Parliament and of the Council of 14 December 2016 on the reduction of national emissions of certain atmospheric pollutants, amending Directive 2003/35/EC and repealing Directive 2001/81/EC (Text with EEA relevance), *OJ L 344, 17.12.2016, p. 1–31*

(2) 'carbon footprint' shall be calculated in accordance with the following formula:

$$\frac{\sum_n^i \left( \frac{\text{current value of investment}_i}{\text{investee company's enterprise value}_i} \times \text{investee company's Scope 1, 2 and 3 GHG emissions}_i \right)}{\text{current value of all investments (€M)}}$$

(3) 'GHG intensity of investee companies' shall be calculated in accordance with the following formula:

$$\sum_n^i \left( \frac{\text{current value of investment}_i}{\text{current value of all investments (€M)}} \times \frac{\text{investee company's Scope 1, 2 and 3 GHG emissions}_i}{\text{investee company's €M revenue}_i} \right)$$

(4) 'GHG intensity of sovereigns' shall be calculated in accordance with the following formula:

$$\sum_n^i \left( \frac{\text{current value of investment}_i}{\text{current value of all investments (€M)}} \times \frac{\text{The country's Scope 1, 2 and 3 GHG emissions}_i}{\text{Gross Domestic Product}_i(\text{€M})} \right)$$

(5) 'inefficient real estate assets' shall be calculated in accordance with the following formula:

$$\frac{((\text{Value of real estate assets built before 31/12/2020 with EPC of C or below}) + (\text{Value of real estate assets built after 31/12/2020 with PED below NZEB in Directive 2010/31/EU}))}{\text{Value of real estate assets required to abide by EPC and NZEB rules}}$$

For the purposes of the formulas, the following definitions shall apply:

- (1) 'current value of investment' means the value in EUR of the investment by the financial market participant in the investee company;
- (2) 'enterprise value' means the sum, at fiscal year-end, of the market capitalisation of ordinary shares, the market capitalisation of preferred shares, and the book value of total debt and non-controlling interests, without the deduction of cash or cash equivalents;
- (3) 'current value of all investments' means the value in EUR of all investments by the financial market participant;
- (4) 'nearly zero-energy building (NZEB)', 'primary energy demand (PED)' and 'energy performance certificate (EPC)' shall have the meanings given to them in paragraphs 2, 5 and 12 of Article 2 of Directive 2010/31/EU of the European Parliament and of the Council<sup>16</sup>.

<sup>16</sup> Directive 2010/31/EU of the European Parliament and of the Council of 19 May 2010 on the energy performance of buildings (recast) (OJ L 153, 18.6.2010, p. 13)

Table 1

**Statement on principal adverse impacts of investment decisions on sustainability factors**

**Financial market participant**, PAYDEN USD LOW DURATION CREDIT FUND, 549300NYCG2Q5B5KVVW94

**Summary**

PAYDEN USD LOW DURATION CREDIT FUND, LEI: 549300NYCG2Q5B5KVVW94, considers principal adverse impacts of its investment decisions on sustainability factors.

This statement on principal adverse impacts on sustainability factors covers the reference period from 1 January 2025 to 31 December 2025.

The following report contains information relating to all mandatory principal adverse impacts, together with two further principal adverse impacts namely: Investments in companies without carbon emission reduction initiatives and Average corruption score. This statement is based on available data or metrics from MSCI related to the relevant quarter-end holdings as of 31 March 2025, 30 June 2025, 30 September 2025, and 31 December 2025. With effect from 29 November 2022, the Fund considered principal adverse impacts of its investment decisions on sustainability factors.

Data coverage may vary by PAI topic based on methodology, disclosures, and time periods, and holdings in mutual funds are not included in PAI analysis.

**Please Note**

\*N/A denotes that either an issuer has not reported on the relevant metric or that the Fund did not hold securities within the coverage of the said metric at the relevant time

**Description of the principal adverse impacts on sustainability factors**

Indicators applicable to investments in investee companies						
Adverse sustainability indicator	Metric	Impact [2025]	Impact [2024]	Explanation	Actions taken, and actions planned and targets set for the next reference period	
CLIMATE AND OTHER ENVIRONMENT-RELATED INDICATORS						
Greenhouse gas emissions	1. GHG emissions	Scope 1 GHG emissions	42,222.83	16,165.44	Sum of portfolio companies' Carbon Emissions - Scope 1 (tCO2e) weighted by the portfolio's value of investment in a company and by the company's most recently available enterprise value including cash. Emissions are grossed up to represent 100% of the Fund's relevant holdings.	The Fund has sought and continues to seek to maintain a greenhouse gas intensity of investee companies that is less than the Corporate GHG Intensity of the ESG Universe. GHG emissions are defined as scope 1, 2, and 3 normalized by sales in euros. Please find additional details in the Fund's Annex II disclosure here: <a href="#">Payden &amp; Rygel Investment Management</a>
		Scope 2 GHG emissions	7,270.44	4,265.30	Sum of portfolio companies' Carbon Emissions - Scope 2 (tCO2e) weighted by the portfolio's value of investment in a company and by the company's most recently available enterprise value including cash. Emissions are grossed up to represent 100% of the Fund's relevant holdings.	

		Scope 3 GHG emissions	219,984.89	145,920.07	Sum of portfolio companies' Scope 3 – Total Emission Estimated (tCO2e) weighted by the portfolio's value of investment in a company and by the company's most recently available enterprise value including cash. Emissions are grossed up to represent 100% of the Fund's relevant holdings.
		Total GHG emissions	302,347.26	171,280.12	The total annual Scope 1, Scope 2, and estimated Scope 3 GHG emissions associated with the market value of the portfolio. Companies' carbon emissions are apportioned across all outstanding shares and bonds (based on the most recently available enterprise value including cash). Emissions are grossed up to represent 100% of the Fund's relevant holdings.
	2. Carbon footprint	Carbon footprint	367.37	379.14	The total annual Scope 1, Scope 2, and estimated Scope 3 GHG emissions associated with 1 million EUR invested in the portfolio. Companies' carbon emissions are apportioned across all outstanding shares and bonds (Scope 1, Scope 2, and estimated Scope 3 GHG emissions/ the most recently available enterprise value including cash).

	3. GHG intensity of investee companies	GHG intensity of investee companies	813.72	819.83	The portfolio's weighted average of its holding issuers' GHG Intensity (Scope 1, Scope 2 and estimated Scope 3 GHG emissions/EUR million revenue).	
	4. Exposure to companies active in the fossil fuel sector	Share of investments in companies active in the fossil fuel sector	10.67%	10.97%	The percentage of the portfolio's market value exposed to issuers with fossil fuels related activities, including exploration, extraction, mining, storage, distribution and trading of oil and gas, production and distribution of thermal coal, and production, distribution, storage, and reserves of metallurgical coal, rebalanced by the sub-portfolio of corporate holdings.	The Fund has sought and continues to seek to attain E/S Characteristics through restrictions and exclusions on activities that could be deemed harmful to society or the environment. The ESG Investment Exclusions Policy includes securities relating to oil & gas and thermal coal based on revenue thresholds. Please find more information here: <a href="#">Payden &amp; Rygel Investment Management</a>

<p>5. Share of non-renewable energy consumption and production</p>	<p>Share of non-renewable energy consumption and non-renewable energy production of investee companies from non-renewable energy sources compared to renewable energy sources, expressed as a percentage of total energy sources</p>	<p>62.23%</p>	<p>67.87%</p>	<p>The portfolio's weighted average of issuers' energy consumption and/or production from non-renewable sources as a percentage of total energy used and/or generated.</p>	<p>The Investment Manager has undertaken and continues to undertake targeted engagements that focus on specific themes related to ESG. These align with initiatives the Investment Manager believes support long-term value creation/protection and/or reflect the values of those on whose behalf the Fund invests. As of December 2025, Payden's engagement policy can be found here: <a href="#">Payden &amp; Rygel Investment Management</a></p>
<p>6. Energy consumption intensity per high impact climate sector</p>	<p>Energy consumption in GWh per million EUR of revenue of investee companies, per high impact climate sector</p>	<p>NACE Code A (Agriculture, Forestry and Fishing) N/A*  NACE Code B (Mining and Quarrying) 0.95</p>	<p>NACE Code A (Agriculture, Forestry and Fishing) N/A*  NACE Code B (Mining and Quarrying) 1.82</p>	<p>The portfolio's weighted average of Energy Consumption Intensity (GWh/million EUR revenue) for issuers classified within NACE Code A (Agriculture, Forestry and Fishing)  The portfolio's weighted average of Energy Consumption Intensity (GWh/million EUR revenue) for issuers classified within NACE Code B (Mining and Quarrying)</p>	<p>A summary of 2025 engagements by PAI topic can be found <a href="#">here</a>.</p>

			NACE Code C (Manufacturing) 0.39	NACE Code C (Manufacturing) 0.22	The portfolio's weighted average of Energy Consumption Intensity (GwH/million EUR revenue) for issuers classified within NACE Code C (Manufacturing)	
			NACE Code D (Electricity, Gas, Steam and Air Conditioning Supply) 1.88	NACE Code D (Electricity, Gas, Steam and Air Conditioning Supply) 5.50	The portfolio's weighted average of Energy Consumption Intensity (GwH/million EUR revenue) for issuers classified within NACE Code D (Electricity, Gas, Steam and Air Conditioning Supply)	
			NACE Code E (Water Supply; Sewerage, Waste Management and Remediation Activities) 0.33	NACE Code E (Water Supply; Sewerage, Waste Management and Remediation Activities) N/A*	The portfolio's weighted average of Energy Consumption Intensity (GwH/million EUR revenue) for issuers classified within NACE Code E (Water Supply; Sewerage, Waste Management and Remediation Activities)	
			NACE Code F (Construction) 0.11	NACE Code F (Construction) N/A*	The portfolio's weighted average of Energy Consumption Intensity (GwH/million EUR revenue) for issuers classified within NACE Code F (Construction)	

			<p>NACE Code G (Wholesale and Retail Trade; Repair of Motor Vehicles and Motorcycles) 0.31</p> <p>NACE Code H (Transportation and Storage) 5.28</p> <p>NACE Code L (Real Estate Activities) 0.41</p>	<p>NACE Code G (Wholesale and Retail Trade; Repair of Motor Vehicles and Motorcycles) 0.21</p> <p>NACE Code H (Transportation and Storage) 4.29</p> <p>NACE Code L (Real Estate Activities) 0.42</p>	<p>The portfolio's weighted average of Energy Consumption Intensity (GwH/million EUR revenue) for issuers classified within NACE Code G (Wholesale and Retail Trade, Repair of Motor Vehicles and Motorcycles)</p> <p>The portfolio's weighted average of Energy Consumption Intensity (GwH/million EUR revenue) for issuers classified within NACE Code H (Transportation and Storage)</p> <p>The portfolio's weighted average of Energy Consumption Intensity (GwH/million EUR revenue) for issuers classified within NACE Code L (Real Estate Activities)</p>	
Biodiversity	7. Activities negatively affecting biodiversity-sensitive areas	Share of investments in investee companies with sites/operations located in or near to biodiversity-sensitive areas where activities of those investee companies negatively affect those areas	6.55%	7.35%	The percentage of the portfolio's market value exposed to issuers that reported having operations located in or near biodiversity sensitive areas, are assessed to potentially negatively affect local biodiversity, and have no impact assessment; or they are involved in controversies with severe impact on local biodiversity.	

Water	8. Emissions to water	Tonnes of emissions to water generated by investee companies per million EUR invested, expressed as a weighted average	0.00	N/A*	The total water emissions (metric tons) associated with EUR 1 million invested in the portfolio. It is calculated as the weighted average of Water Emissions (metric tons) per company divided by the company's most recently available enterprise value including cash.	
Waste	9. Hazardous waste and radioactive waste ratio	Tonnes of hazardous waste and radioactive waste generated by investee companies per million EUR invested, expressed as a weighted average	0.53	1.05	The total annual hazardous waste (metric tons reported) associated with 1 million EUR invested in the portfolio. Companies' hazardous waste is apportioned across all outstanding shares and bonds (based on the most recently available enterprise value including cash).	
<b>Additional climate and other environment-related indicators</b>						

Emissions	A1. Investments in companies without carbon emission reduction initiatives	Share of investments in investee companies without carbon emission reduction initiatives aimed at aligning with the Paris Agreement	41.67%	46.19%	The percentage of the portfolio's market value exposed to issuers without a carbon emissions reduction target aligned with the Paris Agreement.	<p>The Investment Manager has undertaken and continues to undertake targeted engagements that focus on specific themes related to ESG. These align with initiatives the Investment Manager believes support long-term value creation/protection and/or reflect the values of those on whose behalf the Fund invests. As of December 2025, Payden's engagement policy can be found here: <a href="#">Payden &amp; Rygel Investment Management</a></p> <p>A summary of 2025 engagements by PAI topic can be found <a href="#">here</a>.</p>
<b>INDICATORS FOR SOCIAL AND EMPLOYEE, RESPECT FOR HUMAN RIGHTS, ANTI-CORRUPTION AND ANTI-BRIBERY MATTERS</b>						

Social and employee matters	10. Violations of UN Global Compact principles and Organisation for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises	Share of investments in investee companies that have been involved in violations of the UNGC principles or OECD Guidelines for Multinational Enterprises	0.00%	0.00%	The percentage of the portfolio's market value exposed to issuers with very severe controversies related to the company's operations and/or products.	The Fund's Governance Assessment has evaluated and continues to evaluate corporate issuers based on available, quantitative information in order to evaluate a broad and global investment universe. The Governance Assessment determines which corporate issuers may comprise the investable universe. Companies in violation are excluded based on the ESG Good Governance Policy. Please find more information here: <a href="#">Payden &amp; Rygel Investment Management</a>
	11. Lack of processes and compliance	Share of investments in	2.62%	1.24%	The percentage of the portfolio's market value exposed to issuers	The Investment Manager has

	mechanisms to monitor compliance with UN Global Compact principles and OECD Guidelines for Multinational Enterprises	investee companies without policies to monitor compliance with the UNGC principles or OECD Guidelines for Multinational Enterprises or grievance /complaints handling mechanisms to address violations of the UNGC principles or OECD Guidelines for Multinational Enterprises			that are not signatories in the UN Global Compact.	undertaken and continues to undertake targeted engagements that focus on specific themes related to ESG. These align with initiatives the Investment Manager believes support long-term value creation/protection and/or reflect the values of those on whose behalf the Fund invests. As of December 2025, Payden's engagement policy can be found here: <a href="#">Payden &amp; Rygel Investment Management</a>
	12. Unadjusted gender pay gap	Average unadjusted gender pay gap of investee companies	16.79%	21.13%	The portfolio holdings' weighted average of the difference between the average gross hourly earnings of male and female employees, as a percentage of male gross earnings.	A summary of 2025 engagements by PAI topic can be found <a href="#">here</a> .
	13. Board gender diversity	Average ratio of female to male board members in	35.41%	35.08%	The portfolio holdings' weighted average of the ratio of female to male board members.	

		investee companies, expressed as a percentage of all board members.				
	14. Exposure to controversial weapons (anti-personnel mines, cluster munitions, chemical weapons and biological weapons)	Share of investments in investee companies involved in the manufacture or selling of controversial weapons	0.00%	0.00%	The percentage of the portfolio's market value exposed to issuers with an industry tie to landmines, cluster munitions, chemical weapons or biological weapons. Note: Industry ties includes ownership, manufacturing and investments. Ties to landmines do not include related safety products.	The Fund has sought and continues to seek to attain E/S Characteristics through restrictions and exclusions on activities that could be deemed harmful to society or the environment. The ESG Investment Exclusions Policy includes securities relating to controversial weapons. Please find more information here: <a href="#">Payden &amp; Rygel Investment Management</a>
<b>Indicators applicable to investments in sovereigns and supranationals</b>						
<b>Adverse sustainability indicator</b>	<b>Metric</b>	<b>Impact [2025]</b>	<b>Impact [2024]</b>	<b>Explanation</b>	<b>Actions taken, and actions planned and</b>	

						targets set for the next reference period
Environmental	15. GHG intensity	GHG intensity of investee countries	N/A*	244.42	The portfolio's weighted average of sovereign issuers' GHG Emissions Intensity (Scope 1, 2 and 3 emissions/EUR M GDP).	
Social	16. Investee countries subject to social violations	Number of investee countries subject to social violations (absolute number and relative number divided by all investee countries), as referred to in international treaties and conventions, United Nations principles and, where applicable, national law	0.00 0.00%	0.00 0.00%	The portfolio's number of unique sovereign issuers with European External Action Service (EEAS) restrictive measures (sanctions) on imports and exports.	The Investment Manager has undertaken and continues to undertake targeted engagements that focus on specific themes related to ESG. These align with initiatives the Investment Manager believes support long-term value creation/protection and/or reflect the values of those on whose behalf the Fund invests. As of December 2025, Payden's engagement policy can be found here:  <a href="#">Payden &amp; Rygel Investment Management</a>  A summary of 2025 engagements by PAI

						topic can be found <a href="#">here.</a>
<b>Additional indicators for social and employee, respect for human rights, anti-corruption and anti-bribery matters</b>						
Governance	A2 Average corruption score	Measure of the perceived level of public sector corruption using a quantitative indicator explained in the explanation column	N/A*	69.00	The weighted average of the portfolio's issuers' Corruption Perceptions Index (0-100 score), which measures the perceptions of public sector corruption, including bribery, diversion of public funds, use of public office for private gain, nepotism in the civil service, state capture and mechanisms available to prevent corruption. Values range from 100 (best) to 0 (worst). Data source: Transparency International.	The Investment Manager has undertaken and continues to undertake targeted engagements that focus on specific themes related to ESG. These align with initiatives the Investment Manager believes support long-term value creation/protection and/or reflect the values of those on whose behalf the Fund invests. As of December 2025, Payden's engagement policy can be found here: <a href="#">Payden &amp; Rygel Investment Management</a>  A summary of 2025 engagements by PAI topic can be found <a href="#">here.</a>

<b>Indicators applicable to investments in real estate assets</b>						
<b>Adverse sustainability indicator</b>		<b>Metric</b>	<b>Impact [2025]</b>	<b>Impact [2024]</b>	<b>Explanation</b>	<b>Actions taken, and actions planned and targets set for the next reference period</b>
Fossil fuels	17. Exposure to fossil fuels through real estate assets	Share of investments in real estate assets involved in the extraction, storage, transport or manufacture of fossil fuels	N/A	N/A	N/A	N/A
Energy efficiency	18. Exposure to energy-inefficient real estate assets	Share of investments in energy-inefficient real estate assets	N/A	N/A	N/A	N/A
<b>Other indicators for principal adverse impacts on sustainability factors</b>						
<b>Other adverse impacts on sustainability factors used to identify and assess additional principal adverse impacts on a sustainability factors:</b>						
In addition to the set of mandatory indicators above, the Fund considers two additional indicators subject to data availability.						

**Table 2, Indicator 4:** Investments in companies without carbon emission reduction initiatives. This indicator measures the share of investments in investee companies without carbon emission reduction initiatives aimed at aligning with the Paris Agreement. It is mitigated through the application of the Payden ESG Engagement Policy ([ESG Engagement.pdf \(payden.com\)](#)).

**Table 3, indicator 21:** Average corruption score. This indicator measures of the perceived level of public sector corruption using a quantitative indicator. It is mitigated through the application of the Payden ESG Engagement Policy ([ESG Engagement.pdf \(payden.com\)](#)).

**Description of policies to identify and prioritise principal adverse impacts on sustainability factors:**

Where information relating to any of the indicators used is not readily available, the Company uses with third party data providers or external experts or makes reasonable assumptions.

Payden Global Funds Plc (the “Company”) instilled a Principle Adverse Impact (“PAI”) Statement as of 29 November 2022 and updated as of May 2025. The Statement to identify and prioritise PAIs on sustainability factors was approved by Waystone Management Company (IE) Limited, the manager of the Company, on 29 November 2022. The ESG committee (the “ESG Committee”) of Payden & Rygel, the sub-investment manager of the Company (“Payden”) is responsible for oversight of the implementation of this ESG Principal Adverse Impact Statement working in conjunction with all of Payden’s investment research and strategy teams. Payden’s ESG-Compliance Sub-Committee is responsible for the monitoring and testing of this ESG Principal Adverse Impact Statement. The managing committee of Payden reviews and updates the ESG Principal Adverse Impact Statement at least annually and periodically as appropriate upon the advice of the ESG Committee and compliance group. Please find more information at [ESG PAI Statement.pdf \(payden.com\)](#).

The Company identifies and addresses the principal adverse impacts and indicators and set parameters on a sub-fund-by-sub-fund basis for how principal adverse impacts are considered in the investment process. Payden seeks to manage the risks connected with potential adverse impacts from the Company’s investments as outlined by SFDR regulation. Payden mitigates these risks in various ways, including (i) the application of the Payden ESG Investment Exclusion Policy ([ESG Exclusions.pdf \(payden.com\)](#)), (ii) promotion of E/S characteristics and (iii) the application of the Payden ESG Engagement Policy ([ESG Engagement.pdf \(payden.com\)](#)). In addition, Payden periodically reviews this disclosure and the data sources and methodologies used to assess and mitigate principal adverse impacts. The Principal Adverse Impact Statement takes a quantitative and data driven approach and is used globally across relevant products. Payden places reliance on third party data for this analysis and periodically evaluates the data and service providers through due diligence. For a list of data providers that the Company uses, please find more information at [http://www.payden.com/SFDRPolicies/ESG\\_Data.pdf](http://www.payden.com/SFDRPolicies/ESG_Data.pdf).

One of the challenges faced by the investment management industry when integrating sustainability risks, Principal Adverse Impacts, or ESG considerations in the investment process is the limited availability of relevant data for that purpose. For some areas of the market, data is not yet systematically disclosed by issuers or, when disclosed by issuers, may be incomplete or may follow different methodologies. Information used to establish Payden’s ESG Policies or determine applicable ESG factors for any portfolio is typically based on historical data, which may not be complete or may not fully reflect the future ESG performance or risks of the investments.

Principle Adverse Impact data is sourced and calculated by MSCI.

Certain information contained herein (the “Information”) is sourced from/copyright of MSCI Inc., MSCI ESG Research LLC, or their affiliates (“MSCI”), or information providers (together the “MSCI Parties”) and may have been used to calculate scores, signals, or other indicators. The Information is for internal use only and may not be reproduced or disseminated in whole or part without prior written permission. The Information may not be used for, nor does it constitute, an offer to buy or sell, or a promotion or recommendation of, any security, financial instrument or product, trading strategy, or index, nor should it be taken as an indication or guarantee of any future performance. Some funds may be based on or linked to MSCI indexes, and MSCI may be compensated based on the fund’s assets under management or other measures. MSCI has established an information barrier between index research and certain Information. None of the Information in and of itself can be used to determine which securities to buy or sell or when to buy or sell them. The Information is provided “as is” and the user assumes the entire risk of any use it may make or permit to be made of the Information. No MSCI Party warrants or guarantees the originality, accuracy and/or completeness of the Information and each expressly disclaims all express or implied warranties. No MSCI Party shall have any liability for any errors or omissions in connection with any Information herein, or any liability for any direct, indirect, special, punitive, consequential or any other damages (including lost profits) even if notified of the possibility of such damages.

#### **Engagement policies**

The Company believes environmental, social and governance (“ESG”) factors have the potential to impact the long-term financial performance of an issuer and to the performance of its securities. Payden deems engagement, as described in its ESG engagement policy (the “ESG Engagement Policy”) to be a tool to understanding how issuers intend to deal with ESG issues over time. In addition, Payden views Engagement as an opportunity to learn about an issuer’s response to the evolving ESG landscape.

Payden, on behalf of the Company, uses targeted engagements to focus specific themes related to ESG. These align with initiatives Payden believes support long-term value creation/protection and/or reflect the values of those on whose behalf the Company invests. Payden utilizes several methods for conducting targeted engagements in its stewardship efforts. The method and frequency of engagement are determined by several factors including Payden’s history of engagement with the issuer, the relevant issue, and asset class. More information can be found at [ESG Engagement.pdf \(payden.com\)](#). Examples of enterprise-wide initiatives which are integrated into the targeted engagement process include Principal Adverse Impacts. The Company seeks to manage the risks connected with potential adverse impacts from its investments in various ways, including engagement. More information can be found at [https://www.payden.com/SFDRPolicies/ESG\\_PAI\\_Statement.pdf](https://www.payden.com/SFDRPolicies/ESG_PAI_Statement.pdf).

#### **References to international standards**

The Company adheres to responsible business conduct codes and internationally recognised standards for due diligence and reporting and evaluations of the degree of issuers' alignment to the objectives of the Paris Agreement. Where relevant, alignment with global notes is evaluated by Payden’s ESG Good Governance Policy. The policy is applicable in the evaluation of corporate issuers based on available, quantitative information in order to define a broad and global investment universe. This includes the requirement that corporate issuers must not be in violation of the United Nations Global Compact. Issuers with controversies due to situations such as regulatory action or violations of commonly accepted international norms, are judged to have operations or products that may have a negative ESG impact. These issuers are not eligible for

funds designated Article 8 financial products pursuant to the Sustainable Finance Disclosure Regulation (EU 2019/2088) and are reference above under PAI 10: Violations of UN Global Compact principles and Organisation for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises .

The Company addresses Climate Change Mitigation (“Climate Change Mitigation”) as a binding element. The Company promotes certain environmental characteristics focusing on climate change mitigation Climate Change Mitigation. This is measured via greenhouse gas intensity data and climate score of the underlying securities of each sub-fund. Each sub-fund’s portfolio’s greenhouse gas intensity is compared to the relevant comparable investment universe which is representative of the broad portfolio allocation for the sub-fund. Below are the sustainability indicators used by the Company to measure Climate Change Mitigation where data is available:

- I. Corporate Investments: The Company will seek to maintain a greenhouse gas intensity of investee companies (“Corporate GHG Intensity”) that is less than the Corporate GHG Intensity of the ESG Universe calculated as described above. Each sub-fund’s Corporate GHG Intensity is measured as the weighted average carbon emissions in-line with Principal Adverse Impacts (“PAIs”) pursuant to Article 7 under SFDR (PAI 3: Green House Gas (GHG) emissions – scope 1, 2 and 3 normalized by sales in euros).

One of the challenges faced by the investment management industry when integrating sustainability risks, Principal Adverse Impacts, or ESG considerations in the investment process is the limited availability of relevant data for that purpose. For some areas of the market, data is not yet systematically disclosed by issuers or, when disclosed by issuers, may be incomplete or may follow different methodologies. Information used to establish Payden’s ESG Policies or determine applicable ESG factors for any portfolio is typically based on historical data, which may not be complete or may not fully reflect the future ESG performance or risks of the investments. A forward-looking climate scenario is not used in measuring the E/S Characteristics of the fund given the variability of assumptions in underlying models. Data is sourced from MSCI and ICE Climate. For a list of data providers used by Payden, please find more information at [http://www.payden.com/SFDRPolicies/ESG\\_Data.pdf](http://www.payden.com/SFDRPolicies/ESG_Data.pdf)

#### **Historical comparison**

The 2025 statement is based on available data or metrics from MSCI related to the relevant quarter-end holdings as of 31 March 2025, 30 June 2025, 30 September 2025 and 31 December 2025. With effect from 29 November 2022 the Fund considered principal adverse impacts of its investment decisions on sustainability factors. For historic 2024 data, the assessment of the impact for 31 December 2024 is based on available data or metrics from MSCI related to the relevant quarter-end holdings as of 31 March 2024, 30 June 2024, 30 September 2024 and 31 December 2024.

#### **Please Note**

\*N/A denotes that either an issuer has not reported on the relevant metric or that the Fund did not hold securities within the coverage of the said metric at the relevant time.

*Table 2*

#### **Additional climate and other environment-related indicators**

Adverse sustainability impact	Adverse impact on sustainability factors (qualitative or quantitative)	Metric
<b>Indicators applicable to investments in investee companies</b>		
<b>CLIMATE AND OTHER ENVIRONMENT-RELATED INDICATORS</b>		
Emissions	1. Emissions of inorganic pollutants	Tonnes of inorganic pollutants equivalent per million EUR invested, expressed as a weighted average
	2. Emissions of air pollutants	Tonnes of air pollutants equivalent per million EUR invested, expressed as a weighted average
	3. Emissions of ozone-depleting substances	Tonnes of ozone-depleting substances equivalent per million EUR invested, expressed as a weighted average
	4. Investments in companies without carbon emission reduction initiatives	Share of investments in investee companies without carbon emission reduction initiatives aimed at aligning with the Paris Agreement
Energy performance	5. Breakdown of energy consumption by type of non-renewable sources of energy	Share of energy from non-renewable sources used by investee companies broken down by each non-renewable energy source

Water, waste and material emissions	6. Water usage and recycling	<p>1. Average amount of water consumed by the investee companies (in cubic meters) per million EUR of revenue of investee companies</p> <p>2. Weighted average percentage of water recycled and reused by investee companies</p>
	7. Investments in companies without water management policies	Share of investments in investee companies without water management policies
	8. Exposure to areas of high water stress	Share of investments in investee companies with sites located in areas of high water stress without a water management policy
	9. Investments in companies producing chemicals	Share of investments in investee companies the activities of which fall under Division 20.2 of Annex I to Regulation (EC) No 1893/2006
	10. Land degradation, desertification, soil sealing	Share of investments in investee companies the activities of which cause land degradation, desertification or soil sealing

	11. Investments in companies without sustainable land/agriculture practices	Share of investments in investee companies without sustainable land/agriculture practices or policies
	12. Investments in companies without sustainable oceans/seas practices	Share of investments in investee companies without sustainable oceans/seas practices or policies
	13. Non-recycled waste ratio	Tonnes of non-recycled waste generated by investee companies per million EUR invested, expressed as a weighted average
	14. Natural species and protected areas	1.Share of investments in investee companies whose operations affect threatened species  2.Share of investments in investee companies without a biodiversity protection policy covering operational sites owned, leased, managed in, or adjacent to, a protected area or an area of high biodiversity value outside protected areas
	15. Deforestation	Share of investments in companies without a policy to address deforestation
Green securities	16. Share of securities not issued under Union legislation on environmentally sustainable bonds	Share of securities in investments not issued under Union legislation on

		environmentally sustainable bonds
<b>Indicators applicable to investments in sovereigns and supranationals</b>		
Green securities	17. Share of bonds not issued under Union legislation on environmentally sustainable bonds	Share of bonds not issued under Union legislation on environmentally sustainable bonds
<b>Indicators applicable to investments in real estate assets</b>		
Greenhouse gas emissions	18. GHG emissions	Scope 1 GHG emissions generated by real estate assets
		Scope 2 GHG emissions generated by real estate assets
		Scope 3 GHG emissions generated by real estate assets
		Total GHG emissions generated by real estate assets
Energy consumption	19. Energy consumption intensity	Energy consumption in GWh of owned real estate assets per square meter
Waste	20. Waste production in operations	Share of real estate assets not equipped with facilities for waste sorting and not covered by a waste recovery or recycling contract

Resource consumption	21. Raw materials consumption for new construction and major renovations	Share of raw building materials (excluding recovered, recycled and biosourced) compared to the total weight of building materials used in new construction and major renovations
Biodiversity	22. Land artificialisation	Share of non-vegetated surface area (surfaces that have not been vegetated in ground, as well as on roofs, terraces and walls) compared to the total surface area of the plots of all assets

Table 3

**Additional indicators for social and employee, respect for human rights, anti-corruption and anti-bribery matters**

<b>INDICATORS FOR SOCIAL AND EMPLOYEE, RESPECT FOR HUMAN RIGHTS, ANTI-CORRUPTION AND ANTI-BRIBERY MATTERS</b>		
<b>Adverse sustainability impact</b>	<b>Adverse impact on sustainability factors (qualitative or quantitative)</b>	<b>Metric</b>
<b>Indicators applicable to investments in investee companies</b>		
Social and employee matters	1. Investments in companies without workplace accident prevention policies	Share of investments in investee companies without a workplace accident prevention policy
	2. Rate of accidents	Rate of accidents in investee companies expressed as a weighted average
	3. Number of days lost to injuries, accidents, fatalities or illness	Number of workdays lost to injuries, accidents, fatalities or illness of investee companies expressed as a weighted average
	4. Lack of a supplier code of conduct	Share of investments in investee companies without any supplier code of conduct (against unsafe working conditions, precarious work, child labour and forced labour)

	5. Lack of grievance/complaints handling mechanism related to employee matters	Share of investments in investee companies without any grievance/complaints handling mechanism related to employee matters
	6. Insufficient whistleblower protection	Share of investments in entities without policies on the protection of whistleblowers
	7. Incidents of discrimination	<p>1. Number of incidents of discrimination reported in investee companies expressed as a weighted average</p> <p>2. Number of incidents of discrimination leading to sanctions in investee companies expressed as a weighted average</p>
	8. Excessive CEO pay ratio	Average ratio within investee companies of the annual total compensation for the highest compensated individual to the median annual total compensation for all employees (excluding the highest-compensated individual)

Human Rights	9. Lack of a human rights policy	Share of investments in entities without a human rights policy
	10. Lack of due diligence	Share of investments in entities without a due diligence process to identify, prevent, mitigate and address adverse human rights impacts
	11. Lack of processes and measures for preventing trafficking in human beings	Share of investments in investee companies without policies against trafficking in human beings
	12. Operations and suppliers at significant risk of incidents of child labour	Share of investments in investee companies exposed to operations and suppliers at significant risk of incidents of child labour in terms of geographic areas or type of operation
	13. Operations and suppliers at significant risk of incidents of forced or compulsory labour	Share of the investments in investee companies exposed to operations and suppliers at significant risk of incidents of forced or compulsory labour in terms in terms of geographic areas and/or the type of operation
	14. Number of identified cases of severe human rights issues and incidents	Number of cases of severe human rights issues and incidents connected to investee companies on a weighted average basis

Anti-corruption and anti-bribery	15. Lack of anti-corruption and anti-bribery policies	Share of investments in entities without policies on anti-corruption and anti-bribery consistent with the United Nations Convention against Corruption
	16. Cases of insufficient action taken to address breaches of standards of anti-corruption and anti-bribery	Share of investments in investee companies with identified insufficiencies in actions taken to address breaches in procedures and standards of anti-corruption and anti-bribery
	17. Number of convictions and amount of fines for violation of anti-corruption and anti-bribery laws	Numbers of convictions and amount of fines for violations of anti-corruption and anti-bribery laws by investee companies
<b>Indicators applicable to investments in sovereigns and supranationals</b>		
Social	18. Average income inequality score	The distribution of income and economic inequality among the participants in a particular economy including a quantitative indicator explained in the explanation column
	19. Average freedom of expression score	Measuring the extent to which political and civil society organisations can operate freely including a quantitative indicator

		explained in the explanation column
Human rights	20. Average human rights performance	Measure of the average human right performance of investee countries using a quantitative indicator explained in the explanation column
Governance	21. Average corruption score	Measure of the perceived level of public sector corruption using a quantitative indicator explained in the explanation column
	22. Non-cooperative tax jurisdictions	Investments in jurisdictions on the EU list of non-cooperative jurisdictions for tax purposes
	23. Average political stability score	Measure of the likelihood that the current regime will be overthrown by the use of force using a quantitative indicator explained in the explanation column
	24. Average rule of law score	Measure of the level of corruption, lack of fundamental rights, and the deficiencies in civil and criminal justice using a quantitative indicator explained in the explanation column