



LEA 02	Discretionary Mandate	Priority: PRI 1,2,3
Type of engagement	Reason for interaction	
Individual/ internal staff engagements	<input checked="" type="checkbox"/> To support investment decisionmaking in a company's material ESG issues <input checked="" type="checkbox"/> To influence corporate practice or identify the need for additional or enhanced environmental or social data <input checked="" type="checkbox"/> To engage internal ESG expertise <input type="checkbox"/> Other, specify:	
Collaborative engagements	<input type="checkbox"/> To support investment decisionmaking in a company's material ESG issues <input type="checkbox"/> To influence corporate practice or identify the need for additional or enhanced environmental or social data <input type="checkbox"/> Other, specify:	
Service provider engagements	<input type="checkbox"/> To support investment decisionmaking in a company's material ESG issues <input type="checkbox"/> To influence corporate practice or identify the need for additional or enhanced environmental or social data <input type="checkbox"/> Other, specify:	

RI TRANSPARENCY REPORT

2017

Columbia Management Investment Advisers, LLC

About this report

The PRI Reporting Framework is a key step in the journey towards building a common language and industry standard for reporting responsible investment (RI) activities. This RI Transparency Report is one of the key outputs of this Framework. Its primary objective is to enable signatory transparency on RI activities and facilitate dialogue between investors and their clients, beneficiaries and other stakeholders. A copy of this report will be publicly disclosed for all reporting signatories on the [PRI website](#), ensuring accountability of the PRI Initiative and its signatories.

This report is an export of the individual Signatory organisation's response to the PRI during the 2017 reporting cycle. It includes their responses to mandatory indicators, as well as responses to voluntary indicators the signatory has agreed to make public. The information is presented exactly as it was reported. Where an indicator offers a response option that is multiple-choice, all options that were available to the signatory to select are presented in this report. Presenting the information exactly as reported is a result of signatory feedback which suggested the PRI not summarise the information. As a result, the reports can be extensive. However, to help easily locate information, there is a **Principles index** which highlights where the information can be found and summarises the indicators that signatories complete and disclose.

Understanding the Principles Index

The Principles Index summarises the response status for the individual indicators and modules and shows how these relate to the six [Principles for Responsible Investment](#). It can be used by stakeholders as an 'at-a-glance' summary of reported information and to identify particular themes or areas of interest.

Indicators can refer to one or more Principles. Some indicators are not specific to any Principle. These are highlighted in the 'General' column. When multiple Principles are covered across numerous indicators, in order to avoid repetition, only the main Principle covered is highlighted.

All indicators within a module are presented below. The status of indicators is shown with the following symbols:

Symbol	Status
✓	The signatory has completed all mandatory parts of this indicator
☑	The signatory has completed some parts of this indicator
🔒	This indicator was not relevant for this signatory
-	The signatory did not complete any part of this indicator
Ⓜ	The signatory has flagged this indicator for internal review

Within the table, indicators marked in blue are mandatory to complete. Indicators marked in grey are voluntary to complete.

Principles Index

Organisational Overview				Principle						General
Indicator	Short description	Status	Disclosure	1	2	3	4	5	6	
OO 01	Signatory category and services	✓	Public							✓
OO 02	Headquarters and operational countries	✓	Public							✓
OO 03	Subsidiaries that are separate PRI signatories	✓	Public							✓
OO 04	Reporting year and AUM	✓	Public							✓
OO 05	Breakdown of AUM by asset class	✓	Asset mix disclosed in OO 06							✓
OO 06	How would you like to disclose your asset class mix	✓	Public							✓
OO 07	Fixed income AUM breakdown	✓	Private							✓
OO 08	Segregated mandates or pooled funds	✓	Private							✓
OO 09	Breakdown of AUM by market	✓	Private							✓
OO 10	RI activities for listed equities	✓	Public							✓
OO 11	RI activities in other asset classes	✓	Public							✓
OO 12	Modules and sections required to complete	✓	Public							✓
OO End	Module confirmation page	✓	-							

Strategy and Governance				Principle						General
Indicator	Short description	Status	Disclosure	1	2	3	4	5	6	
SG 01	RI policy and coverage	✓	Public							✓
SG 02	Publicly available RI policy or guidance documents	✓	Public							✓
SG 03	Conflicts of interest	✓	Public							✓
SG 04		✓	Private							✓
SG 05	RI goals and objectives	✓	Public							✓
SG 06	Main goals/objectives this year	-	n/a							✓
SG 07	RI roles and responsibilities	✓	Public							✓
SG 08	RI in performance management, reward and/or personal development	✓	Private							✓
SG 09	Collaborative organisations / initiatives	✓	Public				✓	✓		
SG 10	Promoting RI independently	✓	Public				✓			
SG 11	Dialogue with public policy makers or standard setters	-	n/a				✓	✓	✓	
SG 12	ESG issues in strategic asset allocation	✓	Public	✓						
SG 13	Long term investment risks and opportunity	✓	Private	✓						
SG 14	Allocation of assets to environmental and social themed areas	✓	Private	✓						
SG 15	ESG issues for internally managed assets not reported in framework	✓	Public							✓
SG 16	ESG issues for externally managed assets not reported in framework	⚠	n/a							✓
SG 17	Innovative features of approach to RI	✓	Private							✓
SG End	Module confirmation page	✓	-							

Direct - Listed Equity Incorporation				Principle						General
Indicator	Short description	Status	Disclosure	1	2	3	4	5	6	
LEI 01	Breakdown by passive, quantitative, fundamental and other active strategies	✓	Private							✓
LEI 02	Reporting on strategies that are <10% of actively managed listed equities	✓	Private							✓
LEI 03	Percentage of each incorporation strategy	✓	Public	✓						
LEI 04	Type of ESG information used in investment decision	✓	Private	✓						
LEI 05	Information from engagement and/or voting used in investment decision-making	✓	Private	✓						
LEI 06	Types of screening applied	✓	Public	✓						
LEI 07	Processes to ensure screening is based on robust analysis	✓	Public	✓						
LEI 08	Processes to ensure fund criteria are not breached	✓	Private	✓						
LEI 09	Types of sustainability thematic funds/mandates	🔒	n/a	✓						
LEI 10	Review ESG issues while researching companies/sectors	✓	Public	✓						
LEI 11	Processes to ensure integration is based on robust analysis	✓	Private	✓						
LEI 12	Aspects of analysis ESG information is integrated into	✓	Private	✓						
LEI 13	ESG issues in index construction	🔒	n/a	✓						
LEI 14	How ESG incorporation has influenced portfolio composition	-	n/a	✓						
LEI 15	Measurement of financial and ESG outcomes of ESG incorporation	-	n/a	✓						
LEI 16	Examples of ESG issues that affected your investment view / performance	-	n/a	✓						
LEI 17	Disclosure of approach to ESG incorporation	✓	Public		✓					✓
LEI End	Module confirmation page	✓	-							

Direct - Listed Equity Active Ownership				Principle						General
Indicator	Short description	Status	Disclosure	1	2	3	4	5	6	
LEA 01	Description of approach to engagement	✓	Public		✓					
LEA 02	Reasoning for interaction on ESG issues	✓	Public	✓	✓	✓				
LEA 03	Process for identifying and prioritising engagement activities	✓	Public		✓					
LEA 04	Objectives for engagement activities	✓	Public		✓					
LEA 05	Process for identifying and prioritising collaborative engagement	🔒	n/a		✓					
LEA 06	Objectives for engagement activities	🔒	n/a		✓					
LEA 07	Role in engagement process	🔒	n/a		✓		✓			
LEA 08	Monitor / discuss service provider information	🔒	n/a		✓				✓	
LEA 09	Share insights from engagements with internal/external managers	✓	Private	✓	✓					
LEA 10	Tracking number of engagements	✓	Public		✓					
LEA 11	Number of companies engaged with, intensity of engagement and effort	✓	Private		✓					
LEA 12	Engagement methods	✓	Private		✓					
LEA 13	Engagements on E, S and/or G issues	✓	Private		✓					
LEA 14	Companies changing practices / behaviour following engagement	✓	Private		✓					
LEA 15	Examples of ESG engagements	✓	Private		✓					
LEA 16	Disclosure of approach to ESG engagements	✓	Public		✓				✓	
LEA 17	Voting policy & approach	✓	Public	✓	✓	✓				
LEA 18	Typical approach to (proxy) voting decisions	✓	Public		✓					
LEA 19	Percentage of voting recommendations reviewed	🔒	n/a		✓					
LEA 20	Confirmation of votes	✓	Private		✓					
LEA 21	Securities lending programme	✓	Private		✓					
LEA 22	Informing companies of the rationale of abstaining/voting against management	✓	Public		✓					
LEA 23	Percentage of (proxy) votes cast	✓	Public		✓					
LEA 24	Proportion of ballot items that were for/against/abstentions	✓	Public		✓					
LEA 25	Shareholder resolutions	✓	Private		✓					
LEA 26	Examples of (proxy) voting activities	✓	Private		✓					
LEA 27	Disclosing voting activities	✓	Public		✓				✓	
LEA End	Module confirmation page	✓	-							

Direct - Fixed Income				Principle						General
Indicator	Short description	Status	Disclosure	1	2	3	4	5	6	
FI 01	Breakdown by passive,active strategies	✓	Private							✓
FI 02	Option to report on <10% assets	🔒	n/a							✓
FI 03	Breakdown by market and credit quality	✓	Private							✓
FI 04	Incorporation strategies applied	✓	Public	✓						
FI 05	ESG issues and issuer research	✓	Private	✓						
FI 06	Processes to ensure analysis is robust	✓	Public	✓						
FI 07	Types of screening applied	✓	Public	✓						
FI 08	Negative screening - overview and rationale	✓	Public	✓						
FI 09	Examples of ESG factors in screening process	-	n/a	✓						
FI 10	Screening - ensuring criteria are met	✓	Public	✓						
FI 11	Thematic investing - overview	✓	Private	✓						
FI 12	Thematic investing - themed bond processes	✓	Public	✓						
FI 13	Thematic investing - assessing impact	✓	Public	✓						
FI 14	Integration overview	✓	Public	✓						
FI 15	Integration - ESG information in investment processes	✓	Public	✓						
FI 16	Integration - E,S and G issues reviewed	✓	Public	✓						
FI 17	ESG incorporation in passive funds	🔒	n/a	✓						
FI 18	Engagement overview and coverage	✓	Private		✓					
FI 19	Engagement method	✓	Private	✓	✓					
FI 20	Engagement policy disclosure	✓	Private	✓	✓					
FI 21	Financial/ESG performance	✓	Private							✓
FI 22	Examples - ESG incorporation or engagement	-	n/a	✓	✓					
FI 23	Communications	✓	Public		✓				✓	
FI End	Module confirmation page	✓	-							

Columbia Management Investment Advisers, LLC

Reported Information

Public version

Organisational Overview

PRI disclaimer

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Basic Information

OO 01

Mandatory

Public

Gateway/Peering

General

OO 01.1

Select the services you offer.

Fund management

% of assets under management (AUM) in ranges

<10%

10-50%

>50%

Fund of funds, manager of managers, sub-advised products

Other, specify

Execution and advisory services

OO 02

Mandatory

Public

Peering

General

OO 02.1

Select the location of your organisation's headquarters.

United States

OO 02.2

Indicate the number of countries in which you have offices (including your headquarters).

1

2-5

6-10

>10

OO 02.3

Indicate the approximate number of staff in your organisation in full-time equivalents (FTE).

FTE

1270

OO 03

Mandatory

Public

Descriptive

General

OO 03.1

Indicate whether you have subsidiaries within your organisation that are also PRI signatories in their own right.

Yes

No

OO 03.3	Additional information. [Optional]
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While none of our subsidiaries have signed on to the PRI, our affiliate, Threadneedle Investments, is a PRI signatory.

OO 04	Mandatory	Public	Gateway/Peering	General
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OO 04.1	Indicate the year end date for your reporting year.
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31/12/2016

OO 04.2	Indicate your total AUM at the end of your reporting year, excluding subsidiaries you have chosen not to report on.
----------------	---

	trillions	billions	millions	thousands	hundreds
Total AUM		334	323	145	714
Currency	USD				
Assets in USD		334	323	145	714

OO 06	Mandatory	Public	Descriptive	General
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New selection options have been added to this indicator. Please review your prefilled responses carefully.

OO 06.1	How you would like to disclose your asset class mix.
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- as percentage breakdown
- as broad ranges

	Internally managed (%)	Externally managed (%)
Listed equity	10-50%	10-50%
Fixed income	10-50%	<10%
Private equity	0	0
Property	0	0
Infrastructure	<10%	0
Commodities	0	<10%
Hedge funds	<10%	0

Forestry	0	0
Farmland	0	0
Inclusive finance	0	0
Cash	<10%	0
Other (1), specify	<10%	<10%
Other (2), specify	<10%	<10%

'Other (1)' specified

Alternatives other than Commodities and Hedge funds listed above.

'Other (2)' specified

Multi Asset Allocation other than Commodities and Hedge funds listed above.

OO 06.2 Publish our asset class mix as per attached image [Optional].

OO 06.3 Provide contextual information on your AUM asset class split. [Optional]

Alternatives denotes asset classes that are not included in "Equity" or "Fixed Income", i.e. Commodities, Property, and Alternative Funds etc.

Multi-assets includes accounts that invest across multiple broad level asset types, such as Equity, Fixed Income and Cash and Cash Equivalents. This includes Fund of Fund products and accounts that directly invest in those broad level asset types, such as Balanced Funds & asset allocation funds.

Gateway asset class implementation indicators

OO 10	Mandatory	Public	Gateway	General
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OO 10.1 Select the direct or indirect ESG incorporation activities your organisation implemented for listed equities in the reporting year.

- We incorporate ESG in our investment decisions on our internally managed assets
- We address ESG incorporation in our external manager selection, appointment and/or monitoring processes
- We do not incorporate ESG in our directly managed listed equity and/or we do not address ESG incorporation in our external manager selection, appointment and/or monitoring processes.

OO 10.2

Select the direct or indirect engagement activities your organisation implemented for listed equity in the reporting year.

- We engage with companies on ESG factors via our staff, collaborations or service providers
- We require our external managers to engage with companies on ESG issues on our behalf
- We do not engage directly and do not require external managers to engage with companies on ESG factors.

OO 10.3

Select the direct or indirect voting activities your organisation implemented for listed equity in the reporting year

- We cast our (proxy) votes directly or via dedicated voting providers
- We require our external managers to vote on our behalf
- We do not cast our (proxy) votes directly and do not require external managers to vote on our behalf

OO 11

Mandatory

Public

Gateway

General

OO 11.1

Select the internally managed asset classes in which you addressed ESG incorporation into your investment decisions and/or your active ownership practices (during the reporting year).

- Fixed income – SSA
- Fixed income – corporate (financial)
- Fixed income – corporate (non-financial)
- Fixed income – securitised
- Infrastructure
- Hedge funds
- Cash
- Other (1)
- Other (2)
- None of the above

'Other (1)' [as defined in OO 05]

Alternatives other than Commodities and Hedge funds.

'Other (2)' [as defined in OO 05]

Multi Asset Allocation other than Commodities and Hedge funds.

OO 11.2

Select the externally managed assets classes where you addressed ESG incorporation and/or active ownership in your external manager selection, appointment and/or monitoring processes (during the reporting year)

- Fixed income – SSA
- Fixed income – corporate (non-financial)
- Fixed income – securitised
- Commodities
- Other (1)
- Other (2)
- None of the above

OO 11.3b

If your organisation does not integrate ESG factors into investment decisions on your externally managed assets, explain why not.

While externally managed assets represent approximately 17% of our total AUM, we presently have several dozen external managers that manage assets for our firm, including our affiliate, Threadneedle Asset Management, a PRI signatory, and which manages approximately 36% of our externally managed assets.

We do not presently require external managers who are not affiliates to integrate ESG factors into their investment decisions due in part due to the complexities and resources required to oversee, measure and monitor each firm, many of whom may not have adequate resources to consider ESG factors, with the exception of our affiliate, Threadneedle Asset Management.

During 2017 CMIA plans to begin internal discussions around this topic and will investigate the available options for developing a more formal oversight program of our external managers who are not affiliates.

'Other (1)' [as defined in OO 05]

Alternatives other than Commodities and Hedge funds.

'Other (2)' [as defined in OO 05]

Multi Asset Allocation other than Commodities and Hedge funds.

OO 11.3

Additional information. [Optional]

Alternatives denotes asset classes that are not included in "Equity" or "Fixed Income", i.e. Commodities, Property, and Alternative Funds etc.

Multi-assets includes accounts that invest across multiple broad level asset types, such as Equity, Fixed Income and Cash and Cash Equivalents. This includes Fund of Fund products and accounts that directly invest in those broad level asset types, such as Balanced Funds & asset allocation funds.

OO 12**Mandatory****Public****Gateway****General**

You will need to make a selection in OO 12.1 only if you have any voluntary modules that you can choose to report on.

OO 12.1

Select from below any additional applicable modules or sections you would like to report on voluntarily. You are only required to report on asset classes that represent 10% or more of your AUM.

Core modules

- Organisational Overview
- Strategy and Governance

RI implementation directly or via service providers

Direct - Listed Equity incorporation

- Listed Equity incorporation

Direct - Listed Equity active ownership

- Engagements
- (Proxy) voting

Direct - Fixed Income

- Fixed income - SSA
- Fixed income - Corporate (financial)
- Fixed income - Corporate (non-financial)
- Fixed income - Securitised

Closing module

- Closing module

Columbia Management Investment Advisers, LLC

Reported Information

Public version

Strategy and Governance

PRI disclaimer

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Investment policy

SG 01

Mandatory

Public

Core Assessed

General

New selection options have been added to this indicator. Please review your prefilled responses carefully.

SG 01.1

Indicate if you have an investment policy that covers your responsible investment approach.

Yes

SG 01.2

Indicate the components/types and coverage of your policy.

Select all that apply

Policy components/types	Coverage by AUM
<input checked="" type="checkbox"/> Policy setting out your overall approach <input checked="" type="checkbox"/> Formalised guidelines on environmental factors <input checked="" type="checkbox"/> Formalised guidelines on social factors <input checked="" type="checkbox"/> Formalised guidelines on corporate governance factors <input type="checkbox"/> Asset class-specific RI guidelines <input type="checkbox"/> Sector specific RI guidelines <input checked="" type="checkbox"/> Screening / exclusions policy <input checked="" type="checkbox"/> Engagement policy <input checked="" type="checkbox"/> (Proxy) voting policy <input type="checkbox"/> Other, specify (1) <input type="checkbox"/> Other, specify(2)	<input checked="" type="radio"/> Applicable policies cover all AUM <input type="radio"/> Applicable policies cover a majority of AUM <input type="radio"/> Applicable policies cover a minority of AUM

SG 01.4	Indicate what norms you have used to develop your investment policy that covers your responsible investment approach.
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- UN Global Compact Principles
- UN Guiding Principles on Business and Human Rights
- Universal Declaration of Human Rights
- International Bill of Human Rights
- International Labour Organization Conventions
- United Nations Convention Against Corruption
- OECD Guidelines for Multinational Enterprises
- Other, specify (1)
- Other, specify (2)
- Other, specify (3)
- None of the above

No

SG 01.6	Provide a brief description of the key elements, any variations or exceptions to your investment policy that covers your responsible investment approach. [Optional]
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CMIA's Responsible Investment (RI) Policy sets forth our responsible investment approach and details how we are integrating environmental, social and corporate governance issues in our investment process and wider policy engagement to uphold our stewardship responsibilities on behalf of our clients.

Core to our investment philosophy is the belief that well-governed companies are better positioned to manage the risks and challenges of the issuers in which we invest and to capture opportunities that help deliver sustainable growth and returns for our clients' overtime. We believe effective stewardship will therefore benefit companies, our clients and the economy as a whole.

Our portfolio managers, analysts and RI team work collaboratively to monitor and engage with the companies we invest in, with a view to understanding the dynamics, opportunities and risks inherent in the businesses and to protect the interests of our clients. We also monitor market practice and policy developments that affect the quality of the investment environment we operate in. Within our approach, portfolio managers take lead responsibility for the assessment and monitoring of companies strategies, management, performance and merger and acquisition activity. Risk and capital management issues are assessed and the RI team takes lead responsibility for the assessment and monitoring of companies' ESG practices. This research and analysis is disseminated as part of the firm's culture of idea sharing. Through collaborative research and meetings, ESG factors are fed in to the investment process to form part of the holistic company, sector or thematic reviews.

While we believe that integrating ESG factors enables portfolio managers to make better informed investment decisions, each portfolio management team within Columbia Management Investment Advisers, LLC makes its own investment decisions and certain teams may put more or less emphasis on ESG factors in any given investment decision. ESG restrictions are not systematically applied to client portfolios unless we are specifically directed to do so by the individual client.

SG 02	Mandatory	Public	Core Assessed	PRI 6
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New selection options have been added to this indicator. Please review your prefilled responses carefully.

SG 02.1	Indicate which of your investment policy documents (if any) are publicly available. Provide a URL and an attachment of the document.
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- Policy setting out your overall approach

URL/Attachment

URL

URL

<https://www.investor.columbiathreadneedleus.com/responsible-investment>

Attachment (will be made public)

Formalised guidelines on environmental factors

URL/Attachment

URL

URL

<https://www.investor.columbiathreadneedleus.com/responsible-investment>

Attachment (will be made public)

Formalised guidelines on social factors

URL/Attachment

URL

URL

<https://www.investor.columbiathreadneedleus.com/responsible-investment>

Attachment (will be made public)

Formalised guidelines on corporate governance factors

URL/Attachment

URL

URL

<https://www.investor.columbiathreadneedleus.com/responsible-investment>

Attachment (will be made public)

Screening / exclusions policy

URL/Attachment

URL

URL

<https://www.investor.columbiathreadneedleus.com/responsible-investment>

- Attachment (will be made public)
- Engagement policy

URL/Attachment

- URL

URL

<https://www.investor.columbiathreadneedleus.com/responsible-investment>

- Attachment (will be made public)
- (Proxy) voting policy

URL/Attachment

- URL

URL

<https://www.investor.columbiathreadneedleus.com/responsible-investment>

- Attachment (will be made public)
- We do not publicly disclose our investment policy documents

SG 02.4 Additional information [Optional].

Our Responsible Investment Policy, available at the URL included above, addresses topics such as engagements and screening and exclusion, which are listed above. Our Proxy Voting Policy is also available at the URL listed above.

Our proxy voting records are available online at <https://www.investor.columbiathreadneedleus.com/responsible-investment>.

In addition to the policies cited above, we also intend to publish occasional product positioning, research and thought leadership pieces related to responsible investment.

SG 03	Mandatory	Public	Core Assessed	General
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SG 03.1 Indicate if your organisation has a policy on managing potential conflicts of interest in the investment process.

- Yes

SG 03.2

Describe your policy on managing potential conflicts of interest in the investment process.

We have a compliance program in place that is intended to identify, mitigate and, in some instances, prevent actual and potential conflicts of interest, as well as to ensure compliance with legal and regulatory requirements and ensure compliance with client investment guidelines and restrictions. Our compliance program includes written policies and procedures that we believe are reasonably designed to prevent violations of applicable law and regulations.

The firm addresses conflicts of interest and how conflicts are managed through multiple policies within its Compliance Program as disclosed in its Form ADV, Part 2A. Additional information about Columbia Management Investment Advisers, LLC also is available on the SEC's website at www.adviserinfo.sec.gov.

No

SG 03.3

Additional information. [Optional]

Specific to voting proxies on behalf of clients, we seek to carry out our responsibilities without undue influence from individuals or groups who may have an economic interest in the outcome of a proxy vote, and we have implemented practices reasonably designed to identify potential material conflicts of interest. One way that we seek to address potential material conflicts of interest is through employing predetermined voting guidelines. Alternatively, if we determine that a material conflict of interest exists, we will invoke one or more of the following conflict management practices:

- causing the proxies to be voted in accordance with the recommendations of an independent third party (which may be our proxy voting administrator or research provider);
- causing the proxies to be delegated to an independent third party (which may be our proxy voting administrator or research provider); and
- in unusual cases, with the client's consent and upon ample notice, forwarding the proxies to our clients so that they may vote the proxies directly. For example, with respect to proxies of Ameriprise Financial, Inc., CMIA's parent company, we vote in accordance with the recommendation of an independent third party when we are vested with proxy voting authority. Similarly, with respect to public companies with which we have a substantive relationship, we will vote such proxies following our pre-determined voting guidelines or the recommendations of an independent third party.

CMIA maintains a Proxy Voting Committee (the Committee), whose voting members are portfolio managers and analysts, which is tasked with addressing proxy voting issues for the firm. Members of this committee are prohibited from voting on any proposal for which they have a conflict of interest by reason of a direct relationship with the issuer or other party affected by a given proposal. Persons making recommendations to the Committee or its members are required to disclose to the Committee any relationship with a party making a proposal or other matter known to the person that would create a potential conflict of interest.

Objectives and strategies

SG 05	Mandatory	Public	Gateway/Core Assessed	General
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SG 05.1

Indicate if and how frequently your organisation sets and reviews objectives for its responsible investment activities.

- Quarterly or more frequently
- Biannually
- Annually
- Less frequently than annually
- Ad-hoc basis
- It is not reviewed

SG 05.2

Additional information. [Optional]

The firm formally reviews responsible investment objectives at least annually and more frequently, if necessary.

Governance and human resources

SG 07**Mandatory****Public****Core Assessed****General****SG 07.1**

Indicate the roles present in your organisation and for each, indicate whether they have oversight and/or implementation responsibilities for responsible investment.

Roles present in your organisation

- Board members or trustees
 - Oversight/accountability for responsible investment
 - Implementation of responsible investment
 - No oversight/accountability or implementation responsibility for responsible investment
- Chief Executive Officer (CEO), Chief Investment Officer (CIO), Investment Committee
 - Oversight/accountability for responsible investment
 - Implementation of responsible investment
 - No oversight/accountability or implementation responsibility for responsible investment
- Other Chief-level staff or head of department, specify
Heads of Departments

- Oversight/accountability for responsible investment
- Implementation of responsible investment
- No oversight/accountability or implementation responsibility for responsible investment
- Portfolio managers
 - Oversight/accountability for responsible investment
 - Implementation of responsible investment
 - No oversight/accountability or implementation responsibility for responsible investment
- Investment analysts
 - Oversight/accountability for responsible investment
 - Implementation of responsible investment
 - No oversight/accountability or implementation responsibility for responsible investment
- Dedicated responsible investment staff
 - Oversight/accountability for responsible investment
 - Implementation of responsible investment
 - No oversight/accountability or implementation responsibility for responsible investment
- External managers or service providers
- Investor relations
- Other role, specify (1)
- Other role, specify (2)

SG 07.2

For the roles for which you have RI oversight/accountability or implementation responsibilities, indicate how you execute these responsibilities.

With a global research platform in place, the responsibility for managing collaboration across our platforms rests with the Global Head of our equity and fixed income research teams. The firm also has a dedicated Director of Responsible Investment who reports directly to our Chief Investment Officer, with a dotted line reporting relationship to the Head of the Responsible Investment team at our affiliate, Threadneedle Investments, in the United Kingdom. The Director works closely with the respective research heads in each asset class to ensure continued implementation of the responsible investment approach.

The Director has responsibility for ESG research, integration, engagement, proxy voting and ESG reporting, works closely with a marketing specialist and analytics specialist in undertaking critical responsible investment integration activities. Such specialists have other responsibilities that may be unrelated to responsible investment activities.

Portfolio managers and fundamental analysts take lead responsibility for the assessment and monitoring of issuers, strategies, management and performance. Consideration of ESG risks may be one of many components in our investment decision-making processes. Our portfolio managers and analysts are encouraged to view ESG as an important factor in the sustainability and long-term value creation of portfolio companies and how ESG factors, in turn, affects investment returns. Where appropriate and consistent with our fiduciary duty, we seek to invest in well-governed companies that appropriately identify, manage and disclose their ESG risks as well as those companies whose progressive approach may present opportunities for long-term value creation through innovative use of their strengths and positioning.

The proxy administration team votes client proxies in close coordination with portfolio managers, research analysts and the Director.

SG 07.3

Indicate the number of dedicated responsible investment staff your organisation has.

Number

1

SG 07.4

Additional information. [Optional]

Currently, we have one professional, the firm's Director of Responsible Investment, dedicated to responsible investment initiatives and who has a dotted line reporting relationship to the Head of Responsible Investment team at our affiliate, Threadneedle Asset Management. The Director works closely with that team to coordinate the firm's responsible investment activities. However, in addition, we utilize resources from our research, investment operations, legal, compliance, product development and marketing areas at Columbia Management to support ESG initiatives. The firm has created a cross-functional team from each of these departments who meet regularly to discuss ESG developments within the firm and the industry more broadly.

Promoting responsible investment

SG 09

Mandatory

Public

Core Assessed

PRI 4,5

New selection options have been added to this indicator. Please review your prefilled responses carefully.

SG 09.1

Select the collaborative organisation and/or initiatives of which your organisation is a member or in which it participated during the reporting year, and the role you played.

Select all that apply

Principles for Responsible Investment

Your organisation's role in the initiative during the reporting period (see definitions)

- Basic
- Moderate
- Advanced

Provide a brief commentary on the level of your organisation's involvement in the initiative.
[Optional]

The Director of Responsible Investment served on the PRI Listed Equity Outreach sub-Committee through the end of 2016, and also drafted a case study for the PRI's 2016 publication on Listed Equity Integration. In December 2016 the Director of Responsible Investment was appointed to serve a two-year term on the PRI Fixed Income Advisory Committee.

- AFIC – La Commission ESG
- Asian Corporate Governance Association
- Australian Council of Superannuation Investors
- BVCA – Responsible Investment Advisory Board
- CDP Climate Change
- CDP Forests
- CDP Water
- CFA Institute Centre for Financial Market Integrity
- Code for Responsible Investment in SA (CRISA)
- Code for Responsible Finance in the 21st Century
- Council of Institutional Investors (CII)
- ESG Research Australia
- Eumedion
- EVCA – Responsible Investment Roundtable
- Extractive Industries Transparency Initiative (EITI)
- Global Investors Governance Network (GIGN)
- Global Impact Investing Network (GIIN)
- Global Real Estate Sustainability Benchmark (GRESB)
- Green Bond Principles
- Institutional Investors Group on Climate Change (IIGCC)
- Interfaith Center on Corporate Responsibility (ICCR)
- International Corporate Governance Network (ICGN)
- Investor Group on Climate Change, Australia/New Zealand (IGCC)
- International Integrated Reporting Council (IIRC)
- Investor Network on Climate Risk (INCR)/CERES
- Local Authority Pension Fund Forum
- Principles for Sustainable Insurance
- Regional or National Social Investment Forums (e.g. UKSIF, Eurosif, ASRIA, RIAA), specify
- Responsible Finance Principles in Inclusive Finance
- Shareholder Association for Research and Education (Share)
- United Nations Environmental Program Finance Initiative (UNEP FI)
- United Nations Global Compact
- Other collaborative organisation/initiative, specify
Sustainability Accounting Standards Board (SASB)

Your organisation's role in the initiative during the reporting year (see definitions)

- Basic
- Moderate
- Advanced

Provide a brief commentary on the level of your organisation's involvement in the initiative. [Optional]

The Director of Responsible Investment has served on three SASB Industry Working Groups, helping to develop industry materiality standards for voluntary disclosure by US issuers in their financial statements. He also passed SASB's Fundamentals of Sustainability Accounting (FSA) Level I exam and earned the FSA Level I credential.

SASB's materiality framework forms the basis for much of our work evaluating and assessing ESG factors in investments.

- Other collaborative organisation/initiative, specify
- Other collaborative organisation/initiative, specify
- Other collaborative organisation/initiative, specify

SG 10

Mandatory

Public

Core Assessed

PRI 4

SG 10.1

Indicate if your organisation promotes responsible investment, independently of collaborative initiatives.

- Yes

SG 10.2

Indicate which of the following actions your organisation has taken to promote responsible investment, independently of collaborative initiatives.

- Provided or supported education or training programmes for clients, investment managers, broker/dealers, investment consultants, legal advisers or other investment organisations
- Provided financial support for academic or industry research on responsible investment
- Encouraged better transparency and disclosure of responsible investment practices across the investment industry
- Spoke publicly at events and conferences to promote responsible investment
- Wrote and published in-house research papers on responsible investment
- Encouraged the adoption of the PRI
- Wrote articles on responsible investment in the media.
- Other, specify

- No

SG 10.3

Describe any additional actions and initiatives that your organisation has taken part in during the reporting year to promote responsible investment [Optional]

We have made efforts to promote responsible investment in multiple ways, including participation in speaking engagements, industry working groups, and responsible investment conferences.

For example, our Director of Responsible Investment has served on several industry working groups at the SASB as they develop sustainability materiality reporting standards for US companies and has passed the first level of the Fundamentals of Sustainability Accounting (FSA) credential. The FSA credential establishes a baseline of knowledge on investment sustainability and materiality principles.

The following speaking engagements and conference panels in which the Director of Responsible Investment, our analysts and portfolio managers participated involved discussion of responsible investments.

- Northwestern University Pritzker School of Law's 2016 Garrett Institute - ESG engagement
- AIG Advisor Group conference call - ESG investing
- UBS Investment Symposium - social impact investing
- CFA Society of San Francisco Wealth Management Series - panel focused on ESG investing -
- Ameriprise Advisor client events - ESG investing, impact investing (various locations and dates)
- UBS New York area advisor managers - primer on SRI/ESG investing
- High Water Women Annual Investing for Impact Symposium - panel on fixed income investing and impact investing

Implementation not in other modules

SG 12	Mandatory	Public	Descriptive	PRI 1
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New selection options have been added to this indicator. Please review your prefilled responses carefully.

SG 12.1	Indicate if your organisation executes scenario analysis and/or modelling in which the risk profile of future ESG trends at portfolio level is calculated.
---------	--

- We execute scenario analysis which includes factors representing the investment impacts of future environmental trends
- We execute scenario analysis which includes factors representing the investment impacts of future social trends
- We execute scenario analysis which includes factors representing the investment impacts of future governance trends
- We execute other scenario analysis, specify
- We do not execute such scenario analysis and/or modelling

SG 12.2	Indicate if your organisation considers ESG issues in strategic asset allocation and/or allocation of assets between sectors or geographic markets.
---------	---

- We do the following
- We do not consider ESG issues in strategic asset allocation

SG 15	Mandatory	Public	Descriptive	General
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SG 15.1	Describe how you address ESG issues for internally managed assets for which a specific PRI asset class module has yet to be developed or for which you are not required to report because your assets are below the minimum threshold.
---------	--

Asset Class	Describe what processes are in place and the outputs or outcomes achieved
Other (1) [as defined in Organisational Overview module]	We generally address ESG issues similarly across all asset classes. The extent of our ability to apply our approach in certain asset classes outside of equities and certain classes of fixed income may be limited by the availability of third-party ESG research.
Other (2) [as defined in Organisational Overview module]	We generally address ESG issues similarly across all asset classes. The extent of our ability to apply our approach in certain asset classes outside of equities and certain classes of fixed income may be limited by the availability of third-party ESG research.

Columbia Management Investment Advisers, LLC

Reported Information

Public version

Direct - Listed Equity Incorporation

PRI disclaimer

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ESG incorporation in actively managed listed equities

Implementation processes


LEI 03	Mandatory	Public	Gateway	PRI 1
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New selection options have been added to this indicator. Please review your prefilled responses carefully.


LEI 03.1	Indicate (1) which ESG incorporation strategy and/or combination of strategies you apply to your actively managed listed equities and (2) the breakdown of your actively managed listed equities by strategy or combination of strategies (+/- 5%)
-----------------	--

ESG incorporation strategy (select all that apply)

- Screening alone (i.e. not combined with any other strategies)
- Thematic alone (i.e. not combined with any other strategies)
- Integration alone (i.e. not combined with any other strategies)

Percentage of active listed equity to which the strategy is applied	 95
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- Screening and Integration strategies

Percentage of active listed equity to which the strategy is applied	 5
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- Thematic and integration strategies
- Screening and thematic strategies
- All three strategies combined
- We do not apply incorporation strategies

Total actively managed listed equities
--

100%

LEI 03.2	Describe your organisation's approach to incorporation and the reasons for choosing the particular ESG incorporation strategy/strategies.
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Approach to Incorporation

We believe there are primarily three reasons for ESG incorporation. First, we see the integration of ESG factors as identifying potentially material risks and opportunities, thereby enhancing the investment process. More widely, we have made a commitment to ESG incorporation, including through our commitment to the PRI.

Finally, in line with our core firm value of being client-focused, we recognize that clients are increasingly focused on ESG incorporation, including integration and screening strategies.

ESG integration

ESG criteria are incorporated into our investment processes and tools to identify material risks and opportunities, and we believe that integrating ESG will enable portfolio managers and analysts to make better informed investment decisions.

Our investment process follows a model of idea generation, research and stock selection. ESG research is integrated into key stages of the investment process, as part of the analysis of long-term, quality investments. Our investment professionals make their own investment decisions but ESG may form part of the assessment. To facilitate the integration of ESG factors we sought to develop tools that provide for a third-party suite of ESG data to be systematically considered in our mainstream investment processes. We supplement those tools with internally produced research and external research from a variety of sources. Our goals are to encourage integration of ESG factors by: 1) developing high-quality portfolio, sector, issuer and risk level analytics from the ESG data suite for easy use by our investment professionals, while simultaneously 2) meeting the growing need from clients for insight into their ESG exposures.

For example, we have developed a proprietary, firm-wide research platform called 'IRNet' (Internal Research Network), built using the resources of Bloomberg that provides access for all our global investment professionals to internally generated research on issuers and securities across all asset classes. Internal research includes our own ESG research produced by our dedicated, global RI team.

Also, we have a proprietary analytical tool that provides our investment professionals, through the lenses of ESG, a view of their portfolios in comparison to their fund's respective benchmark(s). The tool feeds information from multiple databases into a graphical interface adapted from a commercially available software product that is easy to program and intuitive for users. This visualization tool goes beyond the standard charts and graphs found in spreadsheets and displays data in more sophisticated means such as with infographics, heat maps, pop-up boxes and detailed charts. Each image includes interactive capabilities, enabling our investment professionals to manipulate them or drill into the issuer-level ESG data for querying and analysis. This allows us to identify and isolate longer-term ESG risks and opportunities not easily detectable with traditional analyses. We believe this approach can help identify and monitor the exposures to risks in a portfolio and in the underlying issuers.

ESG Screening

In line with our firm's value of client-focus, we have the capability to implement screens and restrictions in portfolios for pooled vehicles and segregated mandates. Common requirements include faith-based criteria, tobacco, weapons, alcohol, controversial countries and non-compliance with the UN Global Compact. Screening criteria or lists of specific securities or themes are typically provided by clients based on their requirements. We utilize third-party data to manage and monitor the application of the screens and exclusions to meet their requirements.

LEI 03.3

Where assets are managed using a combination of ESG incorporation strategies, briefly describe how these combinations are used. [Optional]

Approximately 5% of our assets under management are funds or accounts which follow an investment strategy with an ESG component or for which we have been directed by the client to apply specific screens or exclusions pertaining to ESG factors.

The rest of our assets may benefit from our ESG integration approach; however, while portfolio managers and analysts are encouraged to view ESG as an important factor in their investment decision making processes, they are not required to do so.

(A) Implementation: Screening

LEI 06

Mandatory

Public

Descriptive

PRI 1

LEI 06.1

Indicate and describe the type of screening you apply to your internally managed active listed equities.

Type of screening

- Negative/exclusionary screening

Screened by

- Product
- Activity
- Sector
- Country/geographic region
- Environmental and social practices and performance
- Corporate governance

Description

We manage a number of segregated mandates that have restrictions based on product, sector, country and ESG issues. However we do not apply these restrictions to non-segregated mandates, unless such restrictions are part of the Fund's investment objective or strategy and listed in the Fund's offering documents, as relevant.

- Positive/best-in-class screening

Screened by

- Product
- Activity
- Sector
- Country/geographic region
- Environmental and social practices and performance
- Corporate governance

Description

We manage segregated mandates that have best in class screens based on products, sector, country and ESG issues. We also manage certain pooled vehicles, such as ETFs, which utilize best in class screens to aid them in their sustainable investment strategies. However we do not apply best in class criteria to other segregated mandates or pooled vehicles, unless such restrictions are part of the mandate or fund's investment objective or strategy and listed in the mandate or fund's investment guidelines or offering documents, as relevant.

- Norms-based screening

Screened by

- UN Global Compact Principles
- The UN Guiding Principles on Business and Human Rights
- International Labour Organization Conventions
- United Nations Convention Against Corruption
- OECD Guidelines for Multinational Enterprises
- Other, specify

Description

We have a small number of segregated mandates that require screening in accordance with UN Global Compact Principles.

LEI 06.2	Describe how the screening criteria are established, how often the criteria are reviewed and how you notify clients and/or beneficiaries when changes are made.
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For segregated mandates the client may provide a list of restricted issuers or alternatively the criteria to be excluded, in which case we apply the screens managed by MSCI, Inc. Asset Management Compliance will restrict investments on the basis of either the specific list or the vendor-supplied screen. Restrictions are coded into our trade monitoring system to prevent investment by the relevant account. The criteria and applicable categories of the screens are reviewed on a regular basis. If a screen is materially amended by a vendor we notify the affected client.

LEI 07	Mandatory	Public	Core Assessed	PRI 1
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LEI 07.1	Indicate which processes your organisation uses to ensure screening is based on robust analysis.
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- Comprehensive ESG research is undertaken or sourced to determine companies' activities and products.
- Companies are given the opportunity by you or your research provider to review ESG research on them and correct inaccuracies
- External research and data used to identify companies to be excluded/included is subject to internal audit by ESG/RI staff, the internal audit function or similar
- Company ESG information/ratings are updated regularly to ensure that portfolio holdings comply with fund policies
- A committee or body with representatives independent of the individuals who conduct company research reviews some or all screening decisions
- A periodic review of the quality of the research undertaken or provided is carried out
- Other, specify
- None of the above

LEI 07.2	Additional information. [Optional]
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Our research provider, MSCI, seeks to engage with companies in as part of their Business Involvement and Screening Research. Companies may then clarify their positions, allowing for inaccuracies to be corrected. Internally, we have periodically contacted companies where we believe that ambiguities remain.

(C) Implementation: Integration of ESG issues

LEI 10	Mandatory	Public	Core Assessed	PRI 1
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LEI 10.1	Indicate if E, S and G issues are reviewed while researching companies and/or sectors in active strategies.
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ESG issues	Coverage/extent of review on these issues
Environmental	<div style="background-color: #0070C0; color: white; padding: 5px; display: flex; align-items: center;"> Environmental </div> <ul style="list-style-type: none"> <input type="radio"/> We systematically review the potential significance of environmental issues and investigate them accordingly <input checked="" type="radio"/> We occasionally review the potential significance of environmental issues and investigate them accordingly <input type="radio"/> We do not review environmental issues
Social	<div style="background-color: #0070C0; color: white; padding: 5px; display: flex; align-items: center;"> Social </div> <ul style="list-style-type: none"> <input type="radio"/> We systematically review the potential significance of social issues and investigate them accordingly <input checked="" type="radio"/> We occasionally review the potential significance of social issues and investigate them accordingly <input type="radio"/> We do not review social issues
Corporate Governance	<div style="background-color: #0070C0; color: white; padding: 5px; display: flex; align-items: center;"> Corporate Governance </div> <ul style="list-style-type: none"> <input type="radio"/> We systematically review the potential significance of corporate governance issues and investigate them accordingly <input checked="" type="radio"/> We occasionally review the potential significance of corporate governance issues and investigate them accordingly <input type="radio"/> We do not review corporate governance issues

LEI 10.2 Additional information. [Optional]

Our ESG research allows investment professionals to assess how companies manage ESG issues as part of forming a complete view on the quality of a company's leadership, the potential risks and opportunities of an investment, as well as to inform engagement. This approach combines best-in-class considerations and company-specific analysis, taking account of the context, industry and overall performance of the business.

Communication

LEI 17	Mandatory	Public	Core Assessed	PRI 2,6
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LEI 17.1 Indicate if your organisation proactively discloses information on your approach to ESG incorporation in listed equity.

- We disclose it publicly

Provide URL

<https://www.investor.columbiathreadneedleus.com/responsible-investment>

LEI 17.2

Indicate if the information disclosed to the public is the same as that disclosed to clients/beneficiaries.

Yes

LEI 17.3

Indicate the information your organisation proactively discloses to clients/ beneficiaries and the public regarding your approach to ESG incorporation.

- Broad approach to ESG incorporation
- Detailed explanation of ESG incorporation strategy used

LEI 17.4

Indicate how frequently you typically report this information.

- Quarterly or more frequently
 - Biannually
 - Annually
 - Less frequently than annually
 - Ad-hoc/when requested
- No
- We disclose it to clients and/or beneficiaries only
 - We do not proactively disclose it to the public and/or clients/beneficiaries

LEI 17.7

Additional information. [Optional]

The CMIA Responsible Investment Policy Statement is available at: <https://www.investor.columbiathreadneedleus.com/responsible-investment>. The policy broadly outlines our program, which includes how we integrate ESG factors into our investment processes firm-wide.

Columbia Management Investment Advisers, LLC

Reported Information

Public version

Direct - Listed Equity Active Ownership

PRI disclaimer

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Engagement

Overview

LEA 01	Mandatory	Public	Core Assessed	PRI 2
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New selection options have been added to this indicator. Please review your prefilled responses carefully.

LEA 01.1	Indicate whether your organisation has a formal engagement policy.
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Yes

LEA 01.2	Indicate what your engagement policy covers:
----------	--

- Conflicts of interest
- Prioritisation of engagements
- Transparency
- Environmental factors
- Social factors
- Governance factors
- Engagements following on from decisions
- Other, describe
- None of the above

LEA 01.3	Attach or provide a URL to your engagement policy. [Optional]
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URL

<https://www.investor.columbiathreadneedleus.com/responsible-investment>

LEA 01.4	Provide a brief overview of your organization's approach to engagement
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We believe in being active and responsible owners. Targeted engagement with portfolio companies on ESG issues forms an important part of our stewardship activities and our investment approach.

Building on our ESG investing approach, our engagement covers a broad range of ESG issues. Prioritization and planning are important factors in shaping our engagement objectives and activities. The decision to engage is prioritized based on several factors, including our assessment of the significance of issues to the company, the risks to our clients, relative holdings, scope to effect change, and opportunities to collaborate.

We may engage with other shareholders on issues we believe have significant implications for our clients' investments. We may engage through collaborative bodies such as PRI investor networks, or bilaterally with other shareholders. Where we do not have major holdings, but share concerns raised by other shareholders, we may choose to lend them our support and endorsement when we deem doing so to be appropriate from a regulatory and fiduciary perspective.

Our approach to engagement is one component of our Responsible Investment Policy.

No

LEA 02	Mandatory	Public	Gateway	PRI 1,2,3
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LEA 02.1	Indicate the method of engagement, giving reasons for the interaction.
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Type of engagement	Reason for interaction
Individual/Internal staff engagements	<input checked="" type="checkbox"/> To influence corporate practice (or identify the need to influence) on ESG issues <input checked="" type="checkbox"/> To encourage improved/increased ESG disclosure <input type="checkbox"/> Other, specify <input type="checkbox"/> We do not engage via internal staff
Collaborative engagements	<input type="checkbox"/> To influence corporate practice (or identify the need to influence) on ESG issues <input type="checkbox"/> To encourage improved/increased ESG disclosure <input checked="" type="checkbox"/> Other, specify <p>We consider various opportunities to participate in collaborative engagements, including through the PRI Clearinghouse, but have not yet selected a collaborative engagement.</p> <input type="checkbox"/> We do not engage via collaborative engagements
Service provider engagements	<input type="checkbox"/> To influence corporate practice (or identify the need to influence) on ESG issues <input type="checkbox"/> To encourage improved/increased ESG disclosure <input type="checkbox"/> Other, specify <input checked="" type="checkbox"/> We do not engage via service providers

Process

Process for engagements run internally

LEA 03	Mandatory	Public	Core Assessed	PRI 2
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New selection options have been added to this indicator. Please review your prefilled responses carefully.

LEA 03.1	Indicate whether your organisation has a formal process for identifying and prioritising engagement activities carried out by internal staff.
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Yes

LEA 03.2

Describe the criteria used to identify and prioritise engagement activities carried out by internal staff.

- Geography/market of the companies targeted
- Materiality of ESG factors
- Systemic risks to global portfolios
- Exposure (holdings)
- In reaction to ESG impacts which has already taken place
- As a response to divestment pressure
- As a follow-up from a voting decision
- Client request
- Other, describe

other description

Pre- and post-shareholder meetings; high levels of shareholder dissent; controversial issues; internal screening identified companies; client queries and interest.

No

LEA 03.3

Additional information. [Optional]

We have developed an issuer engagement framework to increase transparency around our philosophy, approach and processes. The goal of our engagement is to enhance our assessment and understanding of our exposure to the risks and opportunities that may bear on the long-term value creation or sustainability of companies in our clients' portfolios. This framework also assists in the implementation of our annual engagement priorities.

While we may wish to engage with all portfolio companies, it is often not practical to do so. Accordingly, we have developed guidelines that drive most of our engagement activities, and we prioritize meetings with issuers based on our assessment of the exposure to ESG risks and opportunities that may bear on sustainability or long-term value creation for our clients.

We generally prioritize any engagement with an issuer where we have either: 1) large relative holdings over a specific, internally-determined threshold, 2) holdings of any reasonable size and the issuer security is held in one or more of our focus portfolios and/or 3) coverage of the issuer by our fundamental research analysts.

LEA 04**Mandatory****Public****Core Assessed****PRI 2**

New selection options have been added to this indicator. Please review your prefilled responses carefully.

LEA 04.1

Indicate if you define specific objectives for your engagement activities.

- Yes
 - Yes, for all engagement activities
 - Yes, for the majority of engagement activities
 - Yes, for a minority of engagement activities
- We do not define specific objectives for engagement activities carried out by internal staff.

LEA 04.2 Indicate if you monitor the actions that companies take following your engagements.

- Yes
 - Yes, in all cases
 - Yes, in the majority of cases
 - Yes, in the minority of cases
- We do not monitor the actions that companies take following engagement activities carried out by internal staff.

LEA 04.3 Indicate whether your organisation defines milestones and goals for engagement activities carried out by internal staff.

- Yes

LEA 04.4 Indicate if you do any of the following to monitor and evaluate the progress of your engagement activities carried out by internal staff.

- Define timelines for milestones and goals
- Tracking, monitoring progress against defined milestones and goals
- Establish a process for when the goals are not met
- Revisit and, if necessary revise goals on continuous basis
- Other, please specify
- No

LEA 04.5 Additional information. [Optional]

CMLA maintains records of our engagements which assist in monitoring progress beyond issues that can be identified through updated company filings. Through our research sharing platform and calendar systems we maintain records of company meetings which are available to our investment departments.

We conduct periodic screening of our largest holdings where we review the ESG performance of companies with which we have engaged.

We also maintain watch lists within the online systems of two of our research vendors, MSCI and ISS. The watch lists allow us to monitor and review performance where there have been ESG concerns and to reflect this in our research and engagement actions. The watch lists also include email alert functions that provide instant updates when a material change occurs in companies on the watch lists.

Regular meetings with companies also serve to update us on progress; in several instances, we engage with our portfolio companies multiple times each year. We recognize that some of the issues that we engage on are longer- term themes and several years may be required to affect the desired change.

General processes for all three groups of engagers

LEA 10	Mandatory	Public	Gateway	PRI 2
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LEA 10.1 Indicate if you track the number of engagements your organisation participates in.

Type of engagement	Tracking engagements
Individual / Internal staff engagements	<input checked="" type="radio"/> Yes, we track the number of our engagements in full <input type="radio"/> Yes, we partially track the number of our engagements <input type="radio"/> We do not track

LEA 10.2 Additional information. [OPTIONAL]

The number of ESG-focused meetings led by our U.S.-based Responsible Investment staff was 58 last year. It is these meetings that are tracked in full. Additionally, there were around 4,500 research and investment meetings led by portfolio managers and analysts. ESG-focused meetings are recorded in a tracking spreadsheet that includes meeting notes and all reference materials.

Communication

LEA 16

Mandatory

Public

Core Assessed

PRI 2,6

LEA 16.1

Indicate whether your organisation proactively discloses information on its engagements.

- We disclose it publicly

provide URL

<https://www.investor.columbiathreadneedleus.com/responsible-investment>

LEA 16.2

Indicate if the information disclosed to the public is the same as that disclosed to clients/beneficiaries.

- Yes

LEA 16.3

Indicate what engagement information your organisation proactively discloses to clients/beneficiaries and/or the public.

Engagement information disclosed

- Details of the selections, priorities and specific goals of engagement
- Number of engagements
- Breakdown of engagements by type/topic
- Breakdown of engagements by region
- An assessment of the current status of the engagement
- Outcomes that have been achieved from the engagement
- Other information

LEA 16.4

Indicate how frequently you report engagements information.

- Disclosed continuously (prior to and post engagements)
 - Disclosed quarterly or more frequently
 - Disclosed biannually
 - Disclosed annually
 - Disclosed less frequently than annually
 - Ad hoc/when requested
- No
- We disclose it to clients and/or beneficiaries only
 - We do not proactively disclose it to the public and/or clients/beneficiaries.

(Proxy) voting and shareholder resolutions**Overview****LEA 17****Mandatory****Public****Gateway****PRI 1,2,3**

New selection options have been added to this indicator. Please review your prefilled responses carefully.

LEA 17.1

Indicate whether your organisation has a formal voting policy.

- Yes

LEA 17.2

Indicate what your voting policy covers:

- Conflicts of interest
- Prioritisation of voting activities
- Transparency
- Decision making processes
- Environmental factors
- Social factors
- Governance factors
- Filing/co-filing resolutions
- Extraordinary meetings
- Share blocking
- Regional voting practices
- Record keeping
- Company dialogue pre/post vote
- Securities lending process
- Other, describe
- None of the above

LEA 17.3

Attach or provide a URL to your voting policy. [Optional]

URL

<https://www.investor.columbiathreadneedleus.com/responsible-investment>

LEA 17.4

Provide a brief overview of your organization's approach to (proxy) voting.

CMIA is committed to sound stewardship principles and actively carries out proxy voting activities in accordance with our Proxy Voting Policy (Policy) on behalf of our clients. The policy is designed to address our fiduciary obligations in situations where we have been vested with proxy voting authority. In voting proxies on behalf of our clients, we apply the following general principles: (i) Vote in clients' best economic interests; (ii) address material conflicts of interest that may arise; and (iii) comply with disclosure and other requirements in connection with our proxy voting responsibilities.

LEA 17.5

Provide an overview of how you ensure your voting policy is adhered to, giving details of your approach when exceptions to the policy are made (if applicable).

We have adopted the Proxy Voting Guidelines covering certain types of proxy proposals. These Proxy Voting Guidelines indicate whether we vote for, against or abstain from voting a particular proposal, or whether the matter should be considered on a case-by-case basis. When vested with proxy voting authority and in the absence of specific client guidelines, we vote client proxies in accordance with our Proxy Voting Guidelines.

The administration of our proxy voting process is handled by a dedicated central point of administration at our firm (the Proxy Team). The Proxy Team has ultimate responsibility for the implementation of the CMIA Proxy Voting Policy and the Proxy Voting Guidelines. The Director of Responsible Investment analyses certain proxy resolutions and is responsible for engaging with portfolio companies regarding controversial proxies and for on-going monitoring of environmental, social and governance issues and opportunities. The Proxy Voting Committee, whose voting members are portfolio managers and analysts, oversees the

activities of the Proxy Team and the Director of Responsible Investment, and reviews and approves the Proxy Voting Policy and Proxy Voting Guidelines.

No

Process

LEA 18	Mandatory	Public	Descriptive	PRI 2
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LEA 18.1 Indicate how you typically make your (proxy) voting decisions.

Approach

- We use our own research or voting team and make voting decisions without the use of service providers.
- We hire service provider(s) that make voting recommendations or provide research that we use to inform our voting decisions.

Based on

- the service provider voting policy signed off by us
- our own voting policy
- our clients' requests or policy
- other, explain
- We hire service provider(s) that make voting decisions on our behalf, except for some pre-defined scenarios for which we review and make voting decisions.
- We hire service provider(s) that make voting decisions on our behalf.

LEA 18.2 Additional information.[Optional]

The administration of CMIA's proxy voting process is handled by our Proxy Team, which serves CMIA and our affiliates. Among other duties, the Proxy Team coordinates with our third-party proxy voting vendors and research providers, and is responsible for implementing the firm's custom voting policy.

CMIA has engaged Institutional Shareholder Services, Inc. (ISS) as our proxy voting vendor to implement our proxy voting process and to provide recordkeeping and vote disclosure services. CMIA has retained both ISS and Glass, Lewis & Co. to provide proxy research services to ensure quality and objectivity in connection with our proxy voting procedures.

In the event that an investment professional believes that a vote should be cast contrary to our Proxy Voting Guidelines, a written appeal must be lodged with the Proxy Voting Committee. The Committee will consider the appeal and make a voting determination that it believes is in our clients' best interests.

LEA 22	Mandatory	Public	Core Assessed	PRI 2
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New selection options have been added to this indicator. Please review your prefilled responses carefully.

LEA 22.1 Indicate whether you or the service providers acting on your behalf raise any concerns with companies ahead of voting

- Yes, in most cases
- Sometimes, in the following cases:
 - Votes for selected markets
 - Votes relating to certain ESG issues
 - Votes for significant shareholdings
 - Votes for companies we are engaging with
 - On request by clients
 - Other

We may contact companies ahead of registering dissenting votes, but due to volumes of activity in particular periods this is not always possible or feasible.
- Neither we nor our service provider raise concerns with companies ahead of voting

LEA 22.2 Indicate whether you and/or the service provider(s) acting on your behalf, communicate the rationale to companies, when , you abstain or vote against management recommendations.

- Yes, in most cases
- Sometimes, in the following cases.
 - Votes in selected markets
 - Votes on certain issues
 - Votes for significant shareholdings
 - Votes for companies we are engaging with
 - On request by clients
 - Other

The Proxy Voting Guidelines include summary rationale for why votes are cast for or against on specific issues.
- We do not communicate the rationale to companies
- Not applicable because we and/or our service providers do not abstain or vote against management recommendations

LEA 22.3 Additional information. [Optional]

Based on our engagement or dialogue with portfolio companies on proxy topics during the vote solicitation period, we may discuss our votes and the rationale therefor.

In addition, we may notify the Chairman of the Board of Directors of a company in writing in situations where we have significant holdings and where our votes have been cast against management on select issues.

Outputs and outcomes

LEA 23	Mandatory	Public	Core Assessed	PRI 2
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LEA 23.1 For listed equities where you and/or your service provider have the mandate to issue (proxy) voting instructions, indicate the percentage of votes cast during the reporting year.

We do track or collect this information

Votes cast (to the nearest 1%)

%

98

Specify the basis on which this percentage is calculated

- of the total number of ballot items on which you could have issued instructions
- of the total number of company meetings at which you could have voted
- of the total value of your listed equity holdings on which you could have voted

LEA 23.2 Explain your reason(s) for not voting certain holdings

- Shares were blocked
 - Notice, ballots or materials not received in time
 - Missed deadline
 - Geographical restrictions (non-home market)
 - Cost
 - Conflicts of interest
 - Holdings deemed too small
 - Administrative impediments (e.g., power of attorney requirements, ineligibility due to participation in share placement)
 - We do not vote on environmental resolutions
 - We do not vote on social resolutions
 - On request by clients
 - Other
- We do not track or collect this information

LEA 23.3 Additional information. [Optional]




Although we intend to vote all securities for which we are entitled to vote, voting proxies of companies not domiciled in the United States may involve greater effort and cost due to the variety of regulatory schemes and corporate practices at hand. Certain non-U.S. countries require securities to be blocked prior to a vote. CMIA may not vote securities in share blocking countries as the need for liquidity may outweigh the benefit of voting. There may also be additional costs associated with voting in non-U.S. countries such that CMIA may determine that the cost of voting outweighs the potential benefit.

LEA 24	Mandatory	Public	Additional Assessed	PRI 2
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LEA 24.1 Indicate if you track the voting instructions that you and/or your service provider on your behalf have issued.

Yes, we track this information

LEA 24.2 Of the voting instructions that you and/or third parties on your behalf issued, indicate the proportion of ballot items that were:

Voting instructions	Breakdown as percentage of votes cast
For (supporting) management recommendations	 <p>90</p>
Against (opposing) management recommendations	 <p>9</p>
Abstentions	 <p>1.0</p>

100%

LEA 24.3 Describe the actions you take after voting against management recommendations.

In accordance with the CMIA Proxy Voting Guidelines we approach shareholder resolutions based on the underlying issue and our assessment of whether a proposal may bear on the long-term value creation for our clients or on the sustainability of the company. During the last reporting year we supported 444 shareholder resolutions across a wide variety of environmental, social and governance issues.

No, we do not track this information

LEA 24.4 Additional information. [Optional]

During the last reporting period we voted at over 5,100 annual and special shareholder meetings.

Of our total dissenting votes cast, 54% were director-related, 21% were compensation-related, 9% were supporting shareholder resolutions, 6% were routine and other business items, 5% were capitalisation-related, and 5% were antitakeover-related.

We disclose our voting results, as required by the Securities and Exchange Commission, no later than September 1 each year.

Vote disclosures are available online at: <https://www.investor.columbiathreadneedleus.com/responsible-investment>.

Communication

LEA 27 Mandatory Public Core Assessed PRI 2,6

LEA 27.1

Indicate if your organisation proactively discloses information on your voting activities.

- We disclose it publicly

provide URL

[https://www.investor.columbiathreadneedleus.com/responsible-investment.](https://www.investor.columbiathreadneedleus.com/responsible-investment)

LEA 27.2

Indicate if the information disclosed to the public is the same as that disclosed to clients/beneficiaries.

- Yes

LEA 27.3

Indicate the voting information your organisation proactively discloses to the public and/or to clients/beneficiaries.

Indicate how much of your voting record you disclose

- All voting decisions
- Some voting decisions
- Only abstentions and opposing vote decisions
- Summary of votes only

Indicate what level of explanation you provide

- Explain all voting decisions
- Explain some voting decisions
- Only explain abstentions and votes against management
- No explanations provided

LEA 27.4

Indicate how frequently you typically report voting information.

- Continuously (primarily before meetings)
- Continuously (soon after votes are cast)
- Quarterly or more frequently
- Biannually
- Annually
- Less frequently than annually
- Ad-hoc/as requested
- No
- We disclose it to clients/beneficiaries only
- We do not proactively disclose our voting activities to the public and/or to clients/beneficiaries

LEA 27.8

Additional information. [Optional]

We disclose our voting results, as required by the Securities and Exchange Commission, no later than September 1 each year.

Vote disclosures are available online at: <https://www.investor.columbiathreadneedleus.com/responsible-investment>.

Columbia Management Investment Advisers, LLC

Reported Information

Public version

Direct - Fixed Income

PRI disclaimer

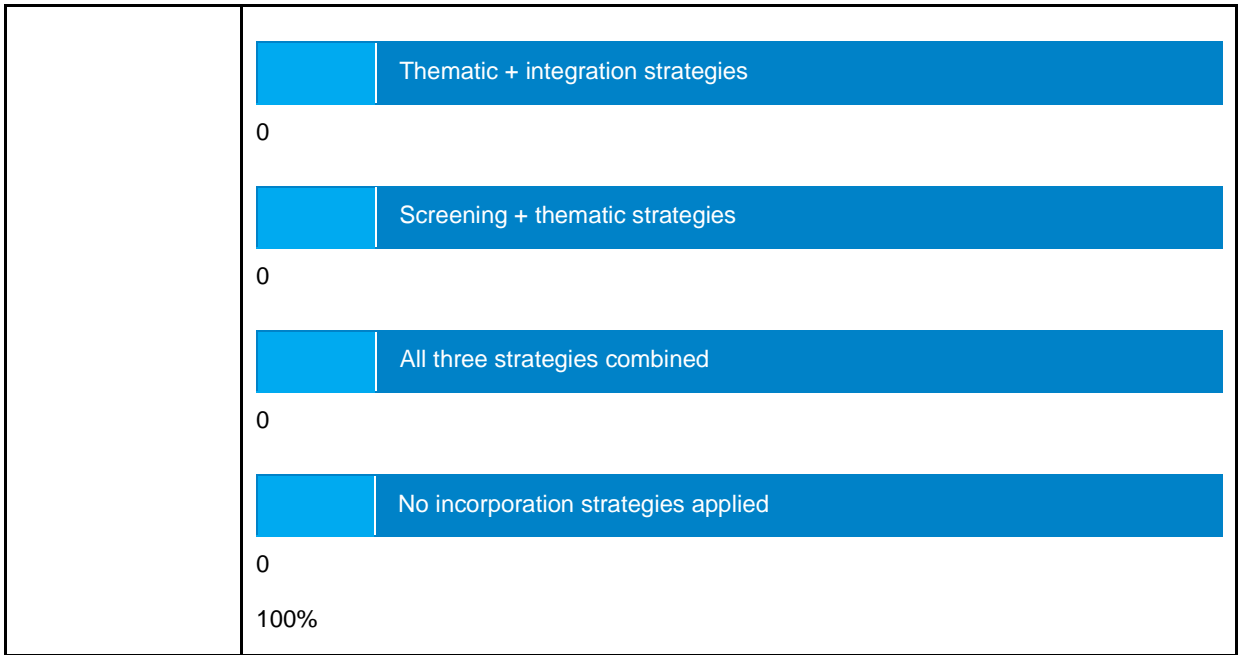
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ESG incorporation in actively managed fixed income

Implementation processes

FI 04	Mandatory	Public	Gateway	PRI 1
FI 04.1	Indicate 1) Which ESG incorporation strategy and/or combination of strategies you apply to your actively managed fixed income investments; and 2) The proportion (+/- 5%) of your total actively managed fixed income investments each strategy applies to.			

SSA	<table border="1"> <thead> <tr> <th>Strategy</th> <th>Percentage</th> </tr> </thead> <tbody> <tr> <td>Screening alone</td> <td>0</td> </tr> <tr> <td>Thematic alone</td> <td>0</td> </tr> <tr> <td>Integration alone</td> <td>95</td> </tr> <tr> <td>Screening + integration strategies</td> <td>0</td> </tr> <tr> <td>Thematic + integration strategies</td> <td>0</td> </tr> <tr> <td>Screening + thematic strategies</td> <td>0</td> </tr> <tr> <td>All three strategies combined</td> <td>5</td> </tr> <tr> <td>No incorporation strategies applied</td> <td>0</td> </tr> <tr> <td>Total</td> <td>100%</td> </tr> </tbody> </table>	Strategy	Percentage	Screening alone	0	Thematic alone	0	Integration alone	95	Screening + integration strategies	0	Thematic + integration strategies	0	Screening + thematic strategies	0	All three strategies combined	5	No incorporation strategies applied	0	Total	100%
Strategy	Percentage																				
Screening alone	0																				
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Screening + thematic strategies	0																				
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Total	100%																				
Corporate (financial)	<table border="1"> <thead> <tr> <th>Strategy</th> <th>Percentage</th> </tr> </thead> <tbody> <tr> <td>Screening alone</td> <td>0</td> </tr> <tr> <td>Thematic alone</td> <td>0</td> </tr> <tr> <td>Integration alone</td> <td>95</td> </tr> <tr> <td>Screening + integration strategies</td> <td>5</td> </tr> </tbody> </table>	Strategy	Percentage	Screening alone	0	Thematic alone	0	Integration alone	95	Screening + integration strategies	5										
Strategy	Percentage																				
Screening alone	0																				
Thematic alone	0																				
Integration alone	95																				
Screening + integration strategies	5																				



Corporate (non-financial)	Screening alone	0
	Thematic alone	0
	Integration alone	95
	Screening + integration strategies	5
	Thematic + integration strategies	0
	Screening + thematic strategies	0
	All three strategies combined	0
	No incorporation strategies applied	0
		100%
Securitised	Screening alone	0
	Thematic alone	0
	Integration alone	95
	Screening + integration strategies	5

	Thematic + integration strategies	0
	Screening + thematic strategies	0
	All three strategies combined	0
	No incorporation strategies applied	0
		100%

FI 04.2 Describe your reasons for choosing a particular ESG incorporation strategy and how combinations of strategies are used.

Please see below in FI 04.3.

FI 04.3 Additional information [Optional].

Approach to Incorporation

There are three reasons for ESG incorporation. First, we see the integration of ESG factors as identifying potentially material risks and opportunities, thereby enhancing the investment process. More widely, we have made a commitment to ESG incorporation, including through our commitment to the PRI. Finally, in line with our core firm value of client-focus, we recognize that clients are increasingly focused on ESG incorporation, including integration and screening strategies. While we believe that integrating ESG factors enables portfolio managers to make better informed investment decisions, each portfolio management team within CMIA makes its own investment decisions and certain teams may put more or less emphasis on ESG factors in any given investment decision. ESG restrictions are not systematically applied in client portfolios unless we are specifically directed to do so by the relevant client.

ESG integration

ESG criteria are incorporated into our investment processes and tools to identify material risks and opportunities, and we believe that integrating ESG will enable portfolio managers and analysts to make better informed investment decisions. ESG issues and analysis are relevant in the context of considering the creditworthiness of an issuer, and integration of ESG analysis complements the risk-mitigation focus that is key to fixed income investment.

With respect to corporate credit, integrating analysis of ESG risks into the investment process enables a richer understanding of the dynamics, opportunities and risks inherent in an issuer's businesses. When assessing municipal and government debt, we likewise believe that potential to create value can be determined by ESG practices and in turn ESG factors may be considered in investment decisions. We believe our integration strategy can enhance our ability to protect the interests of our clients and the capital they have invested.

We acknowledge key differences between ESG integration in equities and fixed income. For instance, the ability of creditors to engage with issuers is significantly more limited, with no routine voting rights and less frequent access to management. Similarly, unlike equities where growth can be a key driver, for bond investors, protection of capital is key given losses are difficult to recoup.

Our ESG strategies are thus applied as appropriate across asset classes. While there has historically been a focus on ESG in equities, during the reporting period the fixed income and RI staff have been working in ever closer collaboration. Together our expertise and related research capabilities provide us with the platform and resource to enable ESG factors and risks to be examined within the fixed income asset class.

ESG Screening

In line with our firm's value of client-focus, we have the capability to implement screens and restrictions in portfolios for segregated mandates. Common requirements include faith-based criteria, tobacco, weapons, alcohol, controversial countries and non-compliance with the UN Global Compact. Screening criteria or lists of specific securities or themes are typically provided by clients based on their requirements. We utilize third-party data to manage and monitor the application of the screens and exclusions to meet their requirements.

Thematic and Combined (SSA)

In line with our client-focused values, and building on our interest in outcome oriented strategies, we manage the Columbia U.S. Social Bond Fund. The Fund aims to deliver a tax-efficient financial return by investing in municipal securities that include social performance. These issues are defined by our social assessment methodology, which is produced by a third party social advisory vendor in collaboration with our firm, and includes seven social themes and one environmental theme.

The security selection and monitoring process is governed by a municipal security social framework that involves no negative screening and instead assesses the nature of the social impact of each investment and the intensity of that impact across multiple impact areas such as community development, environmental protections, housing and education.

FI 06	Mandatory	Public	Additional Assessed	PRI 1
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FI 06.1	Indicate how you ensure that your ESG research process is robust:
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- Issuers are given the opportunity by you or your research provider to review ESG research on them and correct inaccuracies
- Issuer information and/or ESG ratings are updated regularly to ensure ESG research is accurate
- Internal audits of ESG research are undertaken in a systematic way
- ESG analysis is benchmarked for quality against other providers
- Other, specify
- None of the above

FI 06.2	Describe how your ESG information or analysis is shared among your investment team.
----------------	--

- ESG information is held within a centralised database and is accessible to all investment staff
- ESG information is a standard item on all individual issuer summaries, 'tear sheets', 'dashboards' or similar documents
- Investment staff are required to discuss ESG information on issuers as a standard item during investment committee meetings
- Records capture how ESG information and research was incorporated into investment decisions
- Other, specify
- None of the above

FI 06.3	Additional information. [Optional]
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To facilitate the integration of ESG factors we sought to develop tools that provides for a third-party suite of ESG data to be systematically considered in our mainstream investment processes. We supplement those tools with internally produced research and external research from a variety of sources. Our goals are to encourage integration of ESG factors by developing high-quality portfolio, sector, issuer and risk level analytics from the ESG data suite for easy use by our investment professionals, while simultaneously meeting the growing need from clients for insight into their ESG exposures.

In 2016 our fixed income analysts began including a review of the ESG risks and opportunities of each issuer when publishing their investment theses internally. The addition of this perspective has added depth and clarity to each research report and provides insight into the variables that may affect our ratings and/or security selection.

In addition, all our internally-produced fixed income research automatically includes not only an overall ESG rating but individual E, S and G pillar scores.

(A) Implementation: Screening

FI 07	Mandatory	Public	Gateway	PRI 1
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FI 07.1	Indicate the type of screening you conduct.
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Select all that apply

	SSA	Corporate (financial)	Corporate (non-financial)	Securitised
Negative/exclusionary screening	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Positive/best-in-class screening	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Norms-based screening	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

FI 07.2	Describe your approach to screening for internally managed active fixed income
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In line with our firm's client-focused values, we have the capability to implement screens and restrictions in portfolios for segregated mandates. Common requirements include faith-based criteria, tobacco, weapons, alcohol, controversial countries and non-compliance with the UN Global Compact. Screening criteria or lists of specific securities or themes are typically provided by clients based on their requirements. We utilize third-party data to manage and monitor the application of the screens and exclusions to meet their requirements

FI 08	Mandatory	Public	Descriptive	PRI 1
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FI 08.1	Indicate why you conduct negative screening.
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SSA

SSA

- For legal reasons
- For non-legal reasons

Corporate (financial)

Corporate (fin)

- For legal reasons
- For non-legal reasons

Corporate (non-financial)

Corporate (non-fin)

- For legal reasons
- For non-legal reasons

FI 08.2 Describe your approach to ESG-based negative screening of issuers from your investable universe.

When clients desire specific portfolio exclusions, we work together to understand their requirements and meet their needs using tools designed to achieve their goals.

FI 10	Mandatory	Public	Core Assessed	PRI 1
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FI 10.1 Indicate which systems your organisation has to ensure that fund screening criteria are not breached in fixed income investments.

Type of screening	Checks
Negative/exclusionary screening?	<input checked="" type="checkbox"/> Checks are performed to ensure that issuers meet screening criteria <input checked="" type="checkbox"/> Data used for the screening criteria is updated at least every 2 years <input checked="" type="checkbox"/> Automated IT systems prevent our portfolio managers from investing in excluded issuers or bonds that do not meet screening criteria <input type="checkbox"/> Audits of fund holdings are undertaken regularly by internal audit or compliance functions <input type="checkbox"/> Other, specify <input type="checkbox"/> None of the above
Positive/best-in-class screening	<input checked="" type="checkbox"/> Checks are performed to ensure that issuers meet screening criteria <input checked="" type="checkbox"/> Data used for the screening criteria is updated at least every 2 years <input checked="" type="checkbox"/> Automated IT systems prevent our portfolio managers from investing in excluded issuers or bonds that do not meet screening criteria <input type="checkbox"/> Audits of fund holdings are undertaken regularly by internal audit or compliance functions <input type="checkbox"/> Other, specify <input type="checkbox"/> None of the above
Norms-based screening	<input checked="" type="checkbox"/> Checks are performed to ensure that issuers meet screening criteria <input checked="" type="checkbox"/> Data used for the screening criteria is updated at least every 2 years <input checked="" type="checkbox"/> Automated IT systems prevent our portfolio managers from investing in excluded issuers or bonds that do not meet screening criteria <input type="checkbox"/> Audits of fund holdings are undertaken regularly by internal audit or compliance functions <input type="checkbox"/> Other, specify <input type="checkbox"/> None of the above

(B) Implementation: Thematic

FI 12	Mandatory	Public	Core Assessed	PRI 1
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FI 12.1	Indicate whether you encourage transparency and disclosure relating to the issuance of themed bonds as per the Green Bonds Principles:
	<input type="checkbox"/> We require that themed bond proceeds are only allocated to environmentally or socially beneficial projects <input type="checkbox"/> We require the issuer (or 3rd party assurer) to demonstrate a process which determines the eligibility of projects to which themed bond proceeds are allocated <input type="checkbox"/> We require issuers to demonstrate a systematic and transparent process of disbursing themed bond proceeds to eligible projects until all funds are allocated <input type="checkbox"/> We require issuers to report at least once per year on the projects to which proceeds have been allocated including a description of those projects <input type="checkbox"/> Other, specify <input checked="" type="checkbox"/> None of the above

FI 12.2	Describe the actions you take when issuers do not disburse bond proceeds as described in the offering documents.
----------------	--

We would engage the issuer.

FI 13	Mandatory	Public	Additional Assessed	PRI 1
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FI 13.1	Indicate how you assess the environmental or social impact of your thematic investments
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- We require issuers to report at least once per year on specific environmental or social impacts resulting from our themed investments
- We ensure independent audits are conducted on the environmental or social impact of our investments
- We have a proprietary system to measure environmental and social impact
- We measure the impact of our themed bond investments on specific ESG factors such as carbon emissions or human rights
- Other, specify
- None of the above

FI 13.2	Additional information. [Optional]
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The above relates solely to the Columbia U.S. Social Bond Fund. We have developed a proprietary scoring system, with a third party vendor to identify environmental and social impact and issuers that may provide varying levels of impact based on the nature of the project or operation and the level of intensity directed at underserved populations. Analysts are applying our internal scoring system after reviewing credit fundamentals to see if the investment opportunity would fit well with the goals of the fund. During this review process, any negative attributes are also identified and used as a potential screen to prevent inclusion in the portfolio.

(C) Implementation: Integration

FI 14	Mandatory	Public	Descriptive	PRI 1
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FI 14.1	Describe your approach to integrating ESG into traditional financial analysis.
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Our credit research teams conduct fundamental credit analysis in support of our investment strategies. The credit research teams are responsible for analysis on sector/industry and individual security levels. Each credit analyst is responsible for specific sectors. There is frequent dialogue and review between portfolio managers, analysts and traders regarding individual securities, sectors, market supply/demand, credit spreads and pricing. The firm's proprietary research platform serves as a repository for the credit analysts' written research and internal security ratings.

When evaluating a security and assigning an internal credit rating, our analysts incorporate a wide range of security characteristics including issuer, coupon, yield, maturity, covenants, credit rating, sector, coverage ratios, demographics, political environment and social impact, among others.

During the report year our fixed income analysts began including a review of the ESG risks and opportunities of each issuer when publishing their investment theses internally. The addition of this perspective has added depth and clarity to each research report and provides insight into the variables that may affect our internal credit ratings and/or security selection for portfolio inclusion.

In addition, all our internally-produced fixed income research automatically includes not only an overall ESG rating but individual E, S and G pillar scores.

We also employ external resources for supplemental ESG analytical support such as the aforementioned ESG research firms (MSCI, Sustainalytics, Bloomberg, plus brokerage ESG research) and other industry publications. We believe the combination of this information helps to create a more complete view of an issuer.

FI 14.2

Describe how your ESG integration approach is adapted to each of the different types of fixed income you invest in.

SSA

The following applies to our Columbia U.S. Social Bond Fund.

The main focus of our ESG integration efforts in SSA's relates to municipal securities.

We have developed a proprietary scoring system, with a third party vendor to identify environmental and social impact and issuers that may provide varying levels of impact based on the nature of the project or operation and the level of intensity directed at underserved populations. Analysts are applying our internal scoring system after reviewing credit fundamentals to see if the investment opportunity would fit well with the goals of the fund. During this review process, any negative attributes are also identified and used as a potential screen to prevent inclusion in the portfolio.

The security selection and monitoring process involves no negative screening and instead is focused on multiple impact areas such as community development, environmental protection, housing and education.

Corporate (financial)

We take a similar approach to integration in both financial and non-financial fixed income corporates, although different ESG factors will be emphasised for this particular sector; for example, regulatory, governance and human capital issues are most likely to be prioritized.

Given the highly regulated nature of this sector, adherence to regulatory requirements is a key consideration for this type of fixed income investment.

Please see below for further detail on our ESG integration approach in corporate debt.

Corporate (non-financial)

With respect to corporate credit, integrating an analysis of ESG risks into the investment process enables a richer understanding of the dynamics, opportunities and risks inherent in an issuer's business. Creditworthiness is a function of a company's profitability, productivity, competitive position, as well as estimated future value and cost of capital. All of these elements can be linked to ESG factors.

Based on our belief that the consideration of ESG is relevant to the creditworthiness of corporate issuers, during the reporting year we further enhanced our use of ESG information for corporate debt. Our fixed income analysts began including a review of the ESG risks and opportunities of each issuer when publishing their investment theses internally. The addition of this perspective has added depth and clarity to each research report and provides insight into the variables that may affect our internal credit ratings and/or security selection for portfolio inclusion. We also note that during the reporting year all our internally-produced fixed income research automatically includes not only an overall ESG rating but individual E, S and G pillar scores

For investment grade research, where coverage is greatest, all our fixed income analyses published includes outputs from MSCI ESG research as noted above. ESG research is thus included in our credit research in a similar way to equities, through MSCI ESG sourced ratings, issuer reviews and sector research. Our ESG coverage in the fixed income space encompasses over 11,000 issuers mapped across 260,000 fixed income securities.

With respect to high yield, external ESG research coverage is less broad than investment grade but is improving year over year. If issues are detected from our internal reviews and no external research is available, the RI staff may undertake its own review and provide observations and conclusions on ESG factors.

Securitized

To the extent it is available, we rely on external resources for ESG analytics in consideration of securitized assets. When available, ESG ratings and E, S and G pillar scores are available for consideration in our analyses.

FI 15 **Mandatory** **Public** **Core Assessed** **PRI 1**

FI 15.1 Indicate how ESG information is typically used as part of your investment process.

Select all that apply

	SSA	Corporate (financial)	Corporate (non-financial)	Securitized
ESG analysis is integrated into fundamental analysis	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
ESG analysis is integrated into security weighting decisions	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
ESG analysis is integrated into portfolio construction decisions	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
ESG analysis is a standard part of internal credit ratings or assessment	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ESG analysis for issuers is a standard agenda item at investment committee meetings	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
ESG analysis is regularly featured in internal research notes or similar	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ESG analysis is a standard feature of ongoing portfolio monitoring	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ESG analysis features in all internal issuer summaries or similar documents	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Other, specify	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

FI 16 **Mandatory** **Public** **Additional Assessed** **PRI 1**

FI 16.1 Indicate the extent to which ESG issues are reviewed in your integration process.

	Environment	Social	Governance
SSA	<input checked="" type="radio"/> Environmental <input type="radio"/> Systematically <input checked="" type="radio"/> Occasionally <input type="radio"/> Not at all	<input checked="" type="radio"/> Social <input type="radio"/> Systematically <input checked="" type="radio"/> Occasionally <input type="radio"/> Not at all	<input checked="" type="radio"/> Governance <input type="radio"/> Systematically <input checked="" type="radio"/> Occasionally <input type="radio"/> Not at all
Corporate (financial)	<input checked="" type="radio"/> Environmental <input type="radio"/> Systematically <input checked="" type="radio"/> Occasionally <input type="radio"/> Not at all	<input checked="" type="radio"/> Social <input type="radio"/> Systematically <input checked="" type="radio"/> Occasionally <input type="radio"/> Not at all	<input checked="" type="radio"/> Governance <input type="radio"/> Systematically <input checked="" type="radio"/> Occasionally <input type="radio"/> Not at all
Corporate (non-financial)	<input checked="" type="radio"/> Environmental <input type="radio"/> Systematically <input checked="" type="radio"/> Occasionally <input type="radio"/> Not at all	<input checked="" type="radio"/> Social <input type="radio"/> Systematically <input checked="" type="radio"/> Occasionally <input type="radio"/> Not at all	<input checked="" type="radio"/> Governance <input type="radio"/> Systematically <input checked="" type="radio"/> Occasionally <input type="radio"/> Not at all
Securitized	<input checked="" type="radio"/> Environmental <input type="radio"/> Systematically <input checked="" type="radio"/> Occasionally <input type="radio"/> Not at all	<input checked="" type="radio"/> Social <input type="radio"/> Systematically <input checked="" type="radio"/> Occasionally <input type="radio"/> Not at all	<input checked="" type="radio"/> Governance <input type="radio"/> Systematically <input checked="" type="radio"/> Occasionally <input type="radio"/> Not at all

FI 16.2 Please provide more detail on how you review E, S and G factors in your integration process.

SSA

The main focus of our ESG review efforts in SSA's relates to municipal securities.

We have developed a proprietary scoring system, with a third party vendor to identify environmental and social impact and issuers that may provide varying levels of impact based on the nature of the project or operation and the level of intensity directed at underserved populations. Analysts are applying our internal scoring system after reviewing credit fundamentals to see if the investment opportunity would fit well with the goals of the fund. During this review process, any negative attributes are also identified and used as a potential screen to prevent inclusion in the portfolio.

The security selection and monitoring process involves no negative screening and instead is focused on multiple impact areas such as community development, environmental protection, housing and education.

Corporate (financial)

We take a similar approach to reviewing both financial and non-financial fixed income corporates, although different ESG factors will be emphasised for this particular sector; for example, regulatory, governance and human capital issues are most likely to be prioritized.

Given the highly regulated nature of this sector, adherence to regulatory requirements and governance are core factors reviewed, which is particularly salient to the sector given the increasing regulatory burden, the significant impact of recent fines on the sector and the systemic risk inherent in the financial system.

Please see below for further detail on our ESG review approach in corporate debt.

Corporate (non-financial)

With respect to corporate credit, reviewing ESG risks enables a richer understanding of the dynamics, opportunities and risks inherent in an issuer's business. Creditworthiness is a function of a company's profitability, productivity, competitive position, as well as estimated future value and cost of capital. All of these elements can be linked to ESG factors.

All our fixed income analysis includes both an overall ESG rating from MSCI ESG research, as well as itemized scores across E, S and G pillars. Key components of our fixed income analysts' own research is often related to governance, regulation, litigation and accounting flags. The most material E, S, and G factors will differ according to the sector and geography of the issuer, and particular issues may require detailed attention.

Securitized

To the extent it is available, we rely on external resources for ESG analytics in consideration of securitized assets. When available, ESG ratings and E, S and G pillar scores are available for consideration in our analyses.

Communication

FI 23	Mandatory	Public	Core Assessed	PRI 2,6
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FI 23.1 Indicate if your organisation proactively discloses information on your approach to RI across all of your fixed income investments.

- We disclose it publicly

Provide URL

<https://www.investor.columbiathreadneedleus.com/responsible-investment>

FI 23.2 Indicate if the information disclosed to the public is the same as that disclosed to clients/beneficiaries.

- Yes

FI 23.3 Indicate the information your organisation proactively discloses to the public regarding your approach to RI incorporation.

- Broad approach to RI incorporation
- Detailed explanation of RI incorporation strategy used

FI 23.4

Indicate how frequently you typically report this information.

- Quarterly or more frequently
- Biannually
- Annually
- Less frequently than annually
- Ad-hoc/when requested

- No
- We disclose it to clients and/or beneficiaries only
- We do not proactively disclose it to the public and/or clients/beneficiaries

FI 23.7

Additional information. [Optional]

The CMIA Responsible Investment Policy Statement is available at:
<https://www.investor.columbiathreadneedleus.com/responsible-investment>. The policy broadly outlines our program, which includes how we integrate ESG factors into our investment processes firm wide.