



# Responsible Investment Policy

**Challenger Limited**

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# 1. Introduction

## 1.1 Our Purpose

Challenger believes it is paramount that every Australian has the opportunity to be financially secure throughout their retirement. Our purpose is to provide our customers with financial security for a better retirement. From designing innovative investment solutions to our advocacy work with government on behalf of our customers, we help to improve the quality of life for current and future retirees and to help our clients to achieve their financial objectives.

Challenger is cognisant of the world which our current and future customers will retire into and the opportunity we have to make a positive difference in how that future looks through stewardship and investment activity. We integrate ESG considerations in our investment process because we believe ESG factors have an impact on the long-term performance of markets, countries and companies and that ESG integration should improve risk adjusted returns over time.

The Challenger Life (CLC) business primarily supports the retirement phase, with products such as the guaranteed lifetime annuity, which provide income security for an ageing population. Our Funds Management business, which includes Challenger Investment Management (CIM), as well as our suite of affiliate partners within the Fidante Partners (Fidante) business, primarily supports the accumulation phase of our customers' superannuation and enables our clients to achieve their financial goals, through specialised equity, fixed income, real estate and alternative investment strategies.

## 1.2 Our Overall Approach to Responsible Investing

Challenger takes ESG risks into consideration in our investment decision-making and ownership practices, and when we appoint managers to act on our behalf. Incorporating ESG considerations into investment decision-making and portfolio construction, also helps Challenger to build a more resilient organisation and protects both the business and customers from financial and non-financial risks.

The Board bears the ultimate responsibility for setting and approving Challenger's Responsible Investment Policy. The ESG Steering Committee provides executive management focus on the development and implementation of the ESG risk management framework. The investment teams have responsibility for integrating ESG considerations into the investment process, with senior investment leaders across Challenger Life and Challenger Funds Management having Key Performance Indicators linked to responsible investment and ESG integration.

Challenger has been a signatory to the UN-backed Principles of Responsible Investment (PRI) since 2015 and is committed to its six principles.

## 1.3 Fiduciary Duty

We believe ESG factors are a key investment value driver and therefore it is our fiduciary duty to consider material ESG factors in our investment decisions to ensure we meet the needs of all our stakeholders.

## 1.4 Purpose of This Policy

This Policy outlines how Challenger integrates ESG considerations in its investment processes, and how the approach to ESG integration varies depending on the nature of the relevant asset class and investment strategy.

The principal objectives of this policy are to:

- ensure that ESG risks and opportunities are adequately considered as part of Challenger's investment processes in line with stakeholders and relevant industry standards such as the PRI; and
- to assist and guide Challenger in engaging with companies and Challenger-appointed third-party investment managers to promote better governance practices.

This policy should be read in conjunction with Challenger's Risk Management Strategy. This policy is consistent with the long-term investment objectives of Challenger and its risk tolerances.

## 2. Responsible Investment Governance Structure

Portfolio Managers within each investment team are ultimately responsible for the implementation of ESG integration within their investment strategy. Senior investment leaders, or where appointed dedicated senior-level ESG champions, are responsible for each investment team's ESG strategy. The in-house ESG team provides insights and expertise to the investment teams on specific ESG issues as well as ESG integration.

Investment managers identify potential ESG issues for discussion and monitoring. This is done at the investment team level. This excludes affiliates who have their own ESG risk reporting process.

### 2.1 Board Oversight

ESG risks are reported to Challenger's Board of Directors by Divisional Chief Executives and the Challenger Group Risk Committee (GRC).

### 2.2 Group Risk Committee

ESG risks are reported to and assessed by the GRC. These risks are reported to the GRC through various channels, including the ESG Steering Committee.

### 2.3 ESG Steering Committee

The ESG Steering Committee provides support to Challenger's on-going commitment to addressing issues in relation to the environment, corporate social responsibility and corporate governance.

The ESG Steering Committee is a cross-functional management committee. It assists Challenger's Leadership Team in developing and setting the Group's ESG strategy. This includes assessing ESG risks and associated controls, initiatives and policies relating to the implementation of the strategy, external reporting and disclosures relating to the Group's ESG performance, and monitoring and assessing developments relating to, and improving, Challenger's understanding of ESG. The roles and responsibilities of the ESG Steering Committee are detailed in the Charter that governs the committee.

The ESG Steering Committee through the Chair and any other relevant members provides updates to the Group Leadership Team and Group Risk Committee to communicate progress of Challenger's ESG programs, initiatives, risks and opportunities. The Committee also informs the Leadership Team and Board of any changes in regulations as well as policies that require their endorsement. The Committee's focus is on the Challenger ESG Framework and the Committee does not influence individual investment teams on how they consider ESG risks as part of their investment strategies.

### 2.4 Investment Committees

#### **CLC**

The CLC Investment Committee (CLC IC) is comprised of senior investment leaders within CLC and other senior stakeholders involved in the Challenger Life business. The CLC IC supports the Chief Executive, Life and Solutions by providing first line oversight of the balance sheet activities of CLC, including consideration of ESG related risks and issues.

#### **Funds Management – Challenger Investment Management**

The Challenger Investment Management Board has established Investment Committees to assist it in carrying out its responsibilities with respect to Client Portfolios. A separate Committee has been established for each client portfolio. ESG risks and opportunities are considered by the investment committees for transactions in the portfolios.

# 3. ESG Integration

Our investment approach is consistent with our purpose of providing customers with financial security for a better retirement. Capital preservation, value creation and risk mitigation are at the centre of our ESG integration process. We strongly believe that working with issuers, investee companies and asset managers to improve business practices and behaviour will achieve these goals and have a positive impact on society as a whole.

We have adopted an integrated investment management approach to deliver responsible investment outcomes. In line with these practices is Challenger’s belief that the consideration of ESG factors will provide a greater understanding of areas of potential risk and opportunity that could ultimately affect the value, performance, and reputation of the investment decision-making that it undertakes.

Challenger’s investment management teams consider ESG risks and opportunities that are relevant to the current or future value of an investment when deciding whether to buy, retain or sell an investment. These issues may be driven by existing or future market trends, reflect issues of considerable societal concern, or pose potential operational, financial, strategic, reputational, or systemic risks. Importantly, ESG factors form a part of the overall value proposition for an investment. These considerations are made at the investment level and also form a part of portfolio construction decisions across the entire portfolio.

Where possible, Challenger seeks to identify positive ESG trends and invests with the intent to reduce the cost of capital for companies or sectors which have a positive impact on the environment or society. Challenger believes investors benefit from such investments through improved investment outcomes as a result of the reduced risks on these investments.

We subscribe to an external ESG data provider to enable our investment teams to access additional ESG metrics, insights, and reporting capability.

ESG risks and opportunities that may be considered across different asset classes are set out in the table below.

## ESG Risks and Opportunities

Considerations	Examples
Environmental	Climate change (e.g., greenhouse gas emissions, emissions trading, physical risks and opportunities, transition risks, adaptation, mitigation), biodiversity loss, building energy performance, energy consumption, pollution, natural resource use and degradation (e.g., water scarcity), land use, waste, clean technology products and services, environmental management practices and product lifecycle management.
Social	Human capital, workplace health and safety, labour relations and standards, human rights, modern slavery, demographic changes, supply-chain, responsible lending, data privacy, indigenous cultural heritage, animal welfare and community impacts.
Governance	Board composition and independence, executive remuneration and incentive plans, corporate accountability structures, compliance, negligence, bribery and corruption, conflicts of interest and related-party transactions, shareholder rights, board oversight of ESG risks, accounting and audit quality.

## 3.1 Materiality

We determine materiality of ESG factors by considering which ESG risks and opportunities an industry is most exposed to as well as any ESG risks and opportunities specific to the company or issuer itself. A material ESG risk is one which can have a significant impact on the valuation or reputation of a company or investment, if not well managed.

## 3.2 ESG Integration Across Different Asset Classes

We undertake investment activity across our Challenger Life and Funds Management businesses. CIM and several Fidante Partner's affiliates manage money on behalf of the Challenger Life business as well as for external clients.

The consideration of ESG factors for these investment teams is governed by the Responsible Investment Statements specific to their investment teams. However, they are all aligned to the Challenger Responsible Investment Policy.

Detailed asset class approaches to ESG integration can be found on the Challenger and CIM websites. The following documents are currently available:

- CLC Responsible Investment Statement; and
- CIM Fixed Income Responsible Investment Statement.

# 4. Manager Selection, Appointment, and Monitoring

## 4.1 Third-Party External Investment Managers

When carrying out due diligence for the appointment of new third-party investment managers, Challenger:

- promotes Challenger's expectations in respect of ESG considerations as a formal part of Challenger's investment manager selection and review process;
- understands the third-party investment manager's responsible investment approach, resource capability and intent with respect to ESG;
- reviews the third-party investment manager's ESG Policy and, where relevant, encourages and assists the manager in formalising such a policy;
- encourages the third-party investment manager to discuss ESG considerations undertaken in their own investment decision-making and ownership practices in their reports to Challenger; and
- encourages the third-party investment manager to become a signatory to the PRI Principles.

Challenger also expects that the third-party investment managers we appoint will:

- demonstrate an acceptable level of commitment to the management of key ESG risks and opportunities, including:
  - following the PRI Principles;
  - meeting any Sustainable Finance regulatory requirements in the relevant jurisdictions;
  - having a formalised ESG Policy and governance structure;
  - effectively assessing, measuring, and monitoring climate risks and opportunities at an entity and portfolio level; and
  - demonstrating that modern slavery risks are considered as part of the ESG integration process; and
- apply principles of active ownership and investment stewardship, particularly in relation to proxy voting and engagement, in a manner similar to that set out in this policy.

## 4.2 Investment Management Agreements (IMAs) with Third-Party Investment Managers

Senior investment leaders across Challenger Group and their teams are responsible for ensuring that all new IMAs with third-party investment managers, including IMAs between Fidante as Responsible Entity and its affiliate partners, include ESG considerations. When IMAs are entered into, the relevant senior investment leaders and their teams ensure:

- there is a specific clause contained within the IMA which clearly sets out the third-party investment manager's approach to ESG considerations, including an adequate explanation as to how ESG risks are accounted for; and
- the proxy voting reporting arrangements that have been agreed between Challenger and the third-party investment manager are clearly articulated and are sufficient for Challenger to meet its obligations under of this policy.

## 5. Fidante Affiliate Partnerships

Fidante invests in and forms long-term alliances with talented investment professionals to create, grow and support specialist, affiliate funds management businesses. We believe that high quality investment practices should involve an assessment of ESG-related risks and opportunities. We therefore will only partner with investment managers who are committed to continuous progress in ESG integration.

We assess each manager's capability and commitment to ESG integration at every stage of the selection process. Our in-house ESG Specialist is involved in this process, engaging with prospective affiliates to understand their integration approach.

Any fund for which Fidante acts as Responsible Entity (RE) must integrate ESG considerations in its investment process. A specific clause relating to Responsible Investment is included as part of our standard Investment Management Agreements (IMA) as outlined in 4.0.1 of this policy.

The success of our affiliate partnership model relies on Fidante allowing its affiliates effective autonomy over their investment and active ownership activities. We work closely with our affiliates and support them in achieving their ESG goals.

We seek to understand an investment manager's ESG beliefs, process for integration and how ESG factors influence investment decisions. Key areas covered in our due diligence process include:

- ESG integration goals, approach and strategy;
- how ESG factors influence investment decisions, including climate change and modern slavery;
- ESG people and oversight;
- process, portfolio construction and investment valuation;
- engagement approach and impact on investment decisions; and
- voting approach and impact on investment decisions (equity only).

Through our annual business planning process, we work with our affiliates to measure progress on ESG as well as to set goals to support affiliates on further enhancing their ESG integration capability.

However, we do not direct our affiliates to invest or engage in a specific way. Our ESG approach in this part of our business is focussed on a thorough due diligence prior to partnership and ongoing monitoring and support. Our selection approach includes an assessment of both current ESG integration practices as well as a genuine desire for continued enhancement of ESG capability. The success of our business model relies on our ability to select and support our affiliates but to allow them effective autonomy over their investment activities.

### 5.1 Supporting our Affiliates on ESG

The key areas in which we support our affiliates on ESG are outlined below:

- setting plans and goals for ESG integration as part of the annual business planning process;
- support on the development and enhancements to ESG policies and processes;
- providing research and insights on emerging ESG themes;
- support on compliance with new ESG-related regulation;
- support with ESG reporting;
- host education events on emerging ESG topics; and
- support through the PRI reporting process and advice on process enhancements in line with the latest PRI guidance.

We monitor our affiliates through quarterly portfolio ESG reporting.



# 6. ESG Themes

## 6.1 Climate Change

Challenger believes climate change will impact every part of the economy. We recognise the role we can play in managing the potential risk exposures and opportunities related to climate change across our value chain.

We are committed to supporting progress in transitioning to a low-carbon economy. This includes working with internal and external stakeholders to find ways to reduce risks and create a more resilient economy. We recognise that the physical and transition risks related to climate change, if not considered, will have financial impacts. .

Our investment teams assess the potential impacts of climate change-related physical and transition risks on the value of their investments. Investment teams also take into account how resilient investee companies are to such risks and if they are well positioned to benefit from such a transition. The approach to climate-risk assessment in investment analysis varies between asset classes and is detailed in each team's Responsible Investment Statement.

In addition to our investment analysis, we are committed to the following strategy across our business:

- analysis of policy and market context for areas relevant to Challenger, based on a breakdown of material areas of investment;
- developing and analysing climate scenarios;
- identifying priority climate-related risks and opportunities at a market sector level; and
- developing governance structures around climate-related financial risks.

We also acknowledge the recently published standards of the International Sustainability Standards Board (ISSB) on sustainability and climate change, in particular the IFRS S2 Climate Related Disclosures, along with the Treasury Consultation on Climate Risk Disclosure and the Australian Accounting Standards Board (AASB) requirements which will govern the content of climate reporting. The new standards consolidate and build on the TCFD framework. We are working to align our climate risk framework with the ISSB standards and report accordingly in the timeframes set by the Australian Government.

## 6.2 Modern Slavery and Human Rights

Challenger recognises the importance of companies respecting and protecting human rights, ensuring acceptable working conditions, and upholding labour rights in its own business and those within its supply chain. We believe all people are entitled to basic rights and freedoms.

At Challenger, we respect and support internationally recognised human rights as set out in the Universal Declaration of Human Rights and the Fundamental Conventions of the International Labour Organisation.

We also understand that modern slavery is a serious social issue that corporate Australia must work to address. Challenger recognises that there are still instances of modern slavery, particularly in high-risk jurisdictions and high-risk industries.

Challenger is subject to is required to comply with Australian Modern Slavery Act 2018. Under this Act, Challenger has an obligation to report annually on the risks of modern slavery in its operations and supply chains, including investment activities.

When assessing potential or existing investment opportunities, Challenger's investment managers will undertake due diligence to assess any potential modern slavery risks in accordance with the specific entity and asset class approach to ESG integration. Challenger is committed to ensuring that its investment managers are aware of the risks of modern slavery within their investment portfolios and supply chain, ensuring adequate policies are in place to mitigate and manage modern slavery risks caused by, contributed or directly linked to an investment activity.



# 7. Stewardship

We believe that sustainability is a long-term driver of future performance and that companies and issuers with strong sustainability and governance practices are in a better position to mitigate risks and capture opportunities. We believe that company and issuer engagement is an opportunity for value creation across our investments.

## 7.1 Engagement Goals

We engage with the companies and third-party investment managers in which we invest, or are considering for investment, in relation to their ESG risk management policies, strategies, performance, disclosure and management capabilities. The level of engagement is dependent on the asset class and nature of the investment. The intent of the engagement is to reduce the risk of the underlying investment or sector, with the objective of improving investment outcomes for our stakeholders.

## 7.2 Responsibility for Engagements

Each investment team engages directly with their issuers or investee companies. Engagements are prioritised based on the materiality of ESG risk to the particular investment.

## 7.3 Our Expectations of Issuers and Investee Companies

Consistent with our belief that ESG integration can improve risk-adjusted returns, we engage issuers and companies on material ESG concerns with the goal of risk mitigation and value creation.

Although ESG risk exposure will vary between investments and strategies, as a general guide we align our minimum standards for expected behaviour with the OECD Guidelines for Multinational Enterprises.

Our affiliates have effective autonomy and are not subject to Challenger's engagement guidelines. Their approach to engagement is outlined in their ESG and Engagement Policies which are publicly available on their respective websites. Fidante has oversight of ESG integration through regular reporting and its multi-faceted relationship.

## 7.4 Corporate Governance Considerations

Corporate governance deals with the way in which companies are directed and controlled and is an important consideration for Challenger when determining how to exercise voting rights and other stewardship tools. Challenger believes that effective corporate governance is advanced by applying recognised corporate governance principles such as those outlined in the ACSI Governance Guidelines 2021, FSC and ACSI ESG Reporting Guide for Australian Companies 2017 and the ASX Corporate Governance Principles and Recommendations. Specific corporate governance considerations for Internal Investment Managers and External Investment Managers may include:

- establishment of a sound risk management framework and periodic review of the effectiveness of that framework;
- considering and managing all material risks facing their company including ESG risks and recognising the wide range of stakeholders required to succeed;
- instilling and continually reinforcing a culture across the organisation of acting lawfully, ethically and responsibly and the alignment between expected and actual behaviour;
- company policies being in place for effectively managing conflicts of interest;
- timely and balanced disclosure of all matters concerning it that a reasonable person would expect to have a material effect on the price or value of its securities;
- appropriate processes and structures to verify the integrity of its corporate reports and to effectively meet continuous disclosure requirements;
- clear delineation of the respective roles and responsibilities of its board and management and regular review of their performance;
- having boards with sufficient independence, are of an appropriate size and collectively have the skills, commitment and knowledge of the entity and the industry in which it operates, to enable it to discharge its duties effectively and to add value;

- having appropriate mechanisms in place to demonstrate board accountability for the actions and decisions of the organisation;
- appropriately structured executive share/option schemes that provide incentives to improve current and long-term performance with clearly stated robust performance hurdles and timeframes, including appropriate employee share schemes;
- the formation of nomination, remuneration and audit committees comprised of a majority of independent directors;
- articulation of a clear strategy to address the issue of diversity at the board level; and
- the application of the 'one share, one vote' principle whereby all shareholders have equal voting rights in public companies and each share has one vote.

While the above considerations guide Challenger's approach to voting on company resolutions, voting is always assessed on a case-by-case basis. Consequently, other factors may be considered instead of, or as well as, the considerations outlined above if Challenger believes that it is in the best interests of its stakeholders to do so.

## 7.5 Stewardship Tools

### 7.5.1 ESG Research and Data Tools

Our investment teams utilise external ESG research and data, and their deep understanding of their investee companies, to inform their engagement activity.

### 7.5.2 Proxy Voting Tools

Challenger utilises a proxy voting platform for corporate governance research and proxy voting. Voting reports are also made publicly available through ISS on our website for all pooled managed funds.

### 7.5.3 Engagement Logs

Investment teams log their engagement activity in team engagement logs or notes.

## 7.6 Escalation Strategies

If company or issuer engagement fails to result in a satisfactory response or there is no response, our investment teams can take one of a number of actions depending on the asset class and strategy. This can include avoiding the investment, stipulating covenants into agreements to mitigate the risk, reducing a position or divesting. Individual investment teams are responsible for determining the specific escalation strategy for each situation in the best interest of asset owners.

## 7.7 Proxy Voting Procedures

Proxy voting is a means by which Challenger is able to demonstrate its interest in the governance practices of companies. By exercising its right to vote, Challenger can have an influence on the corporate governance of the companies in which it invests. Challenger follows the PRI Principles on corporate governance and proxy voting.

Challenger aims to meet the investment objectives of clients in relation to ESG matters by discouraging disadvantageous corporate policies through active discussions with management or the board of directors, and by exercising proxy votes. Challenger also recognises that there are opportunities to encourage effective management through the endorsement given by positive votes.

Challenger seeks to vote on all company resolutions, regardless of materiality, provided that it has the authority to do so and the necessary documentation is received in time to lodge a vote by the due date. Challenger recognises that voting rights are a valuable asset which should be managed with the same care and diligence as any other portfolio asset. In addition, Challenger may, in determining its proxy voting, rely on a third-party advisory firm that provides advice on proxy voting and corporate governance issues.

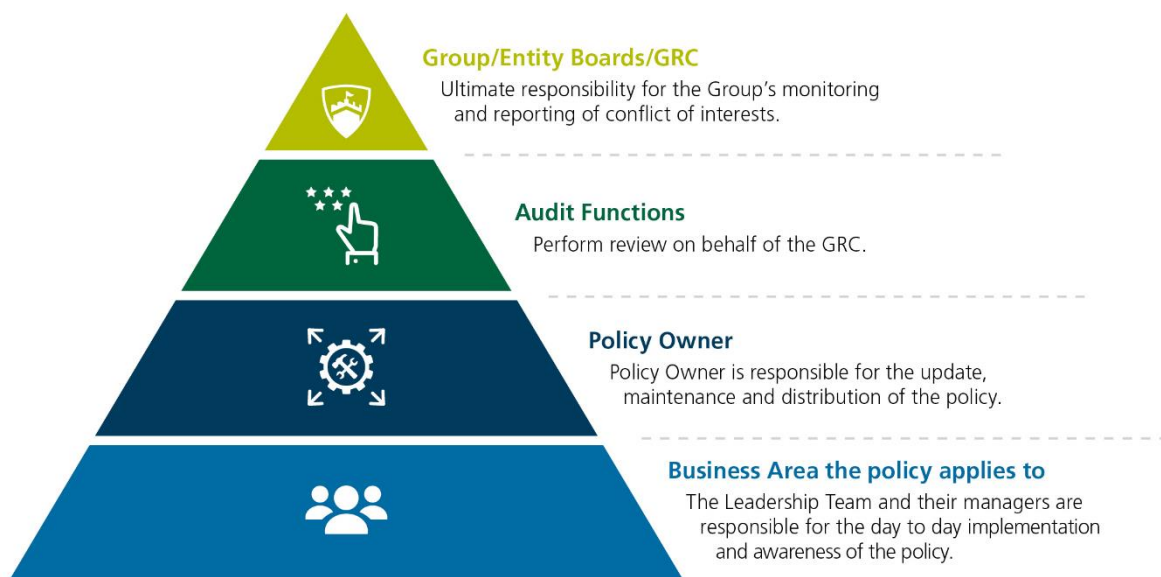
# 8. Scope

This policy applies to all relevant employees of Challenger who are responsible for making active investment decisions. This includes:

- Challenger’s Board of Directors and respective Boards of Directors of relevant Challenger subsidiary companies;
- Challenger’s Leadership Team;
- ESG Steering Committee members;
- Senior investment leaders and Portfolio Managers who make the decision to buy, retain or sell a particular asset to achieve the objectives of an investment portfolio;
- Challenger Life senior investment leaders who make decisions to allocate funds to third party investment managers; and
- Challenger investment analysts who research and rate the quality and value of assets.

This policy also outlines the process to be followed when appointing new third-party investment managers. It is also intended to act as a guide to assist existing Challenger-appointed third-party investment managers to meet their responsibilities under applicable laws, regulations and industry standards relevant to ESG factors.

# 9. Overall Responsibilities



At Challenger, we share a common set of values which are integral to our culture and linked to everything we do. These values set out the behaviours we need to meet community expectations and ensure we can deliver on our vision and strategy. Our values are:

- Act with integrity – we do things the right way
- Aim high – we deliver outstanding results
- Collaborate – we work together to achieve shared goals
- Think Customer – we make decisions with our customers front of mind.

# 10. Additional Obligations and Accountabilities

## 10.1 Portfolios Where Challenger Performs the Investment Management Function

This sub-section only applies to Portfolios where Challenger performs the investment management function. This sub-section does not apply to Portfolios where Challenger has delegated the investment management function to a third-party investment manager.

## 10.2 Reporting Requirements

### 10.2.1 Reporting Responsible Investment Strategies to Stakeholders

Challenger commits to regularly communicating its responsible investment approach. These communications will include the following:

- commentary in Challenger's Annual Sustainability Report which provides a summary of the ESG considerations contemplated as part of Challenger's investment decision-making and ownership practices over the course of the previous financial year;
- making information available on the Challenger website;
- an annual modern slavery statement available on a public Modern Slavery Statements Register; and
- any other regulatory reporting required in the jurisdictions in which Challenger operates.

On an annual basis and in line with the PRI requirements, the Chief Executive Life and Solutions and the Chief Executive Funds Management review and approve the annual PRI Assessment Report submission and provide a copy to the ERMC and ESG Steering Committee for review.

Challenger also publishes an annual summary report of its proxy records. In addition, mandate clients are informed of proxy voting through regular reports (if applicable) in compliance with the contractual terms of the relevant IMA.

### 10.2.2 Application of This Policy to Different Investment Structures

Challenger's investment arrangements are a combination of separate mandates with investment managers, investments in pooled vehicles, and direct investments. Appropriate approaches to ESG integration are expected across these different investment arrangements.

From the date of this policy, all new IMAs entered into by Challenger for mandates will be aligned with this policy. All existing IMAs will be reviewed to ensure they are aligned to this policy as they are reviewed and progressively updated.

Where Challenger invests in pooled funds, adopting principles of responsible investment will ultimately depend upon the relevant investment managers incorporating ESG considerations into their own investment processes rather than relying on this policy.

### 10.2.3 Domestic and International Markets

In relation to Challenger entities based in both local and international markets, Challenger informs all of its investment managers, as well as any other relevant service providers, that it will:

- regularly monitor the progress of its internal and third-party investment managers and their ESG integration processes;
- monitor the domestic and global sustainability regulatory requirements to ensure compliance in all jurisdictions;
- promote Challenger's expectations in respect of ESG as a formal part of Challenger's investment manager selection and review process; and
- report on the progress of the implementation of this policy to Challenger's Board and shareholders via regular reports.

## 10.2.4 Monitoring, Review and Reporting of Challenger's ESG Integration

Challenger's senior investment leaders periodically monitor the integration of ESG considerations and their management strategies in Challenger's investment decision-making and ownership practices. In order to facilitate this, all identified ESG matters are required to be recorded by the relevant business area as part of the documentation for each investment decision. Challenger's senior investment leaders report any material changes to their ESG integration process to the ESG Steering Committee.

# 11. Related Policies and Practice Notes

In developing this policy, Challenger has considered the obligations laid out in the below policies, practice notes, statements, standards, regulations and other documents:

- Challenger's Investment Management Governance (Proxy Voting) Policy;
- Challenger's Incident Management Policy & Practice Note;
- Challenger's Risk Management Strategy;
- Principles for Responsible Investment;
- FSC Standard No. 13: Proxy Voting;
- FSC Standard 23, Principles of Internal Governance and Asset Stewardship;
- ASX Corporate Governance Principles and Recommendations;
- FSC and ACSI ESG Reporting Guide for Australian Companies 2017;
- ACSI Governance Guidelines 2021; and
- Regulation 7.9.14C of the Corporations Regulations.

Challenger entities and divisions that have operations in jurisdictions other than Australia must always consider local rules and regulations as they may be stricter than the practices set out in this policy. Where local rules are more stringent than those outlined in this policy, the local regulations will always prevail. If there is a direct conflict between the local laws of another jurisdiction and the requirements under this policy, the relevant management of the Challenger or division must notify the Policy Owner prior to the implementation of any local policies or procedures.

# 12. Training & Awareness

The senior investment leaders and the relevant Leadership Team members are responsible for ensuring that the appropriate divisional procedures to effectively meet the obligations contained in this policy are documented and operational.

All relevant employees must receive training on policies, procedures and internal controls in order to understand their responsibilities for meeting the obligations contained within this policy.

# 13. Risk Appetite & Compliance with this Policy

Challenger's purpose is to provide Customers with financial security for a better retirement. Challenger promotes a positive culture of risk awareness and transparency, including open communication and challenge of current and emerging risks, speaking up regarding matters of concern and the proactive management of issues and incidents. Challenger has no appetite for conducting business activities unfairly or in contravention of the law, or which knowingly damage or are inconsistent with its brand and reputation. Challenger has no appetite for employees intentionally not following policies and procedures.

Employees are to comply with Challenger policies and are responsible for familiarising themselves with the policies relevant to their role. Policies are available on the intranet. Incidents of non-compliance with this policy are to be reported in line with the Challenger Incident Management Policy.

Employees at Challenger are held accountable for their actions. Consequences for non-compliance with this Policy may include but are not limited to:

- Additional training
- Increased supervision
- A verbal warning
- A written warning (including a first and final written warning)
- An impact to performance rating or promotion
- A financial consequence
- Dismissal.

For details, refer the Challenger Conduct Risk and Consequence Management Framework.

## 14. Whistleblower Provisions

Challenger Whistleblower Policy encourages disclosures from employees, former employees, and suppliers regarding any unethical, illegal, corrupt, or other inappropriate conduct including in relation to this policy. The Whistleblower Policy is available on [www.challenger.com.au](http://www.challenger.com.au).

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### **Anton Kapel**

Chief Executive, Life and Solutions

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### **Victor Rodriguez**

Chief Executive, Funds Management

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### **Peter Schliebs**

Chief Investment Officer, Life

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### **Chris Fleming**

Head of ALM and Liquids, Life

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### **Stephen Kidd**

Head of Equities and Alternatives, Life

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### **Adam Fusca**

Head of Life Risk, Life

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### **Pete Robinson**

Head of Investment Strategy,  
Challenger Investment Management  
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### **Stephen Martin**

Head of ABS, Challenger Investment  
Management (CIM)



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**Sid Kumar**

Head of Acquisition Finance, Challenger Investment Management (CIM)

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**Tim Koroknay**

Head of Affiliates, Fidante

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**Gerard Hargraves**

Head of Real Estate Lending, Challenger Investment Management (CIM)

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**Rhiannon Hornsey**

General Manager  
Corporate Affairs and  
Sustainability, Chair of  
ESG Steering Committee



# 15. Policy Changes

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**Version and date**    **Summary of changes**

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