

# Investment Exclusions Guidelines

July 2023

AIMCo reserves the right to exclude the securities of certain companies from its investment portfolios, on a case-by-case basis, and as required to satisfy individual clients' statements of investment policy and goals. Companies may be excluded from the investment universe if they appear to be operating in contravention of local or international legislation/international agreements<sup>1</sup>; and/or after engagement with the company fails; and/or if a company's policies or activities appear to significantly raise operational, financial, environmental or social risks beyond an acceptable level.

AIMCo does not invest directly in issuers considered to be members of the tobacco industry. AIMCo does not invest directly in companies considered to be manufacturers of nuclear weapons, cluster munitions, anti-personnel mines, biological and chemical weapons, depleted uranium munitions, white phosphorous or other weapons of mass destruction, in keeping with statutory investment restrictions and international treaties signed by Canada prohibiting the development, manufacture and distribution of such products. AIMCo is subject to all orders and regulations made under the United Nations Act (Canada) with respect to the Suppression of Terrorism. AIMCo may become subject to orders and regulations in respect of other countries, groups or issues under the Special Economic Measures Act (Canada).

Excluded securities may be reintroduced into AIMCo's portfolios at a later date, once the original rationale for the exclusion no longer exists, and where the circumstances warrant reinvestment, in keeping with AIMCo's preference for 'voice over exit'.

## EXCLUSIONS AND EXIT

AIMCo prefers a policy of engagement over exclusions and divestitures, or 'voice over exit.' However, AIMCo may exclude or divest of certain investments for various reasons, which may include the following:

- Instances of contravention of law, (e.g. the Special Economic Measures Act or the United Nations Act) regulations or governmental policy
- To comply with client investment policies agreed to by AIMCo
- Where we determine that the company and/or managers of the investment are acting with disregard for generally acceptable international business practices
- Consideration of our ability to effect positive change
- Where the costs associated with continued ownership outweigh the potential benefits
- Risk of reputational harm to AIMCo or our clients

From time to time the Managing Director, Sustainable Investing or the AIMCo Investment Committee may make divestment recommendations to the AIMCo Executive Committee, including the Chief Investment Officer and Chief Executive Officer, in accordance with the foregoing considerations.

<b>Effective Date</b>	<b>July 2023</b>
<b>Approved by</b>	Investment Committee
<b>Review Frequency</b>	Annually
<b>Next Review Date</b>	July 2024

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<sup>1</sup> These include but are not limited to: The UN Global Compact, the OECD Guidelines for Multinational Enterprises, the International Labour Organization Standards (ILO), the Oslo Convention on Cluster Munitions, the Ottawa Convention Banning Landmines and The UN Security Council Arms Embargo, etc.