March 2025

SUSTAINABILITY REPORT '24

FOREWORD

FOREWORD

Climate, biodiversity, and nature remained key themes influencing the investment landscape and market for our clients throughout 2024, reinforcing the importance of sustainable finance and investment in transitioning our economy. It has been another year of change across industries, investor groups, and regulators, not to mention geopolitical headwinds.

The COP29 UN Climate Change Conference was held in Baku, Azerbaijan in November 2024. Dubbed the 'climate finance COP', it concluded with a new climate finance deal which was described as a base on which to build, although many were targeting a more ambitious outcome. Elsewhere, we saw regulators setting stricter guidelines for ESG and sustainability-related terms in fund names with the objective of ensuring greater clarity and protection for investors.

Antoine Spillmann
Chair of the
Board of Directors

Our commitment to sustainability

The Board remains committed to delivering on our strategic goals and targets under the pillars of GAM's sustainability strategy: commitments, embedding ESG, active stewardship, sustainable solutions, and corporate sustainability. We are focused on investing responsibly by creating value for our clients, developing and supporting high standards as investors, whilst aiming to have a positive impact on society and the environment.

Elmar Zumbuehl
Chief Executive Officer

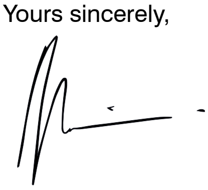
We are proud that GAM's Sustainable Climate Bond strategy was recognised with an industry award for the third successive year. GAM also won the ESG initiative of the year at the Environmental Finance Sustainable Investment Awards for the development of our innovative Net Zero Alignment Assessment Tool (NZAAT). We continued to make progress in 2024, including aligning our stewardship reporting with the Swiss Stewardship Code requirements. We conducted over 250 engagements with companies on ESG issues. Additionally, we voted at over 700 company meetings on around 8,500 unique resolutions.

We also focused on ESG data integration to further support embedding ESG risks, opportunities and impacts in our investment analysis, and decision making. We remain committed to actively leading and participating in key industry initiatives and organisations that align with our sustainability strategy.

Focus on transparency

Our Sustainability Report 2024 is being published on a voluntary basis and follows the reporting thresholds outlined by the Swiss Code of Obligation. It covers issues required by non-financial reporting requirements, including climate and environmental matters, employee-related issues, combating corruption, respect for human rights, and social issues.

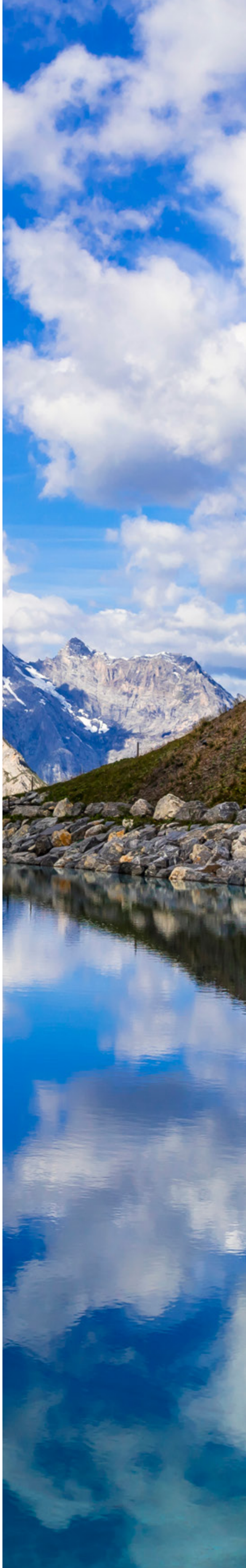
Yours sincerely,



Antoine Spillmann
Chair of the Board of Directors

Elmar Zumbuehl
Chief Executive Officer

March 2025



INTRODUCTION

INTRODUCTION

Overview of GAM

We are an active, independent global asset manager that thinks beyond the obvious to deliver distinctive and differentiated investment solutions for our clients. Our purpose is to protect and enhance our clients' financial future. We attract and empower the brightest minds to provide investment leadership and innovation, and strive for a positive impact on society and the environment.

At a glance

CHF 16.3bn

Investment Management
Assets under Management (AuM)

Employees in
14 countries

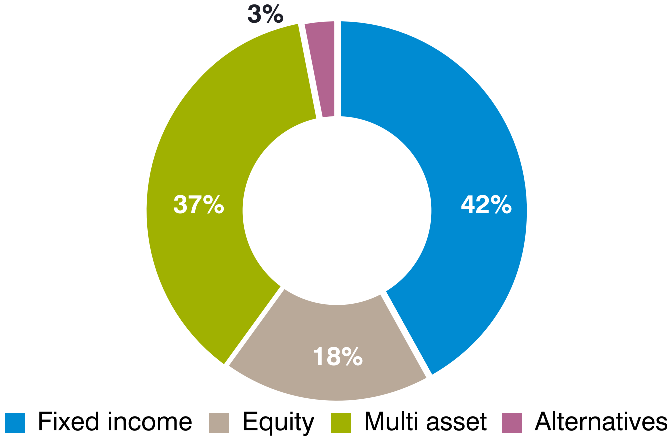
SIX Swiss Exchange

Symbol 'GAM'

Source: GAM as at 31 December 2024.

Investment management assets

By asset class



Source: GAM

Our business model and strategy

GAM's business model is focused on three core business areas:

GAM Specialist Active: Deep expertise, experience and specialisms unlocking core and niche returns in equities, fixed income, and multi-asset investing.

GAM Alternatives: Access to in-house and third-party alternative strategies for alpha generation and diversification benefits.

GAM Wealth Management: Multi-Asset solutions and tailored portfolios for individuals, charities and trusts utilising best of breed GAM and third-party products.

These three core business areas share and benefit from GAM's global platform and agile operating model and modern technology.

GAM's strategy is designed to achieve sustainable growth and profitability by delivering best possible investment performance and exemplary service for our clients by focusing on our Investment and Wealth Management capabilities. The four pillars of our strategy have been:

- **Focusing on clients** in existing core markets;
- **Amplifying and growing** core active equity, fixed income and multi-asset strategies by investing in talent and product ideas;
- **Diversifying into new investment product areas** and building the Wealth Management offering by leveraging GAM's heritage of active management and building strategic partnerships and GAM's alternatives and hedge funds platform; and
- **Enhancing effectiveness** by reducing complexity.

GAM is focusing exclusively on its Investment (Specialist Active and Alternatives) and Wealth Management businesses, expanding its distribution reach and capabilities, amplifying its core active strategies, and diversifying into new product areas, including rebuilding its alternatives capabilities.

We are an independent, pureplay, active investment and wealth manager, headquartered in Switzerland with a global presence.

We are no longer a third-party fund services business, having sold that business in 2024.

We no longer operate fund management company (ManCo) activities, having outsourced and transferred our ManCo activities in Luxembourg, Switzerland, Dublin (in 2024) and the UK (to be completed in 2025).

We have made great progress throughout 2024 on our four-pillar strategy to transform GAM into a focused, client-centric, and profitable business.

GAM now has a highly scalable global investment platform, excellent global distribution capabilities with regional presence and a business focused on three core areas to drive sustainable growth and profitability.

Further details of our business strategy, corporate governance, risk management and performance and developments expected in 2025 are outlined in our Annual Report.

Scope of our report

Our Sustainability Report 2024 is being published on a voluntary basis and covers issues required by non-financial reporting obligations, including climate and environmental matters, employee-related issues, combating corruption, respect for human rights, and social issues. An index of disclosures is provided in Chapter 7.

Materiality Assessment – The disclosure in this report was informed by an internal materiality assessment. This assessment comprised three stages:

1. **Identification of actual and potential sustainability issues** – desk-based research reviewing our existing risk register, relevant standards and regulations, peer reports, and external benchmarks.
2. **Analysis and prioritisation** – the qualitative assessment, conducted with a small internal group representing key functions considered financial, customer, reputation, regulatory, business disruption, employee, societal, and environmental impact.
3. **Review and validation** – results collated to create a short list of 10 material issues, reviewed by key internal stakeholders.

We considered the relevant aspects of IFRS S1 and IFRS S2 in the preparation of this report, which covers the period from 1 January to 31 December 2024. Data is provided as at year-end unless otherwise stated.

Feedback

We are committed to continual improvement in our operational and investment activities and strive to achieve best-in-class performance. Feedback from stakeholders is important and welcomed via Investor Relations or Sustainability.

CHAPTER 1: STRATEGY AND GOVERNANCE

CHAPTER 1: STRATEGY AND GOVERNANCE

Sustainability strategy and framework

GAM's purpose is to protect and enhance our clients' financial future. By attracting and empowering bright minds to think beyond the obvious, we strive to provide investment leadership, innovation, and a positive impact on society and the environment.

Our sustainability strategy supports our firm-wide strategy through our focus on investing responsibly – this includes embedding environmental, social, and governance (ESG) considerations into our investment decisions, active stewardship, in providing sustainable solutions for our clients, and a focus on our own corporate sustainability.

Sustainability strategy

1

Commitments
We support action and improved standards through public commitments and transparency.

2

Embedding ESG
We aim to embed ESG risks, opportunities and impacts in our investment analysis and decision-making using leading data, tools, and insight.

3

Active stewardship
We seek to use our influence through voting, engagement, and industry collaboration to add value to our clients within our investments, and in the broader market.

4

Sustainable solutions
We are committed to developing products and solutions to help our clients navigate, benefit from, and drive the transition to a more sustainable economy.

5

Corporate sustainability
We deliver our purpose through a commitment to our people, a focus on diversity, equity and inclusion, and striving for a positive impact on society and the environment.

Source: GAM

Our strategy is guided by three principles:

- **Driving value for our clients** – we are committed to focusing on ESG integration, stewardship, and industry collaboration to support our investment strategies, expertise, and insights to best deliver for our clients.
- **Developing and supporting high standards** – we believe high standards in sustainability and transparency are key to a well-functioning company and market. We aim to evidence these in our own actions and commitments, and support improving standards in the companies and markets in which we invest.
- **Striving for a positive impact** – we challenge ourselves and the companies in which we invest to improve their performance and outcomes. As part of our commitment to sustainable and responsible business practices, we are proud signatories to the UN Global Compact.

Strategic goals and targets

Pillar	2024 goals	Progress in 2024	2025 goals
Commitments We support action and improved standards through public commitments and transparency.	Submit net-zero targets to Science Based Targets initiative.	**Net Zero** – focused on ensuring ongoing commitment to offsetting 100% of operational emissions and further developed NZAAT tool to support data aligned decision making.	Actively review our commitments and initiatives with a considered approach to align with our strategic goals. Aim to ensure that all our commitments and initiatives focus on meaningful and value-add activities.
	Continue to report progress in line with Finance Sector Deforestation Action (FSDA) initiative.	**Deforestation** – continued to support the FSDA initiative and conduct deforestation focused engagements.	
Embedding ESG We aim to embed ESG risks, opportunities and impacts in our investment analysis and decision-making using leading data, tools and insight.	Develop Deforestation Risk Assessment Tool.	**ESG Tools** – developed the exposure module of our Nature and Biodiversity Tool.	Continue to evaluate data needs to ensure that the ESG data used to support the investment process remains of high quality and fit for purpose.
		Data Integration – automation of third-party ESG data to improve quality and reduce risk.	
		Data Vendor Review – reviewed our core ESG data providers to assess quality, service, and internal governance processes.	
Active stewardship We seek to use our influence through voting, engagement and industry collaboration to add value to our clients within our investments, and in the broader market.	Maintain UK Stewardship Code signatory status.	**UK Stewardship Code** – maintained signatory status.	Continue to support regional stewardship codes.
	Report in line with the Swiss Stewardship Code requirements.	**Swiss Stewardship Code** – reported in line with requirements.	Set strategic thematic engagement programs with targeted objectives.
	Prioritise engagements on net-zero and nature.	**Engagement** – engaged with 7 out of our top 10 (highest financed emissions) holdings on ESG related matters.	
Sustainable solutions We are committed to developing products and solutions to help our clients navigate, benefit from and drive the transition to a more sustainable economy.	Leverage and build global sustainable thematic strategies.	**Sustainable strategies** – continued focus on developing our existing sustainable focused strategies to align with client and regulatory expectations.	Ensure that our sustainable product offering aligns with regulatory expectations and client demands.
	Enhance fund-level climate reporting.	**Fund Reporting** – reviewed the current fund level reporting and satisfied that it remains appropriate.	
Corporate sustainability We deliver our purpose through a commitment to our people, a focus on diversity, equity and inclusion, and striving for a positive impact on society and the environment.	Progress on diversity targets at Board, Executive, and Senior Manager level.	**Diversity** – achieved our Board level diversity targets.	Continue to positively progress on our Executive and Senior Manager level diversity targets.
	CarbonNeutral® certification for operational Scope 1, 2, and business travel emissions.	**Net zero** – CarbonNeutral® certified for operational Scope 1, 2, and business travel emissions.	Further enhance the annual employee survey and review traininig opportunities.
	Increase engagement via annual survey.	**Employee engagement** – increased engagement via annual survey.	
	Encourage uptake of volunteering by employees.	**Volunteering** – 825 hours.	Encourage uptake of volunteering by employees.

Sustainability governance

The Board of Directors of GAM Holding AG is ultimately responsible for our strategy, the stewardship of the Group's risk management systems and processes, and their governance and control. Board Committees consider those sustainability topics as appropriate and there are individual Board members responsible for culture and climate.

Antoine Spillmann is the Board member responsible for climate and Jeremy Smouha is the Board member responsible for culture.

Our Sustainability Committee, chaired by our Global Head of Sustainability & Investments Business Management, oversees the execution of our strategy. The Sustainability Committee reports to our Group Management Board (GMB) and the Board on a quarterly basis.

Sustainability governance structure

GAM Holding Board
Individual Board member responsibility for Culture and Climate

Group Management Board
Day-to-day management, oversight, and control

Sustainability Committee
- Directs sustainability strategy
- Oversees responsible investment (RI) framework
- Reviews progress against commitments
- Escalation point for conflicts or exceptions
- Quarterly updates to GMB and Board

Cross-functional: Investments | Risk | Compliance | Product | Marketing | Distribution | Legal | Human Resources | Operations

Best Execution and Investment Management Oversight Committee
- Monitors compliance with RI policies
- Oversees integration of ESG considerations
- Reviews voting and engagement
- Monitors external investment managers ESG due dilligence

Key functions: Investments | Risk | Compliance

Group Risk Oversight Committee – responsible for risk management oversight throughout the Group
Conflicts of Interest Committee – responsible for overseeing management of conflicts throughout the Group

Source: GAM

Sustainability risk management framework

GAM recognises that the management of all risks, including sustainability and climate risk, is pivotal in achieving our business and strategic objectives – this is relevant to all stakeholders, including our clients, shareholders, employees, regulators and external partners.

Our risk strategy is based on the belief that risk awareness and management is the responsibility of every employee, and must be integrated into GAM's strategy, capital allocation, decision-making, and routine operations. This includes relevant policies, procedures, monitoring and oversight. Our risk management framework comprises risk appetite statements, which include sustainability and climate risk.

Dedicated Key Risk Indicators (KRIs) are used to measure and monitor adherence to the sustainability and climate risk appetite statements. The KRIs are tracked and reported through risk reports to various GAM companies' boards and committees.

As dedicated research, methodologies and tools become available, and data offerings improve, GAM will continue to develop its sustainable and climate risk identification and measurement approaches, in line with our multi-year roadmap.

Sustainability and climate risk – GAM has integrated sustainability and climate risk procedures and measures within its monitoring framework, which are periodically reviewed. The system for monitoring risk exposure is focused on the use of indicators to signal a changed risk situation or the materialisation of new or potential events, and therefore the need to assess their impact and possible mitigation measures. Assessment of sustainability and climate risk exposure is integrated at a functional level.

We define sustainability and climate risk as any potential impact of an event and its probability of manifesting that result in an adverse effect on the Group's ability to achieve its long-term sustainable objectives and meet stakeholders' expectations. We classify risks according to our risk universe, which comprises a range of sustainable and climate-related risks, the most relevant of which are described below.

Greenwashing risk – Greenwashing refers to the inadequate representation of the sustainability profile of the investment solutions offered to clients, misleading them into believing that an investment solution is environmentally friendly or has a positive environmental impact. This risk is mitigated with the establishment of procedures that provide for independent review of how sustainability features are described in relevant investment solutions documents. We address this with robust marketing governance, investment management oversight frameworks, and mandatory annual greenwashing awareness training for all employees.

Non-compliance with sustainable investment objectives – The risk that investment solutions do not comply with the sustainable investment rules and limits stated in a fund prospectus or in a mandate contract. A dedicated investment compliance monitoring team reviews all managed portfolios and mandates daily to ensure compliance with the existing sustainability investment restrictions. Additionally, periodic investment risk meetings are held with all investment desks.

Inadequate employee risk awareness – Our risk strategy is based on the belief that risk management is the responsibility of every employee every day, and that it must be integrated into routine operations. Sustainability and climate risk is a relatively new field within risk management. Staff may have inadequate knowledge or awareness of the nature of these risks resulting in actions or behaviour not aligned with the Group's long-term sustainable objectives or risk appetite.

Each year, employees are expected to undertake ESG-related training.

Climate-related risks – Physical and transition climate risks could have a financial impact either directly, through the physical assets we operate, or indirectly, through the agency relationships with our clients. These risks are varied, and include, but are not limited to, the risk of declines in values and/or liquidity of assets, business risk, decreased assets under management if clients decide to move assets away, increased defaults and reallocation of capital resulting from changes in global policies, and regulatory risk stemming from ongoing legislative and regulatory changes regarding climate risk management and best practices. As part of the ongoing effort to monitor such risk exposures, we periodically review our sustainability and climate risk management framework and, when needed and available, enhance it with newer climate risk measures.

CHAPTER 2: BUSINESS CONDUCT

CHAPTER 2: BUSINESS CONDUCT

Our culture

We recognise that having the right culture is key to meeting stakeholder expectations and ensuring the continued success of our business. We are strongly committed to our core values of acting with integrity, being driven by excellence, and having an inclusive workforce where different ideas, perspectives, and backgrounds enrich our decision-making. Accordingly, we seek to conduct our business in line with highest standards – always acting with honesty and integrity – and we are committed to fostering and embedding a positive ethical, respectful and client-centric culture at all levels of the organisation.

Our Group Code of Conduct sets out how we do business and interact with our stakeholders, including clients, colleagues, shareholders, regulators, and business partners. Compliance with this Code is not optional, and every employee is expected to read, understand, and follow it, both in letter and in spirit.

The appointment of a Board member, Jeremy Smouha, as champion responsible for driving culture forward at GAM reflects our commitment to a culture in which GAM at all times conducts its business in the best interests of clients.

Financial crime prevention

GAM is committed to protecting the integrity of the financial system and society, applying a zero-tolerance approach to all areas of financial crime including, but not limited to, terrorism finance, bribery, and corruption. Whilst we recognise that it is not possible to remove financial crime risks in their entirety, we have appropriate and proportionate risk-based policies, procedures, systems and other controls to protect our clients, employees and other stakeholders by deterring, detecting and preventing those who seek to use the Group or a GAM fund to facilitate any form of money laundering, any activity identified as a predicate offence to money laundering, or broader financial crimes. This includes a dedicated financial crime prevention team supporting our Money Laundering Reporting Officers (MLROs) and senior staff responsible for local office regulatory positions managing anti-money laundering (AML) and financial crime matters. To ensure GAM staff maintain these standards, periodic training for financial crime-related areas is issued to all employees, with 100% of employees completing their dedicated training on AML and financial crime prevention.

Anti-bribery and corruption

All employees are expected to adhere to the letter and the spirit of applicable laws and regulations of the countries in which we operate, as well as with our own internal policies and procedures. We have no tolerance for corruption or bribery, and we do not accept or offer any payments, gifts, or other advantages in the course of our business in breach of law or regulation. The controls in place ensure GAM maintains its commitment to detecting and preventing money laundering, terrorist financing, sanctions breaches, the facilitation of fraud, bribery, corruption, and tax evasion, which support the financial crime framework.

Whistleblowing

A culture of openness and accountability is essential to support highest standards of business conduct. Through the Group Whistleblowing Policy and relevant training, GAM encourages its staff to speak up if they have genuinely identified any misconduct within GAM, in the knowledge that they will be listened to and safeguarded from reprisals, victimisation, discrimination or disadvantage for having done so. Concerns can be raised either directly to a Whistleblowing Officer or anonymously via an external facility, the details of which are provided in the Group Whistleblowing Policy and relevant training.

For the year 2024, there were no monetary losses relating to legal proceedings associated with fraud, insider trading, anti-trust, anti-competitive behaviour, market manipulation, malpractice, or other related financial industry laws or regulations.

CHAPTER 3: INVESTING RESPONSIBLY

CHAPTER 3: INVESTING RESPONSIBLY

Our approach

Sustainability challenges such as climate change, nature loss, and inequality alongside the social, regulatory, and market response to these challenges continue to influence investment risks and opportunities at a systemic and asset level. We therefore believe that incorporating relevant ESG factors into investment decisions and our stewardship practices is integral to delivering better returns for our clients.

Our responsible investment approach incorporates three pillars that support our investment processes and solutions to deliver on our clients' objectives:

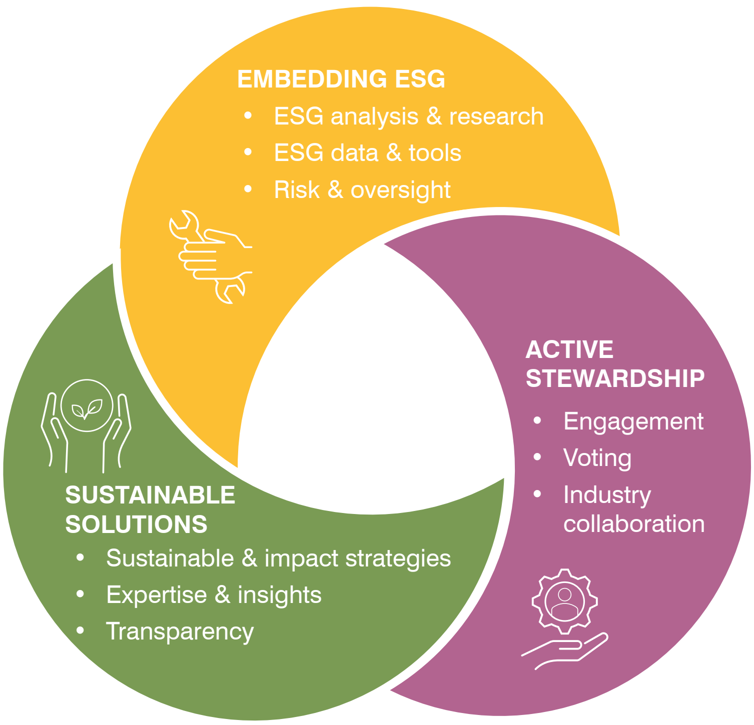
- Embedding ESG
- Active Stewardship
- Sustainable Solutions

We have been proud signatories to the Principles for Responsible Investment since 2014 and remain committed to effectively incorporating responsible investment principles within our business and continue to explore opportunities to refine our approach across asset classes.

Signatory of:

PRI Principles for Responsible Investment

Responsible investment approach



Source: GAM

Embedding ESG

- **Analysis and research** – Our Responsible Investment (RI) team acts as a centre of expertise on ESG issues, working alongside investment managers to support ESG research, engagement, and voting, as appropriate to the strategy and asset class.
- **Data and tools** – We utilise multiple external ESG data sources and third-party assessments to support our ESG analysis and research. We have developed several proprietary tools to assist with portfolio analysis, including Principal Adverse Impacts, assessing companies with minimal ESG data coverage and on specific themes such as climate and nature.
- **Risk and oversight** – For strategies managed by GAM, investment risk meetings incorporate an ongoing review of ESG key risk indicators. For strategies managed by external investment managers, an annual ESG review is conducted, as well as monthly reporting of ESG-related key risk indicators.

Active stewardship

Stewardship is a central pillar of our responsible investment strategy, supporting our investment decision-making by building a better understanding of how ESG risks and opportunities are managed and driving positive change where we consider an issue requires specific action.

GAM's engagement and voting activities support our ESG integration. Our active collaboration within financial services is aimed at supporting a more sustainable industry and economy through the development of best practice, knowledge sharing, and shaping policy and regulation.

We continue to meet the UK Stewardship Code signatory requirements and are committed to the Swiss Stewardship Code, Singapore Stewardship Principles for Responsible Investors, and Japan's Stewardship Code.

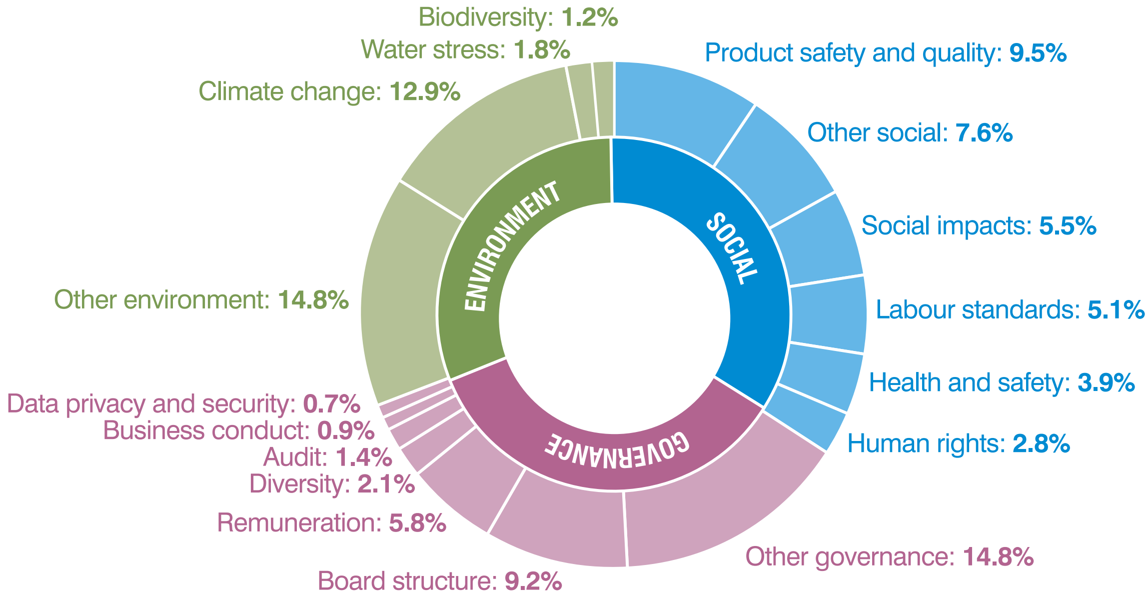
Our Stewardship Reports can be viewed here and provide further details on our stewardship activities.

Engagement

Our engagement is driven both bottom-up, as we identify specific issues at a security level, and top-down, as we focus on key themes such as climate, nature, governance, and human rights. Our engagement is either direct or part of a broader investor collaboration.

- **Direct engagement** – In 2024, we conducted 835 one-to-one or group meetings with 447 individual companies, of which 254 of these meetings (30%) involved ESG-related topics[1]. There was a relatively even split of meetings across governance (35%), social (34%), and environment (31%) topics.
- **Collaborative initiatives** – In 2024, our collaborative engagement initiatives included CDP, Climate Action 100+, NZEI (Net Zero Engagement Initiative), PRI Advance, Nature Action 100, FSDA (Finance Sector Deforestation Action), and the World Benchmarking Alliance's Collective Impact Coalition for Ethical AI.

Direct engagement



Source: GAM

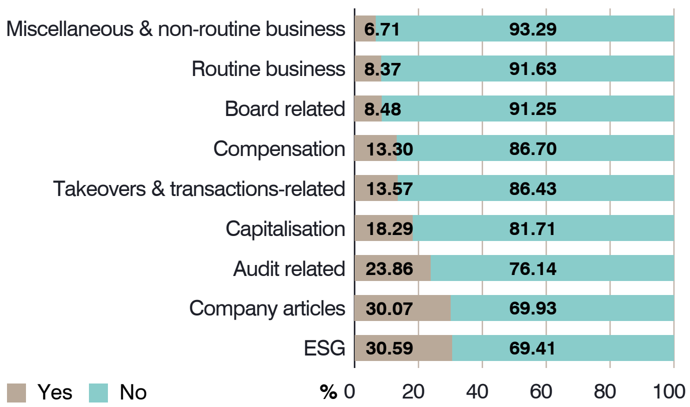
[1]Scope of engagement records includes all internally managed GAM equity funds and those corporate debt engagements conducted by Atlanticomnium (external manager). This covers over 95% of our equity funds and over 95% of our corporate fixed income funds. The data reported is based on recorded engagement data. Engagement themes are allocated based on the primary topic of the engagement. However, most engagements cover multiple ESG topics.

Voting

Our corporate governance expectations and approach on key voting topics are outlined in our Corporate Governance and Voting Principles and we aim to make our voting decisions for all our funds publicly available on a monthly rolling basis. On a six-monthly basis, we disclose our voting rationale where we voted against management. We take a considered and principles-based approach to our voting, recognising the individual company context and the importance of our vote in signaling our views to the respective board.

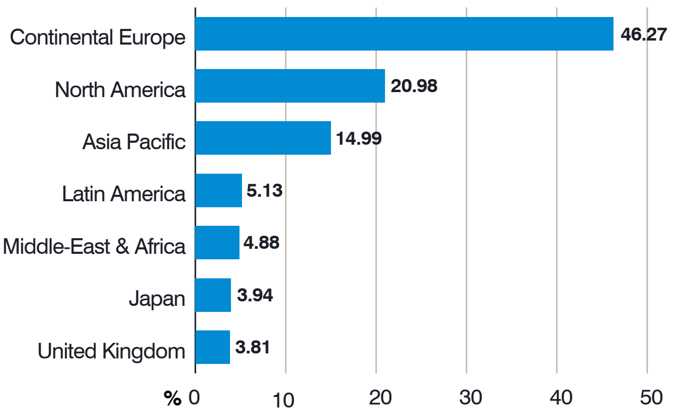
In 2024, we voted at a total of 732 meetings (2023: 912) representing 99.6% of votable meetings (2023: 99.6%). We voted on 8,947 unique resolutions in 2024, of which 11.8% were votes against management (2023: 10.8%). We supported 54% of the 299 shareholder resolutions we voted on in 2024 (2023: 50.4%).

Voting Against Management by theme



Source: GAM

Votes by region



Source: GAM

Industry collaboration

GAM actively contributes and participates in key industry initiatives to build knowledge, standards, and integrity in the market. In 2024, this included:

- **Sustainable investment regulation** – Providing input on the EU SFDR Consultation and FCA Sustainability Disclosure Regime as a member of the PRI Global Policy Reference Group and UK Investment Association Sustainable and Responsible Investment Committee.
- **UK Stewardship Code Consultations** – Sharing feedback on the proposed revisions to the UK Stewardship Code through the UK Investor Forum.
- **Improving disclosure** – As a member of the Asian Corporate Governance Association (ACGA), co-signing a letter to the Securities and Exchange Board of India (SEBI), addressing key issues such as executive remuneration, board-stakeholder engagement, and board leadership.

Sustainable solutions

We are focused on ensuring that our products meet the evolving needs of our clients and comply with changing sustainability disclosure and labelling regimes. Sustainability characteristics remain important considerations in the development and management of our products.

- **Sustainable and impact strategies** – As at year end 2024, 90% of our 'in scope' funds promote environmental or social characteristics and operate in accordance with Article 8 or Article 9 of SFDR[2].
- **Expertise and insights** – Our clients value our support in navigating the increasingly complex sustainability landscape. In 2024, our 'GAM Explains' series included articles on COP16, Geopolitics and the Green Economy Disruptions in Asia Pacific, the EU's Sustainable Finance Disclosure Regulation, Proxy Season Key Themes, and the Corporate Sustainability Due Diligence Directive.
- **Transparency** – We pride ourselves on clear and transparent client communication, which is particularly important for the sustainability characteristics of our funds. We continue to provide clients with monthly ESG Summary and Extended reports that include information on ESG ratings, climate metrics and details on UNGC breaches. These reports are available for over 95% of our equity and corporate debt investments by AuM[3]. Ensuring our communication with clients is clear, fair, and not misleading is pivotal to how we conduct our business. Given the introduction of new regulatory definitions for sustainability terms, and the increased client interest and disclosure, we developed a core mandatory learning module 'Understanding the Risks of Greenwashing', which is assigned annually to all employees.

[2]In Scope: Funds that are marketed in the EU. SFDR: Sustainable Finance Disclosure Regulation.

[3]At the time of publication, each ESG Summary and Extended report for our equity and corporate debt funds has at least 78% ESG data coverage by AuM. The funds for which ESG reports are available represent approximately two thirds of our total fund AuM.

CHAPTER 4: CLIMATE & NATURE

CHAPTER 4: CLIMATE & NATURE

Investment landscape

The need to decarbonise our economy remains critical if we are to avoid the worst impacts of climate change.

In 2024, COP29 reiterated the importance of Nationally Determined Contributions (NDCs) and ambitious climate finance goals, though the final goals fell short of targeted values. The year was characterised by political elections which may yet have profound impacts. The re-elected President of the European Council has reaffirmed commitment to the EU climate goals and the UK is striving to become a clean energy superpower and green finance capital of the world, whilst the presidential election in the United States poses uncertainty.

The race to protect our planet's biodiversity is just as critical as the fight against climate change, presenting both risks and opportunities for investors. With over half of global GDP reliant on nature[4], the implications are significant. To maintain liveable planetary boundaries, investors must be concerned with the protection, restoration, and sustainable use of biodiversity.

Focus on the interconnection between climate change and nature is likely to continue in 2025, with COP30 due to be hosted in Brazil, custodian of the Amazon rainforest.

Our commitments

Transitioning to net zero remains one of the greatest disruptions to the economy since the industrial revolution and poses several significant risks, whilst also giving rise to opportunities. While the Net Zero Asset Managers (NZAM) initiative is currently undergoing review, GAM believes that the asset management industry continues to play a crucial role in the road to net zero. We focus on helping our clients to navigate the transition to a low carbon economy by providing solutions to meet their objectives and through the key pillars of our sustainability strategy: investment integration, active stewardship, and collaboration. Similarly for nature, we believe these underlying pillars are the most effective mechanism to benefit clients and contribute to real world change.

We continue to develop and utilise our in-house NZAAT and Nature and Biodiversity Tool to support and integrate our stewardship activities.

[4]World Economic Form – https://www.weforum.org/press/2020/01/half-of-world-s-gdp-moderately-or-highly-dependent-on-nature-says-new-report/.

Climate and nature timeline

2018		Joined Climate Action 100+
2020	**Jun**	Joined the Institutional Investors Group on Climate Change (IIGCC)
2021	**Jan**	Became an Investor Signatory of CDP
	Feb	Became a formal supporter of TCFD (Task Force on Climate-related Financial Disclosures)
	Jul	Joined Net Zero Asset Managers (NZAM) initiative
	Sep	Launched GAM Sustainable Climate Bond strategy
	Sep	Joined the Climate Bonds Initiative
	Oct	Introduced fund-level ESG summary reports with key climate metrics
2022	**Jan**	Formally support of the Transition Pathway Initiative (TPI)
	Feb	Published first voluntary TCFD-aligned report
	Mar	Invited to be Forum Member of the PRA-FCA Climate Financial Risk Forum
	Jul	Submitted out initial NZAM interim targets
	Sep	Became a signatory to the Powering Past Coal Alliance (PPCA) Finance Principles
	Dec	Environmental Finance IMPACT Award for our first Impact Report for our Climate Bond strategy
2023	**Feb**	Supported CDP Green Finance Accelerator initiative
	Mar	Joined IIGCC Net Zero Engagement Initiative
	Mar	Became a member of UK Transition Plan Taskforce (TPT) Asset Management Working Group
	Apr	Environmental Finance Green Bond Fund of the year award
	Jul	Use of Net Zero Alignment Assessment Tool (NZAAT) for company analysis and engagement
	Sep	Joined Nature Action 100
2024	**Mar**	Best ESG Investment Fund in the Green, Social and Sustainability Bond category at the ESG Investing Awards
	Jun	Environmental Finance ESG initiative of the year award for Net Zero Alignment Assessment Tool (NZAAT)
	Nov	Completion of infrastructure integration project to allow for enhanced use of climate and nature data with systems
	Dec	Developed Nature and Biodiversity Tool to assess companies and incorporate engagement results

Our climate plan

	Investment integration	Active stewardship	Collaboration
Actions	Data and tools	Direct engagement	Policy and regulation
	Research and analysis	Collective engagement	Standards and frameworks
	Climate solutions	Voting	Supporting clients
2030 targets	**Decarbonisation target** Primarily through engagement, seek to achieve a 50% reduction in financed carbon emissions (carbon emissions per USD million invested attributed using EVIC)	**Engagement target** 90% of financed emissions in material sectors are either assessed as net-zero, aligned with a net-zero pathway, or the subject of direct or collective engagement and stewardship actions	**Net-zero coverage target** 75% of AuM in material sectors considered to be achieving net-zero, 'aligned' to net-zero or 'aligning' to net-zero
Scope	Asset classes not included in the scope of the targets include sovereign, mortgage-backed and insurance-linked securities, multi-asset and alternatives. This is mainly due to limitations in data availability and methodological developments		

	Minimising direct operational impact		
	Renewable energy	**Business travel**	**Carbon offsetting**
Actions	Offices with excellent sustainability standards	Encouraging more sustainable transport options	GAM has been certified as a CarbonNeutral® company for its operational emissions since 2019
2025 targets	All GAM-managed global offices to be using 100% renewable electricity resources	Maintain our total distance travelled by air at a level at least 25% below our 2019 figures	100% carbon offsetting of our reported operational Scope 1, 2, and 3 emissions. We are committed to ensuring that any offsets meet the Oxford Principles for Net Zero Aligned Carbon Offsetting

Source: GAM

Progress update

Pillar 1 – Investment integration

Climate change remains a critical issue, with the drive to decarbonise shaping the investment landscape and how our clients choose to invest. We consider managing climate risks as part of our overall risk management and are committed to providing solutions to help our clients navigate the low-carbon transition and to meet their investment objectives. Progress in 2024 includes:

- **Net Zero Alignment Assessment Tool (NZAAT)** – We continued to develop our in-house tool, which in June 2024 won Environmental Finance's ESG Initiative of the Year award. Based on guidance including the IIGCC Net Zero Investment Framework (NZIF), internal engagement data, and multiple external data sources including MSCI, SBTi, TPI, CA100+ and CDP, the tool is designed to assess progress on net-zero alignment, prioritise and support engagement, and monitor progress against our targets.
- **Nature and Biodiversity Tool** – We enhanced our in-house approach for identifying companies that have high exposure to deforestation risk and poor disclosure, driving how we prioritise company engagement. We include data from sources such as MSCI, CDP, and Forest 500, and incorporate our own data based on engagement activity. In 2025, we aim to broaden the coverage of the tool to include additional nature and biodiversity topics.
- **Climate solutions** – GAM's Sustainable Climate Bond strategy invests in green and sustainable bonds with clear use of proceeds linked to climate and other environmental projects. We are proud to have won ESG Investing Awards' best ESG Investment Fund in the Green, Social and Sustainability Bonds category in 2024, following our Green Bond Fund of the year award at the 2023 Environmental Finance Awards and an impact reporting award in 2022.

We will continue to respond to client demand for products and solutions that support their climate-related investment objectives.

Pillar 2 – Active stewardship

Engagement and voting are key for supporting effective decarbonisation. Our efforts are focused on climate-related disclosure, setting carbon reduction targets, and forming effective decarbonisation strategies. In 2024, we focused on:

- **Direct engagement** – Environmental topics were a core focus, with 31% of meetings including discussion of climate change, biodiversity, water stress, or other environmental concerns.
- **Collaborative engagement** – We participated in the IIGCC Net Zero Engagement Initiative, Climate Action 100+, and the CDP Non-Disclosure Campaign. We engaged through collaborative initiatives in line with our fiduciary duty and consider it an important mechanism for driving positive change. We were also part of the Nature Action 100 and FSDA collaborative engagement initiatives, focusing on nature and biodiversity issues.
- **Voting** – Our voting principles set expectations for appropriate disclosure and management of climate-related risks. We support shareholder resolutions, where considered proportionate and additive. In 2024, we supported 35% of 17 climate related shareholder resolutions (2023: 41% of 44) and voted in support of all five management resolutions (2023: 100% of 5).

Pillar 3 – Collaboration

A 'just transition' relies on appropriate governmental policies. We selectively support policy engagement by organisations such as IIGCC, the UK Investment Association, and the PRI, alongside specific industry and multi-stakeholder initiatives including:

- **Powering Past Coal Alliance (PPCA)** – An alliance formed of national, sub-national, and finance sector members that advocate for no new coal investments and coal phase-out.
- **UK Transition Plan Taskforce (TPT) Asset Management Working Group** – Working with peers to develop sector-specific guidance on transition plans.
- **Supporting ISSB standards** – Supporting consistent and comparable climate-related disclosures, in line with the ISSB Climate Standard.

Climate and Nature Disclosures

Climate Disclosures

- **Task Force on Climate-Related Financial Disclosures (TCFD)** – We have published annual TCFD-aligned disclosures since 2022. Our climate-related disclosures are in Chapter 7.
- **Net Zero Asset Managers (NZAM) initiative** – We report annually via the UN PRI reporting framework on progress related to our net zero targets. GAM remains committed to helping clients to meet their investment objectives and will engage in the review of NZAM's future announced in early 2025.

Nature and Biodiversity Disclosures

- **Finance Sector Deforestation Action (FSDA) initiative** – Resource exploitation, including deforestation, is a driver of nature loss, and in 2024 we engaged with companies both directly and alongside other investors, including through the FSDA collaborative engagement initiative.
- **Taskforce on Nature-related Financial Disclosures (TNFD)** – In January 2024, over 320 publicly listed companies across multiple geographies and industry sectors, representing USD 4 trillion in market capitalisation, committed to early adoption of reporting against the TNFD recommendations. We consider voting against the respective board chair or other responsible directors of companies in high-impact sectors that do not sufficiently address and disclose climate-related and nature-related risks.

We review the initiatives and disclosure regimes supported by GAM on an ongoing basis.

CHAPTER 5: OUR PEOPLE

CHAPTER 5: OUR PEOPLE

Our business is built on the foundation of attracting and empowering brightest minds to enable us to protect and enhance our clients' financial future. We believe that Diversity, Equity and Inclusion (DEI) are values that attract, develop and retain exceptional colleagues and strengthen our ability to deliver on our purpose.

Diversity, Equity & Inclusion

We believe that DEI is critical to our success and that by embracing it, we will nurture creativity, belonging and collaboration. We are committed to providing everyone at GAM the same opportunities to thrive, no matter their ethnicity, gender, sexual orientation, age, ability, nationality, or religion. We want to create a diverse and inclusive workplace where all individuals feel valued, listened to, treated fairly and respected.

We aim to achieve this through leadership and a robust policy framework, building an inclusive culture and aiming for continual improvement.

Leadership and policies
Our CEO is accountable for DEI, supported by the Board, Group Management Board, and senior leaders. We have a strong policy framework to support DEI within our Code of Conduct, Diversity and Inclusion Policy and Compensation Policy. This is also evident in our family-friendly suite of policies covering maternity, paternity and parental leave, group dignity at work and grievance procedures.

Inclusive culture
We strive for an inclusive culture where individuals can thrive as themselves. We support this through our employee-led Equals network, which has senior management participation, and collaborates with external partners such as Talent Keepers and The Diversity Project to provide wider support and awareness. All new joiners complete unconscious bias training as part of their on-boarding, and for the last three years, there has been a performance objective cascaded from the CEO to all employees to demonstrate at least one action to support DEI at GAM.

Clear commitments
GAM signed the UK Women in Finance Charter in 2018 and joined Ireland's Women in Finance Charter in 2022. We have achieved the gender diversity target of 30% female participation on the board by 2024, following the appointment of Donatella Ceccarelli, Inès de Dinechin, and Anne Empain to the board of GAM Holding AG at the 2024 Annual General Meeting.

We are committed to our business representing our diverse client base and the society in which we live and work. We recognise that setting public targets can encourage greater diversity, but it is the actions we take that will determine whether we build a high performing and inclusive culture and workforce.

We therefore commit to following goals and actions:

1. **Gender diversity goals**
   - **Board** – 30% by 2024 – Achieved
   - **Executive Committee (GMB)** – 20% by 2026
   - **Senior Managers** – 25% by 2025
2. **Ethnic diversity** – we recognise the value of ethnic diversity in our workforce. To help inform our practices and foster an inclusive culture which recognises unrepresented groups, in 2025 we plan to engage with our employees to measure ethnic diversity at GAM.
3. **Inclusive hiring** – We plan to update our hiring policy to ensure we encourage applications and opportunities for a diverse talent pool.

Gender diversity

	2023		2024		Target
	Male (%)	Female (%)	Male (%)	Female (%)	(%)
Board of Directors	100	0	57	43	30% by 2024
Executive Committee (GMB)	100	0	100	0	20% by 2026
Senior management	85	15	83	17	25% by 2025
Line manager	68	32	78	22	
GAM overall	62	38	64	36	

Source: GAM

Talent acquisition & retention

We seek to identify the best candidates from the widest talent pool. This includes a commitment to supporting junior talent. We continued to support apprentice positions and broadened access to the finance sector through our continued support for the 10,000 Black Interns programme in 2024.

Learning and development opportunities, both to ensure our talent is suitably skilled to carry out their role within the company, and to develop their talents in ways to match the company's strategic objectives plays an important role in retention. We believe the development of an employee's skills, expertise and abilities is paramount to employee engagement and vital to the company meeting its future business goals.

In 2024, employees completed an average of 22.4 hours of learning (2023: 18 hours); with an average of 2.1 hours focused on sustainability topics (2023: 2.4 hours). Providing career progression for our employees is an important part of retention. We were pleased that 13% of our positions in 2024 were filled through internal applications.

Understanding our employees' views and responding to feedback is central to building and maintaining our culture and engagement. In 2024, we partnered with Willis Towers Watson to conduct our Employee Engagement Survey, the results of which we used to identify focus themes and actions for progress within 2024. The next annual survey is intended to be conducted in the first quarter of 2025.

Employee health and wellbeing

We are focused on protecting the health, safety, and wellbeing of our employees. We keep our workplaces safe by following health and safety rules and provide support to our employees through our Employee Assistance Programme (EAP). The EAP is a confidential service which gives free unlimited access to GAM employees, their partners or spouses and all other members of their households to specialist information, consultants, and counsellors 24 hours a day, 365 days a year.

The consultants and counsellors offer information and impartial advice on a wide range of issues via telephone and if need be, face-to-face counselling. We recognise that 2024 presented an increased level of uncertainty for our employees and we are committed to open and transparent communication.

CHAPTER 6: OUR OPERATIONS

CHAPTER 6: OUR OPERATIONS

Human rights and modern slavery

GAM's Human Rights Policy outlines our responsible business practices consistent with the UN Guiding Principles that promote respect for human rights, including those enshrined in the Universal Declaration of Human Rights and the Core International Labour Organisation (ILO) Conventions. We also adopt business policies and practices that protect the privacy and data security of our employees and clients.

We are committed to ensuring that our supply chains are free of any slavery, human trafficking or child labour, and will not knowingly support or do business with any supplier who is involved in such activities.

Appropriate due diligence of suppliers and service providers is conducted as part of our procurement process to assess exposure to the risk of human rights violations. Our procurement documentation includes questions regarding working practices, and where relevant, contractual obligations are incorporated to comply with all applicable laws relating to human rights.

The measures are applied proportionately in accordance with the assessment of the level of risk associated with the supplier or service provider. Consideration is given to the nature of products or services and the locations in which those products are made, or services provided. All staff with responsibility for procurement from third-party suppliers or service providers receive appropriate training on their obligations.

Awareness training on modern slavery is made available to new joiners and is completed biannually by all GAM employees.

Swiss Ordinance on Due Diligence and Transparency in relation to Minerals and Metals from Conflict-Affected Areas and Child Labour – This regulation requires companies to comply with due diligence and reporting obligations in relation to minerals and metals from conflict-affected and high-risk areas, and in relation to child labour. GAM maintains a robust procurement process and following an assessment of GAM's business activities, country risk assessment, and selected supplier risk assessments, GAM concluded that there are no products or services for which there is a reasonable suspicion that they have been manufactured or provided using child labour. As a result, no additional reporting obligations arise with respect to this regulation.

Direct environmental footprint

Our operational environmental impact is predominantly due to business travel and our use of office premises. In 2024, GAM operated across 14 countries, with our largest offices being in London, Zurich and Dublin. These offices are all in buildings that have been certified to high environmental standards such as LEED (Leadership in Energy and Environmental Design), and BREEAM, the world's longest-established method of assessing, rating, and certifying the sustainability of buildings.

Our actions focus on three areas:

- **Renewable energy** – All our offices with more than 10 employees use only electricity from renewable sources. In 2024, 90% of energy consumption came from renewable energy sources (2023: 84%).
- **Business travel** – This is our largest source of operational Scope 3 greenhouse gas (GHG) emissions. We report emissions from business flights and from car hire and rail when booked through our business travel agents. Estimates of other modes of travel, e.g., taxis, are utilised for the purpose of carbon offsetting. In 2024, our total distance travelled by air increased by 2.6%, but is still down by over 75% since our baseline year of 2019.
- **Carbon offsetting** – We utilise offsets for any GHG emissions we cannot avoid. GAM has been certified as a CarbonNeutral® company since 2019. We voluntarily offset all of the GHG emissions generated by our business operations and travel that we cannot yet reduce, through a combination of certified emissions reductions certificates and carbon removal projects.

Our operational environmental data is reported in Chapter 7 under KPIs.

Minimising our direct environmental impact

	Minimising direct operational impact		
	Renewable energy	**Business travel**	**Carbon offsetting**
Actions	Offices with excellent sustainability standards	Encouraging more sustainable transport options	GAM has been certified as a CarbonNeutral® company for its operational emissions since 2019
2025 targets	All GAM-managed global offices to be using 100% renewable electricity resources	Maintain our total distance travelled by air at a level at least 25% below our 2019 figures	Carbon offsetting of all our reported operational Scope 1, 2, and 3 emissions. We are committed to ensuring that any offsets meet the Oxford Principles for Net Zero Aligned Carbon Offsetting

Source: GAM

Community impact

We are committed to supporting volunteering opportunities for employees, enabling them to give their time and skills to support communities in which we live and work. We encourage all permanent employees and full-time contractors to take up to two paid volunteer days per year, with an uptake of 30% in 2024 (2023: 27%). Over 800 hours were spent in total supporting our community, either individually or with colleagues, with activities taking place in almost every office location.

We support charitable donations for organisations that are important to our employees, with donations in 2024 totaling CHF 4,663 (2023: CHF 2,480). We also support direct employee donations through a ‘Give-As-You-Earn-Scheme’ in the UK.

CHAPTER 7: DATA AND DISCLOSURES

CHAPTER 7: DATA AND DISCLOSURES

Swiss Code of Obligations – Index

Section 6: Transparency on Non-Financial Matters		
Article 964b – Purpose and content of the report		
The report on non-financial matters shall cover:		
Environmental matters, in particular the CO_2 goals	**Chapter 4: Climate and Nature** • Our net-zero commitment • Our climate plan • Nature and biodiversity **Chapter 6: Our operations** • Direct environmental footprint **Chapter 7: Data and disclosures** • Climate disclosures	 Page 20 Page 21 Page 22 Page 27 Page 31
Social issues	**Chapter 6: Our operations** • Human rights and modern slavery • Community impact	 Page 27 Page 28
Employee-related issues	**Chapter 5: Our people** • Diversity, Equity & Inclusion • Talent acquisition & retention • Employee health and wellbeing	 Page 24 Page 25 Page 25
Respect for human rights	**Chapter 6: Our operations** • Human rights and modern slavery	 Page 27
Combating corruption	**Chapter 2: Business conduct**	Page 14
The report shall include in particular:		
Description of the business model	**Introduction** • Our business model	 Page 7
Description of the policies adopted	**Chapter 7: Data and disclosures** • Policies and reports	 Page 37
Measures taken to implement these policies and an assessment of the effectiveness of these measures	**Chapter 2: Business conduct** **Chapter 3: Investing responsibly** **Chapter 4: Climate and nature** **Chapter 5: Our people** **Chapter 6: Our operations**	Page 13 Page 15 Page 19 Page 23 Page 26
Description of the main risks	**Chapter 1: Strategy and governance** • Sustainability risk management framework	 Page 12
Main performance indicators	**Chapter 7: Data and disclosures** • Key performance indicators	 Page 35
Section 8: Due Diligence and Transparency in relation to Minerals and Metals from Conflict-Affected Areas and Child Labour		
Article 964k – Due diligence		
GAM Investments does not import or process minerals or metals from conflict-affected and high-risk areas or offer products or services where there is a reasonable suspicion of child labour. **Further details available in Chapter 6: Our operations.**		

Climate disclosures

Our climate disclosures are based on the 'Recommendations of the Task Force on Climate-related Financial Disclosures' report as outlined in the Swiss Ordinance on Climate Disclosures (effective from 1 January 2024) and noting the ISSB Climate Standard.

Governance

Requirement	Disclosure
Describe the Board's oversight of climate-related risks and opportunities.	The Board of Directors of GAM Holding AG is ultimately responsible for our strategy, the stewardship of the Group's risk management systems and processes, and their governance and control. Climate-related risks are considered within the Board-level audit. Our Board Chair has individual responsibility for climate.
Describe management's role in assessing and managing climate-related risks and opportunities.	At a management level, Key Risk Indicators (KRIs) are provided to the Group Risk Oversight Committee (RiOC). Dedicated KRIs are used to measure and monitor adherence to the climate risk appetite statements which are tracked and reported through risk reports to GAM companies' Boards and Committees. GAM continues to further develop its climate risk identification and measurement approaches. GAM consider the development and implementation of the sustainability and climate risk management framework an ongoing process.

Strategy

Requirement	Disclosure
Describe the climate-related risks and opportunities the organisation has identified over the short, medium, and long term.	Our business model focuses on delivering high performing and differentiated investment management strategies to wholesale, institutional, and wealth clients globally, managed through in-house capabilities and external investment management partnerships. Climate-related risks are varied and include, but are not limited to, the risk of declines in values and/or liquidity of assets, business risk, decreased assets under management if clients decide to move assets away, increased defaults and reallocation of capital because of changes in global climate policies, and regulatory risk stemming from ongoing legislative and regulatory changes regarding climate risk management and best practices.
Describe the impact of climate-related risks and opportunities on the organisation's business, strategy, and financial planning.	Physical and transition climate risks could have a financial impact either directly, through physical assets we operate or indirectly, through agency relationships with our clients. Our climate plan focuses on investment integration, active stewardship, industry collaboration to inform our product development, and managing our operational impact.
Describe the resilience of the organisation's strategy, taking into consideration different climate-related scenarios, including a 2°C or lower scenario.	For our investment management business, we review resilience in the following ways and are continuing to build out appropriate Key Risk Indicators (KRIs): • **Investment resilience** – Climate-related risks are reviewed at the portfolio level by reviewing weighted average carbon intensity (relative to benchmark, where available and appropriate), and largest carbon emitters on a relative and absolute basis. These metrics are predominantly available for equity and corporate and sovereign fixed income asset classes. Periodic scenario analysis is conducted using MSCI Climate Value and Risk Analysis. These figures are reported below, however, we would highlight significant uncertainty regarding the scenarios and the accuracy of the Value at Risk measurement. Details of the MSCI methodology are outlined in 'Additional Notes'. • **Product set resilience** – We review our product set on an annual basis and review any climate-related issues as part of the new product development process. • **Operational resilience** – We continue to integrate into our business continuity planning (BCP) specific BCP events linked to physical climate-related risks.

Risk Management

Requirement	Disclosure
Describe the organisation's processes for identifying and assessing climate-related risks.	Climate-related risks are identified and assessed within our Climate Change Risk Register, which is reviewed periodically by the RIOC. The system for monitoring exposure to sustainability and climate risks is focused on the use of indicators to signal a changed risk situation or the materialisation of climatic and environmental events, and therefore the need to assess their impact and possible mitigation measures. Assessment of sustainability and climate risk exposure is being integrated at the functional-level risk and control self-assessments.
Describe the organisation's processes for managing climate-related risks.	At a management level, Key Risk Indicators (KRIs) are provided to the Group Risk Oversight Committee (RiOC). These will continue to evolve over time. Additionally, applicable risk areas are overseen within the relevant Investment Management and Distribution oversight committees. The Risk Team schedules regular meetings with business departments to ensure any operational risks, incidents/issues are discussed and escalated appropriately, including any climate-related topics.
Describe how processes for identifying, assessing, and managing climate-related risks are integrated into the organization's overall risk management.	The standard risk management structures aim to embed climate-related risks across the relevant functions. A key component of effective risk management is a risk governance structure that provides appropriate senior-level oversight, segregation of duties, as well as adequate, effective and independent control within a risk-conscious culture. The delivery of the organisation's strategic objectives is supported by a set of Group policies and a Policy Management Framework. These establish GAM's operating principles and standards for managing risk across the organisation. Our risk management framework is underpinned by a three-lines of defence model, with defined accountabilities and responsibilities for risk management, which are designed to deliver the standards of conduct that our stakeholders expect. This provides structure around our risk management and control by defining roles and responsibilities in different areas and the relationship between those different areas. As outlined above, regular risk meetings are held with business departments to ensure any operational risks, incidents, and issues are discussed and escalated appropriately, including climate-related topics.

Metrics and Targets

Requirement	Disclosure
Disclose the metrics used by the organisation to assess climate-related risks and opportunities in line with its strategy and risk management process.	We use several KPIs and metrics[5] to measure our exposure to risk: • **Carbon Footprint Analysis** – we have selected the three most prominent carbon footprint calculation approaches to measure our exposure on an aggregate basis. We continue to use these three methodologies to track our year-on-year changes[6]. These are the Weighted Average Carbon Intensity, Financed Carbon Emissions, which measures carbon footprint per million invested, and Financed Carbon Intensity, which measures the carbon intensity in the context of/according to revenue. For 2024, we report on Scopes 1, 2, and 3 (separately) for equity and fixed income corporate credit and GHG intensity for fixed income sovereign[7]. • **Scenario Analysis** – climate scenarios can be a useful tool to identify and understand possible physical and transition to low carbon economy risks and opportunities over different time horizons. To stress test the portfolios, we selected two 1.5 NGFS transition scenarios. We report Climate Value at Risk (VaR) as calculated by MSCI. This approach has significant limitations but presents a quantitative value for those assets where there is coverage. • **Operational** – we disclose energy-related emissions and renewable energy use (Scopes 1 and 2), and business travel by air (Scope 3). This data is provided in the KPI table on page 35. Operational emissions cover onsite natural gas heating (Scope 1), electricity from the grid (Scope 2) as well as business travel (Scope 3). A summary is provided in Table A below. Additional details are in the KPI table on page 35.

Disclose Scope 1, Scope 2, and, if appropriate, Scope 3 greenhouse gas (GHG) emissions, and the related risks.

Table A: Operational GHG emissions

OPERATIONAL GHG EMISSIONS		2024	2023
GHG emissions (tCO_2e)	Scopes 1 and 2	54	95
	Scope 3	245	270

GAM investment-related emissions cover those emissions associated with the investment management of equity, corporate credit, and sovereign credit assets (approximately one third of total assets) across Scopes 1, 2, and 3.

Tables B1 and B2 show the emissions using the WACI methodology for Equity and Fixed Income Corporate Credit in tCO_2e/CHFm sales, and Fixed Income Sovereign in tCO_2e/CHFm nominal GDP respectively.

Table B1: Equity and Fixed Income Corporate Credit WACI

WEIGHTED AVERAGE CARBON INTENSITY		2024		2023	
Allocation Base: EVIC		Equity	Fixed Income Corporate Credit	Equity	Fixed Income Corporate Credit
WACI (tCO_2e/CHFm sales)[8]	Scope 1	60.7	14.2	72.5	9.8
	Scope 2	37	9.6	40.8	8.3
	Scopes 1 and 2[9]	97.7	23.4	113.2	18.2
	Scope 3[10]	621	428.7	743.7	510

Table B2: Fixed Income Sovereign WACI

		2024	2023
		Fixed Income Sovereign	Fixed Income Sovereign
WACI (tCO_2e/CHFm sales)[11]	GHG Emissions	455	735

We also calculate the emissions using footprint metrics based on investor allocation presented in Table C for Equity and Fixed Income Corporate Credit.

[5]All carbon data and analysis for the Metrics and Targets section is sourced from MSCI ESG Research. This data provider was selected following a review of multiple providers.

[6]Coverage varies between metrics since different values are needed for each metric approach. Emissions data varies between scopes – Scope 1 and 2 values are easier to collect or derive, and are generally better reported, than Scope 3. Furthermore, financial information such as EVIC may not be available for all constituents. The WACI approach has the highest coverage as the data collection for this methodology is easier since EVIC value data is not required.

[7]In scope for 2024 are investment management fund assets classified as equity, fixed income corporate credit and fixed income sovereign, reflecting holdings data, as at the end of December 2024, held in equity or fixed income funds. Mandates and other asset class funds are not included.

[8]Measures funds' exposure to GHG-intensive companies or economies, defined as the funds' weighted average emissions intensity per revenue.

[9]Direct greenhouse gas (GHG) emissions derived from owned and controlled business activities (Scope 1) and indirect GHG emissions associated with the purchase of electricity (Scope 2). (GHG Protocol).

[10]Indirect emissions are produced as a result of a company's activities that the company does not own or control upstream or downstream of the value chain. These activities can include extraction and processing of raw materials, transportation of goods, use or end of life of sold products or services. (GHG Protocol).

[11]Measures the exposure of the funds to GHG-intensive economies using the weighted average intensity of the funds' sovereign constituents normalised by GDP.

Disclose Scope 1, Scope 2, and, if appropriate, Scope 3 greenhouse gas (GHG) emissions, and the related risks.

Table C: Footprint Metrics Based on Investor Allocation

FOOTPRINT METRIC BASED ON INVESTOR ALLOCATION		2024		2023	
Allocation Base: EVIC		Equity	Fixed Income Corporate Credit	Equity	Fixed Income Corporate Credit
Financed Carbon Emissions (tCO_2e / (CHF)M invested)	Scope 1	28.5	8.4	34.9	6.7
	Scope 2	10.0	2.4	12.5	1.6
	Scopes 1 and 2	38.6	10.8	47.4	8.2
	Scope 3	249.3	120.6	338.9	116.3
Financed Carbon Intensity (tCO_2e / (CHF)M sales)	Scopes 1 and 2	118.5	32.8	123.8	26.1
	Scope 3	766.5	366.2	884.5	368.3
Total Financed Carbon Emissions (tCO_2e)	Scopes 1 and 2	106,727	72,525	172,600	73,988
	Scope 3	690,183	808,605	1,233,289	1,043,386

Table D: Climate Value at Risk metrics for aggregate Equity and Fixed Income Corporate Credit

SCENARIO ANALYSIS	2024		2023	
Scenarios	Equity	Fixed Income Corporate Credit	Equity	Fixed Income Corporate Credit
Transition Risk Scenario NGFS 1.5 Orderly	-8.30%	-0.50%	-9.10%	-0.20%
Transition Risk Scenario NGFS 1.5 Disorderly	-10.00%	-0.60%	-11.50%	-0.20%
Physical Risk Scenario NGFS 1.5	-1.30%	-0.10%	-3.00%	0.00%

Describe the targets used by the organisation to manage climate-related risks and opportunities and performance against targets.

We joined the Net Zero Asset Manager (NZAM) initiative in 2021, committing to work in collaboration with our clients to reach net-zero greenhouse gas emissions by 2050 or sooner to limit warming to 1.5°C. We submitted interim targets for 2030 for decarbonisation, engagement, and net-zero coverage for approximately one third of our investment management AuM.

We have set operational targets for renewable energy use, business travel, and carbon offsetting. Further details on our net-zero commitment and progress on our climate plan are in Chapter 4. Details of progress on our operational targets are in Chapter 6.

Key performance indicators

Chapter	Topic	KPI	2024	2023
Investing Responsibly	Active stewardship	Votable meetings	732	916
		Meetings voted	729	912
		% meetings voted	99.60%	99.56%
		Total resolutions voted	8,947	11,216
		Total resolutions voted against management	1,057	1,209
		% of votes against management	11.80%	10.80%
		Shareholder resolutions voted	299	367
		Shareholder resolutions supported	161	185
		% of shareholder resolutions supported	54%	50.40%
		Number of engagements (one-to-one or group)	835	1,019
		Number of engagements on ESG themes	254	390
		Number of companies engaged	447	624
		Number of companies engaged on ESG themes	183	274
	Sustainable solutions	ESG Summary report coverage	>95%	> 89%
Our People	Employees	Total headcount	296	469
		Average tenure of employees	9.2	9.7
		Average age	46.5	45
		Average experience of investment professionals	17.9 years	19 years
		Part-time employees	4.73%	7.9%
	Diversity, Equity and Inclusion	Permanent employees - split between male and female	M: 64% F: 36%	M: 62% F: 38%
		Board of directors - split between male and female	M: 57% F: 43%	M: 100% F: 0%
		Line manager split	M: 78% F: 22%	M: 68% F: 32%
		Senior management	M: 83% F: 17%	M: 85% F: 15%
		New joiner split	M: 62% F: 38%	M: 67% F: 33%
		Leaver split	M: 59% F: 41%	M: 59% F: 41%
		Family leave	240.4 weeks (M: 8.3% F: 91.7%)	457 weeks (M: 36% F: 64%)
	Talent acquisition and retention	Training hours (average per employee)	22.4	18.1
		ESG training hours (average per employee)	2.1	2.44
		Voluntary turnover rate	19.3%	18%
		Involuntary turnover rates	36.1%	3%
		Retention within 12 months of starting	98%	94%
	Employee health and wellbeing	Health & Safety Incidents (reported incidents)	All Offices: 1	All Offices: 0
Our Operations	Direct environmental impact	Energy use (Scope 1) - Heating natural gas (MWh)	237	320
		Energy use (Scope 2) - Electricity consumption (MWh)	487	503
		Percentage renewable electricity	90%	84%
		Energy use (Scope 1 & 2) - Total energy consumption (MWh)	724	823
		Business travel – flights (km)	1,237,756	1,206,638
		GHG emissions - Scope 1 & 2 (tCO_2 e)	54	95
		GHG emissions - Scope 3 (tCO_2 e)	245	270
		Total GHG emissions - Scope 1,2 & 3 (tCO_2 e)	300	365
		Total GHG emissions (tCO_2 e) per FTE	1.02	0.76
	Climate disclosures	Investment related climate metrics	Pages 31-34	Pages 31-34
	Our community	Volunteering (percent employees volunteering)	30% of employees	27% of employees
		Volunteering hours	825	1,288
		Total charitable donations (CHF)	4,663	2,480
		Political donations (CHF)	0	0

All data is as at 31 December 2024 unless otherwise stated. Additional notes and definitions are provided in the next section 'Additional notes and definitions'.

Additional notes and definitions

CHAPTER 3: INVESTING RESPONSIBLY

- **Engagement** – At GAM, we define engagement as active and purposeful dialogue with current or potential investment targets, such as companies, government and municipalities, with the underlying objective to meet our stewardship obligations to protect and enhance long-term investor value for our clients. For our internally managed funds, all engagements are recorded in Bloomberg. For our externally managed funds, methods of recording engagement and availability of data varies. We chose to include Atlanticomnuim engagements in our report due to strong data availability.

CHAPTER 5: OUR PEOPLE

- **Total headcount** – measured as permanent employees.
- **Training hours** – data includes those employed as at end December 2024.

CHAPTER 6: OUR OPERATIONS

- **Our direct environmental footprint** – Carbon emissions from homeworking – working from home has reduced substantially and the related emissions are extremely difficult to measure with any accuracy. Once the mitigating factor of a reduction in commuting is taken into account, homeworking is not considered to be a material source of Scope 3 emissions for GAM and will no longer be reported.

CHAPTER 7: DATA AND DISCLOSURES

Climate disclosures

General

- **Investment coverage** – For carbon footprint analysis (Tables B1, B2 and C) the selected asset classes for 2024 are aggregate investment management fund assets classified as equity, fixed income corporate credit, and fixed income sovereign funds reflecting holdings data as at the end of December 2024 held in equity or fixed income funds. Mandates and other asset class funds are not included. This scope covers over 60% of the total GAM investment management AuM. For scenario climate value at risk analysis (Table D), the methodology is only available for our equity and fixed income credit holdings. This scope covers over 50% of total GAM investment management AuM. The funds in scope differ from 2023, as the 2024 scope excludes any funds that closed during 2024.
- **Carbon footprint metrics definitions and methodology** can be found in CARBON FOOTPRINTING 101, MSCI methodology document.
- **EVIC** is Enterprise Value Including Cash
- **MSCI Climate Value-at-Risk (VaR)** – (Climate VaR) is intended to help investors identify and consider any physical and transition risks that might arise through climate and socioeconomic changes. Climate VaR is comprised of Low Carbon Transition Risks Scenario and the Physical Climate Scenarios.

For the purpose of this report, we have selected the NGFS Scenarios Orderly and Disorderly for the Low Carbon Transition Risks Scenario and for the Physical Climate Scenario. The Climate VaR percentage represents the costs (negative value) or profits (positive value) of the aggregated funds' market value under each scenario. The costs are associated with risks in future policy and extreme weather events, whilst profits are associated with technology opportunities and some extreme weather events.

Limitations

- **Data estimation** – Our primary carbon data provider is MSCI. Estimations are applied where there are data gaps. A larger proportion of companies report on Scope 1 and 2 emissions whilst fewer companies report on Scope 3 (upstream and downstream) emissions according to the GHG Protocol. Thus, most Scope 3 emissions provided by data vendors are estimated using assumptions based on sector and geography.
- **Data availability** – MSCI is the primary source for carbon emissions data. We are therefore dependent on MSCI for coverage and accuracy of the data. MSCI provides estimates for certain carbon-related metrics based on their models. When carrying out portfolio carbon footprint calculations, data such as emissions and company financial information might not be available for all constituents and thus decreases the percentage coverage of the results.
- **Asset class coverage** – Specific instruments such as futures, options, and cash are not covered by the calculations as there is no associated emissions data recorded. These are excluded from the calculations, decreasing the portfolio coverage. Furthermore, not all asset classes can be covered by carbon footprint due to a lack of specific methodologies.
- **Data timeliness** – Carbon footprint calculations use backward-looking data, so the results can only illustrate the carbon intensity of a portfolio at the point of analysis, using historic data. Carbon footprint calculations can provide a year-on-year change for the portfolios, but supplementary information such as Climate VaR and company engagement is needed for a fuller assessment.
- **Climate scenario assumptions** – These forward-looking metrics are intended to help investors identify and consider any physical and transition risks that might arise through climate and socioeconomic changes. We use MSCI's Climate VaR models, which seek to quantify the impact of various scenarios expressing values at the current market value for a time horizon until the end of 2100. All models are highly dependent on the assumptions made. The potential limitations of the NGFS Orderly and Disorderly scenarios[12] include the reliance on carbon removal technologies that are not yet available or deployed at scale. Furthermore, the models used do not consider the responses from investee companies with regard to their climate-specific actions.

[12] NGFS FAQ including limitations and dependencies of scenario analysis.

Policies and reports

At a corporate level, we take a considered approach to the commitments we make and the standards we follow.

Transparency is a key pillar of our strategy, and we seek to disclose our own approach and progress clearly and transparently to promote accountability.

The Results Centre, Policies and Disclosures, and Responsible Investing sections of our website host our latest policies, reports and disclosures, including:

Reports:

- Committing to Net Zero
- Stewardship Report (UK)
- Stewardship Report (Japan)
- UK Modern Slavery Statement
- UN Global Compact Communication on Progress

Policies:

- Code of conduct
- Corporate governance and voting principles
- Diversity and inclusion
- Engagement
- Financial crime
- Global talent and development
- Health and safety
- Human rights
- Information security
- Responsible investment framework
- Tax strategy
- Whistleblowing

Memberships and initiatives

Here are selected industry bodies, standards and organisations we support and/or collaborate with to improve sustainability practices across the market – as at 31st December 2024.

Access to Medicine	ESG	Supporter Q1 2018
Access to Nutrition	ESG	Supporter Q1 2018
ACGA	ESG	Member Q4 2020
CDP	ESG	Signatory Q1 2021 Participant in collaborative engagement initiatives
Climate Action 100+	ESG	Signatory Q1 2018
30% Club	ESG	Member 2018 (Ireland)
EUROSIF	ESG	Member Q4 2020
Human Rights Investor Alliance	ESG	Member Q2 2021
IIGCC	ESG	Member Q12021
UK Investment Association	ESG	Member Q1 2002 Member SFDR Implementation Forum Member Stewardship Reporting Working Group
Japan Stewardship Code	ESG	Signatory 2021
Know the Chain	ESG	Supporter Q1 2022
Mining and Tailings Safety Initiative	ESG	Signatory Q1 2019
Net Zero Asset Managers Initiative	ESG	Signatory Q3 2021
Powering Past Coal Alliance (PPCA) Finance Principles	ESG	Member Q3 2022
Singapore Stewardship Code	ESG	Signatory Q2 2021
Swiss Stewardship Code	ESG	Supporter Q4 2023
Swiss Sustainable Finance (SSF)	ESG	Member Q4 2019
Task Force on Climate-related Financial Disclosures (TCFD)	ESG	Supporter Q1 2021
Transition Pathway Initiative	ESG	Supporter Q4 2021
UK Stewardship Code	ESG	Signatory since 2021
UKSIF	ESG	Member Q4 2020
UN Global Compact	ESG	Signatory Q3 2021
UN Principles for Responsible Investment (UN PRI)	ESG	Signatory Q4 2014 Member of Swiss Regional Policy Reference Group Supporting PRI Advance Initiative
US Managed Funds Association (MFA)	ESG	Member ESG working group Q1 2022
Women in Finance Charter - Ireland	ESG	Signatory 2022
Women in Finance Charter - UK	ESG	Signatory 2018
World Benchmarking Alliance	ESG	Supporter of the Ethical AI engagement initiative Q3 2022

Disclosure

The information in this Report is given for information purposes only and does not qualify as investment advice or as meeting any particular financial objectives, risk profiles, sustainability preferences or sustainability-related objectives of the recipient. Opinions and assessments contained in this Report may change and reflect the point of view of GAM in the current economic environment. No liability shall be accepted for the accuracy and completeness of the information. There is no assurance that any sustainability-related objectives, if applicable, will be achieved. Further information on GAM's approach to responsible investing can be found here:

https://www.gam.com/en/corporate-responsibility/responsible-investing

https://www.gam.com/en/policies-and-disclosures#sfdr

The investment strategies described in this Report may involve the selection, prevent the acquisition of or require the disposal of securities of certain issuers for reasons other than investment performance or other financial considerations. As a result, the strategies may underperform other strategies with a similar financial objective or policy that do not utilise an ESG-focused investment strategies and may suffer investment losses if it is required to dispose of a security as a result of non-financial considerations.

The investment strategies described in this Report may be reliant on sustainability-related data. The quality, timeliness, completeness and availability of sustainability-related data may not be comparable with the general quality, timeliness, completeness and availability of more standardised and traditional financial data. The implementa- tion of the investment strategies may be adversely impacted as a result and may result in losses (including loss of opportunity) as a result of investment decisions taken in reliance on sustainability-related data which may not be accurate, complete or timely or if decisions are taken which do not correctly assess the impact of such data. Estimates, proxies and subjective judgements may be used when assessing sustainability risk or applying an investment strategy which, if incorrect, may result in losses (including loss of opportunity).

GAM and/or a Co-Investment or Delegated Investment Managers may rely on third parties for inputs used in its investment decisions including data vendors and ESG ratings providers. The data and ratings provided by such third parties may be impacted by the quality, timeliness, completeness, and availability of sustainability related data available to them.

ESG ratings generally assess the impact of environmental, social and governance (ESG) factors on a company and/or a company's impact on the outside world and provide an opinion, expressed as a rating, of such impacts. ESG ratings may not capture all sustainability risks or impacts of a particular company. As different ESG rat- ings may rely on different data sources and calculation methodologies (including the weightings applied to ESG factors), the ratings applied to one company by a ratings provider may be different to the rating applied to the same company by another provider. The businesses of ESG ratings and ESG data providers are generally unregulated. ESG ratings may be provided by third parties that have an existing relationship with the companies that are being rated (and may have been engaged by that company to provide ESG ratings), which can create a conflict of interest for the ESG ratings provider. ESG ratings providers may also not make timely changes in a rating to reflect changes to the relevant company, sustainability risks or other external events. The investment strategy may suffer losses (including loss of opportunity) and its ESG per- formance may be different from that intended because of reliance on data or ratings which prove inaccurate, incomplete, or out of date or if the Co-Investment Manager does not correctly assess the impact of such data.

The Portfolio ESG Rating, where applicable, stated in respect of any given strategy is derived from ratings provided by a third party in respect of the investments and is designed to help investors understand the resiliency of the portfolio to long-term ESG risk and opportunities. A strategy with a high Portfolio ESG Rating implies that its investments are perceived to have a strong or improving management of financially relevant ESG risks and may be more resilient to disruptions from ESG events. However, the investments of such a strategy with a high Portfolio ESG Rating may still create significant negative externalities on environmental or social factors such as pollution and poor labour practices. Further, a strategy with a high Portfolio ESG Rating does not necessarily achieve or seek any positive ESG or sustainability impact. There can be no assurance that the Portfolio ESG Rating correctly represents the strategy's exposure to financial loss because of ESG risks.

The strategies described in this Report may invest in economic activities which are aligned with the EU Taxonomy. Alignment of investments with the EU Taxonomy is calculated by specific metrics (such as revenue or expenditure) and determined by data most recently disclosed or provided by investee companies or collected by third parties in relation to those economic activities. Such metrics are calculated and disclosed, provided, or collected as at a point in time for each investee company and are based on the activities of those investee companies which may vary over time or be impacted by external events. As a result, any taxonomy-alignment of the strategies will be indicative only and will not be a true reflection of the taxonomy-alignment of the strategies as at a point in time or over a particular reference period. The strategies may involve investment decisions based on the taxonomy alignment of an investment and the impact of such decisions may result in the strategies generating lower financial returns than if the taxonomy alignment were not considered.

The strategies described in this Report may include sustainable investments as defined in the EU's Sustainable Finance Disclosure Regulation (EU 2019/2088) ("SFDR"). A sustainable investment is an investment in an economic activity which contributes to an environmental or social objective, which does not significantly harm any environ- mental or social objective and where the investee company follows good governance practices. SFDR does not provide for objective criteria to determine the contribution of an economic activity to a particular environmental or social objective or set thresholds for identifying whether an economic activity causes significant harm to an environ- mental or social objective. As a result, the definition of "sustainable investments" is not standardised and requires firms to make subjective decisions. Firms subject to SFDR may take different approaches to categorising such investments. There can be no guarantee that a sustainable investment will attain its environmental or social objective or avoid harm to any particular environmental or social objective. The strategies may involve investment decisions based on the whether or not an investment is determined to be a "sustainable investment" and the impact of such decisions may result in the strategies generating lower financial returns than if it did not consider such determination.

The strategies described in this Report may be intended to have an ESG-related impact. Any impact will be calculated based on sustainability-related data, and will be subject to the data limitations outlined above. Any ESG-related impact may not be as expected and there is no assurance that any ESG-related impact will be achieved.

Within the UK, this material has been issued and approved by GAM London Ltd, 8 Finsbury Circus, London EC2M 7GB, authorised and regulated by the Financial Conduct Authority.

Source: GAM, unless otherwise stated. GAM has not independently verified the information from other sources and GAM gives no assurance, expressed or implied, as to whether such information is accurate, true or complete. Links to third party websites are provided for information and reference purposes only and should not be viewed as an endorsement by GAM of the services or views of such websites or their providers.

Nothing contained herein constitutes investment, legal, tax or other advice nor is it to be relied on in making an investment or other decision. Nothing in this presentation should be construed as a solicitation, offer or recommendation to acquire or dispose of any investment or to engage in any other transaction. The views expressed herein are those of the manager at the time and are subject to change.

This Report contains forward-looking statements relating to the objectives, opportunities, and the future performance of the U.S. market generally. Forward-looking statements may be identified by the use of such words as; "believe," "expect," "anticipate," "should," "planned," "estimated," "potential" and other similar terms. Examples of forward-looking statements include, but are not limited to, estimates with respect to financial condition, results of operations, and success or lack of success of any particular investment strategy. All are subject to various factors, including, but not limited to general and local economic conditions, changing levels of competition within certain industries and markets, changes in interest rates, changes in legislation or regulation, and other economic, competitive, governmental, regulatory and technological factors affecting a portfolio's operations that could cause actual results to differ materially from projected results. Such statements are forward-looking in nature and involve a number of known and unknown risks, uncertainties and other factors, and accordingly, actual results may differ materially from those reflected or contemplated in such forward-looking statements. GAM cautions against placing undue reliance on any forward-looking statements or examples. None of GAM or any of its affiliates or principals nor any other individual or entity assumes any obligation to update any forward-looking statements as a result of new information, subsequent events or any other circumstances. All statements made herein speak only as of the date that they were made.

GAM Investments