



GLC Engagement Policy

Signatory of:



Objective

GLC Asset Management Group (“GLC”) is a Canadian asset management subsidiary of The Great-West Life Assurance Company managing money across a range of traditional, specialty and alternative asset classes with the singular aim of providing our clients with strong, long-term investment performance.

The purpose of the GLC Asset Management Group Engagement Policy is to formalize our belief that, rather than simple divestiture, active engagement with investee companies enhances our existing disciplined investment processes. It should be noted that as a UN PRI signatory, GLC has committed to responsible investment principles and view engagement activities as essential to this commitment.

Engagement Policy

In circumstances where GLC deems appropriate and consistent with GLC’s existing disciplined investment processes, GLC will engage with corporate management teams, directly or indirectly through the voting process, on Environmental, Social and Governance (“ESG”) issues.

GLC will identify opportunities to engage in open dialogue with investee companies with the aim of furthering our understanding of ESG risk management policies, providing firms with the chance to better understand our investment processes, or discussing and assessing responses to negative controversies that risk shareholder value.

Identifying Engagement Opportunities

GLC evaluates opportunities for engaging with companies while considering the materiality of an ESG issue to an investee’s risk/reward profile, the significance of the position within a given portfolio, our firm-wide exposure/influence, and the anticipated long-term value creation from a successful engagement.

GLC will engage with companies on a range of relevant ESG subjects including, but not limited to:

- The quality of ESG-related disclosure and transparency;
- Significant controversies and issues identified in client requests to GLC;
- Board structure, diversity and oversight;
- Capital management;
- Minority shareholder rights;
- Climate change, pollution and other environmental management concerns;
- Health and safety, labour relations and other social issues; and
- Other issues relating to the UN Sustainable Development Goals.

GLC may also occasionally engage with public policymakers, including regulatory authorities, where we believe it is appropriate and beneficial for our clients.

Engagement Methods

As a manager of diversified asset classes, GLC engages as both an equity and fixed income investor. Depending on the issue being raised, our investment teams will use one of the following three methods for engagement:

1. Internal dialogue with investee companies via:

- Investor conferences;
- Meetings with relevant management teams; and
- Letters to management.

2. Join collaborative engagement efforts like:

- Backing activist shareholder proposals;
- Joining collaborative shareholder efforts; and
- Working in conjunction with our industry-leading third-party research partner to improve investee companies ESG disclosures.

3. Proxy voting process as an engagement tool:

- GLC subscribes to a leading proxy voting service to administer the process;
- Individual portfolio managers will follow GLC's Proxy Voting Guidelines; and
- GLC's Proxy Voting Guidelines are [available at the company website](http://glc-amgroup.com/about/responsible-investing) (glc-amgroup.com/about/responsible-investing).

Monitoring and Reporting

Our ESG-related engagements will be documented including the tracking of discussion points, outcomes, feedback and action items, if applicable.

Annually, GLC will provide a high-level summary on our active ownership initiatives through the UN PRI public reporting process. Upon client request, GLC will provide more detailed information of engagements initiated with respect to holdings in a client's portfolio.

Governance Concerns

GLC recognizes the potential for engagements to produce conflicts of interest or material non-public information. Our employees are required to adhere to our compliance policies and procedures at all times, including our Conflict of Interest policy, and attest to this adherence annually.

This engagement policy is subject to periodic review by the GLC Responsible Investment Committee, which includes GLC's senior leadership, compliance and ESG specialists. GLC will review the policy at least every two years.