THE NT EMERGING MARKETS NATURAL CAPITAL PAB INDEX FUND

Supplement dated 22 November 2024 to the Prospectus dated 27 August 2024 for Northern Trust Investment Funds plc

The NT Emerging Markets Natural Capital PAB Index Fund

*This Supplement contains specific information in relation to The NT Emerging Markets Natural Capital PAB Index Fund (the "**Fund**"), a Fund of Northern Trust Investment Funds plc (the "**Company**") an open-ended investment company with variable capital established as an umbrella fund with segregated liability between Funds governed by the laws of Ireland and authorised by the Central Bank of Ireland (the "**Central Bank**").*

This Supplement forms part of and should be read in conjunction with the Prospectus.

*The Directors of the Company, whose names appear in the **Management and Administration** section of the Prospectus, accept responsibility for the information contained in the Prospectus, this Supplement and the Annex. To the best of the knowledge and belief of the Directors (who have taken all reasonable care to ensure that such is the case) such information is in accordance with the facts and does not omit anything likely to affect the import of such information. The Directors accept responsibility accordingly.*

Words and expressions defined in the Prospectus shall, unless the context otherwise requires, have the same meaning when used in this Supplement.

*The Fund meets the criteria pursuant to Article 8 of the Sustainable Finance Disclosure Regulation (Regulation EU/2019/2088) as amended ("**SFDR**") to qualify as a financial product which promotes, among other characteristics, environmental or social characteristics, or a combination of those characteristics and provided that the companies that the Fund invests in follow good governance practices. Please refer to the Annex appended hereto which has been prepared for the purpose of meeting the specific financial product level disclosure requirements contained in SFDR applicable to an Article 8 Fund.*

An investment in the Fund should not constitute a substantial proportion of an investment portfolio and may not be appropriate for all investors.

A typical investor is prepared to accept a degree of medium to high volatility. A typical investor will be seeking to achieve exposure across developed market equities and will be seeking to achieve a return on investment in the medium to long term.

Investment in the Fund may be appropriate for professional or retail investors who have knowledge of, and investment experience in, this particular financial product and understand and can evaluate the strategy, characteristics and risks in order to make an informed investment decision. This Fund is passively managed.

The Fund may invest in financial derivative instruments ("FDI") for hedging and efficient portfolio management purposes ("EPM") (as detailed below). See below section titled "Borrowing and Leverage" for details of the leverage effect of investing in FDI.

INVESTMENT OBJECTIVE AND POLICIES

Investment Objective

The investment objective of the Fund is to closely match the risk and return characteristics of the MSCI Emerging Markets Natural Capital Paris-Aligned Equity Select Index (the "**Index**") with net dividends reinvested.

Any change of Index shall only be made with the prior approval of the Shareholders.

Investment Policies

The Fund seeks to achieve its investment objective through investment primarily in a diversified portfolio of freely transferable Equity and (where considered by the Investment Manager to be necessary or appropriate) Equity Related Securities issued by companies or linked to companies within the Index.

Such Equity and Equity Related Securities shall be listed on stock exchanges or regulated markets in countries (within the list of Markets set out in Appendix 1 of the Prospectus) comprised within the Index, details of which are set out under the heading "**Index Description**" below. Where direct access to the equity markets in those countries is not practicable, indirect exposure may be achieved through investment in Equities and/or Equity Related Securities listed on markets elsewhere. In order to access Equity and Equity Related Securities issued by companies or linked to companies located in China or listed/traded on stock exchanges in China, the Fund may trade through the Shanghai and Shenzhen Stock Connect programmes. The Fund may from time to time hold Equity and Equity Related Securities which are not included in the Index constituents as a result of corporate actions and other such activities. In such event, the Fund will sell such securities as soon as reasonably practicable taking into account the best interests of the Shareholders. In addition, certain Equity and Equity Related Securities which the Fund may hold may experience more market price volatility than other securities and could, in certain circumstances, result in high volatility levels. The Net Asset Value of the Fund may reflect this volatility.

The Fund's investments will, at the time of purchase, comply with the Fund's ESG policy, as described below under "Index Description". As the Fund is an index tracking product, it may continue to hold securities which no longer comply with these ESG requirements until such time as the relevant securities cease to form part of the Index or if the Investment Manager exercises its discretion to dispose of a security before the next rebalance in limited instances and it is possible and practicable (in the Investment Manager's view) to liquidate the position, having regard to the best interests of the Shareholders.

The Fund may also invest (up to 10% of its Net Asset Value) indirectly in Equities and Equity Related Securities comprised within the Index through holdings in open-ended collective investment schemes ("**CIS**") (including UCITS exchange traded funds ("**ETFs**")). Any such CIS will have investment objectives which are materially similar to the Fund.

The Fund operates an index tracking/replication strategy as further set out in the section "Index Tracking Strategy" below. The Fund will measure its performance against the Index.

The Fund may invest in FDI for EPM purposes further details of the techniques and instruments that the Fund may employ for EPM purposes are set out in the **Efficient Portfolio Management, Financial Derivative Instruments and Securities Financing Transactions** section of the Prospectus. The Fund may invest in FDI as set out in the section titled **"Use of Efficient Portfolio Management Techniques, Financial Derivative Instruments and Securities Financing Transactions**" below.

Index Tracking Strategy

The Fund operates an index tracking strategy whereby it seeks to track the risk and return characteristics of the Index through the investment directly in assets that are Index constituents (i.e. a physical replication model).

It may not always be possible or practicable to purchase each and every constituent of the Index in accordance with the weightings of the Index, or doing so may be detrimental to Shareholders (for example, where there are considerable costs or practical difficulties involved in compiling a portfolio of securities in order to replicate the Index, or in circumstances where a security in the Index becomes temporarily unavailable or less liquid, or as a result of legal restrictions that apply to the Fund but not to the Index). In these circumstances, the Investment Manager may use a number of techniques, including purchasing securities which are not constituents of the Index, whose returns, individually or collectively, are considered by the Investment Manager to be well-correlated to the constituents of the Index.

The Fund typically holds securities at, or very close to, Index weight and an annualised ex-post tracking error of up to 1% should be anticipated. The causes of Tracking Error can include but are not limited to the following: the holdings and size of the Fund, cash flows, such as any delays in investing subscription proceeds into the Fund or realising investments to meet redemptions, fees and the frequency of rebalancing against the Index.

As the Fund does not pursue a synthetic index replication strategy, there is no counterparty risk related to the index replication strategy.

As outlined above the Fund seeks to track certain characteristics of the Index. The Fund may therefore avail of the increased diversification limits as outlined in Regulation 71(1)(a) of the Regulations and may therefore invest up to 20% of its Net Asset Value in Equity and Equity Related Securities issued by the same body. This increased limit may only be utilised where the Fund is investing directly in constituents of the Index.

Index Description

The Index is designed to meet the standards of the EU Paris Aligned Benchmark ("**PAB**"), aiming to reduce the weighted average greenhouse gas intensity relative to the MSCI Emerging Markets Index (the "**Parent Index**") by 50% and reduce the weighted average greenhouse gas ("**GHG**") intensity by 7% on an annualized basis. The Index additionally aims to reduce exposure to companies according to select indicators that are associated with adverse impact on natural resources, and to increase exposure to companies that are associated with positive contribution to the environment through their products or services, or through their management of natural-capital related risks.

The starting universe for the Index corresponds with the Parent Index, the MSCI Emerging Markets Index which captures large and mid-cap representation across emerging markets as determined by MSCI, covering approximately 85% of the free float-adjusted market capitalisation in each country.

The eligible screened universe is constructed by excluding from the Index securities of companies based on exclusion criteria which are incorporated to align with the objectives detailed in the PAB and which are further supplemented pursuant to the following environmental, social and governance ("**ESG**") criteria:

i. companies which cause environmental harm, meaning all companies which have faced controversies classified as "very severe" and "severe" pertaining to environmental issues;

ii. companies that are in breach of the UN's Global Compact Ten Principles due to being involved in controversies classified as "very severe" in the areas of Environment, Human Rights & Community, Labour Rights & Supply Chain, or Governance;

iii. companies deriving 5% or more revenue from gambling-related business activities;

iv. companies deriving 5% or more revenue from adult entertainment-related business activities;

v. companies that derive any revenue from the production of tobacco, or those deriving 5% or more revenue from the distribution or retail of tobacco products, or those deriving 5% or more revenue from the supply of key products to the tobacco industry;

vi. companies that manufacture controversial weapons, such as cluster bombs, landmines, nuclear weapons, depleted uranium weapons;

vii. biological/chemical weapons, (or their strategic components), blinding laser, non-detectable components, or incendiary weapons;

viii. companies that manufacture civilian firearms or retail civilian firearms and derive 5% or more revenue from this sector;

ix. companies that manufacture conventional weapons or provide support services to and derive 5% or more revenue from this sector;

x. companies that derive 1% of revenue or more from the mining and sale of thermal coal;

xi. companies that derive 50% or more aggregate revenue from thermal coal, oil (liquid fuel), and/or natural gas-based power generation;

xii. companies deriving 10% or more revenue from thermal coal-based power generation;

xiii. companies that derive more than 5% revenue from thermal coal-based power generation and have transition risk preparedness or carbon management that is considered weak - i.e. an MSCI Low Carbon Transition (LCT) Management Score of 4 or below, or a score in the bottom two LCT Management Score quartiles;

xiv. companies that derive 10% or more revenue from oil and gas production, refining, distribution or transportation;

xv. companies that derive (a) 50% or more revenue from unconventional oil and gas (oil sands, oil shale, shale gas, shale oil, coal bed methane and coal seam gas) or (b) between 5% and 50% revenue from these sources and have transition risk preparedness or carbon management that is considered weak - i.e. an MSCI LCT Management Score of 4 or below, or a score in the bottom two LCT Management Score quartiles;

xvi. companies that derive (a) 50% or more revenue from Arctic oil or (b) between 1% and 50% revenue from this source and have transition risk preparedness or carbon management that is considered weak - i.e. an MSCI LCT Management Score of 4 or below, or a score in the bottom two LCT Management Score quartiles; and

xvii. companies that derive 5% or more of their total annual revenues (either reported or estimated) from activities related to for-profit prisons.

The Index also excludes companies linked to adverse impacts on natural resources, including those linked to ecosystem loss and water pollution as per the following criteria:

i. companies with an environment pillar controversy score of 1 or lower;

ii. companies that derive 5% or more of revenues from production or distribution of palm oil and less than 50% of their palm holdings are certified by the Roundtable on Sustainable Palm Oil;

iii. companies with a raw material sourcing score in the bottom industry quartile for material issues with a score in the bottom raw material sourcing quartile;

iv. companies with a water stress score (which considers consumption and intensity) in the bottom industry quartile for material issues, excepting those which are water utilities; and

v. companies which score as "strongly mis-aligned" to SDG 14 (Life below Water) or to SDG 15 (Life on Land), and those which score as "mis- aligned" where they derive less than 20% green revenue, being cumulative revenue derived from clean technology themes including alternative energy, energy efficiency, green building, pollution prevention, sustainable water, or sustainable agriculture.

The Index will also seek to tilt the screened universe by reweighting the Index constituents such that, compared to the Parent Index, there is a positive uplift:

1) in exposure to companies with revenues from clean technology themes, including alternative energy, energy efficiency, green building, pollution prevention and control, sustainable agriculture and water; and

2) to those best-in-class companies in sectors where land use and biodiversity, resource use and emissions, effluents and waste are material topics based on their sector-relative management scores.

In addition, companies in emerging markets shall be excluded which do not conform with all four of the following criteria:

- the individual shareholders of the relevant company must not hold 30% or more of the voting rights;
- at least half of the relevant company's board of directors must be independent;

- at least half of members of the company's audit committee must be independent; and
- at least half of members of the company's remuneration committee must be independent.

i) Furthermore, the company must have a clean (non-qualified) auditor opinion. Finally, companies that are domiciled within countries identified by Freedom House as having a lower degree of freedom in terms of civil liberties and political rights and as being not free in terms of press freedom shall be excluded if they also meet criteria for super majority state ownership or face a recent, severe human rights controversy.

ii) In addition, the Investment Manager shall also ensure that any investments made by the Product pursuant to the foregoing strategy are in accordance with rules regarding cluster munitions laid down in the relevant national legislation adopting the Convention on Cluster Munitions.

The exclusion lists and tilting rules are non-exhaustive and subject to change.

Further details of the Index constituents, weightings and methodology can be navigated to from the following link:

MSCI Natural Capital Paris Aligned Equity Select Indexes

The Index is reviewed semi-annually for any necessary rebalancing – typically in May and November – with the objective of reflecting changes in the underlying equity markets in a timely manner, while minimising ex-ante tracking error relative to the Parent Index and maximising replicability subject to climate and diversification objectives. Risk is controlled by applying a turnover constraint and limiting, relative to the Parent Index, the weights of securities exposure by industry and country.

INVESTMENT RESTRICTIONS

The general investment restrictions set out under the heading **Investment Restrictions** in the Prospectus shall apply.

It is noted in particular that the Fund may not invest more than 10% of Net Asset Value in CIS in aggregate.

USE OF EFFICIENT PORTFOLIO MANAGEMENT TECHNIQUES, FINANCIAL DERIVATIVE INSTRUMENTS AND SECURITIES FINANCING TRANSACTIONS

The Fund may use currency forwards and exchange- traded futures for hedging and EPM purposes. Further details of the techniques and instruments that the Fund may employ for EPM purposes are set out in the **Efficient Portfolio Management, Financial Derivative Instruments and Securities Financing Transactions** section of the Prospectus.

The Fund may also enter into certain currency related transactions in order to hedge exchange rate fluctuation risks between the denominated currencies of the Fund's assets and the designated currency of the relevant Share Class.

As a result of currency hedging, hedged Share Classes may be exposed to counterparty risk as further detailed in the section of the Prospectus entitled Credit Risk and Counterparty Risk.

The Fund may use securities lending transactions (i.e. Securities Financing Transactions) in accordance with the requirements of SFTR and the Central Bank Rules. Any type of assets that may be held by the Fund in accordance with its investment objective and policies may be subject to such Securities Financing Transactions. There is no restriction on the proportion of assets that may be subject to Securities Financing Transactions and therefore the maximum and expected proportion of the Fund's asserts that can be subject to Securities Financing Transactions can be as much as 100%, i.e. all of the assets of the Fund. Use of repurchase/reverse repurchase agreements and Total Return Swaps by the Fund is not envisaged. In any case the most recent semi-annual and annual report of the Company will express as an absolute amount and as a percentage of the Fund's assets the amount of Fund assets subject to Securities Financing Transactions.

As a result of corporate actions in respect of Equity and Equity Related Securities invested in by the Fund, warrants, share purchase rights, convertible preference shares and convertible bonds, may also be held, traded or exercised when considered appropriate

Collateral or margin may be passed by the Fund to a counterparty or broker in respect of EPM techniques or Securities Financing Transactions. Please refer to the section of the Prospectus entitled **Collateral Policy** for further details.

The use of FDI and Securities Financing Transactions for the purposes outlined above may expose the Fund to the risks disclosed under the section of the Prospectus titled **Risk Factors**.

BORROWING AND LEVERAGE

The Fund may borrow up to 10% of its Net Asset Value on a temporary basis.

Global exposure and leverage as a result of its investment in FDI as described above shall not exceed 100% of the Net Asset Value of the Fund. Global exposure will be measured using the commitment approach.

RISK FACTORS

The general risk factors as set out in the Prospectus under the heading "**Risk Factors"** apply to the Fund, as well as the following additional factors, which apply specifically to the Fund:

Stock Connect Risks; **Emerging Market Risks**; and
Currency Hedging at Share Class Level Risk.

DIVIDEND POLICY

Accumulating Shares

No dividends will be declared in respect of the Accumulating Shares.

Distributing Shares

In respect of the Distributing Shares, the Directors intend to declare and pay all net income of the Fund attributable to each class annually as a dividend to the Shareholders of each relevant class of Shares on the register of members as at the close of business on the relevant Dealing Day.

Further details on the distribution policy are set out in Prospectus under the heading **Dividend Policy**.

KEY INFORMATION FOR BUYING AND SELLING

Share Classes

Shares may be issued as Accumulating Shares or (where specifically identified as such) Distributing Shares.

Base Currency

USD

Business Day

Any day (except Saturday or Sunday) on which the banks in Ireland are open generally for business, or such other day as the Directors may determine and notify to Shareholders.

Dealing Day

The Dealing Day for the Fund will be every Business Day or such other day or days as the Directors may determine and notify in advance to Shareholders, provided that there shall be at least one Dealing Day per fortnight. In determining whether a day should be treated as a Dealing Day, the Directors may take into account whether there are sufficient market exchanges open as determined by the Investment Manager to allow the normal liquidity trading of the portfolio. The Investment Manager maintains a list of any non- Dealing Days on the Website.

Dealing Deadline

In respect of a Dealing Day, the Dealing Deadline is 2.00 p.m. (Irish time) on the Business Day immediately preceding each Dealing Day.

Initial Offer Period

The Initial Offer Period in respect to all other Share Classes shall continue until 5.00 p.m. (Irish time) on 23 May 2025 (or such shorter or longer period as the Manager may determine and notify to the Central Bank).

After the close of the relevant Initial Offer Period, the relevant classes will be continuously open for subscriptions on each Dealing Day.

Settlement Date

In the case of applications, proceeds must be received no later than two (2) Business Days after the relevant Dealing Day or as otherwise determined by the Manager.

In the case of repurchases proceeds must be remitted to investors no later than three (3) Business Days after the relevant Dealing Day (assuming the receipt of the relevant duly signed repurchase documentation) or as otherwise determined by the Manager provided that in all cases proceeds are paid within ten (10) Business Days.

Preliminary Charge

There will be no Preliminary Charge for this Fund.

Redemption Charge

There is no Redemption Charge for this Fund.

Anti-Dilution Levy

The Directors or the Manager (or their duly appointed delegate) may impose a swing-pricing adjustment as further detailed in the section of the Prospectus entitled **Anti-Dilution Levy**.

Valuation Point

With respect to: (i) currencies and currency-related transactions only, 4pm (London time); and (ii) all other assets, the close of business of the relevant market that closes last on each Dealing Day, which in all cases shall be after the Dealing Deadline.

Initial Issue Price

For Euro denominated Share Classes €100 per Share, for USD denominated Share Classes $100 per Share, for Sterling denominated Share Classes, £100 per Share.

Classes of Shares Available

A, B, C, D, E, F, G, H

Each of the above referenced Share Classes are available as Accumulating Shares and Distributing Shares.

Currencies Available

Each of the Share Classes are available in Euro, Sterling and U.S. Dollar.

Currency Hedged Share Classes

Each Share Class is available as either a hedged or an unhedged Share Class.

Minimum Shareholding

For all Shares Classes USD100,000 (or its equivalent in the relevant Share Class currency) subject to the discretion of the Directors to allow lesser amounts.

Minimum Initial Investment Amount

For all Shares Classes USD100,000 (or its equivalent in the relevant Share Class currency) subject to the discretion of the Directors to allow lesser amounts.

German Taxation

The Fund will invest and be managed such that it qualifies as an Equity Fund as defined in the Prospectus.

FEES AND EXPENSES

The Investment Manager will be entitled to receive an annual fee of up to 0.50% in respect of the Share Classes A, B, C, D, E, F, G and H Shares (plus VAT thereon, if any).

Such fee shall accrue and be calculated on each Dealing Day and be payable monthly in arrears. The Investment Manager shall be entitled to be reimbursed out of the assets of the Fund for its reasonable out-of-pocket expenses incurred in the performance of its duties.

The Manager shall not receive a fee but shall be entitled to be reimbursed out of the assets of the Fund for the reasonable out-of-pocket expenses incurred in the performance of its duties.

The Administrator shall be entitled to receive out of the Net Asset Value of the Fund an annual fee, accrued and calculated on each Dealing Day and payable monthly in arrears at an annual rate which will not exceed 0.08% of the Net Asset Value of the Fund (plus VAT, if any). The Administrator is entitled to be repaid out of the assets of the

Fund all of its reasonable agreed upon transaction and other charges (which will be at normal commercial rates) and other out-of-pocket expenses (plus VAT thereon, if any).

The Depositary shall be entitled to receive out of the Net Asset Value of the Fund an annual fee, accrued and calculated on each Dealing Day and payable monthly in arrears, at an annual rate which will not exceed 0.2% of the Net Asset Value of the Fund (plus VAT thereon, if any).

The Depositary is also entitled to be repaid out of the assets of the Fund sub-custodian's fees (which will be charged at normal commercial rates) as well as agreed upon transaction charges (which will be at normal commercial rates) and other out-of- pocket expenses (plus VAT thereon, if any).

In addition to the fees outlined above, the Fund will also be responsible for the fees of Hermes EOS (for its services in respect of the Fund, as described in the Prospectus), up to 0.02% of the Net Asset Value of the Fund per annum. Such fee shall accrue and be calculated on each Dealing Day and be payable quarterly in arrears.

This section should be read in conjunction with the section entitled **Fees and Expenses of the Funds** in the Prospectus.

Establishment costs

The organisational and establishment expenses relating to the creation of the Fund are expected not to exceed EUR 25,000. These costs shall be borne by the Fund and will be amortised over the first five accounting periods of its operation (or such other period as may be determined by the Directors at their discretion).

Any other fees and expenses payable out of the assets of the Fund are set out in the Prospectus under the heading "Fees and Expenses".

MISCELLANEOUS

Reporting

Some Shareholders may receive additional information and/or reports in relation to the Fund on a frequent basis. Any such information will be available to all investors in the Fund on request. Any such information will only be provided on a historical basis and after the relevant Dealing Day to which the information relates. Please contact your relationship manager to discuss any reporting needs.

Other Funds

The other Funds of the Company are listed in the Global Supplement to the Prospectus.

New Funds may be created from time to time by the Directors with the prior approval of the Central Bank in which case further Supplements incorporating provisions relating to those Funds will be issued by the Company.

ANNEX

Template pre-contractual disclosure for the financial products referred to in Article 8, paragraphs 1, 2 and 2a, of Regulation (EU) 2019/2088 and Article 6, first paragraph, of Regulation (EU) 2020/852

Sustainable investment means an investment in an economic activity that contributes to an environmental or social objective, provided that the investment does not significantly harm any environmental or social objective and that the investee companies follow good governance practices.

The **EU Taxonomy** is a classification system laid down in Regulation (EU) 2020/852, establishing a list of **environmentally sustainable economic activities**. That Regulation does not include a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

Product name: The NT Emerging Markets Natural Capital PAB Index Fund (the "Fund")

Legal entity identifier: 635400UYDPHZK7LS3297

Environmental and/or social characteristics

Does this financial product have a sustainable investment objective?

☐ **Yes**	☒ **No**
☐ It will make a minimum of **sustainable investments with an environmental objective**: ___%	☒ **It promotes Environmental/ Social (E/S) characteristics** and while it does not have as its objective a sustainable investment, it will have a minimum proportion of 10% of sustainable investments
☐ in economic activities that qualify as environmentally sustainable under the EU Taxonomy	☐ with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy
☐ in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy	☒ with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy
	☐ with a social objective
☐ It will make a minimum of **sustainable investments with a social objective: ___%**	☐ It promotes E/S characteristics, but **will not make any sustainable investments**

What environmental and/or social characteristics are promoted by this financial product?

The Fund promotes environmental and social characteristics through tracking the risk and return characteristics of the MSCI Emerging Markets Natural Capital Paris-Aligned Equity Select Index (the "Index") which has been designated as a reference benchmark.

The Fund promotes the following environmental characteristics related to climate change:

i. reduction of carbon emissions versus the Parent Index, with the Index being designed to meet the standards of the EU Paris Aligned Benchmark ("**PAB**"), aiming to reduce the weighted average greenhouse gas intensity relative to the MSCI World Index (the “**Parent Index**”) by 50% and reduce the weighted average greenhouse gas ("**GHG**") intensity by 7% on an annualised basis.

The Fund promotes the following other environmental characteristics

i. reduction of exposure to companies according to select indicators that are associated with adverse impact on ecosystem and pollution criteria;
ii. increasing exposure to companies:
   - that are associated with positive contribution to the environment through their products or services, upweighting companies with revenues from clean technology themes, including alternative energy, energy efficiency, green building, pollution prevention and control, sustainable agriculture and water; or
   - through their management of natural-capital related risks, upweighting those best-in-class companies, in sectors where land use and biodiversity, resource use and emissions, effluents and waste are material topics based on their sector-relative management scores.

The Fund promotes the following social characteristics related to social norms and conventions:

i. avoiding specific investment in business activities with adverse health and social impacts including tobacco, nuclear weapons, civilian firearms, controversial weapons, conventional weapons, and for-profit prisons; and
ii. human rights, labour rights, supply chain and anti-bribery and corruption as set out in the principles of the UN Global Compact.

Further information on the methodology and specific parameters of the Index that the Fund tracks can be found here: MSCI Natural Capital Paris Aligned Equity Select Indexes.

Please refer to the criteria within the sustainability indicators and binding elements of the investment strategy stated below for further detail.

Sustainability indicators measure how the environmental or social characteristics promoted by the financial product are attained.

What sustainability indicators are used to measure the attainment of each of the environmental or social characteristics promoted by this financial product?

The following sustainability indicators are used to measure the attainment of the environmental and social characteristics promoted by the Fund:

- Scope 1, 2 and 3 carbon emissions;
- MSCI Red Flag ESG Controversies, defined as Very Severe, Ongoing controversies that a company is directly involved in
- Specific revenue thresholds regarding tobacco, civilian forearms, for-profit prisons, unconventional oil and gas, Arctic oil, thermal coal mining, thermal coal power, controversial and conventional weapons, palm oil;
- Revenues from clean technology themes, including alternative energy, energy efficiency, green building, pollution prevention and control, sustainable agriculture and water;
- Raw material sourcing score industry quartile;
- Water stress score industry quartile; and
- MSCI LCT Management Score, which assesses current and potential exposure to transition risks and opportunities through companies' operations and business model.

This is not an exhaustive list and is subject to change.

Please also refer to the response below on the binding elements of the investment strategy for further details of the sustainability indicators, including the thresholds applied.

Further information on the methodology and specific thresholds of the Index may be found here: MSCI Natural Capital Paris Aligned Equity Select Indexes.

What are the objectives of the sustainable investments that the financial product partially intends to make and how does the sustainable investment contribute to such objectives?

The intended objectives of the sustainable investments of the Fund are to positively contribute towards the environmental and social objectives including reducing carbon emissions and avoiding business activities with adverse health and social impacts including tobacco, nuclear weapons, civilian firearms, controversial weapons, conventional weapons, and for-profit prisons or human or labour rights violations as set out in the principles of the UN Global Compact. An investee company must promote good governance practices without causing significant adverse impact through its products and services.

An investee company is assessed as a sustainable investment using the Index methodology: MSCI Natural Capital Paris Aligned Equity Select Indexes.

How do the sustainable investments that the financial product partially intends to make, not cause significant harm to any environmental or social sustainable investment objective?

In order to deem an investment a sustainable investment, the investee company must 'do no Significant Harm' (DNSH) to the environment or to society through its product and services.

The assessment of harm involves a set of diverse environmental and social indicators to assess whether a company with potentially positive environmental or social contributions, has other adverse environmental and/or social impacts.

The Investment Manager considers each of the Principal Adverse Impacts (PAI) indicators within Table 1, Annex 1 of the Regulatory Technical Standards (RTS) of SFDR and applies a proprietary threshold to each indicator. In circumstances where the Investment Manager feels that the data integrity behind an indicator is lacking, a relevant proxy is applied.

These thresholds represent a value or metric at which the Investment Manager believes there is a risk of significant harm. In practice, this means that an investee company can only be deemed a sustainable investment where it:

- does not breach the PAI threshold as set by the Investment Manager;
- meets the minimum positive contribution test (please see response to "what are the objective of the sustainable investments that the financial product partially intends to make and how does the sustainable investment contribute to such objectives" for further details on the positive contribution test); and
- follows good governance practices and are aligned with minimum safeguards such as the United Nations Global Compact and Organisation for Economic and Cooperation and Development (OECD) Guidelines for Multinational Enterprises on Responsible Business Conduct.

How have the indicators for adverse impacts on sustainability factors been taken into account?

In addition to the DNSH test detailed in the previous response, the Fund considers certain adverse impacts as part of the investment strategy to track the Index, which seeks to exclude companies that:

- are found to be directly involved in violation of international norms;
- are not considered to meet ESG characteristics;
- derive revenue from the production or distribution of tobacco;
- manufacture civilian firearms, controversial and conventional weapons;
- derive revenue from thermal coal power, thermal coal mining, unconventional oil and gas, for-profit prisons;
- derive revenue from the production or distribution of palm oil;
- have a low raw material sourcing score in the bottom industry quartile; and
- have a water stress score in the bottom industry quartile.

This list may not be exhaustive, and these criteria may be updated over time as new ESG data providers and datasets arise to help us to carry out this assessment and ongoing monitoring.

For sustainable investments specifically, and as described above, the Fund's assessment of harm involves the use of a set of diverse environmental and social indicators with thresholds that represent a value or metric at which the Investment Manager believes there is a risk of significant harm. Examples include avoidance of controversial weapons and human rights violations, reducing carbon footprint and exposure to fossil fuels.

- *How are the sustainable investments aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights? Details:*

The Fund applies ESG Controversy screening criteria to identify and exclude companies that do not adhere to international norms and conventions such as:

- OECD Guidelines for Multinational Enterprises; and
- the UN Guiding Principles on Business and Human Rights, including the principles and rights set out in the eight Fundamental conventions identified in

the Declaration of the International Labour Organisation (ILO) on Fundamental Principles and Rights at Work.

The implementation of these exclusions takes place semi-annually and is based on any investee company being directly involved in very severe and ongoing controversies in relation to its operations, products and services.

In practice, this means that all investee companies that form part of the Index are aligned with these minimum safeguards, not only the sustainable investments.

The EU Taxonomy sets out a "do not significant harm" principle by which Taxonomy-aligned investments should not significantly harm EU Taxonomy objectives and is accompanied by specific EU criteria.

The "do no significant harm" principle applies only to those investments underlying the financial product that take into account the EU criteria for environmentally sustainable economic activities. The investments underlying the remaining portion of this financial product do not take into account the EU criteria for environmentally sustainable economic activities.

Any other sustainable investments must also not significantly harm any environmental or social objectives.

Principal adverse impacts are the most significant negative impacts of investment decisions on sustainability factors relating to environmental, social and employee matters, respect for human rights, anti-corruption and anti-bribery matters.

Does this financial product consider principal adverse impacts on sustainability factors?

✖ **Yes,**

☐ **No**

The Fund considers as part of the investment strategy, the following principal adverse impact (PAI) indicators in Annex 1, Table 1 of the RTS:

- Greenhouse Gas (GHG) emissions (Scope 1, 2 and 3);
- Carbon footprint and GHG intensity of investee companies;
- Exposure to companies active in the fossil fuel sector;
- Violations of UNGC principles and OECD Guidelines for Multinational Enterprises; and
- Exposure to controversial weapons (anti-personnel mines, cluster munitions, chemical weapons and biological weapons).

In addition, through the Investment Manager's direct engagement and voting, as well as engagement activities performed by the Investment Manager's outside engagement partner, Hermes EOS, the Fund aims to encourage investee companies to improve their ESG practices and disclosures.

What investment strategy does this financial product follow?

The Fund uses a passive strategy whereby it seeks to track the risk and return characteristics of the Index - the MSCI Emerging Markets Natural Capital Paris-Aligned Equity Select Index – by investing directly in assets that are Index constituents.

The Index is designed to meet the standards of the PAB, and additionally aims to reduce exposure to companies according to select indicators that are associated with adverse impact on natural resources, and to increase exposure to companies that are associated with positive contribution to the environment through their products or services, or through their management of natural-capital related risks.

The investment strategy guides investment decisions based on factors such as investment objectives and risk tolerance.

What are the binding elements of the investment strategy used to select the investments to attain each of the environmental or social characteristics promoted by this financial product?

The following are the binding elements of the investment strategy, applied as part of the Index methodology construction by MSCI, that are used to promote the environmental and social characteristics promoted by the Fund.

Companies are excluded from the Index according to environmental, social and governance ("ESG") criteria, including:

i. companies which cause environmental harm, meaning all companies which have faced controversies classified as "very severe" and "severe" pertaining to environmental issues;

ii. companies that are in breach of the UN’s Global Compact Ten Principles due to being involved in controversies classified as “very severe” in the areas of Environment, Human Rights & Community, Labour Rights & Supply Chain, or Governance;

iii. companies deriving 5% or more revenue from gambling-related business activities;

iv. companies deriving 5% or more revenue from adult entertainment-related business activities;

v. companies that derive any revenue from the production of tobacco, or those deriving 5% or more revenue from the distribution or retail of tobacco products, or those deriving 5% or more revenue from the supply of key products to the tobacco industry;

vi. companies that manufacture controversial weapons, such as cluster bombs, landmines, nuclear weapons, depleted uranium weapons;

vii. biological/chemical weapons, (or their strategic components), blinding laser, non-detectable components, or incendiary weapons;

viii. companies that manufacture civilian firearms or retail civilian firearms and derive 5% or more revenue from this sector;

ix. companies that manufacture conventional weapons or provide support services to and derive 5% or more revenue from this sector;

x. companies that derive 1% of revenue or more from the mining and sale of thermal coal;

xi. companies that derive 50% or more aggregate revenue from thermal coal, oil (liquid fuel), and/or natural gas-based power generation;

xii. companies deriving 10% or more revenue from thermal coal-based power generation;

xiii. companies that derive more than 5% revenue from thermal coal-based power generation and have transition risk preparedness or carbon management that is considered weak - i.e. an MSCI LCT Management Score of 4 or below, or a score in the bottom two LCT Management Score quartiles;

xiv. companies that derive 10% or more revenue from oil and gas production, refining, distribution or transportation;

xv. companies that derive (a) 50% or more revenues from unconventional oil and gas (oil sands, oil shale, shale gas, shale oil, coal bed methane and coal seam gas) or (b) between 5% and 50% revenue from these sources and have transition risk preparedness or carbon management that is considered weak - i.e. an MSCI LCT Management Score of 4 or below, or a score in the bottom two LCT Management Score quartiles;

xvi. companies that derive (a) 50% or more revenue from Arctic oil or (b) between 1% and 50% revenue from this source and have transition risk preparedness or carbon management that is considered weak - i.e. an MSCI LCT Management Score of 4 or below, or a score in the bottom two LCT Management Score quartiles; and

xvii. companies that derive 5% or more of their total annual revenues (either reported or estimated) from activities related to for-profit prisons.

The Index also excludes companies linked to adverse impacts on natural resources, including those linked to ecosystem loss and water pollution as per the following criteria:

i. companies with an environment pillar controversy score of 1 or lower;

ii. companies that derive 5% or more of revenues from production or distribution of palm oil and less than 50% of their palm holdings are certified by the Roundtable on Sustainable Palm Oil;

iii. companies with a raw material sourcing score in the bottom industry quartile for material issues with a score in the bottom raw material sourcing quartile;

iv. companies with a water stress score (which considers consumption and intensity) in the bottom industry quartile for material issues, excepting those which are water utilities; and

v. companies which score as “strongly mis-aligned” to SDG 14 (Life below Water) or to SDG 15 (Life on Land), and those which score as “mis- aligned” where they derive less than 20% green revenue, being cumulative revenue derived from clean technology themes including alternative energy, energy efficiency, green building, pollution prevention, sustainable water, or sustainable agriculture.

The Index will also seek to tilt the screened universe by reweighting the Index constituents such that compared to the Parent Index:

i. there is a positive uplift in exposure to companies with revenues from clean technology themes, including alternative energy, energy efficiency, green building, pollution prevention and control, sustainable agriculture and water; and

ii. there is a positive uplift in exposure to best-in-class companies, in sectors where land use and biodiversity, resource use and emissions, effluents and waste are material topics, based on their sector- relative management scores.

In addition, companies in emerging markets shall be excluded which do not conform with all four of the following criteria:

i. the individual shareholders of the relevant company must not hold 30% or more of the voting rights;

ii. at least half of the relevant company's board of directors must be independent;

iii. at least half of members of the company’s audit committee must be independent; and

iv. at least half of members of the company’s remuneration committee must be independent.

Furthermore, the company must have a clean (non-qualified) auditor opinion. Finally, companies that are domiciled within countries identified by Freedom House as having a lower degree of freedom in terms of civil liberties and political rights and as being not free in terms of press freedom shall be excluded if they also meet criteria for super majority state ownership or face a recent, severe human rights controversy.

In addition, the Investment Manager shall also ensure that any investments made by the Product pursuant to the foregoing strategy are in accordance with rules regarding cluster munitions laid down in the relevant national legislation adopting the Convention on Cluster Munitions.

These exclusion lists and tilting rules are non-exhaustive and subject to change.

Further details of the Index methodology and specific thresholds can be found here: MSCI Natural Capital Paris Aligned Equity Select Indexes

What is the committed minimum rate to reduce the scope of the investments considered prior to the application of that investment strategy?

While the Fund’s investment universe of the Parent Index is reduced as a result of the binding application of exclusions, and tilting rules, the Fund does not commit to a minimum reduction rate. As such, the reduction of the universe as a result of binding exclusions and tilts may be subject to change.

Good governance practices include sound management structures, employee relations, remuneration of staff and tax compliance.

What is the policy to assess good governance practices of the investee companies?

An assessment of good governance of investee companies forms a foundational part of the ESG screening criteria applied to the Parent Index. The ESG Controversy screen is a proxy framework designed to address governance topics consistent with international norms represented by the UN Declaration of Human Rights, the ILO Declaration on

Fundamental Principles and Rights at Work, the OECD Guidelines and the UN Global Compact.

A very severe, ongoing controversy directly implicates a company through its operations, products and services and will result in that company's exclusion from the Index. The following indicators are used:

- **Bribery and fraud**: issues such as bribery, tax evasion, insider trading, money laundering, tax evasion or avoidance, violations of government sanctions and accounting irregularities;
- **Corporate governance structures**: issues such as shareholder- or board-level objections to pay practices and governance structures, shareholder resolutions seeking change to governance practices, and conflicts of interest or unethical behaviour by, or misrepresentation of, or lack of qualifications on the part of, directors or senior executives; and
- **Controversial investments**: issues such as financing projects that are controversial because of their actual or anticipated environmental or social impact, as well as criticism of mining companies, real estate investment trusts and similar companies that receive royalties or own shares in a particular project that they neither own nor operate.

In addition, as noted above within the list of binding indicators, companies in emerging markets shall be excluded which do not conform with all four of the following criteria:

i) the individual shareholders of the relevant company must not hold 30% or more of the voting rights;

ii) at least half of the relevant company's board of directors must be independent;

iii) at least half of members of the company's audit committee must be independent; and

iv) at least half of members of the company's remuneration committee must be independent.

Furthermore, the company must have a clean (non-qualified) auditor opinion. Finally, companies that are domiciled within countries identified by Freedom House as having a lower degree of freedom in terms of civil liberties and political rights and as being not free in terms of press freedom shall be excluded if they also meet criteria for super majority state ownership or face a recent, severe human rights controversy.

Asset allocation describes the share of investments in specific assets.

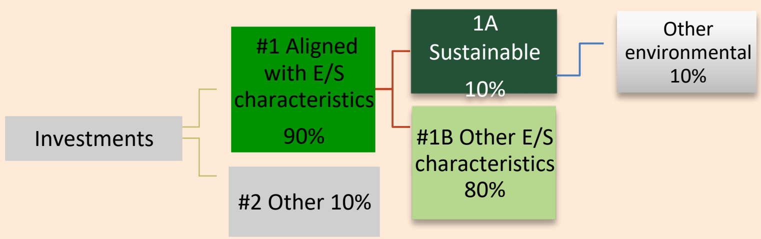
What is the asset allocation planned for this financial product?

The Fund intends to invest at least 90% of its Net Asset Value in companies that are aligned with the environmental and social characteristics promoted by the Fund. physical climate risks;

Of this, a minimum of 10% of its Net Asset Value will be invested in sustainable investments with an environmental objective.

The "other" assets are expected to be cash and derivatives for hedging and other ancillary purposes.

Taxonomy-aligned activities are expressed as a share of:
- **turnover** reflecting the share of revenue from green activities of investee companies
- **capital expenditure** (CapEx) showing the green investments made by investee



companies, e.g. for a transition to a green economy.
- **operational expenditure** (OpEx) reflecting green operational activities of investee companies.

#**1 Aligned with E/S characteristics** includes the investments of the financial product used to attain the environmental or social characteristics promoted by the financial product.

#2 Other includes the remaining investments of the financial product which are neither aligned with the environmental or social characteristics, nor are qualified as sustainable investments.

The category **#1 Aligned with E/S characteristics** covers:
- The sub-category **#1A Sustainable** covers sustainable investments with environmental or social objectives.
- The sub-category **#1B Other E/S characteristics** covers investments aligned with the environmental or social characteristics that do not qualify as sustainable investments.

How does the use of derivatives attain the environmental or social characteristics promoted by the financial product?

Derivatives are not used to attain the environmental or social characteristics promoted by the Fund.

To comply with the EU Taxonomy, the criteria for **fossil gas** include limitations on emissions and switching to renewable power or low-carbon fuels by the end of 2035. For **nuclear energy**, the criteria include comprehensive safety and waste management rules.

To what minimum extent are sustainable investments with an environmental objective aligned with the EU Taxonomy?

The Fund invests at least 10% of its Net Asset Value in sustainable investments but commits 0% of its Net Asset Value to sustainable investments with an environmental objective aligned with the EU Taxonomy.

Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy[1]?

☐ **Yes:**

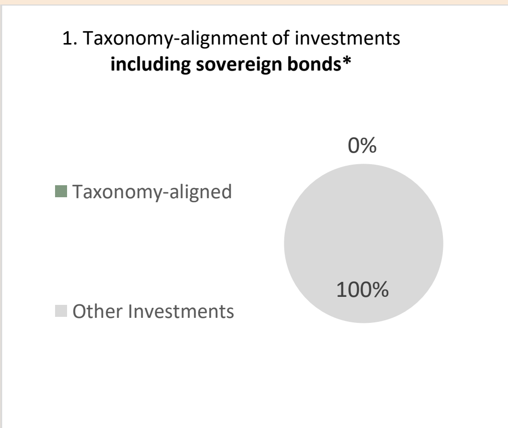
☐ In fossil gas ☐ In nuclear energy

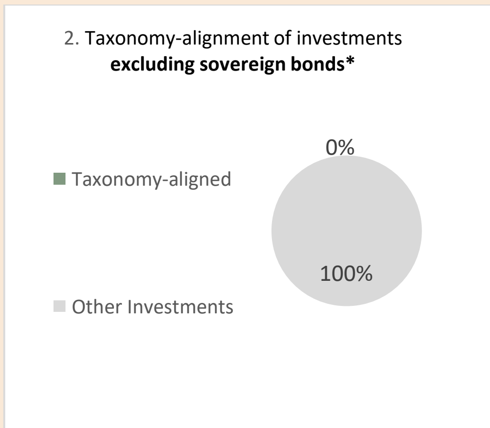
☒ **No**

Enabling activities directly enable other activities to make a substantial contribution to an environmental objective.

Transitional activities are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.

The two graphs below show in green the minimum percentage of investments that are aligned with the EU Taxonomy. As there is no appropriate methodology to determine the Taxonomy-alignment of sovereign bonds*, the first graph shows the Taxonomy alignment in relation to all the investments of the financial product including sovereign bonds, while the second graph shows the Taxonomy alignment only in relation to the investments of the financial product other than sovereign bonds.





**** For the purpose of these graphs, 'sovereign bonds' consist of all sovereign exposures***

[1] Fossil gas and/or nuclear related activities will only comply with the EU Taxonomy where they contribute to limiting climate change ("climate change mitigation") and do not significantly harm any EU Taxonomy objective – see explanatory note in the left hand margin. The full criteria for fossil gas and nuclear energy economic activities that comply with the EU Taxonomy are laid down in Commission Delegated Regulations (EU) 2022/1214.

are sustainable investments with an environmental objective that **do not take into account the criteria** for environmentally sustainable economic activities under the EU Taxonomy.

What is the minimum share of investments in transitional and enabling activities?

Not applicable. The Fund will not make any investments in transitional and enabling activities.

What is the minimum share of sustainable investments with an environmental objective that are not aligned with the EU Taxonomy?

The Fund invests at least 10% of its Net Asset Value in sustainable investments with environmental objectives which are not aligned with the EU Taxonomy.

What is the minimum share of socially sustainable investments?

Not applicable. The Fund does not commit to sustainable investments with a social objective.

What investments are included under "#2 Other", what is their purpose and are there any minimum environmental or social safeguards?

- Derivatives and cash are the only two investment types categorised as 'other' and no minimum environmental or social safeguards are applied.
- Investments may be categorised as 'other' for the following reasons:
- Cash and cash equivalents or money market instruments: the Fund may invest in Cash and cash equivalents or money market instruments to take advantage of market opportunities as they arise.
- Derivatives: The Fund may use derivatives for hedging and managing broad market exposure.

Is a specific index designated as a reference benchmark to determine whether this financial product is aligned with the environmental and/or social characteristics that it promotes?

Yes, the Index has been designated as a reference benchmark.

Reference benchmarks are indexes to measure whether the financial product attains the environmental or social characteristics that they promote.

How is the reference benchmark continuously aligned with each of the environmental or social characteristics promoted by the financial product?

The Index is aligned with each of the environmental or social characteristics of the Fund as it is screened by MSCI research based on the binding elements detailed earlier, which are applied to the Index constituents at the semi-annual rebalance. The Investment Manager evaluates the application of the binding elements through regular reviews to ensure that the Index continues to be aligned with each of the environmental or social characteristics promoted by the Fund.

How is the alignment of the investment strategy with the methodology of the index ensured on a continuous basis?

Alignment of the investment strategy with the methodology of the Index is achieved on a continuous basis through the Fund tracking the Index which incorporates the various binding ESG criteria, within a set tracking error tolerance and outlined in the Index Tracking Strategy section of this Supplement.

In addition, to the extent possible, the investment guidelines and restrictions are coded into the investment Manager's order management system to enable pre- and post-trade monitoring.

How does the designated index differ from a relevant broad market index?

The Index differs from the Parent Index in the application of the ESG screening and tilts described in earlier responses.

Where can the methodology used for the calculation of the designated index be found?

The Index methodology for the Index can be found here: MSCI Natural Capital Paris Aligned Equity Select Indexes.

Where can I find more product specific information online?

More product-specific information regarding the Product can be found on the website: International Pooled Funds | Northern Trust