

Impact Investing Solutions

Impact Restrictions

FOR ONE-ON-ONE USE WITH A CLIENT'S FINANCIAL ADVISOR ONLY.



The overlay restriction program at Envestnet allows clients to apply customized impact restrictions to their investment portfolios. There are 17 different restriction criteria available, many of which have both a Best in Class and Impact Strict restriction.

Impact Best in Class Restriction Criteria

The Impact Best in Class restriction criteria are designed for investors aiming to achieve alignment between their values and their need to ensure the prudent management of their investments. They exclude companies involved in the production and/or distribution of certain products such as weapons, alcohol, nuclear power, adult entertainment, and tobacco. The Impact Best in Class restrictions also allow investors to avoid companies involved in major environmental, social, and/or governance controversies in which the company's operations have major negative impacts on the environment, society at large, and/or external stakeholders.

Impact (Plus) Strict Restriction Criteria

The Impact Strict restrictions are designed for investors who want to integrate more stringent product involvement and environmental/social criteria into their investments. They seek to minimize exposure to companies with specific products, services, and operations that do not meet the personal convictions criteria set by the client. The company's involvement in the operations, production, and distribution of certain products (*to be chosen at the discretion of the client*), which may include weapons, alcohol, nuclear power, adult entertainment, and tobacco, is given a low tolerance threshold based on annual revenues. The Impact Strict restriction also allow investors to avoid companies with significant controversies or incidents that endanger the health and well-being of the environment, employees, customers, and society.

Alcohol

■ Best in Class

Companies that meet the following criteria are deemed ineligible for investment:

- **Production:** the company derives $\geq 10\%$ of revenue from the manufacture of alcoholic beverages.
- **Related Products/Services:** the company derives $\geq 25\%$ of revenue from the supply of alcohol-related products/services to alcoholic beverage manufacturers. This includes the supply of specialized equipment and specialized raw materials required for the production of alcoholic beverages.
- **Retail:** the company derives $\geq 25\%$ of revenue from the distribution and/or retail sale of alcoholic beverages. This includes retail sales of alcoholic beverages through liquor stores, bars or pub chains, restaurants, supermarkets, and convenience stores.

■ Strict Restriction

Companies that meet the following criteria are deemed ineligible for investment:

- **Production:** the company derives $\geq 5\%$ of revenue from the manufacture of alcoholic beverages.
- **Related Products/Services:** the company derives $\geq 10\%$ of revenue from the supply of alcohol-related products/services to alcoholic beverage manufacturers. This includes the supply of specialized equipment and specialized raw materials required for the production of alcoholic beverages.
- **Retail:** the company derives $\geq 10\%$ of revenue from the distribution and/or retail sale of alcoholic beverages. This includes retail sales of alcoholic beverages through liquor stores, bars or pub chains, restaurants, supermarkets, and convenience stores.

Animal Testing

■ Best in Class

Companies that meet the following criteria are deemed ineligible for investment:

- **Non-pharmaceutical products:** the company conducts animal testing for non-pharmaceutical products.

■ Strict Restriction

Companies that meet the following criteria are deemed ineligible for investment:

- **Non-pharmaceutical products:** the company conducts animal testing for non-pharmaceutical products.
- **Pharmaceutical products:** the company conducts animal testing for pharmaceutical products, medical devices, and biotechnology.

Firearms

■ Best in Class

Companies that meet the following criteria are considered ineligible for investment:

- **Production:** the company derives $\geq 10\%$ of revenue from the manufacture and sale of small arms to civilian customers or military/law enforcement.

■ Strict Restriction

Companies that meet the following criteria are considered ineligible for investment:

- **Production:** the company derives $\geq 10\%$ of revenue from the manufacture and sale of small arms to civilian customers or military/law enforcement.
- **Retail:** the company derives $\geq 5\%$ of revenue from the distribution and/or retail sale of small arms and/or key components.

Gambling

■ Best in Class

Companies that meet the following criteria are considered ineligible for investment:

- **Operations:** the company derives $\geq 10\%$ of revenue from the ownership/operation of a gambling establishment. This includes the ownership and/or operation of casinos, racetracks, online gambling, bingo parlors, or other betting establishments.
- **Specialized Equipment:** the company derives $\geq 10\%$ of revenue from the manufacture of specialized equipment used exclusively for gambling such as slot machines, roulette wheels, and lottery terminals.
- **Supporting Products/Services:** the company derives $\geq 10\%$ of revenue from the provision of supporting products/services to gambling operations. This includes gambling-related, customized products or services such as consulting services, credit lines within casinos, or gambling technology.

■ Strict Restriction

Companies that meet the following criteria are considered ineligible for investment:

- **Operations:** the company derives $\geq 5\%$ of revenue from the ownership/operation of a gambling establishment. This includes the ownership and/or operation of casinos, racetracks, online gambling, bingo parlors, or other betting establishments.
- **Specialized Equipment:** the company derives $\geq 5\%$ of revenue from the manufacture of specialized equipment used exclusively for gambling such as slot machines, roulette wheels, and lottery terminals.
- **Supporting Products/Services:** the company derives $\geq 5\%$ of revenue from the provision of supporting products/services to gambling operations. This includes gambling-related, customized products or services such as consulting services, credit lines within casinos, or gambling technology.

Adult Entertainment

■ Best in Class

Companies that meet the following criteria are considered ineligible for investment:

- **Production:** the company derives $\geq 25\%$ of revenue from the production of adult entertainment and/or owns adult entertainment establishments. This includes production of adult entertainment media such as movies, magazines, or websites, and/or the ownership and operation of strip clubs, topless bars, and other types of adult entertainment establishments.
- **Distribution:** the company derives $\geq 25\%$ of revenue from the distribution of adult entertainment. This includes the distribution of pay-per-view adult channels and/or movie channels with adult content through the internet, cellular telephones, and satellite and broadcast television.

■ Strict Restriction

Companies that meet the following criteria are considered ineligible for investment:

- **Production:** the company derives $\geq 10\%$ of revenue from the production of adult entertainment. This includes production of adult entertainment media such as movies, magazines or websites, and/or the ownership and operation of strip clubs, topless bars, and other types of adult entertainment establishments.
- **Distribution:** the company derives $\geq 10\%$ of revenue from the distribution of adult entertainment. This includes the distribution of pay-per-view adult channels and/or movie channels with adult content through the internet, cellular telephones, and satellite and broadcast television.

Military Weapons

■ Best in Class

Companies that meet the following criteria are considered ineligible for investment:

- **Production of military weapons:** the company derives $\geq 25\%$ of revenue from the manufacture of military weapons systems and/or integral tailor-made components of these weapons. This area of involvement includes bombs, missiles, missile launchers, grenades, mines, pistols, rifles, machine guns, ammunition, warheads, and incendiaries. It also may include weapons systems such as jet fighters, attack helicopters, battleships, tanks, and other assault vehicles. This area does not include transportation or rescue vehicles.
- **Biological and chemical weapons:** the company is involved in the core weapons system for biological and chemical weapons systems and/or components/services of these weapons that are considered tailor-made and essential for lethal use.
- **Nuclear weapons:** the company is involved in the core nuclear weapons system or components/services of these weapons that are considered tailor-made and essential for lethal use.
- **Weapons-related products and services:** the company derives $\geq 25\%$ of revenue from tailor-made products or services that support military weapons. This area of involvement includes equipment, components, or support systems designed or customized for military applications.

■ Strict Restriction

Companies that meet the following criteria are considered ineligible for investment:

- **Production of military weapons:** the company derives $\geq 5\%$ of revenue from the manufacture of military weapons systems and/or integral tailor-made components of these weapons. This area of involvement includes bombs, missiles, missile launchers, grenades, mines, pistols, rifles, machine guns, ammunition, warheads, and incendiaries. It also may include weapons systems such as jet fighters, attack helicopters, battleships, tanks, and other assault vehicles. This area does not include transportation or rescue vehicles.
- **Biological and chemical weapons:** the company is involved in the core weapons system for biological and chemical weapons systems and/or components/services of these weapons that are considered tailor-made and essential for lethal use.
- **Nuclear weapons:** the company is involved in the core nuclear weapons system or components/services of these weapons that are considered tailor-made and essential for lethal use.
- **Weapons-related products and services:** the company derives $\geq 5\%$ of revenue from tailor-made products or services that support military weapons. This area of involvement includes equipment, components or support systems designed or customized for military applications.

Nuclear Power

■ Best in Class

Companies that meet the following criteria are considered ineligible for investment:

- **Production:** the company derives $\geq 25\%$ of its energy-generating capacity from nuclear power. This includes utilities that own or operate nuclear power generators.

■ Strict Restriction

Companies that meet the following criteria are considered ineligible for investment:

- **Production:** the company produces nuclear power. This includes utilities that own or operate nuclear power generators.

Tobacco

■ Best in Class

Companies that meet the following criteria are considered ineligible for investment:

- **Production:** the company derives $\geq 25\%$ of revenue from the manufacture of tobacco products.
- **Retail:** the company derives $\geq 10\%$ of revenue from the distribution and/or retail sale of tobacco products.

■ Strict Restriction

Companies that meet the following criteria are considered ineligible for investment:

- **Production:** the company generates $\geq 5\%$ of revenue from the manufacture of tobacco products.
- **Retail:** the company generates $\geq 10\%$ of revenue from the distribution and/or retail sale of tobacco products.
- **Related Products/Services:** the company generates $\geq 10\%$ of revenue from the supply of tobacco-related products/services.

Customer Rights

■ Best in Class

The Customer Rights Best in Class restriction identifies and excludes companies involved in customer-related controversies or incidents that are severe in nature. These may include, for example, controversies or incidents related to anti-competitive practices; marketing practices; privacy issues related to clients; misleading or fraudulent commercial practices; product quality issues; or concerns over the health and safety of a product. The resulting impact on stakeholders from these incidents is considered to be high.

■ Strict Restriction

The Customer Rights Strict restriction identifies and excludes companies involved in customer-related controversies or incidents that are severe or significant in nature. These may include, for example, controversies or incidents related to anti-competitive practices; marketing practices; privacy issues related to clients; misleading or fraudulent commercial practices; product quality issues; or concerns over the health and safety of a product. The resulting impact on stakeholders from these incidents is considered to be moderate or high.

Employee Rights

■ Best in Class

The Employee Rights Best in Class restriction identifies and excludes companies with severe controversies over labor rights and/or working conditions at a company's operations and in its social supply chain. These may include, for example, controversies or incidents related to poor labor standards; diversity, health, and safety concerns; evidence of the use of child or forced labor; a failure to respect freedom of association; or poor union relations. The resulting impact on stakeholders from these incidents is considered to be high.

■ Strict Restriction

The Employee Rights Strict restriction identifies and excludes companies with severe as well as significant controversies over labor rights and/or working conditions at a company's operations and in its social supply chain. These may include, for example, poor labor standards; diversity, health, and safety concerns; evidence of the use of child or forced labor; a failure to respect freedom of association; or poor union relations. The resulting impact on stakeholders from these incidents is considered to be moderate or high.

Environment

■ Best in Class

The Environment Best in Class restriction identifies and excludes companies involved in severe environmental controversies related to their operations, contractors and supply chain, or products and services. For operations-related controversies or incidents, these may include events related to pollution caused by the company's operations; fines and incidents related to poor environmental practices, waste management, and/or toxic emissions; or environmental damage to ecosystems. For contractor and supply-chain-related controversies or incidents, these may include events related to various types of environmental concerns among suppliers or contractors, such as excessive emissions, spills, and deforestation; destruction of natural habitats; or the lack of environmental standards. For products and services, these may include events related to the poor environmental performance of a company's products or services; the risks the products/services pose to the environment and public health; or concerns related to the products at their end of their life cycle. The impact on stakeholders from these incidents is considered to be high.

■ Strict Restriction

The Environment Strict restriction identifies and excludes companies involved in severe or significant environmental controversies related to their operations, contractors/supplies, or products and services. For operations-related controversies or incidents, these may include, for example, events related to pollution caused by the company's operations; and/or fines and incidents related to poor environmental practices, waste management, toxic emissions; or environmental damage to ecosystems. For contractor and supply-chain-related controversies or incidents, these may include events related to various types of environmental concerns among suppliers or contractors such as excessive emissions, spills, deforestation, destruction of natural habitats, or the lack of environmental standards. Controversies related to the poor environmental performance of a company's products or services include the risks the products/services pose to the environment and public health, or concerns related to the products at the end of their life cycle. The impact on stakeholders from these incidents is considered to be high or moderate.

The Environment Strict restriction also identifies and excludes companies that generate $\geq 10\%$ revenue from GMO and seeds, palm oil, thermal coal, or pesticides.

Human Rights

■ Best in Class

The Human Rights Best in Class restriction identifies and excludes companies with severe controversies related to human rights, collaboration with repressive regimes, and/or conflicts with local communities. The impact on stakeholders from these incidents is considered to be high.

■ Strict Restriction

The Human Rights Best in Class restriction identifies and excludes companies with severe or significant controversies related to human rights, collaboration with repressive regimes, and/or conflicts with local communities. The impact on stakeholders from these incidents is considered to be moderate or high.

Landmines

■ Best in Class

There is no separate Best in Class restriction for Landmines; please use Strict restriction for landmines.

■ Strict Restriction

Companies that meet the following criteria are considered ineligible for investment:

- **Anti-personnel landmines:** the company is involved in the core weapons system for landmines and/or components/services that are considered tailor-made and essential for lethal use.

Abortion

■ Best in Class

There is no Best in Class restriction for Abortion.

■ Strict Restriction

Companies that meet the following criteria are considered ineligible for investment:

- **Abortion-Operations:** the company owns and/or operates acute care hospitals or surgical centers.
- **Abortion-Production:** the company manufactures drugs designed and marketed for specific use as abortifacients.

Contraceptives

■ Best in Class

There is no Best in Class restriction for Contraceptives.

■ Strict Restriction

Companies that meet the following criteria are considered ineligible for investment:

- **Contraceptives-Production:** the company manufactures contraceptives.

Embryonic Stem Cell/Fetal Tissue Research

■ Best in Class

There is no Best in Class restriction for Embryonic Stem Cell/Fetal Tissue Research.

■ Strict Restriction

Companies that meet the following criteria are considered ineligible for investment:

- **Human Embryonic Stem Cells:** the company is involved in the use of human embryonic stem cells.
- **Fetal Cell Lines:** the company is involved in the use of fetal cell lines for vaccine or biologics development.

Pork/Usury

■ Best in Class

There is no Best in Class restriction for Pork and Usury.

■ Strict Restriction

Companies that meet the following criteria are considered ineligible for investment:

- **Production of Pork:** the company derives $\geq 10\%$ of revenue from the manufacture of pork products.
- **Retail of Pork:** the company derives $\geq 10\%$ of revenue from the distribution and/or retail sale of pork products.
- **Usury:** the company operates in the finance sector, including the following industry groups: Banks, Finance/Rental/Leasing, Investment Banks/Brokers, Investment Managers, and Financial Conglomerates.

About Sustainalytics

Sustainalytics is an independent Environmental, Social and Governance (ESG) and corporate governance research, ratings and analysis firm supporting investors around the world with the development and implementation of responsible investment strategies. With 13 offices globally, Sustainalytics partners with institutional investors who integrate environmental, social and governance information and assessments into their investment processes. Today, the firm has 230 staff members, including more than 120 analysts with varied multidisciplinary expertise of more than 40 sectors. Sustainalytics was voted best independent responsible investment research firm for three consecutive years in Extel's global Independent Research in Responsible Investment (IRRI) survey. For more information, visit www.sustainalytics.com

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Investnet | PMC makes a best efforts attempt to apply restrictions to portfolios. Data is not always available regarding all of a company's services and practices. There is a *risk* of holding a company in your portfolio that *does not pass your impact restrictions*.

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