

# **About this report**

PRI reporting is the largest global reporting project on responsible investment. It was developed with investors, for investors.

PRI signatories are required to report publicly on their responsible investment activities each year. In turn, they receive a number of outputs, including a public and private Transparency Report.

The public Transparency Reports, which are produced using signatories' reported information, provide accountability and support signatories to have internal discussions about their practices and to discuss these with their clients, beneficiaries, and other stakeholders.

This public Transparency Report is an export of the signatory's responses to the PRI Reporting Framework during the 2023 reporting period. It includes the signatory's responses to core indicators, as well as responses to plus indicators that the signatory has agreed to make public.

In response to signatory feedback, the PRI has not summarised signatories' responses – the information in this document is presented exactly as it was reported.

For each of the indicators in this document, all options selected by the signatory are presented, including links and qualitative responses. In some indicators, all applicable options are included for additional context.

# **Disclaimers**

# Responsible investment definitions

Within the PRI Reporting Framework Glossary, we provide definitions for key terms to guide reporting on responsible investment practices in the Reporting Framework. These definitions may differ from those used or proposed by other authorities and regulatory bodies due to evolving industry perspectives and changing legislative landscapes. Users of this report should be aware of these variations, as they may impact interpretations of the information provided.

# **Data accuracy**

This document presents information reported directly by signatories in the 2023 reporting cycle. This information has not been audited by the PRI or any other party acting on its behalf. While this information is believed to be reliable, no representations or warranties are made as to the accuracy of the information presented.

The PRI has taken reasonable action to ensure that data submitted by signatories in the reporting tool is reflected in their official PRI reports accurately. However, it is possible that small data inaccuracies and/or gaps remain, and the PRI shall not be responsible or liable for such inaccuracies and gaps.

# **Table of Contents**

Module	Page
SENIOR LEADERSHIP STATEMENT (SLS)	4
ORGANISATIONAL OVERVIEW (OO)	6
POLICY, GOVERNANCE AND STRATEGY (PGS)	19
LISTED EQUITY (LE)	42
CONFIDENCE-BUILDING MEASURES (CBM)	49



# SENIOR LEADERSHIP STATEMENT (SLS)

# SENIOR LEADERSHIP STATEMENT

## SENIOR LEADERSHIP STATEMENT

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SLS 1	CORE	N/A	N/A	PUBLIC	Senior Leadership Statement	GENERAL

#### Section 1. Our commitment

- Why does your organisation engage in responsible investment?
- What is your organisation's overall approach to responsible investment, and what major responsible investment commitment(s) have you made?

Sustainability and responsibility are embedded throughout our business, which we believe benefits investors in our products, employees, stockholders and other stakeholders. ESG principles are a significant part of WisdomTree's global approach, and we believe there is a need for full transparency in how investors allocate their money while incorporating ESG metrics. We're proud to have built a diverse and inclusive workforce across gender, race, age, and ability, including in our leadership teams and boards. WisdomTree's responsible investing strategy is grounded in the belief that more education and greater transparency are critical to the adoption of ESG. When advisors and end-investors better understand the ESG considerations that could affect their portfolios, they can make more informed investment decisions about the issues that are most important to them.

#### Section 2. Annual overview

- Discuss your organisation's progress during the reporting year on the responsible investment issue you consider most relevant or material to your organisation or its assets.
- Reflect on your performance with respect to your organisation's responsible investment objectives and targets during the reporting year. Details might include, for example, outlining your single most important achievement or describing your general progress on topics such as the following (where applicable):
- refinement of ESG analysis and incorporation
- stewardship activities with investees and/or with policymakers
- collaborative engagements
- attainment of responsible investment certifications and/or awards

During the reporting year, WisdomTree made progress on several key initiatives related to responsible investment. Education and transparency are critical to our firm's responsible investment strategy. Since our last reporting cycle, WisdomTree has begun to offer an ESG certification program with Columbia University for financial advisors and employees. The Climate Impact and Investing Program is built to equip both advisors and WisdomTree's employees with the education and tools needed to make sound decisions around climate, environmental risks, and investing. The program is a workshop built in conjunction with the Columbia Climate School that will address basic climate science, climate impact and tipping points as well as how this all impacts the thinking around investing. WisdomTree also integrated ESG metrics into our Fund Comparison online tool to help investors compare the ESG attributes of various WisdomTree and third-party funds. These metrics currently include ESG risk ratings as well as screens for involvement with products that many investors may view as controversial, such as tobacco, controversial weapons, small arms, and fossil fuels.



#### Section 3. Next steps

■ What specific steps has your organisation outlined to advance your commitment to responsible investment in the next two years?

We have embarked on an initiative to measure our firmwide greenhouse gas emissions and to report on these emissions in alignment with industry standards, such as the TCFD framework. WisdomTree has historically measured carbon emissions in Europe only, but we would like to broaden this initiative to cover our global business. Due to the nature of our business, we believe these emissions will be low, but we also believe that this initiative will further our goal of providing greater transparency and accountability. We hope to begin disclosing these metrics publicly soon.

For our ESG focused products in Europe, we are exploring new ways to measure the ESG impact of such products including the development of strategies that use positive screening or tilt weights towards higher ESG ratings, which can also be combined with WisdomTree's ESG exclusion policy, if possible, Such strategies aim to provide exposure to responsible investment themes, such as the reduction of carbon emissions and the promotion of renewable energy. In addition, WisdomTree is continuing to monitor ESG and commodities and UN SDGs.

#### Section 4. Endorsement

'The Senior Leadership Statement has been prepared and/or reviewed by the undersigned and reflects our organisation-wide commitment and approach to responsible investment'.

Name

Jarrett Lilien

Position

President & COO

Organisation's Name

WisdomTree, Inc.



This endorsement applies only to the Senior Leadership Statement and should not be considered an endorsement of the information reported by the above-mentioned organisation in the various modules of the Reporting Framework. The Senior Leadership Statement serves as a general overview of the above-mentioned organisation's responsible investment approach. The Senior Leadership Statement does not constitute advice and should not be relied upon as such. Further, it is not a substitute for the skill, judgement and experience of any third parties, their management, employees, advisors and/or clients when making investment and other business decisions'.





# **ORGANISATIONAL OVERVIEW (00)**

# **ORGANISATIONAL INFORMATION**

# **REPORTING YEAR**

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
00 1	CORE	N/A	N/A	PUBLIC	Reporting year	GENERAL

What is the year-end date of the 12-month period you have chosen to report for PRI reporting purposes?

	Date	Month	Year
Year-end date of the 12-month period for PRI reporting purposes:	30	06	2023

# **SUBSIDIARY INFORMATION**

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
00 2	CORE	N/A	OO 2.1	PUBLIC	Subsidiary information	GENERAL

Does your organisation have subsidiaries?

o (A) Yes

**⊚** (B) No



# **ASSETS UNDER MANAGEMENT**

# **ALL ASSET CLASSES**

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
00 4	CORE	00 3	N/A	PUBLIC	All asset classes	GENERAL

What are your total assets under management (AUM) at the end of the reporting year, as indicated in [OO 1]?

USD

(A) AUM of your organisation, including subsidiaries, and excluding the AUM subject to execution, advisory, custody, or research advisory only

US\$ 93,666,965,446.00

(B) AUM of subsidiaries that are PRI signatories in their own right and excluded from this submission, as indicated in [OO 2.2]

US\$ 0.00

(C) AUM subject to execution, advisory, custody, or research advisory only

US\$ 0.00

# **ASSET BREAKDOWN**

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
00 5	CORE	OO 3	Multiple indicators	PUBLIC	Asset breakdown	GENERAL

Provide a percentage breakdown of your total AUM at the end of the reporting year as indicated in [OO 1].



	(1) Percentage of Internally managed AUM	(2) Percentage of Externally managed AUM
(A) Listed equity	>50-75%	0%
(B) Fixed income	>10-50%	0%
(C) Private equity	0%	0%
(D) Real estate	0%	0%
(E) Infrastructure	0%	0%
(F) Hedge funds	0%	0%
(G) Forestry	0%	0%
(H) Farmland	0%	0%
(I) Other	>10-50%	0%
(J) Off-balance sheet	0%	0%

# (I) Other - (1) Percentage of Internally managed AUM - Specify:

Commodity & Currency, Leveraged & Inverse, Cryptocurrency, Alternatives

# ASSET BREAKDOWN: INTERNALLY MANAGED LISTED EQUITY

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 5.3 LE	CORE	OO 5	Multiple	PUBLIC	Asset breakdown: Internally managed listed equity	GENERAL

# Provide a further breakdown of your internally managed listed equity AUM.

(A) Passive equity	>75%
(B) Active – quantitative	>0-10%



(C) Active – fundamental	0%
(D) Other strategies	0%

# ASSET BREAKDOWN: INTERNALLY MANAGED FIXED INCOME

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
00 5.3 FI	CORE	OO 5	Multiple	PUBLIC	Asset breakdown: Internally managed fixed income	GENERAL

# Provide a further breakdown of your internally managed fixed income AUM.

(A) Passive – SSA	>75%
(B) Passive – corporate	>10-50%
(C) Active – SSA	>0-10%
(D) Active – corporate	>0-10%
(E) Securitised	0%
(F) Private debt	0%

# **GEOGRAPHICAL BREAKDOWN**

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
00 7	CORE	Multiple, see guidance	N/A	PUBLIC	Geographical breakdown	GENERAL

How much of your AUM in each asset class is invested in emerging markets and developing economies?



# **AUM in Emerging Markets and Developing Economies**

(A) Listed equity	(3) >10 to 20%
(B) Fixed income – SSA	(2) >0 to 10%
(C) Fixed income – corporate	(2) >0 to 10%

# **STEWARDSHIP**

# **STEWARDSHIP**

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
00 8	CORE	Multiple, see guidance	Multiple indicators	PUBLIC	Stewardship	GENERAL
Does your org	ganisation conduct stew	ardship activities,	, excluding (proxy	) voting, for any of	your assets?	
		(1) Listed equity -	(2) Listed equity -	(3) Fixed income -	(4) Fixed income -	(11) Other

	equity - active	equity - passive	income - active	income - passive	(11) Other
(A) Yes, through internal staff					
(B) Yes, through service providers		Ø		Ø	
(C) Yes, through external managers					
(D) We do not conduct stewardship	•	0	•	0	•



# STEWARDSHIP: (PROXY) VOTING

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
00 9	CORE	Multiple, see guidance	Multiple indicators	PUBLIC	Stewardship: (Proxy) voting	GENERAL

# Does your organisation conduct (proxy) voting activities for any of your listed equity holdings?

	(1) Listed equity - active	(2) Listed equity - passive
(A) Yes, through internal staff		
(B) Yes, through service providers		
(C) Yes, through external managers		
(D) We do not conduct (proxy) voting	0	0

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
00 9.1	CORE	00 9	PGS 10.1, PGS 31	PUBLIC	Stewardship: (Proxy) voting	GENERAL

For each asset class, on what percentage of your listed equity holdings do you have the discretion to vote?

# Percentage of your listed equity holdings over which you have the discretion to vote

(A) Listed equity – active	(12) 100%
(B) Listed equity - passive	(12) 100%



## STEWARDSHIP NOT CONDUCTED

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 10	CORE	OO 8, OO 9	N/A	PUBLIC	Stewardship not conducted	2

## Describe why your organisation does not currently conduct stewardship and/or (proxy) voting.

Stewardship, excluding (proxy) voting

(A) Listed equity - active

WisdomTree does not have a dedicated stewardship team. Responsible investment is carried out by WisdomTree's investment managers.

(C) Fixed income - active

WisdomTree does not have a dedicated stewardship team. Responsible investment is carried out by WisdomTree's investment managers.

(K) Other

WisdomTree does not have a dedicated stewardship team. Responsible investment is carried out by WisdomTree's investment managers.

# **ESG INCORPORATION**

# **INTERNALLY MANAGED ASSETS**

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
00 11	CORE	Multiple, see guidance	Multiple indicators	PUBLIC	Internally managed assets	1

For each internally managed asset class, does your organisation incorporate ESG factors into your investment decisions?



# (1) Yes, we incorporate ESG factors into our investment decisions

# (2) No, we do not incorporate ESG factors into our investment decisions

(A) Listed equity - passive	•	0
(B) Listed equity - active - quantitative	•	0
(E) Fixed income - SSA	0	•
(F) Fixed income - corporate	0	•
(V) Other: Commodity & Currency, Leveraged & Inverse, Cryptocurrency, Alternatives	0	

# **ESG NOT INCORPORATED**

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 16	CORE	OO 11, OO 12- 14	N/A	PUBLIC	ESG not incorporated	1

Describe why your organisation does not currently incorporate ESG factors into your investment decisions.

Internally managed (E) Fixed income – SSA

WisdomTree recognizes the importance of incorporating responsible investing into its investment decision-making process. We are seeking to meet increased investor demand for environmental, social, and governance strategies that allow investors to incorporate their principles into portfolios without sacrificing investment performance.

In 2019, WisdomTree increased its commitment to exploring ESG and sustainability options for current and future investment strategies by engaging two third-party global organizations, Sustainalytics, a leader in ESG and Corporate Governance research and ratings and OWL Analytics, a data and indexing company that offers detailed data and metrics on the environmental, social, and governance characteristics of global equities. By integrating their company-level ESG research and ratings, we were able to shape sustainable investment strategies and implement the following enhancements to select Funds:

· Effective March 2020, WTAM restructured three Funds from passively managed to actively managed ESG strategies.



They are the WisdomTree U.S. ESG Fund (RESP), the WisdomTree International ESG Fund (RESD), and the WisdomTree Emerging Markets ESG Fund (RESE).

- Effective January 2021, WTAM began applying ESG screens to its ex-state-owned strategies, these include the WisdomTree Emerging Markets Ex-State-Owned Enterprises Fund (XSOE), the WisdomTree China Ex-State-Owned Enterprises Fund (CXSE), the WisdomTree India Ex-State-Owned Enterprises Fund (IXSE).
- · Effective March 2021, WTAM began applying ESG screens to the WisdomTree Cybersecurity Fund (WCBR).
- Effective August 2021, WTAM began applying ESG screens to the WisdomTree Cloud Computing Fund (WCLD).
- · On September 22, 2022, WTAM launched the WisdomTree Emerging Markets ex-China Fund (XC) which also applies ESG screens.

#### (F) Fixed income - corporate

WisdomTree recognizes the importance of incorporating responsible investing into its investment decision-making process. We are seeking to meet increased investor demand for environmental, social, and governance strategies that allow investors to incorporate their principles into portfolios without sacrificing investment performance.

In 2019, WisdomTree increased its commitment to exploring ESG and sustainability options for current and future investment strategies by engaging two third-party global organizations, Sustainalytics, a leader in ESG and Corporate Governance research and ratings and OWL Analytics, a data and indexing company that offers detailed data and metrics on the environmental, social, and governance characteristics of global equities. By integrating their company-level ESG research and ratings, we were able to shape sustainable investment strategies and implement the following enhancements to select Funds:

- Effective March 2020, WTAM restructured three Funds from passively managed to actively managed ESG strategies. They are the WisdomTree U.S. ESG Fund (RESP), the WisdomTree International ESG Fund (RESD), and the WisdomTree Emerging Markets ESG Fund (RESE).
- Effective January 2021, WTAM began applying ESG screens to its ex-state-owned strategies, these include the WisdomTree Emerging Markets Ex-State-Owned Enterprises Fund (XSOE), the WisdomTree China Ex-State-Owned Enterprises Fund (CXSE), the WisdomTree India Ex-State-Owned Enterprises Fund (IXSE).
- · Effective March 2021, WTAM began applying ESG screens to the WisdomTree Cybersecurity Fund (WCBR).
- · Effective August 2021, WTAM began applying ESG screens to the WisdomTree Cloud Computing Fund (WCLD).
- · On September 22, 2022, WTAM launched the WisdomTree Emerging Markets ex-China Fund (XC) which also applies ESG screens.

#### (O) Other

WisdomTree recognizes the importance of incorporating responsible investing into its investment decision-making process. We are seeking to meet increased investor demand for environmental, social, and governance strategies that allow investors to incorporate their principles into portfolios without sacrificing investment performance.

In 2019, WisdomTree increased its commitment to exploring ESG and sustainability options for current and future investment strategies by engaging two third-party global organizations, Sustainalytics, a leader in ESG and Corporate Governance research and ratings and OWL Analytics, a data and indexing company that offers detailed data and metrics on the environmental, social, and governance characteristics of global equities. By integrating their company-level ESG research and ratings, we were able to shape sustainable investment strategies and implement the following enhancements to select Funds:

· Effective March 2020, WTAM restructured three Funds from passively managed to actively managed ESG strategies.



They are the WisdomTree U.S. ESG Fund (RESP), the WisdomTree International ESG Fund (RESD), and the WisdomTree Emerging Markets ESG Fund (RESE).

- · Effective January 2021, WTAM began applying ESG screens to its ex-state-owned strategies, these include the WisdomTree Emerging Markets Ex-State-Owned Enterprises Fund (XSOE), the WisdomTree China Ex-State-Owned Enterprises Fund (XSOE), the WisdomTree India Ex-State-Owned Enterprises Fund (IXSE).
- · Effective March 2021, WTAM began applying ESG screens to the WisdomTree Cybersecurity Fund (WCBR).
- · Effective August 2021, WTAM began applying ESG screens to the WisdomTree Cloud Computing Fund (WCLD).
- · On September 22, 2022, WTAM launched the WisdomTree Emerging Markets ex-China Fund (XC) which also applies ESG screens.

# **ESG STRATEGIES**

# **LISTED EQUITY**

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
00 17 LE	CORE	00 11	OO 17.1 LE, LE 12	PUBLIC	Listed equity	1

Which ESG incorporation approach and/or combination of approaches does your organisation apply to your internally managed active listed equity?

## Percentage out of total internally managed active listed equity

(A) Screening alone	0%
(B) Thematic alone	0%
(C) Integration alone	0%
(D) Screening and integration	>0-10%
(E) Thematic and integration	0%
(F) Screening and thematic	0%
(G) All three approaches combined	0%
(H) None	>75%



Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
00 17.1 LE	CORE	00 17 LE	LE 9	PUBLIC	Listed equity	1

What type of screening does your organisation use for your internally managed active listed equity assets where a screening approach is applied?

	Percentage coverage out of your total listed equity assets where a screening approach is applied
(A) Positive/best-in-class screening only	0%
(B) Negative screening only	>75%
(C) A combination of screening approaches	0%

# **ESG/SUSTAINABILITY FUNDS AND PRODUCTS**

# LABELLING AND MARKETING

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 18	CORE	OO 11–14	OO 18.1	PUBLIC	Labelling and marketing	1

## Do you explicitly market any of your products and/or funds as ESG and/or sustainable?

(A) Yes, we market products and/or funds as ESG and/or sustainable Provide the percentage of AUM that your ESG and/or sustainability-marketed products or funds represent:

>0-10%

- o (B) No, we do not offer products or funds explicitly marketed as ESG and/or sustainable
- o (C) Not applicable; we do not offer products or funds



Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 18.1	CORE	OO 18	OO 18.2	PUBLIC	Labelling and marketing	1

Do any of your ESG and/or sustainability-marketed products and/or funds hold formal ESG and/or RI certification(s) or label(s) awarded by a third party?

- o (A) Yes, our ESG and/or sustainability-marketed products and/or funds hold formal labels or certifications
- (B) No, our ESG and/or sustainability-marketed products and/or funds do not hold formal labels or certifications

#### PASSIVE INVESTMENTS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 19	CORE	OO 5.3 FI, OO 11	LE 8, FI 10	PUBLIC	Passive investments	1

What percentage of your total internally managed passive listed equity and/or fixed income passive AUM utilise an ESG index or benchmark?

Percentage of AUM that utilise an ESG index or benchm	ıark
-------------------------------------------------------	------

(A) Listed equity - passive 0%

# **SUMMARY OF REPORTING REQUIREMENTS**

# SUMMARY OF REPORTING REQUIREMENTS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 21	CORE	Multiple indicators	Multiple indicators	PUBLIC	Summary of reporting requirements	GENERAL

The following table shows which modules are mandatory or voluntary to report on in the separate PRI asset class modules. Where a module is voluntary, indicate if you wish to report on it.



Applicable modules	<ol><li>(1) Mandatory to report (pre-filled based on previous responses)</li></ol>	(2.1) Voluntary to report. Yes, I want to opt-in to reporting on the module	to No, I want to opt-out of	
Policy, Governance and Strategy	•	0	0	
Confidence Building Measures	•	0	0	
(A) Listed equity – passive	•	0	0	
(B) Listed equity – active – quantitative	•	0	0	

# **SUBMISSION INFORMATION**

# REPORT DISCLOSURE

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
00 32	CORE	00 3, 00 31	N/A	PUBLIC	Report disclosure	GENERAL

How would you like to disclose the detailed percentage figures you reported throughout the Reporting Framework?

- o (A) Publish as absolute numbers



# POLICY, GOVERNANCE AND STRATEGY (PGS)

# **POLICY**

# RESPONSIBLE INVESTMENT POLICY ELEMENTS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 1	CORE	OO 8, OO 9	Multiple indicators	PUBLIC	Responsible investment policy elements	1, 2

#### Which elements are covered in your formal responsible investment policy(ies)?

- ☑ (A) Overall approach to responsible investment
- ☑ (B) Guidelines on environmental factors
- ☑ (C) Guidelines on social factors
- ☑ (D) Guidelines on governance factors
- ☑ (E) Guidelines on sustainability outcomes
- ☑ (F) Guidelines tailored to the specific asset class(es) we hold
- **☑** (G) Guidelines on exclusions
- ☑ (H) Guidelines on managing conflicts of interest related to responsible investment
- ☐ (I) Stewardship: Guidelines on engagement with investees
- ☐ (J) Stewardship: Guidelines on overall political engagement
- $\square$  (K) Stewardship: Guidelines on engagement with other key stakeholders
- ☑ (L) Stewardship: Guidelines on (proxy) voting
- $\ \square$  (M) Other responsible investment elements not listed here
- o (N) Our organisation does not have a formal responsible investment policy and/or our policy(ies) do not cover any responsible investment elements

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 2	CORE	PGS 1	Multiple, see guidance	PUBLIC	Responsible investment policy elements	1

#### Does your formal responsible investment policy(ies) include specific guidelines on systematic sustainability issues?

- ☐ (A) Specific guidelines on climate change (may be part of guidelines on environmental factors)
- ☑ (B) Specific guidelines on human rights (may be part of guidelines on social factors)
- ☑ (C) Specific guidelines on other systematic sustainability issues Specify:



Certain WisdomTree strategies seek to exclude from the eligible investment universe companies that violate certain commonly accepted international norms and standards, such as United Nations and OECD guidelines, are involved in controversial weapons, significantly involved in the tobacco industry, thermal coal activity, unconventional oil and gas exploration/production or small arms.

o (D) Our formal responsible investment policy(ies) does not include quidelines on systematic sustainability issues

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 3	CORE	PGS 1, PGS 2	N/A	PUBLIC	Responsible investment policy elements	6

#### Which elements of your formal responsible investment policy(ies) are publicly available?

(A) Overall approach to responsible investment Add link:

https://resources.wisdomtree.com/corporate-social-responsibility/responsible-investing

☑ (B) Guidelines on environmental factors

Add link:

https://resources.wisdomtree.com/corporate-social-responsibility/responsible-investing

☑ (C) Guidelines on social factors

Add link:

https://resources.wisdomtree.com/corporate-social-responsibility/responsible-investing

☑ (D) Guidelines on governance factors

Add link:

https://resources.wisdomtree.com/corporate-social-responsibility/responsible-investing

☑ (E) Guidelines on sustainability outcomes

Add link:

https://resources.wisdomtree.com/corporate-social-responsibility/responsible-investing

- ☐ (F) Specific guidelines on climate change (may be part of guidelines on environmental factors)
- ☑ (G) Specific guidelines on human rights (may be part of guidelines on social factors)
  Add link:

https://resources.wisdomtree.com/corporate-social-responsibility/employee-wellness

- $\ \square$  (H) Specific guidelines on other systematic sustainability issues
- (I) Guidelines tailored to the specific asset class(es) we hold Add link:

https://www.wisdomtree.eu/en-gb/strategies/responsible-investing

☑ (J) Guidelines on exclusions

Add link:

https://www.wisdomtree.eu/en-gb/strategies/responsible-investing

(K) Guidelines on managing conflicts of interest related to responsible investment



#### Add link:

https://www.wisdomtree.eu/-/media/eu-media-files/other-documents/regulatory/policies/wte-proxy-voting-policy.pdf?sc\_lang=en-ie&hash=B8CEB0B7733CEB2463828312D63FBFD1

# (O) Stewardship: Guidelines on (proxy) voting

Add link:

https://resources.wisdomtree.com/corporate-social-responsibility/governance

o (Q) No elements of our formal responsible investment policy(ies) are publicly available

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 5	CORE	PGS 1	N/A	PUBLIC	Responsible investment policy elements	2

#### Which elements are covered in your organisation's policy(ies) or guidelines on stewardship?

☐ (A) Overall stewardship objectives
☐ (B) Prioritisation of specific ESG factors to be advanced via stewardship activities
□ (C) Criteria used by our organisation to prioritise the investees, policy makers, key stakeholders, or other entities on which to
focus our stewardship efforts
(D) How different stay and ship tools and activities are used somes the argenization

 $\hfill\square$  (D) How different stewardship tools and activities are used across the organisation

 $\square$  (E) Approach to escalation in stewardship

 $\square$  (F) Approach to collaboration in stewardship

 $\square$  (G) Conflicts of interest related to stewardship

 $\Box$  (H) How stewardship efforts and results are communicated across the organisation to feed into investment decision-making and vice versa

#### ☑ (I) Other

Specify:

WisdomTree Europe adopts an active ownership policy through our sub-advisers, Irish Life Investment Management and Assenagon, to whom engagement activities are outsourced

https://www.ilim.com/media/2146/ilim-engagement-policy.pdf

https://www.assenagon.com/fileadmin/footer/Assenagon Engagement and Voting Policy.pdf

 $https://www.wisdomtree.eu/-/media/eu-media-files/other-documents/regulatory/policies/wte-proxy-voting-policy.pdf?sc\_lang=en-ie\&hash=B8CEB0B7733CEB2463828312D63FBFD1\\$ 

o (J) None of the above elements is captured in our policy(ies) or guidelines on stewardship

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 6	CORE	PGS 1	N/A	PUBLIC	Responsible investment policy elements	2



## Does your policy on (proxy) voting include voting principles and/or guidelines on specific ESG factors?

- ☑ (A) Yes, it includes voting principles and/or guidelines on specific environmental factors
- ☑ (B) Yes, it includes voting principles and/or guidelines on specific social factors
- ☑ (C) Yes, it includes voting principles and/or guidelines on specific governance factors
- o (D) Our policy on (proxy) voting does not include voting principles or guidelines on specific ESG factors

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 7	CORE	OO 9	N/A	PUBLIC	Responsible investment policy elements	2

#### Does your organisation have a policy that states how (proxy) voting is addressed in your securities lending programme?

- o (A) We have a publicly available policy to address (proxy) voting in our securities lending programme
- o (C) We rely on the policy of our external service provider(s)
- o (D) We do not have a policy to address (proxy) voting in our securities lending programme
- o (E) Not applicable; we do not have a securities lending programme

#### RESPONSIBLE INVESTMENT POLICY COVERAGE

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 8	CORE	PGS 1	N/A	PUBLIC	Responsible investment policy coverage	1

## What percentage of your total AUM is covered by the below elements of your responsible investment policy(ies)?

## Combined AUM coverage of all policy elements

<ul> <li>(A) Overall approach to responsible investment</li> <li>(B) Guidelines on environmental factors</li> <li>(C) Guidelines on social factors</li> <li>(D) Guidelines on governance factors</li> </ul>	(1) 50% or less



Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 9	CORE	PGS 2	N/A	PUBLIC	Responsible investment policy coverage	1

What proportion of your AUM is covered by your formal policies or guidelines on climate change, human rights, or other systematic sustainability issues?

(3) for a minority of our AUM	
(3) for a minority of our AUM	

**AUM** coverage

(C) Specific guidelines on other systematic sustainability issues	(3) for a minority of our AUM

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 10	CORE	OO 8, OO 9, PGS 1	N/A	PUBLIC	Responsible investment policy coverage	2

Per asset class, what percentage of your AUM is covered by your policy(ies) or guidelines on stewardship with investees?

#### ☑ (A) Listed equity

(1) Percentage of AUM covered

(A) Specific guidelines on climate

(B) Specific guidelines on human

change

rights

- **(1)** >0% to 10%
- o (2) >10% to 20%
- o (3) >20% to 30%
- o (4) >30% to 40%
- o (5) >40% to 50%
- o (6) >50% to 60%
- o (7) >60% to 70%
- (8) >70% to 80%
- o (9) >80% to 90%
- o (10) >90% to <100%
- o (11) 100%
- (2) If your AUM coverage is below 100%, explain why: (Voluntary)
- ☑ (B) Fixed income



#### (1) Percentage of AUM covered

- **(1) >0% to 10%**
- o (2) >10% to 20%
- o (3) >20% to 30%
- o (4) >30% to 40%
- o (5) >40% to 50%
- o (6) >50% to 60%
- o (7) >60% to 70%
- o (8) >70% to 80%
- o (9) >80% to 90%
- o (10) >90% to <100%
- o (11) 100%
- (2) If your AUM coverage is below 100%, explain why: (Voluntary)

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 10.1	CORE	OO 9.1, PGS 1	N/A	PUBLIC	Responsible investment policy coverage	2

# What percentage of your listed equity holdings is covered by your guidelines on (proxy) voting?

## (A) Actively managed listed equity

- (1) Percentage of your listed equity holdings over which you have the discretion to vote
  - o (1) >0% to 10%
  - o (2) >10% to 20%
  - o (3) >20% to 30%
  - o (4) >30% to 40%
  - o (5) >40% to 50%
  - o (6) >50% to 60%
  - o (7) >60% to 70%
  - o (8) >70% to 80%
  - o (9) >80% to 90%
  - o (10) >90% to <100%
  - **(11) 100%**

# ☑ (B) Passively managed listed equity

- (1) Percentage of your listed equity holdings over which you have the discretion to vote
  - o (1) >0% to 10%
  - o (2) >10% to 20%
  - o (3) >20% to 30%
  - o (4) >30% to 40%
  - o (5) >40% to 50%
  - o (6) >50% to 60%
  - o (7) >60% to 70%
  - o (8) >70% to 80%
  - o (9) >80% to 90%
  - o (10) >90% to <100%
  - **(11) 100%**

# **GOVERNANCE**

# **ROLES AND RESPONSIBILITIES**

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 11	CORE	N/A	Multiple indicators	PUBLIC	Roles and responsibilities	1

Which senior level body(ies) or role(s) in your organisation have formal oversight over and accountability for responsible investment?

☑ (A) Board members, trustees, or equivalent

☑ (B) Senior executive-level staff, or equivalent Specify:

COO, Global CIO

☑ (C) Investment committee, or equivalent

Specify:

European Product Governance Committee and European Product Innovation and Development Committee

☑ (D) Head of department, or equivalent

Specify department:

Head of US Product Development & ESG, Head of Europe Product Development & ESG, Head of US Indexes

o (E) None of the above bodies and roles have oversight over and accountability for responsible investment

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 11.1	CORE	PGS 1, PGS 2, PGS 11	N/A	PUBLIC	Roles and responsibilities	1, 2

Does your organisation's senior level body(ies) or role(s) have formal oversight over and accountability for the elements covered in your responsible investment policy(ies)?



# (1) Board members, trustees, or equivalent

# (2) Senior executive-level staff, investment committee, head of department, or equivalent

(A) Overall approach to responsible investment	☑	☑
(B) Guidelines on environmental, social and/or governance factors	☑	☑
(C) Guidelines on sustainability outcomes		
(D) Specific guidelines on climate change (may be part of guidelines on environmental factors)		
(E) Specific guidelines on human rights (may be part of guidelines on social factors)		
(F) Specific guidelines on other systematic sustainability issues	☑	☑
(G) Guidelines tailored to the specific asset class(es) we hold		
(H) Guidelines on exclusions		
(I) Guidelines on managing conflicts of interest related to responsible investment		☑
(M) Stewardship: Guidelines on (proxy) voting		
(N) This role has no formal oversight over and accountability for any of the above elements covered in our responsible investment policy(ies)	0	0



Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 11.2	CORE	N/A	N/A	PUBLIC	Roles and responsibilities	1-6

Does your organisation have governance processes or structures to ensure that your overall political engagement is aligned with your commitment to the principles of PRI, including any political engagement conducted by third parties on your behalf?

## (A) Yes

Describe how you do this:

Political contributions by corporations to candidates are regulated, and may be prohibited, by the election laws of the applicable jurisdiction. Accordingly, it is WisdomTree's policy to not use company funds to make contributions for political purposes where such contributions are not permitted by the laws of the applicable jurisdiction. Any such contributions, where permitted, must be reviewed and approved by the Chief Legal Officer in advance.

In addition, U.S.-based employees of WisdomTree must follow the procedures and reporting requirements of the firm's Political Contributions Policy when making personal political contributions, which includes the requirement to pre-clear any such contributions with the firm's compliance team.

- o (B) No
- o (C) Not applicable, our organisation does not conduct any form of political engagement directly or through any third parties

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 12	CORE	N/A	N/A	PUBLIC	Roles and responsibilities	1

In your organisation, which internal or external roles are responsible for implementing your approach to responsible investment?

# ☑ (A) Internal role(s)

Specify:

Individuals in our Product Development & ESG team, Research and Index team

(B) External investment managers, service providers, or other external partners or suppliers Specify:

Proxy voting is performed by our sub-advisers, Mellon Investments Corporation, Irish Life Investment Management, Assenagon

o (C) We do not have any internal or external roles with responsibility for implementing responsible investment



Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 13	CORE	PGS 11	N/A	PUBLIC	Roles and responsibilities	1

Does your organisation use responsible investment KPIs to evaluate the performance of your board members, trustees, or equivalent?

- o (A) Yes, we use responsible investment KPIs to evaluate the performance of our board members, trustees, or equivalent
- (B) No, we do not use responsible investment KPIs to evaluate the performance of our board members, trustees, or equivalent

Explain why: (Voluntary)

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 14	CORE	PGS 11	N/A	PUBLIC	Roles and responsibilities	1

Does your organisation use responsible investment KPIs to evaluate the performance of your senior executive-level staff (or equivalent), and are these KPIs linked to compensation?

- o (A) Yes, we use responsible investment KPIs to evaluate the performance of our senior executive-level staff (or equivalent)

Explain why: (Voluntary)

#### **EXTERNAL REPORTING AND DISCLOSURES**

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 16	CORE	N/A	N/A	PUBLIC	External reporting and disclosures	6

What elements are included in your regular reporting to clients and/or beneficiaries for the majority of your AUM?

- ☑ (A) Any changes in policies related to responsible investment
- ☑ (B) Any changes in governance or oversight related to responsible investment
- ☐ (C) Stewardship-related commitments
- $\square$  (D) Progress towards stewardship-related commitments
- $\square$  (E) Climate–related commitments
- ☐ (F) Progress towards climate—related commitments
- ☐ (G) Human rights—related commitments
- $\square$  (H) Progress towards human rights–related commitments
- $\square$  (I) Commitments to other systematic sustainability issues



 $\square$  (J) Progress towards commitments on other systematic sustainability issues

o (K) We do not include any of these elements in our regular reporting to clients and/or beneficiaries for the majority of our AUM

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 17	CORE	N/A	N/A	PUBLIC	External reporting and disclosures	6

During the reporting year, did your organisation publicly disclose climate-related information in line with the Task Force on Climate-Related Financial Disclosures' (TCFD) recommendations?

$\square$ (A) Yes, including all governance-related recommended disclosu	sures
--------------------------------------------------------------------------	-------

- ☐ (B) Yes, including all strategy-related recommended disclosures
- ☐ (C) Yes, including all risk management–related recommended disclosures
- $\square$  (D) Yes, including all applicable metrics and targets-related recommended disclosures

Explain why: (Voluntary)

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 19	CORE	N/A	N/A	PUBLIC	External reporting and disclosures	6

During the reporting year, did your organisation publicly disclose its membership in and support for trade associations, think tanks or similar bodies that conduct any form of political engagement?

- (A) Yes, we publicly disclosed our membership in and support for trade associations, think tanks, or similar bodies that conduct any form of political engagement
- o (B) No, we did not publicly disclose our membership in and support for trade associations, think tanks, or similar bodies that conduct any form of political engagement
- **●** (C) Not applicable, we were not members in or supporters of any trade associations, think tanks, or similar bodies that conduct any form of political engagement during the reporting year



# **STRATEGY**

# CAPITAL ALLOCATION

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 20	CORE	N/A	N/A	PUBLIC	Capital allocation	1

#### Which elements do your organisation-level exclusions cover?

□ (A)	Exclusions based	on our organisation's	values or beliefs	regarding particular	sectors, pro	oducts or services
-------	------------------	-----------------------	-------------------	----------------------	--------------	--------------------

 $\square$  (D) Exclusions based on our organisation's climate change commitments

☐ (E) Other elements

(F) Not applicable; our organisation does not have any organisation-level exclusions

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 21	CORE	N/A	N/A	PUBLIC	Capital allocation	1

#### How does your responsible investment approach influence your strategic asset allocation process?

 $\ensuremath{\square}$  (A) We incorporate ESG factors into our assessment of expected asset class risks and returns

Select from dropdown list:

- o (1) for all of our AUM subject to strategic asset allocation
- o (2) for a majority of our AUM subject to strategic asset allocation
- (3) for a minority of our AUM subject to strategic asset allocation
- $\Box$  (B) We incorporate climate change–related risks and opportunities into our assessment of expected asset class risks and returns
- ☐ (C) We incorporate human rights—related risks and opportunities into our assessment of expected asset class risks and returns
- □ (D) We incorporate risks and opportunities related to other systematic sustainability issues into our assessment of expected asset class risks and returns
- o (E) We do not incorporate ESG factors, climate change, human rights or other systematic sustainability issues into our assessment of expected asset class risks and returns
- o (F) Not applicable; we do not have a strategic asset allocation process



<sup>☐ (</sup>B) Exclusions based on our organisation's values or beliefs regarding particular regions or countries

 $<sup>\</sup>Box$  (C) Exclusions based on minimum standards of business practice aligned with international norms such as the OECD Guidelines for Multinational Enterprises, the International Bill of Human Rights, UN Security Council sanctions or the UN Global Compact

# STEWARDSHIP: OVERALL STEWARDSHIP STRATEGY

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 22	CORE	OO 8, OO 9	N/A	PUBLIC	Stewardship: Overall stewardship strategy	2

For the majority of AUM within each asset class, which of the following best describes your primary stewardship objective?

	(1) Listed equity	(2) Fixed income
(A) Maximise our portfolio-level risk-adjusted returns. In doing so, we seek to address any risks to overall portfolio performance caused by individual investees' contribution to systematic sustainability issues.	0	0
(B) Maximise our individual investments' risk-adjusted returns. In doing so, we do not seek to address any risks to overall portfolio performance caused by individual investees' contribution to systematic sustainability issues.		

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 24	CORE	OO 8, OO 9	N/A	PUBLIC	Stewardship: Overall stewardship strategy	2

Which of the following best describes your organisation's default position, or the position of the external service providers or external managers acting on your behalf, concerning collaborative stewardship efforts?

- $\circ$  (A) We recognise the value of collective action, and as a result, we prioritise collaborative stewardship efforts wherever possible
- (B) We collaborate on a case-by-case basis
- o (C) Other
- o (D) We do not join collaborative stewardship efforts



# STEWARDSHIP: (PROXY) VOTING

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 29	CORE	OO 9, PGS 1	N/A	PUBLIC	Stewardship: (Proxy) voting	2

# When you use external service providers to give recommendations, how do you ensure those recommendations are consistent with your organisation's (proxy) voting policy?

- $\Box$  (A) Before voting is executed, we review external service providers' voting recommendations for controversial and high-profile votes
- $\Box$  (B) Before voting is executed, we review external service providers' voting recommendations where the application of our voting policy is unclear
- $\Box$  (C) We ensure consistency with our voting policy by reviewing external service providers' voting recommendations only after voting has been executed
- o (D) We do not review external service providers' voting recommendations
- (E) Not applicable; we do not use external service providers to give voting recommendations

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 30	CORE	00 9	N/A	PUBLIC	Stewardship: (Proxy) voting	2

## How is voting addressed in your securities lending programme?

- o (A) We recall all securities for voting on all ballot items
- o (B) When a vote is deemed important according to pre-established criteria (e.g. high stake in the company), we recall all our securities for voting
- o (C) Other
- (D) We do not recall our securities for voting purposes
- o (E) Not applicable; we do not have a securities lending programme

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 31	CORE	OO 9.1	N/A	PUBLIC	Stewardship: (Proxy) voting	2



For the majority of votes cast over which you have discretion to vote, which of the following best describes your decision making approach regarding shareholder resolutions (or that of your external service provider(s) if decision making is delegated to them)?

- o (A) We vote in favour of resolutions expected to advance progress on our stewardship priorities, including affirming a company's good practice or prior commitment
- o (B) We vote in favour of resolutions expected to advance progress on our stewardship priorities, but only if the investee company has not already publicly committed to the action(s) requested in the proposal
- (C) We vote in favour of shareholder resolutions only as an escalation measure
- o (D) We vote in favour of the investee company management's recommendations by default
- o (E) Not applicable; we do not vote on shareholder resolutions

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 32	CORE	OO 9	N/A	PUBLIC	Stewardship: (Proxy) voting	2

During the reporting year, how did your organisation, or your external service provider(s), pre-declare voting intentions prior to voting in annual general meetings (AGMs) or extraordinary general meetings (EGMs)?

☑ (A) We pre-declared our voting intentions publicly through the PRI's vote declaration system on the Resolution Database

- ☐ (B) We pre-declared our voting intentions publicly by other means, e.g. through our website
- ☑ (C) We privately communicated our voting decision to investee companies prior to the AGM/EGM
- o (D) We did not privately or publicly communicate our voting intentions prior to the AGM/EGM
- o (E) Not applicable; we did not cast any (proxy) votes during the reporting year

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 33	CORE	00 9	PGS 33.1	PUBLIC	Stewardship: (Proxy) voting	2

After voting has taken place, do you publicly disclose your (proxy) voting decisions or those made on your behalf by your external service provider(s), company by company and in a central source?

- o (A) Yes, for all (proxy) votes
- o (B) Yes, for the majority of (proxy) votes
- (C) Yes, for a minority of (proxy) votes Add link(s):

https://www.wisdomtree.eu/en-gb/proxy-voting-dashboard https://www.mellon.com/insights/insights-articles/proxy-voting-report-spring-2023.html https://www.mellon.com/insights/insights-articles/2022-semi-annual-proxy-voting-report.html



Explain why you only publicly disclose a minority of (proxy) voting decisions:

The proxy voting decisions for our European funds are made available through a proxy voting dashboard. In the U.S., our sub-adviser, Mellon, discloses a minority of proposal votes through their proxy reports, however this does not include all proposals for all companies. Additionally, we disclose votes through the Securities & Exchange Commission's required N-PX filings.

o (D) No, we do not publicly report our (proxy) voting decisions company-by-company and in a central source

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 33.1	CORE	PGS 33	N/A	PUBLIC	Stewardship: (Proxy) voting	2

In the majority of cases, how soon after an investee's annual general meeting (AGM) or extraordinary general meeting (EGM) do you publish your voting decisions?

- o (A) Within one month of the AGM/EGM
- $\circ$  (B) Within three months of the AGM/EGM
- o (C) Within six months of the AGM/EGM
- (D) Within one year of the AGM/EGM
- o (E) More than one year after the AGM/EGM

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 34	CORE	OO 9	N/A	PUBLIC	Stewardship: (Proxy) voting	2

After voting has taken place, did your organisation, and/or the external service provider(s) acting on your behalf, communicate the rationale for your voting decisions during the reporting year?

	(1) In cases where we abstained or voted against management recommendations	(2) In cases where we voted against an ESG-related shareholder resolution	
(A) Yes, we publicly disclosed the rationale	(3) for a minority of votes	(3) for a minority of votes	
(B) Yes, we privately communicated the rationale to the company	(3) for a minority of votes	(3) for a minority of votes	



(D) Not applicable; we did not	Ve did not publicly or privately nunicate the rationale, or we ot track this information	0	0	
abstain or vote against management recommendations or ESG-related shareholder resolutions during the reporting year	ain or vote against agement recommendations or -related shareholder	0	0	

# (A) Yes, we publicly disclosed the rationale - Add link(s):

https://www.wisdomtree.eu/en-gb/proxy-voting-dashboard

# STEWARDSHIP: ESCALATION

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 36	CORE	OO 8, OO 9	N/A	PUBLIC	Stewardship: Escalation	2

For your listed equity holdings, what escalation measures did your organisation, or the external investment managers or service providers acting on your behalf, use in the past three years?

# (A) Joining or broadening an existing collaborative engagement or creating a new one (B) Filing, co-filing, and/or submitting a shareholder resolution or proposal (C) Publicly engaging the entity, e.g. signing an open letter (D) Voting against the re-election of one or more board directors



equity holdings  (H) Other - (1) Listed equity - Specify:		
(I) In the past three years, we did not use any of the above escalation measures for our listed	0	
(H) Other		
(G) Litigation		
(F) Divesting		
(E) Voting against the chair of the board of directors, or equivalent, e.g. lead independent director		

Vote pre-declaration

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 37	CORE	Multiple, see guidance	N/A	PUBLIC	Stewardship: Escalation	2

For your corporate fixed income assets, what escalation measures did your organisation, or the external investment

managers or service providers acting on your behalf, use in the past three years?
$\square$ (A) Joining or broadening an existing collaborative engagement or creating a new one
☐ (B) Publicly engaging the entity, e.g. signing an open letter
□ (C) Not investing
□ (D) Reducing exposure to the investee entity
□ (E) Divesting
☐ (F) Litigation
☐ (G) Other
(H) In the past three years, we did not use any of the above escalation measures for our corporate fixed income
assets
Explain why: (\langle olumina)

Explain why: (Voluntary)



#### STEWARDSHIP: ENGAGEMENT WITH POLICY MAKERS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 39	CORE	OO 8, OO 9	PGS 39.1, PGS 39.2	PUBLIC	Stewardship: Engagement with policy makers	2

Did your organisation, or the external investment managers or service providers acting on your behalf, engage with policy makers as part of your responsible investment approach during the reporting year?

- $\square$  (A) Yes, we engaged with policy makers directly
- $\Box$  (B) Yes, we engaged with policy makers through the leadership of or active participation in working groups or collaborative initiatives, including via the PRI
- □ (C) Yes, we were members of, supported, or were in another way affiliated with third party organisations, including trade associations and non-profit organisations, that engage with policy makers, excluding the PRI
- (D) We did not engage with policy makers directly or indirectly during the reporting year beyond our membership in the PRI

Explain why: (Voluntary)

#### **CLIMATE CHANGE**

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 41	CORE	N/A	PGS 41.1	PUBLIC	Climate change	General

#### Has your organisation identified climate-related risks and opportunities affecting your investments?

#### ☑ (A) Yes, within our standard planning horizon

Specify the risks and opportunities identified and your relevant standard planning horizon:

Certain WisdomTree strategies seek to exclude from the eligible investment universe companies that violate certain commonly accepted international norms and standards, such as United Nations and OECD guidelinesor are significantly involved in thermal coal activity or unconventional oil and gas exploration/production.

- ☐ (B) Yes, beyond our standard planning horizon
- o (C) No, we have not identified climate-related risks and/or opportunities affecting our investments

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 41.1	CORE	PGS 41	N/A	PUBLIC	Climate change	General



# Does your organisation integrate climate-related risks and opportunities affecting your investments in its overall investment strategy, financial planning and (if relevant) products?

(A) Yes, our overall investment strategy, financial planning and (if relevant) products integrate climate-related risks and opportunities

Describe how climate-related risks and opportunities have affected or are expected to affect your investment strategy, financial planning and (if relevant) products:

Certain WisdomTree strategies seek to exclude from the eligible investment universe companies that violate certain commonly accepted international norms and standards, such as United Nations and OECD guidelinesor are significantly involved in thermal coal activity or unconventional oil and gas exploration/production.

o (B) No, our organisation has not yet integrated climate-related risks and opportunities into its investment strategy, financial planning and (if relevant) products

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 43	CORE	N/A	N/A	PUBLIC	Climate change	General

Has your organisation assessed the resilience of its investment strategy in different climate scenarios, including one in which the average temperature rise is held to below 2 degrees Celsius (preferably to 1.5 degrees Celsius) above preindustrial levels?

- $\square$  (A) Yes, using the Inevitable Policy Response Forecast Policy Scenario (FPS) or Required Policy Scenario (RPS)
- $\square$  (B) Yes, using the One Earth Climate Model scenario
- ☐ (C) Yes, using the International Energy Agency (IEA) Net Zero scenario
- $\square$  (D) Yes, using other scenarios
- (E) No, we have not assessed the resilience of our investment strategy in different climate scenarios, including one that holds temperature rise to below 2 degrees

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 44	CORE	N/A	N/A	PUBLIC	Climate change	General

Does your organisation have a process to identify, assess, and manage the climate-related risks (potentially) affecting your investments?

- $\square$  (A) Yes, we have a process to identify and assess climate-related risks
- $\square$  (B) Yes, we have a process to manage climate-related risks
- (C) No, we do not have any processes to identify, assess, or manage the climate-related risks affecting our investments

Explain why: (Voluntary)



Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 45	CORE	N/A	N/A	PUBLIC	Climate change	General

During the reporting year, which of the following climate risk metrics or variables affecting your investments did your organisation use and disclose?

	(A)	Exposure	to	physical	risk
--	-----	----------	----	----------	------

 $\square$  (B) Exposure to transition risk

 $\square$  (C) Internal carbon price

 $\square$  (D) Total carbon emissions

 $\square$  (E) Weighted average carbon intensity

 $\square$  (F) Avoided emissions

☐ (G) Implied Temperature Rise (ITR)

 $\square$  (H) Non-ITR measure of portfolio alignment with UNFCCC Paris Agreement goals

□ (I) Proportion of assets or other business activities aligned with climate-related opportunities

 $\square$  (J) Other metrics or variables

(K) Our organisation did not use or disclose any climate risk metrics or variables affecting our investments during the reporting year

Explain why: (Voluntary)

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 46	CORE	N/A	N/A	PUBLIC	Climate change	General

During the reporting year, did your organisation disclose its Scope 1, Scope 2, and/or Scope 3 greenhouse gas emissions?

	(A)	) Scor	pe 1	emi	ssions
--	-----	--------	------	-----	--------

☐ (B) Scope 2 emissions

☐ (C) Scope 3 emissions (including financed emissions)

● (D) Our organisation did not disclose its Scope 1, Scope 2, or Scope 3 greenhouse gas emissions during the reporting year



#### SUSTAINABILITY OUTCOMES

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 47	CORE	N/A	Multiple indicators	PUBLIC	Sustainability outcomes	1, 2

Has your organisation identified the intended and unintended sustainability outcomes connected to its investment activities?

- (A) Yes, we have identified one or more specific sustainability outcomes connected to our investment activities
- o (B) No, we have not yet identified the sustainability outcomes connected to any of our investment activities

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 47.1	CORE	PGS 47	N/A	PUBLIC	Sustainability outcomes	1, 2

Which widely recognised frameworks has your organisation used to identify the intended and unintended sustainability outcomes connected to its investment activities?

Sustainable Finance Disclosures Regulation (SFDR)

- $\square$  (L) Other sectoral/issue-specific framework(s)
- o (M) Our organisation did not use any widely recognised frameworks to identify the intended and unintended sustainability outcomes connected to its investment activities



Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 47.2	CORE	PGS 47	PGS 48	PUBLIC	Sustainability outcomes	1, 2

What are the primary methods that your organisation has used to determine the most important intended and unintended sustainability outcomes connected to its investment activities?

☑ (A) Identify sustainability outcomes that are closely linked to our core investment activities
☐ (B) Consult with key clients and/or beneficiaries to align with their priorities
☐ (C) Assess which actual or potential negative outcomes for people are most severe based on their scale, scope, and
irremediable character
☐ (D) Identify sustainability outcomes that are closely linked to systematic sustainability issues
☐ (E) Analyse the input from different stakeholders (e.g. affected communities, civil society, trade unions or similar)
☐ (F) Understand the geographical relevance of specific sustainability outcome objectives
☐ (G) Other method
<ul> <li>(H) We have not yet determined the most important sustainability outcomes connected to our investment activities</li> </ul>

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 48	CORE	PGS 47.2	PGS 48.1, SO 1	PUBLIC	Sustainability outcomes	1, 2

Has your organisation taken action on any specific sustainability outcomes connected to its investment activities, including to prevent and mitigate actual and potential negative outcomes?

- o (A) Yes, we have taken action on some of the specific sustainability outcomes connected to our investment activities
- (B) No, we have not yet taken action on any specific sustainability outcomes connected to our investment activities Explain why not:

We have not taken action on any specific sustainability actions, but may consider this in the future



# LISTED EQUITY (LE)

## **OVERALL APPROACH**

#### **MATERIALITY ANALYSIS**

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
LE 1	CORE	00 21	N/A	PUBLIC	Materiality analysis	1

Does your organisation have a formal investment process to identify and incorporate material ESG factors across your listed equity strategies?

	(1) Passive equity	(2) Active - quantitative	
(A) Yes, our investment process incorporates material governance factors	(3) for a minority of our AUM	(3) for a minority of our AUM	
(B) Yes, our investment process incorporates material environmental and social factors	(3) for a minority of our AUM	(3) for a minority of our AUM	
(C) Yes, our investment process incorporates material ESG factors beyond our organisation's average investment holding period			
(D) No, we do not have a formal process. Our investment professionals identify material ESG factors at their discretion	0	o	
(E) No, we do not have a formal or informal process to identify and incorporate material ESG factors	0	0	



### **MONITORING ESG TRENDS**

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
LE 2	CORE	00 21	N/A	PUBLIC	Monitoring ESG trends	1

Does your organisation have a formal process for monitoring and reviewing the implications of changing ESG trends across your listed equity strategies?

	(1) Passive equity	(2) Active - quantitative
(A) Yes, we have a formal process that includes scenario analyses		
(B) Yes, we have a formal process, but it does not include scenario analyses	(3) for a minority of our AUM	(3) for a minority of our AUM
(C) We do not have a formal process for our listed equity strategies; our investment professionals monitor how ESG trends vary over time at their discretion	0	0
(D) We do not monitor and review the implications of changing ESG trends on our listed equity strategies	0	•



#### **PRE-INVESTMENT**

## **ESG INCORPORATION IN RESEARCH**

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
LE 3	CORE	OO 21	N/A	PUBLIC	ESG incorporation in research	1

How does your financial analysis and equity valuation or security rating process incorporate material ESG risks?

	(1) Active - quantitative
(A) We incorporate material governance-related risks into our financial analysis and equity valuation or security rating process	(3) in a minority of cases
(B) We incorporate material environmental and social risks into our financial analysis and equity valuation or security rating process	(3) in a minority of cases
(C) We incorporate material environmental and social risks related to companies' supply chains into our financial analysis and equity valuation or security rating process	(3) in a minority of cases
(D) We do not incorporate material ESG risks into our financial analysis, equity valuation or security rating processes	0



Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
LE 4	CORE	00 21	N/A	PUBLIC	ESG incorporation in research	1

What information do you incorporate when you assess the ESG performance of companies in your financial analysis, benchmark selection and/or portfolio construction process?

	(1) Passive equity	(2) Active - quantitative
(A) We incorporate qualitative and/or quantitative information on current performance across a range of material ESG factors	(3) in a minority of cases	(3) in a minority of cases
(B) We incorporate qualitative and/or quantitative information on historical performance across a range of material ESG factors	(3) in a minority of cases	(3) in a minority of cases
(C) We incorporate qualitative and/or quantitative information on material ESG factors that may impact or influence future corporate revenues and/or profitability	(3) in a minority of cases	(3) in a minority of cases
(D) We incorporate qualitative and/or quantitative information enabling current, historical and/or future performance comparison within a selected peer group across a range of material ESG factors	(3) in a minority of cases	(3) in a minority of cases



(E) We do not incorporate qualitative or quantitative information on material ESG factors when assessing the ESG performance of companies in our financial analysis, equity investment or portfolio construction process

0 0

#### **ESG INCORPORATION IN PORTFOLIO CONSTRUCTION**

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
LE 6	CORE	00 21	N/A	PUBLIC	ESG incorporation in portfolio construction	1

How do material ESG factors contribute to your stock selection, portfolio construction and/or benchmark selection process?

	(1) Passive equity	(2) Active - quantitative
(A) Material ESG factors contribute to the selection of individual assets and/or sector weightings within our portfolio construction and/or benchmark selection process	(3) for a minority of our AUM	(3) for a minority of our AUM
(B) Material ESG factors contribute to the portfolio weighting of individual assets within our portfolio construction and/or benchmark selection process	(3) for a minority of our AUM	(3) for a minority of our AUM
(C) Material ESG factors contribute to the country or region weighting of assets within our portfolio construction and/or benchmark selection process	(3) for a minority of our AUM	(3) for a minority of our AUM
(D) Other ways material ESG factors contribute to your portfolio construction and/or benchmark selection process	(3) for a minority of our AUM	(3) for a minority of our AUM



(E) Our stock selection, portfolio construction or benchmark selection process does not include the incorporation of material ESG factors

0 0

(D) Other ways material ESG factors contribute to your portfolio construction and/or benchmark selection process - Specify:

Negative screening for involvement with products like tobacco, controversial weapons or fossil fuels or violators of international standards, such as the UN Global Compact

#### **POST-INVESTMENT**

#### **ESG RISK MANAGEMENT**

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
LE 9	CORE	OO 17.1 LE, OO 21	N/A	PUBLIC	ESG risk management	1

What compliance processes do you have in place to ensure that your listed equity assets subject to negative exclusionary screens meet the screening criteria?

- $\Box$  (A) We have internal compliance procedures that ensure all funds or portfolios that are subject to negative exclusionary screening have pre-trade checks
- $\Box$  (B) We have an external committee that oversees the screening implementation process for all funds or portfolios that are subject to negative exclusionary screening
- ☑ (C) We have an independent internal committee that oversees the screening implementation process for all funds or portfolios that are subject to negative exclusionary screening
- o (D) We do not have compliance processes in place to ensure that we meet our stated negative exclusionary screens

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
LE 10	CORE	OO 21	N/A	PUBLIC	ESG risk management	1

For the majority of your listed equity assets, do you have a formal process to identify and incorporate material ESG risks and ESG incidents into your risk management process?



#### (1) Active - quantitative

(A) Yes, our formal process includes reviews of quantitative and/or qualitative information on material ESG risks and ESG incidents and their implications for individual listed equity holdings	
(B) Yes, our formal process includes reviews of quantitative and/or qualitative information on material ESG risks and ESG incidents and their implications for other listed equity holdings exposed to similar risks and/or incidents	
(C) Yes, our formal process includes reviews of quantitative and/or qualitative information on material ESG risks and ESG incidents and their implications for our stewardship activities	
(D) Yes, our formal process includes ad hoc reviews of quantitative and/or qualitative information on severe ESG incidents	
(E) We do not have a formal process to identify and incorporate material ESG risks and ESG incidents into our risk management process; our investment professionals identify and incorporate material ESG risks and ESG incidents at their discretion	0



(F) We do not have a formal process to identify and incorporate material ESG risks and ESG incidents into our risk management process

#### **DISCLOSURE OF ESG SCREENS**

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
LE 12	CORE	OO 17 LE, OO 21	N/A	PUBLIC	Disclosure of ESG screens	6

For all your listed equity assets subject to ESG screens, how do you ensure that clients understand ESG screens and their implications?

- ☑ (A) We share a list of ESG screens
- ☑ (B) We share any changes in ESG screens
- ☐ (C) We explain any implications of ESG screens, such as their deviation from a benchmark or impact on sector weightings
- o (D) We do not share the above information for all our listed equity assets subject to ESG screens

# **CONFIDENCE-BUILDING MEASURES (CBM)**

#### **CONFIDENCE-BUILDING MEASURES**

#### APPROACH TO CONFIDENCE-BUILDING MEASURES

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
CBM 1	CORE	N/A	Multiple indicators	PUBLIC	Approach to confidence-building measures	6

#### How did your organisation verify the information submitted in your PRI report this reporting year?

- □ (A) We conducted independent third-party assurance of selected processes and/or data related to the responsible investment processes reported in our PRI report, which resulted in a formal assurance conclusion
- ☐ (B) We conducted a third-party readiness review and are making changes to our internal controls or governance processes to be able to conduct independent third-party assurance next year
- $\square$  (C) We conducted an internal audit of selected processes and/or data related to the responsible investment processes reported in our PRI report
- ☑ (D) Our board, trustees (or equivalent), senior executive-level staff (or equivalent), and/or investment committee (or equivalent) signed off on our PRI report



$\square$ (E) We conducted an external ESG audi	of our holdings to verify that our funds c	comply with our responsible investment policy
$\square$ (F) We conducted an external ESG audit	of our holdings as part of risk managem	ent, engagement identification or investment
decision-making		

☑ (G) Our responses in selected sections and/or the entirety of our PRI report were internally reviewed before submission to the PRI

o (H) We did not verify the information submitted in our PRI report this reporting year

#### **INTERNAL REVIEW**

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
СВМ 6	CORE	CBM 1	N/A	PUBLIC	Internal review	6

#### Who in your organisation reviewed the responses submitted in your PRI report this year?

- $\square$  (A) Board, trustees, or equivalent
- ☑ (B) Senior executive-level staff, investment committee, head of department, or equivalent Sections of PRI report reviewed

  - o (2) selected sections of the report
- $\circ$  (C) None of the above internal roles reviewed selected sections or the entirety of the responses submitted in our PRI report this year

