

# RESPONSIBLE INVESTING PRACTICES

JUNE 2023



EMBRACE THE POSS/BLE®

# Contents

Introduction	1
Our purpose	1
Governance structure of our integrated approach	2
Responsible investing beliefs and policy	3
Climate-aware investing	4
Responsible investing in practice	6
Culture and process	11
Transparency	12



# Introduction

As a global investment solutions provider, Russell Investments is committed to integrating responsible investing practices that align with our core values and enable us to deliver attractive investment returns that meet client objectives. As an investment firm, we recognise our pivotal role in driving meaningful change through our investment decisions and active engagement with companies. We believe that generating sustainable financial returns can go hand in hand with making a positive impact on the world around us. We believe our deep understanding of asset managers, built on decades of research and use of proprietary in-house tools to monitor portfolio positions, gives us a competitive advantage in the market.

Responsible investing is a strategy and practice which incorporates consideration of environmental, social and governance (ESG) elements into investment decisions and active ownership. It complements traditional financial analysis and portfolio construction techniques. Russell Investments' policy is to incorporate responsible investing into our investment manager evaluation process, our portfolio management, our advisory services and when implementing proprietary solutions as desired by clients.

In this paper, we outline our responsible investing beliefs and practices. However, as a global solutions provider, we understand that a one-size-fits-all approach does not work for many. Our clients have a wide range of priorities when it comes to investing responsibly. At Russell Investments, we offer bespoke solutions that allow clients to meet their individual requirements using their desired approaches to integrating ESG considerations.



# Our purpose

Russell Investments focuses on meeting our clients' needs through outcome-oriented solutions that incorporate efficient risk management techniques. This focus is built upon a complementary mix of our market-leading capabilities in manager research, portfolio implementation, asset allocation, portfolio construction and total solutions management.

Our company's foundation lies in the people and values of Russell Investments, which have contributed to our long-term success. Our corporate values are rooted in the following principles:

1. We behave with non-negotiable integrity
2. We value our people and are dedicated to fostering a meritocracy. Our pillars are inclusivity, humanity, fairness, hard work, creativity, teamwork, fun and humility
3. We play to win by exceeding client expectations and executing with a sense of urgency and purpose
4. We are passionate investors who embrace intellectual curiosity and rigour

Founded in 1936 and today headquartered in Seattle with operations in the EMEA, North America and Asia-Pacific regions, Russell Investments is a global investment firm that provides investment management, advisory and implementation (execution) services. Our global assets under management (AUM) exceed £240bn, supported by over 1,300 associates who leverage their combined expertise to deliver client outcomes<sup>1</sup>. We prioritise building strong partnerships with our clients to help them achieve their objectives.

Since 1980, our primary business has been serving institutional and retail clients around the world, predominantly through outsourced solutions. At Russell Investments, we stand with you, whether you are an institutional investor, a financial adviser, or an individual guided by an adviser's personalised advice. We cater to clients of all sizes, ranging from smaller organisations to large governmental entities seeking customised solutions. Our business plans emphasise continued focus, investment growth and innovation in the responsible investing space.

---

<sup>1</sup> As of 30 June 2023



# Governance structure of our integrated approach

Our organisation's policies and practices are supported and developed by formal groups that play a crucial role in evaluation and decision-making. These formal groups bring together experts from various investment disciplines to drive our manager research, portfolio management, active ownership and operational due diligence programmes.

Our Responsible Investing teams and initiatives are overseen by our Global CIO, Kate El-Hillow, demonstrating Russell Investments' commitment from the top. Our executive sponsor oversees two ESG councils, namely the Go-to-Market Responsible Investing Council (GTMRIC) and the Investment Division Responsible Investing Council (IDRIC).

The GTMRIC is responsible for guiding our investment deliverables and Go-To-Market (GTM) activities related to responsible investing. Its primary focus is to ensure we deliver the best possible responsible investing solutions and outcomes to our clients globally. The council comprises representatives from across the business including the investment division as well as product, marketing, legal and client-facing teams.

Another vital group is the IDRIC, which operates under the authority of the Investment Strategy Committee, the highest investment governing body at Russell Investments. This council guides the Investment Division's initiatives concerning responsible investing and consists of subject matter experts and key leaders from our Research and Portfolio Management teams. The council's mission is to advance excellence, collaboration, and consistency in Russell Investments' responsible investing practice.

The Responsible Investing Councils are chaired by dedicated ESG professionals who also oversee specific practice areas including ESG solutions, strategy, investment process, and quantitative research and analysis. In addition to these two groups, we have multiple responsible investing-related working groups, assigned with specific tasks such as research delivery (including climate-related), strategy evolution, compliance with the fast-changing regulatory landscape, and client-facing training and development.

## GTMRIC Responsible Investing Council (GTMRIC)

Operating Committee Sponsor  
Chair: Head of Global ESG Strategy

Solutions

Sales  
strategy

GTM  
strategy

Marketing

Legal and  
compliance

Investment  
Division

## ID Responsible Investing Council (IDRIC)

Operating Committee Sponsor  
Chair: Head of ESG Investment Management

Active  
ownership

ESG research

Private  
markets

Portfolio  
management

Manager  
research



# Responsible investing beliefs and policy

## Responsible Investing Policy

Russell Investments' policy is to integrate responsible investing throughout our investment manager evaluation process, portfolio management, advisory services, and when implementing proprietary solutions as desired by clients. Responsible investment entails considering environmental, social and governance (ESG) issues when making investment decisions and leveraging active ownership to more effectively manage risk and generate sustainable, long-term returns. Our approach in all cases is guided by our fiduciary duty.

As a global investment solutions provider, we firmly believe that the inclusion of ESG factors can provide investors with valuable insights into the long-term sustainability and profitability of companies. We recognise that responsible investing can not only help deliver attractive investment returns but also align with our clients' objectives.

Our professionals possess a deep understanding of how sustainability issues impact the financial performance of various investments across asset classes, and their aim is to identify and act on material financial risks and opportunities. We believe that companies with robust ESG practices are more likely to mitigate environmental risks, enhance their brand reputation, attract top talent, and maintain stronger stakeholder relationships, all of which contribute to their long-term financial resilience.

At our firm, we view sustainable investing as intelligent investing, and we have built our responsible investing practice on a set of four core beliefs.





# Climate-aware investing

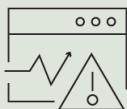
Climate change-related risks have emerged as one of the most significant ESG concerns in the global investment industry. These risks encompass potential damage to property and infrastructure resulting from extreme weather events, policy shifts impacting market preferences, legal actions against climate change-contributing companies, and the potential devaluation of industries with high emissions. Such risks can lead to financial losses, increased costs, and decreased profitability for companies and investors who are not prepared for the shift to a more sustainable, low-carbon economy.

At Russell Investments, we are committed to thoroughly researching, measuring, reporting, and considering climate change risks and opportunities as integral parts of our investment practice. We bolster that commitment through our active ownership, wherever relevant, while continually striving for best practices across our business operations.

Our attention to this issue rests on specific climate change beliefs:



Future climate events and shocks will affect future security prices



Current security prices may not reflect current climate change risks and opportunities



The ability to recognise systematic or idiosyncratic mispricing presents skillful asset managers an opportunity to add investment value through both risk management and opportunity capture



Active ownership may be used to migrate climate-change related risks, or to help foster effective adaptation for individual securities and markets

In the years since the launch of our first low carbon funds in 2015, our approach to climate-aware investing has evolved and adapted with market conditions and client expectations. In 2021 Russell Investments made a firm-wide net zero commitment with the following action points:

- Work in partnership with interested clients to establish clear decarbonisation goals, consistent with an ambition to reach net zero emissions by 2050 across all assets under management (AUM)
- Set an interim target for the proportion of assets to be managed in line with the attainment of net zero emissions by 2050 or sooner
- Review our interim target at least every five years, with a view to ratcheting up the proportion of AUM covered

To support our innovation and supplement our existing climate metrics, we established an ongoing partnership with a specialist climate risk provider. This collaboration arose from a comprehensive review of emerging climate risk vendors, and in 2022, we published our inaugural TCFD report, found [here](#). Our efforts are ongoing. In 2023, we launched an internal net zero dashboard tool to aid portfolio managers and product teams in monitoring and managing funds with net zero objectives, and we have begun work to incorporate climate change modelling into our capital markets assumptions, underscoring our dedication to staying at the forefront of climate-related considerations.

---

Of course, our solutions and progress toward these goals are always client-led. While a decade ago a climate-aware portfolio may have revolved around divesting from fossil fuels, our solutions today are more nuanced and adaptable to client needs. In addition to systematic low carbon products, these solutions can include active manager strategies that offer:

- Reduced carbon intensity of the portfolio (emissions per unit of revenue)
- High carbon intensity but with increased investments in green technology or better alignment to the EU taxonomy
- High exposure to energy companies, but with focus on engaging with companies to set science-based targets. This approach has the advantage of promoting real world progress by engaging with high impact companies

## Climate Change Policy

Russell Investments' policy is to research, measure, report, and consider climate change risks and opportunities as integral parts of our investing practice, and we bolster that commitment through our active ownership, where applicable. Our measures, reported metrics, and consideration of climate risk and opportunities are all integrated into our research and selection of external investment managers, portfolio management, advice, proxy voting, shareholder engagement and day-to-day business.





# Responsible investing in practice

We strive to employ a firmwide, holistic, ESG-integrated approach to our investment process. Responsible investing is embedded in our manager research as well as portfolio construction processes as detailed below. In each step, we identify and manage sustainability risks.

## Sustainability Risks Policy

Russell Investments' policy is to integrate sustainability risk<sup>2</sup> management into our investment solutions by identifying, evaluating and managing relevant risks in our investment manager review process, portfolio management and through implementing proprietary solutions. We believe sustainability risks are most relevant to investment outcomes when they exhibit financial materiality, and, like all investment risks, are incorporated by balancing expected risk with expected reward. In managing investment solutions, we consider financially-material sustainability risks in the context of expected rewards using a blend of inputs from sources including, but not limited to, investment managers, third-party data sources and Russell Investments propriety analysis. Furthermore, we incorporate bespoke sustainability risk management and explicit controls based on clients' requirements for customised mandates. As well, we seek to collaborate with our advisory clients to consider, monitor and manage sustainability risk priorities in their portfolios.

## Manager due diligence

We believe ESG considerations should sit alongside traditional assessments as a part of the overall investment consideration for strategy evaluation. As a natural evolution of our manager research process, manager research analysts have assigned an ESG rank to individual strategies since 2014.

The ESG ranks range from one to five, with a ranking of three considered consistent with a peer group average. The ESG rank includes the following sub-scores:

- ESG Commitment
- ESG Considerations
- ESG Implementation
- Active Ownership

ESG rankings are determined through a comprehensive analysis that combines both qualitative and quantitative assessments. The rankings are informed by three key components:

- **Dedicated ESG due diligence:** During in-depth manager due diligence meetings, we evaluate the extent to which key investment decision-makers are aware of potential ESG risks and returns. We also assess how these ESG insights are translated into the portfolio positioning.
- **Data and analytics:** We utilise quantitative data to analyse portfolios through an ESG lens. Our proprietary systems - PARIS, ExploreR and ENACT - provide ESG data and insights at both the portfolio and holdings levels. This includes risk data from Sustainabilitytics and carbon footprint metrics from MSCI. These valuable inputs inform our manager research discussions.
- **ESG manager survey:** We conduct an annual ESG Manager Survey to obtain firm-level information about ESG-related resource availability and to provide supplemental information on how asset managers are incorporating ESG considerations into their investment processes.

By leveraging this combination of inputs, our research analysts generate a robust and comprehensive picture of whether a manager appropriately assesses and manages the risk and return impacts of ESG issues.

<sup>2</sup> Russell Investments defines "Sustainability Risks" as financially-material risks related to environmental, social, or governance (ESG) issues that are relevant to our investment practice.



---

Russell Investments' manager research analysts have reviewed hundreds of products specifically targeting ESG or sustainable objectives alongside their performance goals. We classify these products as having "ESG Intent" and subject them to special scrutiny in a process called "IPO," which stands for Intent, Process and Outcome. Consistent with our traditional investment universes, less than 10% of these strategies have earned a positive formal rank from our research analysts. Our portfolio managers and clients can utilise these recommendations and research when constructing multi-manager solutions with explicit ESG or sustainable goals. This ensures that our investment decisions are well-informed and aligned with our clients' specific ESG preferences and objectives.

## Portfolio management

When constructing our multi-manager portfolios, we include actively managed investment products that have achieved the highest overall ranks. Russell Investments' portfolio managers choose active managers from among those ranked highly by our manager research teams, utilising our ESG ranks alongside metrics on ESG and carbon footprint, as well as traditional profile and exposure data.

For clients with specific ESG-related objectives, we have developed and delivered products centered around sustainability themes. All manager appointments are carefully considered and approved by the various governance groups within the Investment Division. This ensures that the selection of managers aligns with our commitment to delivering optimal investment outcomes for our clients.

## Sustainability risk management

Under our Sustainability Risks Policy, portfolio managers identify and assess financially-material sustainability risks within portfolios on an ongoing basis. They do this by using available metrics, Russell Investments' proprietary analysis, and dialogue with external investment managers. If a potential sustainability risk is identified, one or more of the following actions may be taken in an investment process we call "Enhanced Oversight":

- Review of the drivers or sub-components of any metrics behind the highlighted risk
- Thesis review with the external investment manager supporting the holding
- Discussion with Russell Investment's Active Ownership team to consider engagement options

Our Sustainability Risks Policy pertains to all investment solutions where Russell Investments has discretionary management of invested assets. It also extends to bespoke solutions and advice for customised mandates, where directed by clients. However, this policy does not typically apply to custom implementation services where Russell Investments is acting as an agent on a client's behalf such as transition management, overlay services, currency management, and outsourced securities-trading services.

Our beliefs drive our policies and investment practices and, ultimately, reflect how we act as responsible stewards of assets to create long-term value for our clients and beneficiaries.

## Insights and research

We continually evolve our research efforts to deepen our understanding of sustainability risks. This commitment is evident in our strategy development, metrics, and reporting, as well as industry analysis.

## Strategy development

Our researchers are dedicated to developing and refining ESG-related strategies, including Decarbonisation 2.0, impact investing and ESG-themed solutions. For our products with a carbon-related focus, we incorporate proprietary carbon and other ESG-related metrics. As part of our efforts, we have created a proprietary Green Energy Ratio, which measures the percentage of energy generated by a utility from renewable sources (green energy). This metric helps identify potential climate transition champions through climate change mitigation technologies.

## Metrics and reporting

Our internal reporting and oversight include multiple industry-standard metrics, along with our own proprietary metrics such as the Material ESG Score. Additional proprietary metrics are developed as more robust data and methodologies are identified.

Where data is available and robust, Russell Investments professionals monitor portfolio holdings using a range of measures. In 2023, we rolled out significant ESG data enhancements to our portfolio attribution and reporting tool. The aim is to quantitatively identify securities that have a higher probability of having high and material sustainability risks. Measures considered may include, but are not limited to, the following:

- Sustainability Risk Rating
- Carbon metrics including emissions and weighted average carbon intensity

- Russell Investments Material ESG Score - combines Sustainalytics Risk Ratings with the Sustainability Accounting Standards Board (SASB) materiality map to identify financially material ESG-related issues in each security
- Sustainalytics' Controversy Score
- UNGC Compliance

Data sources and availability vary by asset class and product type, resulting in potential differences in data utilisation practices among asset-class teams.

## Active ownership

### Proxy voting

Russell Investments has a robust proxy voting and governance process, geared toward engagement on issues related to financially- material ESG factors. A key element of our process involves the active participation of a broad set of experienced investment professionals at Russell Investments. This ensures thorough evaluation of investment risks and rewards in our active ownership endeavors, including proxy voting on ESG-related matters.

We have a dedicated active ownership team, as detailed in our comprehensive active ownership structure below. More detail on our proxy voting and engagement efforts can be found in our [Investment Stewardship Report](#) and our [Responsible Investing home page](#).



#### \*Responsibilities:

Chair: Oversight of all processes and procedures of the committee and its stewardship actions. Chair may function as a tie-breaking vote.

Voting members: Comprised of senior investment professionals charged with voting on policy/procedural changes and proxy proposals.

Legal representative: Oversees all developments and actions of the committee and its stewardship actions.

The Active Ownership Committee establishes and oversees our proxy voting policies, procedures, guidelines and voting decisions, while continuing to adapt our processes to meet evolving client needs and expectations. The Committee is made up of experienced Russell Investments professionals from a variety of investment roles, including portfolio management, manager research and investment strategy. Glass Lewis serves as our proxy administrator and is responsible for applying our custom guidelines when executing proxy votes.

### Engagement

Our objective, through our active ownership activities, is to deliver an integrated and inclusive approach to promote changes aimed at protecting and enhancing shareholder value and shareholder rights.

As a premier investment-solutions partner with extensive multi-asset and multi-manager capabilities, we leverage a wide range of relationships to exert influence and facilitate multiple levels of engagement. These connections extend across external investment managers, standard setters, proxy and engagement service providers, other market participants and, of course, corporate issuers. These relationships not only enable us to share information but also serve as a valuable feedback loop, enriching our active ownership process.

We categorise our activities in three ways: Russell Investments-led direct corporate engagement; dialogue with and through our external investment managers; and our collaborative engagements, including those led by our engagement service provider, Sustainalytics.

Russell Investments sets our engagement priorities at the firm and fund level, taking into account our overall ownership stake and firmwide aims in addition to bottom-up portfolio exposures. Internally led, direct company engagements are

frequently initiated on the back of proxy items. Many relate to votes that have been referred to the Active Ownership Committee for analysis, debate, and a manual vote.

Any referred item that is voted on by the Committee is a potential engagement opportunity. However, Russell Investments will apply additional criteria when selecting targets for engagement, including some, or all, of the following:

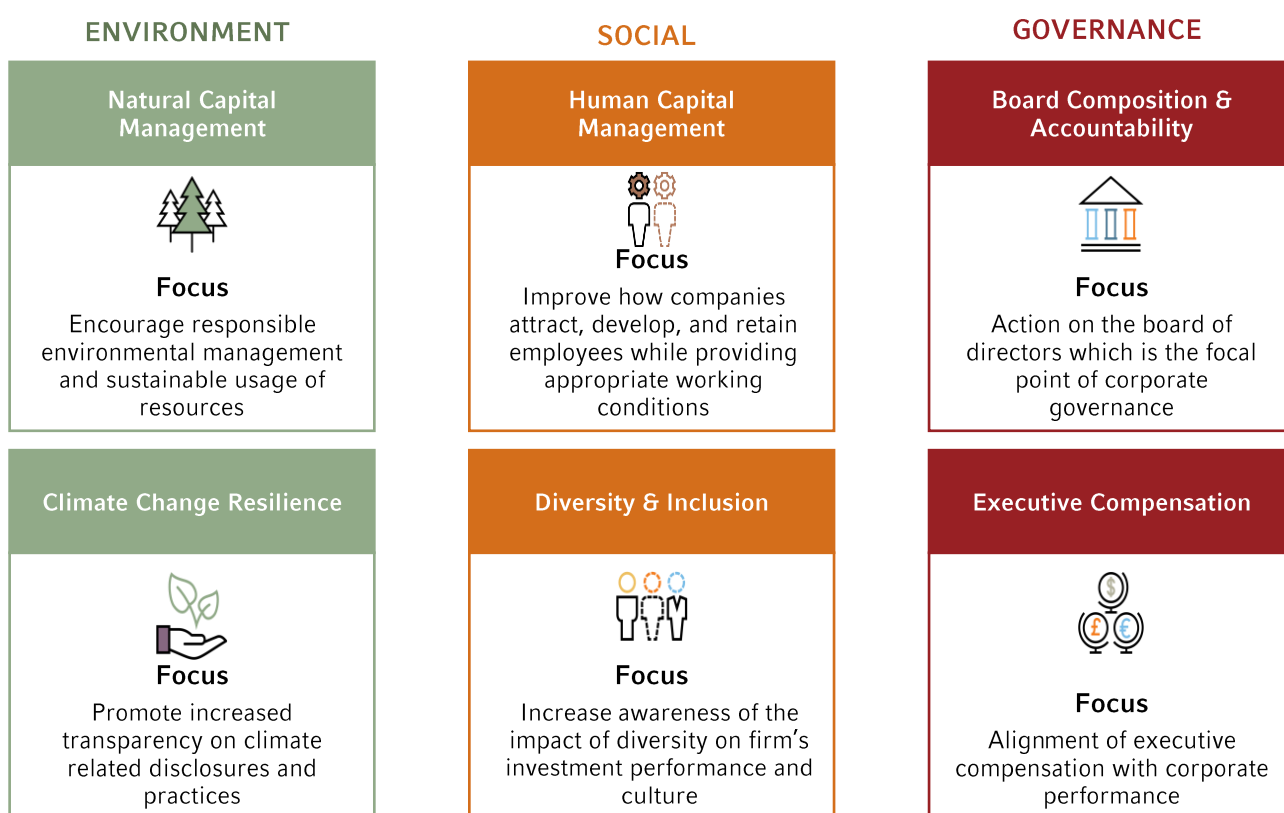
- Russell Investments' ownership stake, as a percent of shares outstanding and/or weight of fund exposure
- Proxy voting history and management responsiveness to shareholder concerns
- ESG analysis performed in-house and by third-party vendors of ESG metrics focusing on sub-industry peer comparison and ESG-related controversies
- Research and analysis from Glass Lewis, our proxy voting administrator
- Any history of previous engagement activity
- Opportunities highlighted by our sub-advisers

Engagement targets are finalised using the input and insights of our portfolio management teams, often gathered through our Enhanced Oversight process, and approved by Russell Investments' Investment Strategy Committee.

In 2022, Russell Investments released an internal platform called ENACT which was built to improve the sharing of ESG-related insights. The name ENACT was drawn from the combination of two of our critical responsible investing practices: Enhanced Oversight and Active Ownership. ENACT is a proprietary tool for capturing sustainability risk management efforts and for monitoring progress toward explicit engagement objectives. The platform enhances visibility and communication across the firm and at the fund level.

We understand that many issues are worthy of engagement, so we apply the criteria listed above to highlight the opportunities which offer the highest risk-return, and change opportunities for our portfolios on behalf of our clients and stakeholders.

While ESG considerations encompass a wide range of worthwhile shareholder concerns, Russell Investments has prioritised engagement efforts under the following six focus areas:



Russell Investments has leveraged a partnership with Sustainalytics for collaborative engagements since 2020. Sustainalytics' thematic engagement programmes are designed to extend over a three-year period, allowing Russell Investments and other participants to build relationships with a set of issuers and to encourage action that promotes long-term value.

In alignment with our five focus areas, Russell Investments is currently supporting programmes of thematic engagement including:



1. Japan material risk
2. Natural capital and biodiversity
3. Sustainable forests and finance
4. Human capital and the future of work
5. Modern slavery

We are also proud to be members of the Climate Action 100+, a joint investor initiative to ensure the world's largest greenhouse gas emitters take action on climate change. As members of the Climate Action 100+ initiative since early 2020, and in line with our Net Zero commitment, Russell Investments has engaged directly with a select number of companies on climate transition.

To find out more about our engagement efforts view our [Engagement Policy](#).

### Collaborative initiatives

Below, we provide a list of the trade organisations and industry initiatives that we are affiliated with.



Principles for Responsible Investment (PRI)



Institutional Investors Group on Climate Change (IIGCC)



Climate Action 100+



Transition Pathway Initiative (TPI)



Carbon Disclosure Project (CDP)



Task Force on Climate-related Financial Disclosures (TCFD)



The Net Zero Asset Managers initiative



Institutional Investing Diversity Cooperative (IIDC)



Investment Association (IA)



Investment Company Institute (ICI)



Securities Industry and Financial Markets Association (SIFMA)



Responsible Investment Association Australasia (RIAA)



Department of Labor (DOL)



## Culture and process

Russell Investments' culture is built on a commitment to a foundational set of beliefs and practices. These provide a rich combination of real-world guidance and an overarching ethic within which we conduct our business. These are captured in the following four pillars:

1. **Corporate values:** Russell Investments' people and values are the foundation of our company and the reason for our long-term success.
2. **Sustainable work practices:** Our mission is to identify and reduce our impact on the environment by ensuring that our day-to-day procedures are carried out in the most sustainable manner.
3. **Diversity, equity and inclusion:** We believe that diversity, equity and inclusion in the workplace drives better performance. Diversity is integral to our long-term growth.
4. **Community involvement:** We are committed to supporting the communities in which we live and work. We also have an extensive internal programme that promotes diversity and inclusion, corporate giving, volunteering and sustainable work practices. Full details can be found [here](#).

Below are some of the organisations we are proud to collaborate with:



Whitechapel  
Mission





# Transparency

## Performance and fund reporting

We provide monthly reporting on investment performance and all related fund information for all listed assets and quarterly reporting for all unlisted assets. In cases where clients or regulatory bodies require reporting on ESG scores, carbon metrics, or impact investing information, we ensure that the frequency of reporting aligns with our investment reporting cycles. In response to client demands, we have developed dedicated ESG fund reporting profiles to cater to specific needs in this area.

## Voluntary reporting

- United Nations-supported Principles for Responsible Investing (PRI) - Russell Investments recognises the importance of environmental, social, and corporate governance issues and is committed to continual capacity enhancement, in partnership with our clients and other industry organisations. We submit a comprehensive annual report to the PRI.
- The Task Force on Climate-related Financial Disclosures (TCFD) is an organisation that was established in December 2015 with the goal of developing a set of voluntary climate-related financial risk disclosures. Our TCFD report is available [here](#).
- Russell Investments produces an annual [Investment Stewardship Report](#), which satisfies submission requirements for the UK Stewardship Code, the New Zealand Stewardship Code, as well as the Japan Principles for Responsible Institutional Investors. This report contains detailed information on our active ownership programme, and we provide custom active ownership reporting to our clients, as requested.

Russell Investments publishes our proxy voting record, searchable by fund and company, on an annual basis, which is available to the public through our Responsible Investing site.

Internally, we report all active ownership activity on a quarterly basis to our Active Ownership Committee. Engagements are recorded and tracked in our proprietary tool, ENACT.

Since 2020, to ensure that our activities are aligned with best practice principles, the Active Ownership Committee has conducted an enhanced internal audit process, to ensure our proxy provider accurately casts proxy votes in accordance with our guidelines.

## Qualitative manager reports

On a regular basis, we monitor and report the ESG ranks we assign to investment managers. These ESG ranks sit within the context of our full analyst assessment, which are used in portfolio construction, ongoing oversight and management.

## Quantitative metrics

We produce a variety of sustainability-related metrics for our portfolios, funded and researched managers, and benchmarks for both equity and fixed income asset classes. These metrics are available for internal analysis and may be made available for external reporting, as required.



## QUESTIONS?

Call Russell Investments at **+44 (0)20 7024 6000**  
or visit **[russellinvestments.com](https://russellinvestments.com)**



### FOR PROFESSIONAL USE ONLY

This material does not constitute an offer or invitation to anyone in any jurisdiction to invest in any Russell Investments Investment product or use any Russell Investments Investment services where such offer or invitation is not lawful, or in which the person making such offer or invitation is not qualified to do so, nor has it been prepared in connection with any such offer or invitation.

Unless otherwise specified, Russell Investments is the source of all data. All information contained in this material is current at the time of issue and, to the best of our knowledge, accurate. Any opinion expressed is that of Russell Investments, is not a statement of fact, is subject to change and does not constitute investment advice.

The value of investments and the income from them can fall as well as rise and is not guaranteed. You may not get back the amount originally invested.

In the UK this marketing document has been issued by Russell Investments Limited. Company No. 02086230. Registered in England and Wales with registered office at: Rex House, 10 Regent Street, London SW1Y 4PE. Telephone +44 (0)20 7024 6000. In the EU this marketing document has been issued by Russell Investments Ireland Limited. Company No. 213659. Registered in Ireland with registered office at: 78 Sir John Rogerson's Quay, Dublin 2, Ireland. Authorised and regulated by the Central Bank of Ireland. Authorised and regulated by the Financial Conduct Authority, 12 Endeavour Square, London, E20 1JN. In the Middle East this marketing document has been issued by Russell Investments Limited a Dubai International Financial Centre company which is regulated by the Dubai Financial Services Authority at: Office 4, Level 1, Gate Village Building 3, DIFC, PO Box 506591, Dubai UAE. Telephone +971 4 578 7097. This material should only be marketed towards Professional Clients as defined by the DFSA.

KvK number 67296386

©1995-2023 Russell Investments Group, LLC. All rights reserved.

EMEA-2431