Environmental, Social and Governance (ESG) Policy

The Council recognises that Environmental, Social and Governance (ESG) issues, including climate change, can have significant future investment implications, in addition to their role in the Council's wider corporate objectives. The Council therefore seeks to be a responsible investor and consider ESG risks as an important overlay to the investment process, thereby improving future sustainability of investments. Responsible investment principles are at the foundation of the Council's approach to stewardship and underpin the fulfilment of its fiduciary duty to Oxford City's residents.

The principal concern is to invest in the best interests of the citizens of Oxford whilst primarily complying with the core principles of Treasury Management, Security Liquidity and then Yield (SLY). The Council's Treasury advisors are planning on providing some ESG indicators relating to Treasury counterparties and the Council will use these to inform Treasury Management decisions. Additionally the Council requests ESG policies and other information from financial institutions with which it looks to place investments and these too will inform Treasury decisions.

Just because concerns have been registered about a company's performance on ESG issues, does not mean that investments will not be made. This is due to the primary Treasury Management duties of complying with SLY and also in order to achieve a balanced portfolio of investments in line with the counterparty limits and with the specified and non-specified investment limits set out in the Treasury Management Strategy. Where possible, where there are concerns about a firm's ESG, the Council will seek to make changes through active ownership and influencing. Where engagement through active ownership is not seen to be resulting in sufficient progress, the Council will consider divesting. Whatever the ESG rating, the Council will still apply its long standing ethical position:

The Council will not knowingly invest directly in businesses whose activities and practices pose a risk of serious harm to individuals or groups, or whose activities are inconsistent with the Council's mission and values. This would include, inter alia, avoiding direct investment in institutions with material links to:

- a. Human rights abuse (e.g. child labour, political oppression)
- b. Environmentally harmful activities (e.g. pollutants, destruction of habitat, fossil fuels)
- c. Socially harmful activities (e.g. tobacco, gambling)

With some investments, the Council must be a passive investor due to the nature of the investment such as a money market fund. These investments will necessarily include funds with companies of varying ESG quality due to the requirement to hold all securities in the target index or to meet other investment criteria such as the credit quality of the investment type. Investments of this nature must be included in the Council's portfolio due to the need to fulfil other treasury management criteria such as ensuring sufficient cash balances in line with cashflow forecasts. It is important to note that ownership of a security in a company, directly or indirectly, does not signify that Oxford City Council approves of all of the company's practices or its products.

Oxford City Council is open to investing in Social Investments; investments where social impact is delivered alongside financial return, however this must still be in line with the fundamental Treasury Management principles. The Council believes that the goal of social impact is inherently compatible with generating sustainable financial returns by meeting societal needs. Any investments in this area must offer an appropriate risk/return profile. 323

