

保德信證券投資信託股份有限公司

永續發展政策

經 113 年 9 月 19 日第 12 屆第 6 次董事會通過生效

第一條、目的與依據

保德信投信（以下簡稱本公司）致力永續發展，營造健全永續發展經營體系。本公司制定永續發展政策（以下稱「本政策」），包含環境、社會、公司治理（Environment, Society, Governance, 以下簡稱 ESG）相關議題，呼應聯合國永續發展目標（Sustainable Development Goals）¹、臺灣永續發展目標（Taiwan Sustainable Development Goals）²、保德信投資管理政策等³，重視利害關係人（Stakeholder）權益，兼顧業務成長。

第二條、權責

- 一、為推廣永續發展，由董事會授權總經理（高階管理階層），指派總經理室統籌，協同投資管理處、財務行政處、業務處、風險管理部、法令遵循部、人力資源部等相關單位，因應國際與國內法規、環境、社會與公司治理等相關層面趨勢，負責永續事務溝通及執行，並定期擬定永續發展策略與執行情形。
- 二、ESG 相關議題，透過討論、評估，將重要議題納入年度具體措施推動，其制定情形、實施成效，定期呈報董事會。

第三條、永續發展策略與發展目標

本公司秉持集團四大核心價值「值得信任」、「客戶導向」、「互相尊重」、「誠信致勝」⁴，從公司治理、客戶保護、員工關懷與培力、報告揭露、永續金融、社會責任為永續發展主要策略，落實符合集團核心價值的永續文化，實踐治理與監督。

- 一、公司治理：強化董事會職能，協助內外部利害關係人（Stakeholder）溝通，達成永續治理。
- 二、客戶保護：參考同業公會會員自律公約、金融友善服務準則，定期檢視客戶意見，進行追蹤改善。
- 三、員工關懷與培力：從健康與福祉、教育訓練、性別平權、合適的工作環境等，規劃員工福利、教育資源、友善女性職場、健康工作環境、合理薪酬與獎懲，培育與留任人才。
- 四、報告揭露：符合國際與國內機關規範，定期於官網專區⁵揭露相關資訊供投資人參考。
- 五、永續金融：掌握客戶、法規需求，訂定 ESG 投資及風險管理作業程序⁶，擴大企

¹ United Nations, "The 17 Goals", [THE 17 GOALS | Sustainable Development \(un.org\)](https://un.org/sustainabledevelopment/) (review date: 2024/5/6).

² 行政院國家發展委員會，《臺灣永續發展目標修正本》，2024/4/29，[臺灣永續發展目標 - 行政院國家永續發展委員會 \(ndc.gov.tw\)](https://ndc.gov.tw/)。

³ PGIM, "PGIM ESG Investment Policy Statement", 2024.

⁴ Prudential Financial, "Our Core Values", reviewed by 2024, [Prudential's Mission, Vision & Core Values | Prudential Financial](https://www.prudential.com/core-values/).

⁵ 保德信證券投資信託股份有限公司，《ESG 專區》，[ESG 專區 | 保德信 \(pgim.com.tw\)](https://pgim.com.tw/esg/)。

⁶ 保德信證券投資信託股份有限公司，《ESG 投資及風險管理作業》，112 年，[PGIM ESG 投資管理說明.pdf](#)。

業影響力。

六、 社會責任：積極參與公益活動，維護相關利害關係人權益。

針對整體營運，另高度重視資訊安全、法令遵循、公平待客等 ESG 重大議題，並納入前揭永續發展策略及具體措施，以致力降低重大議題所產生之影響。

- 一、 資訊安全：定期綜理資訊安全政策推動及資源調度事務，避免因人為疏失、蓄意或自然災害帶來的衝擊。運用適當的控制措施，確保公司核心系統、資訊設備及網路之安全。
- 二、 法令遵循：為確保本公司及同仁遵循相關法令作業，對於新法令或修正之法令，定期佈達予相關單位，並提供各部門法規諮詢，避免公司之法律風險。同時，建置防制洗錢及打擊資恐控管機制，供單位遵循。
- 三、 公平待客：第一線業務同仁具備公平公正服務態度，優先照顧銀髮族、身心障礙人員，並以金融消費者最大權益為優先考量。另推動便利的溝通管道，提供產品、權益、風險預告等說明，並提供申訴平台，讓客戶享有更便捷的服務。

本公司依上述永續發展策略，訂定短、中、長期目標（詳附件一），並每年訂定具體措施推動（附件二）。

第四條 實施與修訂

本政策經董事會核准後實施，修訂時亦同。如因應下列調整者，授權總經理同意後生效：

- 一、 董事會核准之組織異動；
- 二、 法規或報告名稱因國際機構更名或主管機關法規更新而須調整者；或
- 三、 附件重大主題短、中、長期目標如因主管機關法規更新、各單位作業業務範疇調整，惟上述修改須併同每季執行現況報告回報董事會；或
- 四、 附件年度具體措施如因主管機關法規更新、各單位作業業務範疇調整，惟上述修改授權總經理同意後生效。

永續發展策略	SDGs 目標	短期 (2024-2030)	中期 (2030-2040)	長期 (2040-2050)
公司治理	8 合適的工作及經濟成長 9 工業化、創新及基礎建設 16 和平、正義及健全制度	<ul style="list-style-type: none"> 完備內部控制制度 強化科技管理與安全 提升自律規範與法規遵循 定期檢視營運持續計劃 	永續策略發展與精進	企業永續經營，在地深耕
客戶保護	16 和平、正義及健全制度	<ul style="list-style-type: none"> 掌握客戶需求，落實公平待客 增加數位科技體驗 	重視客戶回饋意見，精進服務品質	客戶信賴之品牌
員工關懷與培力	3 健康與福祉 4 優質教育 5 性別平權 8 合適的工作及經濟成長 10 減少不平等	<ul style="list-style-type: none"> 員工福利 員工教育訓練 友善女性職場 健康工作環境 合理薪酬及獎懲 	<ul style="list-style-type: none"> 優秀人才培育 留任人才 	企業菁英文化
報告揭露	12 責任消費及生產 13 氣候行動	<ul style="list-style-type: none"> 碳盤查 氣候變遷與風險管理 	揭露資訊與實踐一致，並定期發布	消費者或投資人能普遍理解且認同
永續金融	17 多元夥伴關係	<ul style="list-style-type: none"> ESG 投資與風險管理作業 強化責任投資、股東議合影響力 	<ul style="list-style-type: none"> 精進產品規劃 持續提升議合能力，與同業或第三方機構共同宣導 	責任投資持續宣導
社會責任	1 終結貧窮 2 消除飢餓 11 永續城鄉	<ul style="list-style-type: none"> 公益活動參與 社會轉型—國際奉獻日 	提升全民氣候變遷及淨零轉型認知，落實低碳生活	<ul style="list-style-type: none"> 生活轉型 促進社區發展與社會安定

附件二

序號	年度執行措施	年度目標及 KPI
1	措施 4 企業永續發展政策	113 年完成：100%
2	措施 8 核心系統與設備評估	113 年第二季完成前三年風險與支出數據盤點：100% 113 年第四季或 114 年第一季完成今年度風險與支出數據盤點：100%
3	措施 8 營運持續計畫	每年定期檢視、更新營運持續計畫：100%
4	措施 9 資訊安全每季執行情形報告	每季執行情形報告與風險回報：100%
5	措施 9 法令遵循每季執行情形報告	每季執行情形報告與風險回報：100%
6	措施 9 公平待客每季執行情形報告	每季執行情形報告與風險回報：100%
7	措施 10 氣候變遷及 ESG 風險等進行分析與評估	113 年第二季完成氣候風險管理政策、氣候相關財務揭露（TCFD）報告書：100%
8	措施 11 專家職能強化永續發展及 ESG 分析與評估	113 年邀請外部專家針對公司年度永續發展及 ESG 議題，提供分析與評估：100%

PGIM Securities Investment Trust Enterprise

Sustainable Development Policy

Approve by Board of Directors on 2024/9/19, Sixth Meeting of the Twelfth Term, and come into effect

a. Purpose and basis

PGIM Securities Investment Trust Enterprise (hereinafter referred to as “the company”) dedicates in sustainable development and sustainable management system build-up. The company conducts sustainable development policy (hereinafter referred to as “the policy”), including environment, society, and governance (hereinafter referred to as “ESG”) related topics, to promote United Nations, “Sustainable Development Goals”¹, “Taiwan Sustainable Development Goals”², and PGIM Inc. policy³ etc., focusing stakeholder’s rights and business growth.

b. Authority and Liabilities

- i. In order to promote sustainable development, Board of Directors authorize CEO (Senior Manager Level) and assign CEO office, to coordinate and support departments including Investment Management Division, Finance and Administration Division, Sales Division, Risk Management Department, Compliance Department, and Human Resources Department etc. in response to international and domestic regulation, environmental, social and corporate governance trends. CEO office will support sustainable related topics communication and execution, organize sustainable development strategies, and track the implementation status regularly.
- ii. ESG related topics will be discussed, evaluated, and turned into annual concrete measures by focusing critical issues. Following the annual concrete measures to review the implementation status and report to Board of Directors regularly.

c. Sustainable Development Strategy and Development Goals

The company obeys four core values⁴ of PGIM Inc., “Worthy of Trust”, “Customer Focused”, “Respect for Each Other” and “Winning with Integrity”, to implement the sustainable culture and fulfill governance and monitoring in line with group’s core values principles from aspects of corporate governance, customer protections, employee caring and training, report disclosure, and sustainable finance, as sustainable development main strategy.

- i. Corporate governance: Strengthen the competency of Board of Directors to support internal and external stakeholders communication to achieve sustainable governance.
- ii. Customer protections: Refer union members self-discipline convention and financial user friendly service principles to review customer opinions for further improvement and tracking.
- iii. Employee caring and training: From health and welfare, training, gender equality, adequate working environment to carry out employee welfare, training resources,

¹ United Nations, “The 17 Goals”, [THE 17 GOALS | Sustainable Development \(un.org\)](https://un.org/sustainabledevelopment/) (review date: 2024/5/6).

² Executive Yuan National Development Council, “Taiwan Sustainable Development Goals”, 2024/4/29, [臺灣永續發展目標 - 行政院國家永續發展委員會 \(ndc.gov.tw\)](https://ndc.gov.tw/).

³ PGIM Inc., “PGIM ESG Investment Policy Statement”, 2024.

⁴ Prudential Financial, “Our Core Values”, reviewed by 2024, [Prudential's Mission, Vision & Core Values | Prudential Financial](https://www.prudential.com/core-values).

women friendly workplace, healthy working environment, reasonable salary and rewards and penalties to cultivate and retain the talents.

- iv. Report disclosure: Fully compliant with international and domestic government norms to disclosure related information for investors reference and publish in official company website.⁵
- v. Sustainable finance: Realize customer and regulation request and conduct “ESG Investing and Risk Management Standard Operating Procedure”⁶ to enhance corporate influence.
- vi. Social responsibility: Proactively joining public welfare activities and maintaining stakeholders’ rights.

For overall business operation, we also pay high attention on information security, legal compliance and fair treatment to customer etc., the ESG essential topics, for sustainable development and concrete measures planning (mentioned in b (ii)) that we can mitigate the impacts if the essential topics under risk.

- i. Information Security: Overall, implement the information security policy and allocate the resources to prevent human errors, intentional errors, or natural disaster impact by adopting appropriate control procedures to ensure company core system, information device and internet under safety.
- ii. Legal Compliance: To ensure the company and employees comply with relevant laws and regulations, team notifies each departments with new regulations or amendments and provide legal consultations to prevent any legal risks. In the meantime, the company establishes anti-money laundering and counter-terrorism mechanism followed by departments.
- iii. Fair treatment to customers: The first line sales team carries out equal and fair treatment attitude, prioritizing the requests from older and the physical and psychological disable, and give best interests to financial consumers. Meanwhile, the company provide convenient communication ways such as product, rights, risk warning information etc. and grievance platform that customer retrieve more convenient services.

The company conducts short, mid, long term target (appendix 1) by above sustainable development strategy and define annual concrete measures (appendix 2).

d. Implementation and Revision

The policy will come into effect by Board of Directors approval, same apply for amendments. In following adjustments, Board of Directors authorize CEO to review and come into effect:

- i. Organization change approved by Board of Directors in the first time;
- ii. Regulation or report title change due to international institution rename or local government regulation update;
- iii. Appendix 1: Major topics of short, medium, and long term target charge due to

⁵ PGIM Securities Investment Trust Enterprise, “ESG area”, [ESG 專區 | 保德信 \(pgim.com.tw\)](https://www.pgim.com.tw)。

⁶ PGIM Securities Investment Trust Enterprise, “ESG Investing and Risk Management Standard Operating Procedure”, 2023, [PGIM ESG 投資管理說明.pdf](#)。

government regulation renew and operation procedure update. The above amendments need to report to Board of Directors and quarterly review implementation status;

- iv. Appendix 2: Annual concrete measures update due to government regulation renew and operation procedure update. The above amendments are approved by CEO and come into effect.

Sustainable development strategy	SDGs Goals	Short-term (2024-2030)	Mid-term (2030-2040)	Long-term (2040-2050)
Corporate governance	8 Decent work and economic growth 9 Industry, innovation and infrastructure 16 peace, justice and strong institutions	<ul style="list-style-type: none"> • Complete internal control system • Strengthen technology management and security • Enhance self-discipline • Check business continuity planning regularly 	Sustainable strategy development and improvement	Corporate sustainable operation
Customer protections	16 peace, justice and strong institutions	<ul style="list-style-type: none"> • Satisfy customer requirement and meet fair treatment to customer • Enhance digital technology experience 	Review customer feedbacks and opinions to level up the service quality	Build “Worthy of Trust” branding
Employee caring and training	3 Good health 4 Quality education 5 Gender equality 8 Decent work and economic growth 10 Reduce inequalities	<ul style="list-style-type: none"> • Employee welfare • Training resources • Women friendly workplace • Healthy working environment • Reasonable salary and rewards and penalties 	<ul style="list-style-type: none"> • Talent cultivation • Talent retain 	Corporate meritocracy culture
Report disclosure	12 Responsible consumption and production 13 Climate action	<ul style="list-style-type: none"> • Carbon emission due diligent • Climate change and risk management 	Disclosure information and action accordingly, publish regularly	Customer or investor can realize and recognize our actions
Sustainable finance	17 Partnerships for the goals	<ul style="list-style-type: none"> • ESG Investing and Risk Management Standard Operating Procedure • Strengthen responsible investing, active stewardship as 	<ul style="list-style-type: none"> • Enhance product planning • Continue to enhance active stewardship with unions or 3rd parties alignment 	Continue to promote responsible investment

		engagement		
Social responsibility	1 No poverty 2 Zero hunger 11 Sustainable cities and communities	<ul style="list-style-type: none"> Public welfare activities joining Social transformation: global volunteer day 	Raise the awareness of climate change and net-zero transition and implement low carbon lifestyle	<ul style="list-style-type: none"> Living transformation Community development and social stability acceleration

NO	Annual Execution Measure	Annual Goal and KPI
1	Measure 4: Corporate sustainable development policy	2024 complete : 100%
2	Measure 8: Core system and device evaluation	2024 quarter 2 to complete past 3 years risk and budget due diligent: 100% 2024 quarter 4 or 2024 quarter 1 to complete 2024 yearly risk and budget due diligent: 100%
3	Measure 8: Business Continuity Plan	Annual review and update Business Continuity Plan: 100%
4	Measure 9: Information security quarterly execution status	Quarterly report and risk update: 100%
5	Measure 9: Compliance quarterly execution status	Quarterly report and risk update: 100%
6	Measure 9: Fair treatment to customer quarterly execution status	Quarterly report and risk update: 100%
7	Measure 10: Climate change and ESG risk analysis and evaluation	2024 quarter 2 to complete climate risk management policy: 100% 2024 quarter 2 to complete TCFD framework report: 100%
8	Measure 11: External expert profession to enhance sustainable development and ESG analysis and evaluation	In 2024, the company will invite external expert to provide analysis and evaluation for annual sustainable development and ESG topics planning: 100%