

# Communication on Progress (COP) 2021

**BlueCove** 

9 February 2022



# **Table of Contents**

Statement from Co-Founder & CEO, Alex Khein	3
BlueCove's ESG Engagement	4
Human Rights	5
Labour	7
Environment	13
Anti-Corruption	15
Mechanisms to report	18
How BlueCove will continue to implement the Principles of the UN Global Compact	19
Important Information and Disclaimer	21



## Statement from Co-Founder & CEO, Alex Khein

To our Stakeholders,

I am pleased to confirm that BlueCove reaffirms its support of the Ten Principles of the United Nations Global Compact in the areas of Human Rights, Labour, Environment, and Anti-Corruption. With this communication, BlueCove expresses its continued intent to implement these principles and to advancing the broader development goals of the United Nations, particularly the Sustainable Development Goals at an individual and corporate level.

BlueCove believes ESG is a generational investment theme of increasing importance to investors, both as principals and as fiduciaries to their clients. The firm and its employees also recognise their broader responsibilities to contribute to society and the planet at a personal, corporate, and industry level.<sup>1</sup>

BlueCove's purpose is to deliver state-of-the-art scientifically-driven fixed income solutions, providing investors with both an alternative and a complement to the traditional discretionary fixed income strategies that dominate the industry today. The firm's ESG philosophy is aligned to this purpose. The firm's ESG strategy is subject to ongoing evolution and innovation alongside its proprietary ESG research and investment tools.

In this first Communication on Progress (COP), BlueCove describes its actions to continually improve the integration of the Global Compact and its principles into the firm's business strategy, culture, and daily operations. BlueCove also commits to sharing this information with the firm's stakeholders using its primary channels of communication and to updating this document annually according to the COP policy of the UN Global Compact.

Sincerely yours,

9

Alex Khein - BlueCove Co-Founder and CEO

<sup>&</sup>lt;sup>1</sup> 98% of employees support BlueCove's ESG philosophy and initiatives (ESG Survey, December 2021 which had a 95% response rate).



# **BlueCove's ESG Engagement**

The multi-year strategy of the UN Global Compact is to drive business awareness and action in support of achieving the UN Sustainable Development Goals (SDGs). BlueCove supports the SDGs as part of its commitment to the UNGC and has the capability to develop future sustainable solutions for clients that use the SDGs.







































#### In 2021, BlueCove:

- Set up its ESG Committee
- Approved its first ESG Policy and Exclusion Policy
- Started to integrate ESG systematically into its corporate credit investment process
- Became a supporter of The Taskforce on Climate-related Financial Disclosures (TCFD) (January 2021)
- Became a signatory to The Principles for Responsible Investment (PRI) (February 2021)
- Became an Alliance member of the Sustainability Accounting Standards Board which is now part of the Value Reporting Foundation (January 2021).





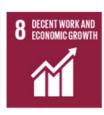
# **Human Rights**

BlueCove believes that everyone has a right to be treated with dignity and respect, both within and outside the firm.

BlueCove supports and respect the protection of internationally proclaimed human rights and takes all reasonable steps to ensure that the firm is not complicit in human rights abuses.









#### Assessing and monitoring risk

In 2021, BlueCove improved its processes to undertake risk assessments of human rights related risks and impact in the firm's industry, sector, and countries of operations. This includes using the Global Slavery Index tools to help to assess risks which is included on BlueCove's Risk Register.

#### Policies and statements

BlueCove has written policies and statements respecting and supporting Human Rights including:

- Code of Conduct
- Equal Opportunities, Respectful Working Environment & Anti-Harassment
- Employee Wellbeing
- Remuneration
- Grievance
- Whistleblowing
- Modern Slavery Transparency Statement
- Health & Safety.

#### Opposition of modern slavery

BlueCove maintains a strong commitment to the opposition of modern slavery and forced labour. Forced labour means any conduct which is an offence under Part 1 of the Modern Slavery Act 2015, including slavery, servitude, any type of forced or compulsory labour and trafficking for the purposes of exploitation.

It is BlueCove's policy not to tolerate any form of modern slavery or forced labour either within its business or within its supply chain. BlueCove's employees (permanent and fixed term) are not at risk of modern slavery and forced labour given BlueCove's employment practices and working conditions. Given the nature of BlueCove's business and its location, the risks of modern slavery and forced labour are more likely to be indirect through supply chains. Even then, these risks are likely to be relatively low when compared to other sectors.

BlueCove has introduced procedures so that where practicable, BlueCove considers the location and nature of the services using the Global Slavery Index as part of its selection, due diligence and/or onboarding processes for third-party providers and undertakes further due diligence and measures as may be required.

Employees are encouraged to consider the Global Slavery Index when making decisions about what services they use and products they purchase in their personal lives.



BlueCove engages a cleaning company to undertake its office cleaning. Under the terms of its service agreement with the cleaning company, BlueCove pays a higher fee to ensure that the cleaners providing that service to BlueCove are paid the London Living Wage rather than the lower National Minimum Wage.

If at any point, employees have any concerns related to human rights including modern slavery in relation to either BlueCove or BlueCove's supply chain, they have been informed they can raise concerns with HR, Legal or Compliance, or via any other communication channel set out in the Employee Handbook. BlueCove welcomes feedback on ways to continue to improve processes. For more information, please see our Modern Slavery Transparency Statement:

https://www.bluecove.com/policies/modern-slavery

#### Investment exclusions

BlueCove excludes investments in companies that participate in the production of controversial weapons (including the production of essential components for) cluster munitions, anti-personnel mines, chemical and biological weapons (as detailed in the firm's Exclusions Policy).



#### Labour

BlueCove aims to attract and retain talent and to create a diverse, supportive, and psychologically safe working environment. As referenced above, BlueCove also has a strong commitment to the opposition of modern slavery and forced labour.











#### Culture

BlueCove's favours a structured, collaborative approach and all employees are aligned to the firm's mission by BlueCove's culture and equity. BlueCove's values are a core set of principles that facilitate decision-making, particularly hard decisions. BlueCove's behaviours, when practised collectively, serve both to create and to preserve the firm's culture.

BlueCove Values  A core set of principles that facilitate decision- making, particularly hard decisions					
Scientific orientation					
Data focus & process driven					
Intellectual honesty & rigour					
Structured collaboration					
Persistent curiosity					

BlueCove Behaviours  Taken together, our behaviours form our culture					
Strategic alignment					
Owner mentality					
Solution orientation					
Technical expertise					
Trust					

All permanent employees have equity interests in BlueCove which creates an alignment of interest and ownership mentality. Before a candidate is hired, they undertake a culture interview to ensure alignment with the firm's culture and values. In addition, all employees are subject to a culture objective (recorded on the firm's user-friendly HR system) which requires them to demonstrate BlueCove's values and behaviours.

#### People policies & processes

BlueCove uses standard employment contracts to ensure consistency, transparency and to protect the firm and its clients. These clearly state employees' rights and responsibilities, compensation and the benefits they are entitled to, as well as privacy and data protection clauses. BlueCove's contracts also protect IP and confidential information and contain reasonable and enforceable restrictions post-termination.

BlueCove's people related policies include:



- Equal Opportunities, Respectful Working Environment, and Anti-Harassment
- Family-friendly policies including paternity, maternity, adoption, shared parental and surrogacy
- Hybrid, Agile and Flexible Working
- Wellbeing
- Study Leave
- Code of Conduct.

BlueCove also maintains a Remuneration Policy. The purpose of the Remuneration Policy is to:

- Ensure compliance with the remuneration codes applicable to BlueCove and other regulations
- Ensure effective risk management consistent with the risk profiles of funds and client mandates (including sustainability risks as appropriate)
- Enable BlueCove to continue to attract and retain talented people
- Ensure that remuneration structures encourage responsible business conduct, fair treatment of clients and mitigate against and manage potential conflicts of interest that may arise.

BlueCove has a formal onboarding and induction process, which covers areas including background checks (followed by annual re-checks), right to work, compliance, health and safety, wellbeing, data protection and information security and whistleblowing. BlueCove uses software tools to automate, where possible, the onboarding process and ensure a user-friendly experience for new hires. This process is designed to ensure employees understand their responsibilities as well as feel supported on joining the firm so they integrate more quickly. BlueCove also sent out periodic onboarding surveys and has new joiner meetings to gather feedback on their induction experience and to highlight areas for improvement. All employees have job descriptions.

#### Benefits and wellbeing

BlueCove has a benefits and wellbeing programme in place for employees which includes:

- Medical insurance on a Medical History Disregarded basis, including mental health cover
- Private GP appointments
- 30 days' annual leave per year
- Pension auto-enrolment all employees have a meeting with an Independent Financial Advisor when they join the firm to discuss pension
- Life assurance equal to five times base salary
- Employee Assistance Programme a confidential, free support service available to employees 24/7 which includes legal support and counselling
- As part of BlueCove's medical insurance policy, employees have access to a range of discounts including on gym memberships, spas, mental wellness apps and trainers, and a reward system where they can earn rewards such as free coffees & cinema tickets by being active
- BlueCove organises inductions for new joiners which include mandatory training sessions (such as compliance and cyber security) and introductions with colleagues they will work closely with in their role
- BlueCove maintains transparent communications including firmwide weekly meetings and quarterly business updates
- Lumina Spark profile and coaching improving self-awareness, communications, personal development and improving psychological safety



- Employees are able to participate in complimentary wellbeing events, exclusive promotions, and activities such as yoga, language classes, volunteering, bootcamps and meditation
- BlueCove adapted its wellbeing policy during Covid to support employees whilst they worked remotely for an extended period of time, in recognition that such circumstances can have a negative impact on mental health and wellbeing. The firm also conducted regular Covid risk assessments (available to employees)
- The firm organises regular inclusive social virtual and in person events
- BlueCove operates an ongoing performance review process enabling feedback to be more regular and linked to specific projects and objectives. BlueCove runs training on providing regular constructive feedback
- The firm regularly consults employees via surveys and other feedback mechanisms. In 2021 such surveys have covered such areas as diversity and inclusion, hybrid working, communications and ESG.
- Volunteering opportunities BlueCove has partnered with Founders4Schools to help raise the aspirations of young people and to help prepare them for work, particularly in the financial services and technology sectors
- BlueCove employees are entitled to membership of The West End Club, an exclusive loyalty programme of rewards across shopping, dining, leisure, and wellbeing
- Employee Assistance Programme
- Pets Policy enabling employees to bring their pets into the office
- Cycle-to-work scheme and season ticket loans.

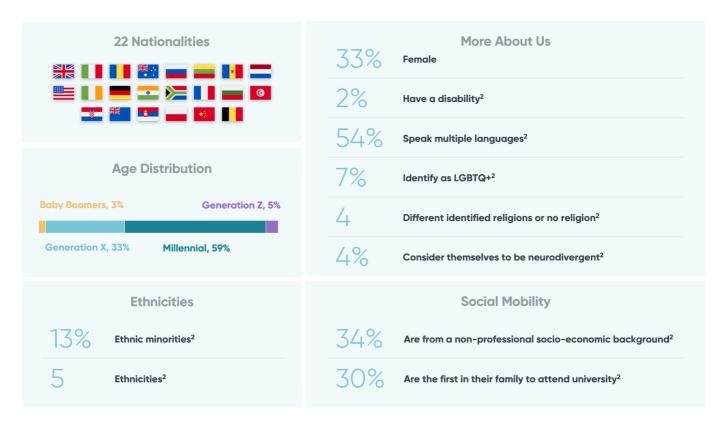
BlueCove aims for consistently high levels of employee engagement and a culture and environment that supports the well-being of all employees. The firm has a Health and Safety Policy and Wellbeing Policy, and has undertaken Health and Safety and HR Risk Assessments which assesses risks to employees and details the steps taken to mitigate against them.

#### **Diversity and inclusion**

BlueCove's Equal Opportunities, Respectful Working Environment, and Anti-Harassment Policy covers the firm's approach to equal opportunities, diversity, and inclusion. All employees undertake training on this topic on an annual basis (as do all new joiners as part of their induction).

BlueCove collects a broad range of data on diversity and inclusion. This enables the firm to take a holistic approach to diversity and inclusion, in recognition that there are a broad range of protected characteristics and numerous benefits to the cognitive diversity that arises from employees with different backgrounds and experiences. BlueCove also collects feedback related to inclusion and belonging. BlueCove shares much of this data, both internally and externally, as this transparency tracks progress and highlights areas for future initiatives.





The firm has also developed a thorough recruitment process to enable it to continue to identify, hire, and integrate diverse talent. BlueCove has a written agreement with all the recruiters the firm works with that they will endeavour to provide diverse candidate lists (including candidates both with protected characters and those from a non-professional socioeconomic background). The firm also collaborates with specialist recruiters (e.g., The Return Hub, an agency that helps professionals get back into work following a career break) and Generation that helped the firm to find its first apprentice.

In 2021, HM Treasury and Department for Business, Energy & Industrial Strategy commissioned City of London Corporate to lead a Taskforce to boost socio-economic diversity (SED) at senior levels in UK financial & professional services. BlueCove is a member of the Productivity Working Group supporting the Taskforce on Socio-Economic Mobility at senior levels in the financial and professional services industry. This is part of the firm's broader collaborative engagement strategy.

BlueCove also launched its first apprenticeship programme during 2021, with support from Makers Academy and Generation. Makers Academy is a software engineering education and training provider. Generation work with young people including those from non-professional socio-economic backgrounds and ethnic minorities. BlueCove's first apprentice is currently completing their BCS Level 4 Apprenticeship in Software Development.

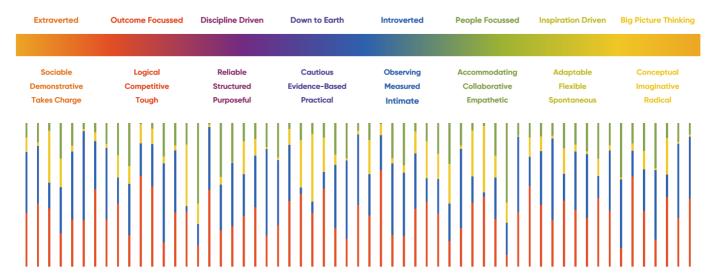
#### Cognitive diversity and psychological safety

BlueCove uses a psychometric tool called Lumina Spark which identifies different "qualities" represented by colours. The firm shares these colours transparently and holds coaching and development sessions to explain what they mean individually and collectively. BlueCove has a good representation of all qualities, and this helps to evidence cognitive diversity across the firm. This transparency and self-awareness make teams more effective and improves engagement, retention, and collaboration particularly as it helps with psychological safety. Improving psychological safety helps to create a more effective and inclusive environment. It also encourages employees to speak out and raise issues, which is particularly

 $<sup>^{2}</sup>$  From BlueCove's July 2021 Diversity and Inclusion Survey which had 85% response rate.



important in a regulated firm. BlueCove has run training on psychological safety (including Google's Project Aristotle) since 2018.



For more information on BlueCove's culture including equal opportunities, diversity and inclusion, please see BlueCove's culture page: <a href="https://www.bluecove.com/culture">https://www.bluecove.com/culture</a>

#### Learning and development

BlueCove values technical expertise, curiosity, and a persistent drive to expand one's knowledge and skills and, there are opportunities for employees to take on stretch opportunities as the firm develops. BlueCove monitors number of firmwide training hours as part of the firm's monthly Key Risk Indicators along with other training opportunities. BlueCove is also supportive of employees taking part in conferences and contributing to relevant papers as part of an ongoing academic collaboration.

13%	Of employees have completed or are currently completing professional qualifications during employment with BlueCove  Average number of hours of firmwide colloquia and presentations attended per employee		Of employees have presented at firmwide L&D sessions during 2021
			Coursera course enrolments to date
9.5			Coursera learning hours to date
4.5	Average number of hours of ESG related firmwide colloquia and presentations attended per employee	367	Coursera lessons taken to date

In seeking to foster a culture of learning, all employees maintain training plans and BlueCove is supportive of employees undertaking relevant qualifications (such as CFA qualifications including the IMC and ESG Investing Certificate, and the Certificate in Quantitative Finance). This support may be in the form of study leave and/or funding (as detailed in the firm's Study Leave Policy). Employees are also encouraged to attend and present at firmwide technical colloquia and lunch & learns. Employees may also complete courses through the firm's account with Coursera.

#### **Modern slavery**

For more information on BlueCove's commitment to the opposition of modern slavery, please see the Human Rights section of this Communication on Progress.



### Monitoring

BlueCove monitors Key Risk Indicators related to Labour Principles on a monthly basis (including average number of sick days, training hours and turnover).



#### **Environment**

BlueCove collects metrics to track and reduce carbon emissions at both a corporate and individual level. BlueCove is a supporter of the Taskforce on Climate-related Financial Disclosure commitments and is developing its plans to set achievable net-zero targets.









#### BlueCove's office

BlueCove's office is in a Crown Estate building. As a tenant of the Crown Estate, BlueCove receives monthly reporting on its share of the London office's emissions, including metrics reporting against previously agreed targets for electricity and gas consumption, recycling, water usage and overall transition to net-zero. The Crown Estate has committed to be carbon neutral by 2030, already uses 100% renewable energy and targets a recycling rate of no lower than 75%. BlueCove has adopted the recycling target of 75% and is developing its targets and timeframes to net-zero carbon emissions.

The office has achieved a B Energy Performance Certificate and an "Excellent" BREEAM scoring (which places it in the top 10% of UK new non-domestic buildings).<sup>3</sup> These ratings have been accomplished through a variety of sustainability measures, which include:

- Triple-glazed insulation to reduce heat loss through the walls by 65%
- Installation of solar panels
- Use of LED lighting throughout the building, which uses 25% less energy than standard lighting
- Use of Good Energy (supplies electricity generated from wind turbines, solar and other sustainable alternative sources)
- Creation of a collection of secret garden spaces, including the previously unused Burlington Mews, to reduce heat island effect, provide outdoor space for customers and encourage wildlife
- Harvesting rainwater for use in the WCs. The WCs have dual flushes and sensor water taps to limit water usage
- Wild West End is creating green steppingstones between existing green areas, through a combination of green
  roofs, green walls, planters, street trees, flower boxes and pop-up spaces. This initiative will not only benefit the
  fauna and flora that inhabit Regent Street, but also those who inhabit, work in and visit this area, as increasing
  evidence shows that access to green space improves social cohesion, reduces stress and increases levels of
  satisfaction and wellbeing, in addition to improving local air quality
- Honey bees on the rooftop apiary. BlueCove's employees can join the trained beekeepers to learn about biodiversity, bees, bee keeping and honey
- Access to local allotments. All experience levels are welcome, from beginners through to experts, so everyone can learn from each other as well as the specialist gardener.

<sup>&</sup>lt;sup>3</sup> Energy performance certificates are a rating scheme to summarise the energy efficiency of buildings. Building Research Establishment Environmental Assessment Method (BREEAM) is the world's longest established method of assessing, rating, and certifying the sustainability of buildings



The office is serviced by Paper Round, a waste management service partner that sends zero waste to landfill. Paper Round collects, grades and sends waste paper to a mill in France. It is then recycled into high-quality office paper. BlueCove discourages printing and buys back its 100% recycled copier paper.

BlueCove runs training sessions with Paper Round, to deepen employees understanding of recycling with a view to improving recycling levels while at work and at home. BlueCove has installed new bins and clearer signage to clarify what is and what is not recyclable.

It is part of the firm's strategy to rent cloud computing space for its research, investment and operational infrastructure which ensures there are no 'always on' high energy consuming servers and telecommunications equipment in operational within the business.

#### **Travel**

BlueCove monitors travel and has carbon reduction strategies. Detailed information on travel and carbon emissions is provided by the Firm's travel agency. The restrictions on travel in place for much of 2020 and 2021 have made comparisons year on year challenging, however, travel is only undertaken when that is a better solution than video conferencing.

BlueCove has an agile and flexible working policy enabling employees to work from home (hybrid working) and therefore reduce their travel. In addition, the firm has a generous cycle-to-work scheme, bicycle racks, lockers, changing facilities and showers at the office. These facilities also benefit those employees that choose to run, cycle or walk, a choice which improves their wellbeing as well as reducing the number of people commuting by car or train.

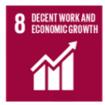
5.1	Tonnes of waste recycled <sup>4</sup>	54.8%	Total % of waste which was recycled <sup>4</sup>
3.0	Tonnes of CO <sub>2</sub> saved <sup>4</sup>	100%	Of energy used which was renewable <sup>4</sup>
1,454	KwH electricity saved <sup>4</sup>	100%	
6.1	Cubic meters of water saved <sup>4</sup>	12%	Of employees have taken advantage of the cycle-to- work scheme

<sup>&</sup>lt;sup>4</sup> Data relating to the BlueCove office and to 10 New Burlington Street.



# **Anti-Corruption**

BlueCove is a regulated firm and operates in an increasingly complex regulatory environment. BlueCove understands this operating environment and the importance of compliance, trust and integrity. The firm operates controls, policies, and engagement strategies to enable employees to do their jobs successfully and to ensure that the firm meets its obligations to clients as well as BlueCove's regulatory and legal obligations, including with regards to anti-corruption.





#### Policies & processes

BlueCove has a thorough set of anti-corruption relevant policies and procedures in place which include:

- Compliance manual (which contains compliance and anti-bribery requirements)
- Compliance monitoring programme
- Whistleblowing Officer and Policy
- Code of Ethics
- Code of Conduct
- Quarterly attestations
- Data protection and information security (including cybersecurity) policies and procedures in place to identify and manage risks (including firmwide training by Head of Platform Infrastructure)
- Remuneration Policy

BlueCove's Senior Manager and Certification Regime processes and training include an annual fitness and propriety check which assesses Senior Managers & Certified Persons':

- Honesty, Integrity & Reputation
- Competence & Capability
- Financial Soundness.

The requirement of Senior Managers and Certified Persons to remain fit and proper is recorded as an objective on BlueCove's HR system. All employees are subject to (and receive training on) the Conduct Rules and Senior Managers also have Statement of Responsibilities.

In 2021, BlueCove implemented a new Code of Conduct for employees. This Code outlines the expectation of employees to meet the highest regulatory, legal, and ethical standards so collectively the firm can create products for its clients, and achieve BlueCove's mission. This includes acting with integrity, competence, diligence, respect and in an ethical manner and in particular, putting the integrity of the investment profession and the interests of clients ahead of individual personal interests. The Code of Conduct also emphasises the requirement of employees to speak up if they ever think that a member of the team, the firm, or one of the firm's third parties is falling short of BlueCove's requirements and standards via the internal or external mechanisms in place.

BlueCove keeps controls under review and seeks to continually improve processes.



#### Awareness and training

BlueCove provides HR, information security and compliance training for all employees (for example anti-bribery and money laundering). All new joiners undergo compliance training as part of their induction programme.

All employees have a six-month probationary period and job descriptions which contain:

- Responsibilities (including committee membership and registrations)
- Values and behaviours
- Compliance and risk requirements (including SMCR requirements and a duty to raise issues)
- Managerial/learning & development relevant to the role (including responsibilities around employee wellbeing).

All employees have a duty to devote their full time and attention to BlueCove and there is a prohibition on being involved in other businesses that are or are likely to be in conflict with BlueCove. As part of its recruitment and new joiner process (including background checks) employees must disclose outside interests (for example Directorships) and potential conflicts such as familial relationships. There is also a requirement to disclose any potential conflicts that may arise on an ongoing basis. Compliance maintains a conflicts register to enable BlueCove to manage potential firm conflicts and annual checks are undertaken regarding Directorships.

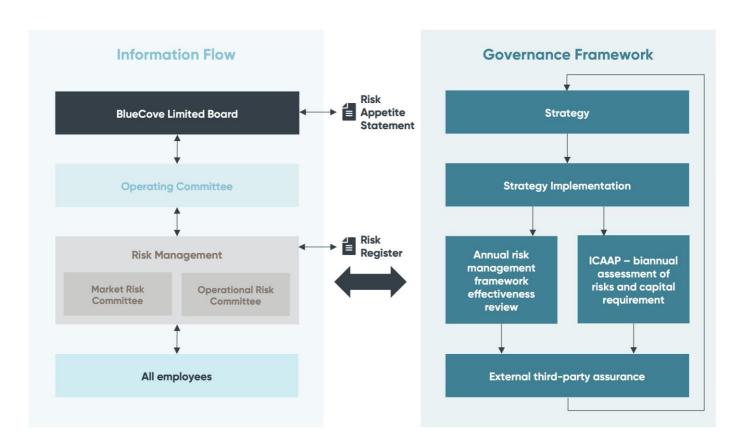
#### Governance

The BlueCove Board bears ultimate responsibility for governance and risk management within the firm. From an operational day-to-day perspective, responsibility is delegated to committees and employees. This includes an ESG Committee. BlueCove promotes an internal culture of governance and risk awareness amongst employees encouraging regular dialogue and knowledge sharing. The Head of Market Risk and Head of Compliance have dual report lines, one of which is directly into the Board.

#### **Monitoring**

BlueCove uses accurate and transparent accounting methods and engages professional firms to undertake audit and internal audit services. BlueCove also has Key Risk Indicators and a Risk Register, both of which are reviewed by the Operational Risk Committee and the Board. The firm also engages compliance consultants and conduct internal and external reviews to ensure consistency with the anti-corruption commitment, including periodic review by senior management. The effectiveness of the risk management framework (depicted below) is verified and confirmed annually.







# **Mechanisms to report**

BlueCove encourages employees to raise genuine concerns about any risk or regulatory concerns, and/or any suspected wrongdoing, including in relation to the UN GC's principles, at the earliest practicable opportunity as stated in the firm's Whistleblowing Policy (contained within our Employee Handbook). BlueCove's training on psychological safety also encourages employees to speak out and raise issues. BlueCove has mechanisms in place which employees can use to escalate and report concerns, both internal such as the firm's grievance processes, Whistleblowing processes, and external such as the confidential report line 'Safecall.' BlueCove also tracks monthly HR Key Risk Indicators. BlueCove also has an anonymous feedback box in the office.



# How BlueCove will continue to implement the Principles of the UN Global Compact

BlueCove's ESG strategy is subject to ongoing evolution and innovation, including by continuing to implement the UNGC Principles and the broader development goals of the United Nations, particularly the SDGs at an individual and corporate level and at a product level in due course. In 2021, BlueCove started to integrate ESG systematically into its investment process and is currently doing this in its corporate credit products.

- ESG data and modern decision support tools: BlueCove is integrating third party ESG data into its corporate credit decision support tools. ESG data may now serve as an input to the portfolio optimisation process, facilitating the inclusion of bespoke client constraints and historical backtest simulations. At a firm-level, for BlueCove managed funds, BlueCove excludes investments in companies involved in the production of certain categories of controversial weapons as defined in BlueCove's Exclusions Policy which details the process and controls for exclusions.
- ESG proprietary research: BlueCove's ESG proprietary research is being developed on the premise that, separate to bespoke sustainable solutions, certain material ESG data can be additive to returns and/or reducing risk. The inclusion of proprietary ESG research in BlueCove's corporate credit investment process is subject to the same rigour as all other research that is included in BlueCove's investment process. Whilst less developed and not yet integrated into signals, the firm's ESG research in sovereign credit indicates that ESG signals may also be additive to risk-adjusted returns. Research in this area is ongoing.
- Sustainable solutions: BlueCove understands its clients may have sustainability requirements over and above alpha generation and prudent risk management, reflecting their principles, fiduciary obligations, and investment objectives. Given its modular approach to portfolio construction and ability to process data efficiently and transparently, BlueCove is well-placed to partner with clients to develop bespoke sustainable solutions. These future bespoke products may include specific ESG integration into the portfolio construction process, for example, utilising third party ESG data to identify best-in-class companies that demonstrate good governance and contribute to environmental or social objectives, such as adherence to the SDGs, or prohibitions of investments that significantly harm certain environmental and/or social objectives (for example, breaches of the UNGC).

The firm's intended further actions include:

- continuing to develop and integrate ESG research into corporate credit products
- reviewing alternative sources of ESG data
- continuing to develop sovereign credit research
- participating in collaborative engagement opportunities via UNPRI and/or UNGC
- product(s) with an Article 8 categorisation under the Sustainable Finance Disclosure Regulation (SFDR)
- developing a new ESG page on BlueCove's website to support disclosures and share information
- developing a Suppliers Code of Conduct
- running ESG and diversity and inclusion surveys to gain metrics and feedback from employees
- supporting employees with the CFA's Certificate in ESG Investing
- mandatory training in areas including compliance, cyber security, and equal opportunities, as well as further firmwide training on recycling and other ESG topics
- internal and external audits including governance and information security reviews
- reviewing and enhancing modern slavery due diligence processes
- contributing to the Productivity Working Group supporting the Taskforce on Socio-Economic Mobility at senior levels in the financial and professional services industry, which will include participation in an industry-wide survey



- collecting and tracking broader diversity data from candidates on a voluntary basis to track progress and highlight areas for future diversity initiatives
- developing formal mentoring and sponsorship programmes.

9 February 2022



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