RBC Vision Funds are a family of funds that invest primarily in the securities of companies that conduct themselves in a socially responsible manner. The RBC Vision Funds Investment Principles set out the screening criteria used to assess the environmental, social and governance (ESG) performance of companies. Companies that do not meet these standards may be placed on a list of ineligible securities, which is a list of companies whose securities cannot be held in RBC Vision Funds.

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There are two categories of RBC Vision Funds:

1. Core funds that apply a broad-based multi-factor ESG screen.
2. Thematic funds that apply a single-factor ESG screen.

For all RBC Vision Funds, investment decisions are solely the responsibility of RBC Global Asset Management (RBC GAM). The RBC Vision Funds Investment Principles reflect what we believe are the most important issues of concern for socially responsible investors. We may modify or add to these Investment Principles at our discretion to reflect the evolution of views on our ESG screens.

Core RBC Vision Funds

In consultation with Sustainalytics\(^1\), RBC GAM developed the ESG analytical framework for the RBC Vision Funds Investment Principles for the core RBC Vision Funds. Sustainalytics is responsible for assessing the performance of companies against this framework.

Environmental, social and governance analytical framework

The RBC Vision Funds Investment Principles outlined in the next section are divided into two basic types: exclusionary screening criteria and qualitative screening criteria. In addition to these socially responsible investing screens, as with all RBC GAM funds, our investment teams managing the RBC Vision Funds integrate material ESG factors into their investment processes. For a more detailed discussion on ESG integration at RBC GAM, please see our [Approach to Responsible Investment](#).

Exclusionary screening criteria

Exclusionary screening criteria are used to screen out companies that manufacture, sell or provide services related to products that socially responsible investors may wish to avoid. The screening criteria for the core RBC Vision Funds include involvement in the areas of alcohol, gaming, weapons, adult entertainment, cannabis, and tobacco. Most are based on a threshold of involvement that is defined in terms of percentage of annual revenues.

Qualitative screening criteria

Qualitative screening criteria are applicable to areas such as community, employee relations and environment, where it is possible for a company to have both positive and negative impacts. It is therefore possible to implement positive screening criteria – that is, screening criteria designed to select companies with desirable attributes – as well as negative screening criteria – that is, criteria designed to screen out companies with undesirable attributes. The inclusion of positive screening criteria reflects one of the goals of most socially responsible investors, which is to focus not only on screening out companies with poor records, but also on encouraging positive social and environmental performance by “screening in.” The application of qualitative criteria involves evaluating each company’s overall

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\(^1\) Sustainalytics is a global leader in ESG and Corporate Governance research and ratings. Sustainalytics supports hundreds of the world’s foremost investors who incorporate ESG and corporate governance insights into their investment processes.
performance, both positive and negative, in each issue area. In the area of employee relations, for example, exceptionally strong employee benefits and programs may offset a less-than-perfect union-relations record. The application of qualitative screening criteria may also involve balancing strengths and concerns across issue areas. For example, strong performance in the area of employee relations may be sufficient to offset a weak environmental record. On the basis of such evaluation, the qualitative screening criteria listed in the next section are used to screen in companies that, on balance, have positive ESG records and screen out companies that, on balance, have poor records.

**The best-in-class methodology**

Sustainalytics applies a best-in-class approach to company ESG Risk Ratings, in which each company’s record is evaluated in relation to that of its industry counterparts. The standard for performance is the best practices in its industry. As part of its performance assessment, Sustainalytics uses the best-in-class approach to evaluate safety and environmental records because, in both of these areas, companies in certain sectors face unique challenges that may be inherent to the nature of the operations of their sector only. For example, a company within the forestry sector is not expected to eliminate all negative environmental impact, because it is measured against the standard of best practices in its sector. The best-in-class approach facilitates engagement with companies in industries facing safety and environmental challenges to improve their performance.

**Core RBC Vision Funds investment principles**

The RBC Vision Funds Investment Principles outlined in the next section detail the ESG screens used by the core RBC Vision Funds, which are organized into two categories.

**Exclusionary screening criteria:**
- alcohol
- gaming
- weapons
- adult entertainment
- cannabis
- tobacco products

**Qualitative screening criteria:**
- community
- corporate governance
- employee relations
- environment
- human rights
- product and business practices

**Exclusionary screening criteria**

The core RBC Vision Funds will avoid investing in the securities of companies meeting any of the criteria listed below.

**(i) Alcohol**

- The company is directly involved in the production of alcoholic beverages and 5% or more of its revenue comes from this activity.
- The company derives 10% or more of its revenue from activities related to the production of alcoholic beverages, which may include the indirect involvement through a subsidiary.
- The company derives 10% or more of its revenue from the sale of alcoholic beverages.

**(ii) Gaming**

- The company is directly involved in the gaming or lottery industries and 5% or more of its revenue comes from this activity.
- The company derives 10% or more of its revenue from the production of goods and services related to gaming or lottery industries, which may include the indirect involvement through a subsidiary.

**(iii) Weapons**

- The company develops and/or manufactures military weapons and/or small arms and 5% or more of its revenue comes from this activity.
- The company manufactures weapons-delivery systems (such as jet fighters, battleships, military submarines, tanks, and armoured personnel carriers) and 5% or more of its revenue comes from these activities.
- The company derives 5% or more of its revenue from the design and/or manufacture of specialized components of weapons.
- The company derives 10% or more of its revenue from the design and/or manufacture of non-specialized components of weapons or of components/parts for...
weapons delivery systems, which may include the indirect involvement through a subsidiary.

- The company derives 10% or more of its revenue from the provision of support services for weapons delivery systems, such as the repair and overhaul of jet fighters, military flight training services, etc., which may include the indirect involvement through a subsidiary.

- The company derives 10% or more of its revenue from the retail sales of small arms.

(iv) Adult entertainment

- The company is directly involved in the production of pornographic materials and 5% or more of its revenue comes from this activity.

- The company derives 10% or more of its revenue from the production of goods and services related to pornography, which may include the indirect involvement through a subsidiary.

- The company derives 10% or more of its revenues from the sale of pornographic materials.

(v) Cannabis

- The company manufactures cannabis products and 5% or more of its revenue comes from this activity.

- The company derives 10% or more of its revenue from the production of cannabis-related products, which may include the indirect involvement through a subsidiary.

- The company derives 10% or more of its revenue from the sale of cannabis products.

(vi) Tobacco products

- The company manufactures tobacco products and 5% or more of its revenue comes from this activity.

- The company derives 10% or more of its revenue from the production of tobacco-related products, which may include the indirect involvement through a subsidiary.

- The company derives 10% or more of its revenue from the sale of tobacco products.

(i) Community

The word “community” refers primarily to the residents of local communities in which a company operates. In the case of many resource companies, this often means Indigenous peoples affected by the activities of the business. The word “community” may also refer to larger areas, such as a province or nation, to the extent that society in such larger areas is affected by a company’s operations.

Positive screening criteria

- The company contributes directly to the development of communities in which they operate through donations or community investment programs, and through early and structured consultation.

Negative screening criteria

- The company has ignored or failed to take into account the needs and interests of communities affected negatively by its operations or planned operations. Evidence of such failure may be found in a lack of engagement in public consultation, especially in the face of community opposition, or in fines, civil penalties, or civil suits related to a company’s negative impact on communities.

- The company has ignored or failed to take into account the needs, interests and rights of Indigenous peoples affected by its operations or planned operations.

(ii) Corporate governance

Strong corporate governance practices enhance investor confidence in a company. They also help to prevent abusive corporate practices. As with all RBC GAM funds, RBC Vision Funds support the development of good corporate governance practices through the voting of proxies. The Funds may also screen out companies with exceptionally poor governance practices. The assessment of corporate governance practices will give consideration to numerous elements, including:

- The development and implementation of corporate governance best practices.

- A strong code of business conduct.

- Respect for basic shareholder rights.

- The level of independence of the Board.

- The level of independence of key Board committees.

- Whether or not the roles of chairman and CEO are separated.

- The company’s share structure.
– An executive compensation plan that appropriately aligns the interests of management with those of shareholders.
– The presence of excessive termination agreements.
– Potential dilution that may result from the company’s equity-based compensation plans.
– Any involvement in controversies related to the company’s corporate governance practices.

(iii) Employee relations

Positive screening criteria
– The company offers a comprehensive benefits package to its employees. In addition to basic benefits, such benefits may include programs to encourage employee ownership (through stock option or share purchase plans), profit sharing plans, wellness programs and policies that support employee engagement and well-being.
– The company has implemented policies and management systems to ensure the health and safety of its employees.
– The company has initiatives in place to promote workplace diversity.

Negative screening criteria
– The company provides inadequate benefits to its employees.
– The company has a health and safety record that is poor relative to its industry counterparts.
– The company has poor relations with its unionized workers, including a recent history of contracting out unionized jobs, first contract arbitration hearings, strike activity, or unfair labour practices. Or, the company has engaged in anti-union activity in opposition to attempts on the part of some workers to become unionized.
– The company has faced major controversies or legal action related to discrimination in the workplace or employment equity issues.

(iv) Environment

In assessing each company’s environmental performance, consideration will be given to the following elements:
– Environmental management and reporting systems.
– The company’s record of compliance with applicable environmental laws, regulations, and operating permits.
– Methods of use/extraction of natural resources (this includes consideration of the use of recycled materials in production processes, the use of alternative energy sources, or resource extraction methods that minimize environmental impact).
– Level of emissions of hazardous or toxic substances or substances that contribute significantly to ozone depletion or the formation of acid rain.
– Impact on natural ecosystems, including the health and viability of wildlife populations (this includes consideration of development projects or other planned operations that are likely to have such an impact).
– Measures to reduce the environmental impact of operations (this includes consideration of reductions in the use and/or release of toxins, hazardous substances, and other pollutants).
– The impact of the company’s product (this includes consideration of the provision of remediation or other environmental services, or products with environmental benefits, as well as the manufacture of products, such as pesticides or other harmful chemicals, that have a negative impact on the environment).
– Disclosure of greenhouse gas (GHG) emissions and efforts to reduce and/or mitigate GHG emissions.
– Disclosure of material climate-related risks and how those risks are being managed.

(v) Human rights

Positive screening criteria
– The company has implemented a code of conduct that addresses human rights issues relevant to its operations in countries with poor human rights records.
– The company has implemented a code of conduct that addresses human and labour rights issues related to its supplier relationships.
– The company has implemented mechanisms to ensure compliance with its human rights code(s) of conduct.
– The company has implemented a code of conduct for operations in conflict zones.
– The company has management structures and systems in place to ensure compliance with the code of conduct.

Negative screening criteria
– There is substantial evidence that the company has been complicit in the violation of human rights.
– The company has operations that create significant exposure to human rights issues. Such exposure may result from involvement in sectors including, but not limited to, resource extraction and infrastructure development.
– The company is involved directly or through its major suppliers in the use of child, forced, or “sweatshop” labour.
– There is substantial evidence that the company has been complicit with military or paramilitary organizations participating in armed conflict. This would include the provision of funding, logistics, or equipment either directly or indirectly to the parties of the conflict.
– The company operates in a conflict zone and there is substantial evidence that its operations there are exacerbating the conflict.

(vi) Product and business practices

Positive screening criteria
– The company has a written/formal code of ethics or business conduct, as well as mechanisms to ensure compliance with the code, such as training for all employees, an annual review and sign-off on the code by all employees, etc.
– The company has a formal policy on bribery and corruption.
– The company has a formal policy on whistleblower protection.

Negative screening criteria
– The company has regularly engaged in fraudulent, deceptive, or highly controversial marketing or advertising practices.
– The company has been convicted or paid recent fines or civil penalties related to price fixing, antitrust violations, tax evasion, or other illegal business activities.
– There is a clear pattern of negligence concerning the safety of one or more of the company’s products. Evidence of this would include multiple lawsuits and regulatory actions that allege the company’s products have caused life-threatening injuries, illness or death while being used responsibly and for their intended use.
– There is substantial evidence of the company’s involvement in bribery or corruption.

Thematic RBC Vision Funds

Thematic RBC Vision Funds investment principles
The RBC Vision Funds Investment Principles outlined in the next section detail the ESG screens used by the individual thematic RBC Vision Funds.

RBC Vision Fossil Fuel Free Global Equity Fund

Analytical Framework
The intention of RBC Vision Fossil Fuel Free Global Equity Fund is to minimize exposure to companies involved in extracting, processing and transporting fossil fuels. To do this, the fossil fuel free (FFF) analytical framework applies two layers of screens to identify companies ineligible for investment:

1. As a first layer, RBC Vision Fossil Fuel Free Global Equity Fund will use an exclusion list based on the Carbon Underground 200 (CU200). Any company included in the CU200 report is ineligible for investment. The CU200 report identifies the top 100 public coal companies globally and the top 100 public oil and gas companies globally, ranked by the potential carbon emissions content of their reported reserves. The CU200 list is maintained by independent third-party provider Fossil Free Indexes LLC and is updated quarterly.

2. RBC GAM, in consultation with Sustainalytics, developed the second layer of the FFF analytical framework. Sustainalytics is responsible for assessing the performance of companies against this framework for RBC Vision Fossil Fuel Free Global Equity Fund, which will not invest in:

a. Companies deriving >0% of revenues from any of the following activities:
   i. arctic oil & gas exploration
   ii. oil & gas exploration, production, refining, transportation (i.e. pipelines, railways, etc.) and/or storage
   iii. oil sands extraction
   iv. shale energy extraction
   v. thermal coal extraction

b. Companies deriving >10% of revenues from any of the following activities:
   i. oil & gas supporting products/services - refers to any tailor-made product and/or service that is provided by third parties to support the oil and gas exploration, production, and refining process

c. Companies that are significant owners of ineligible companies.

In addition to the FFF analytical framework, the investment team managing RBC Vision Fossil Fuel Free Global Equity Fund integrates material ESG factors into its investment process. For a more detailed discussion on ESG integration at RBC GAM, please see our Approach to Responsible Investment.
RBC Vision Women’s Leadership MSCI Canada Index ETF

This Fund has a focus on companies domiciled in Canada that exhibit a commitment toward women leadership among their board of directors and executive leadership positions.²

RBC Vision Women’s Leadership MSCI Canada Index ETF tracks the MSCI Canada IMI Women’s Leadership Select Index (the index) which is based on the MSCI Canada IMI Index. The index aims to include companies which are leaders in Canada in terms of female representation on boards and in executive leadership positions and have at least 30% female directors, or at least three female directors, or two female directors and one woman in a current executive leadership role (CEO or CFO). In addition the percentage of female directors on a board must be greater than the average percentage of female directors on the board of all companies in the MSCI Canada IMI Index. The company also must have not faced severe structural or severe ongoing diversity-related controversies.

RBC GAM is a member of the 30% Club Canadian Investor Group and a signatory to its Statement of Intent. RBC GAM will continue to consider other initiatives that will encourage better alignment of Canadian companies with the 30% Club’s 2022 goals, including enhancements to the ETF over time to reflect the priorities and goals of the 30% Club.

³The RBC ETF referred to herein is not sponsored, endorsed, or promoted by MSCI Inc., and MSCI Inc. bears no liability with respect to the RBC ETF or any index on which the RBC ETF is based.
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https://www.msci.com/canada-womens-leadership

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