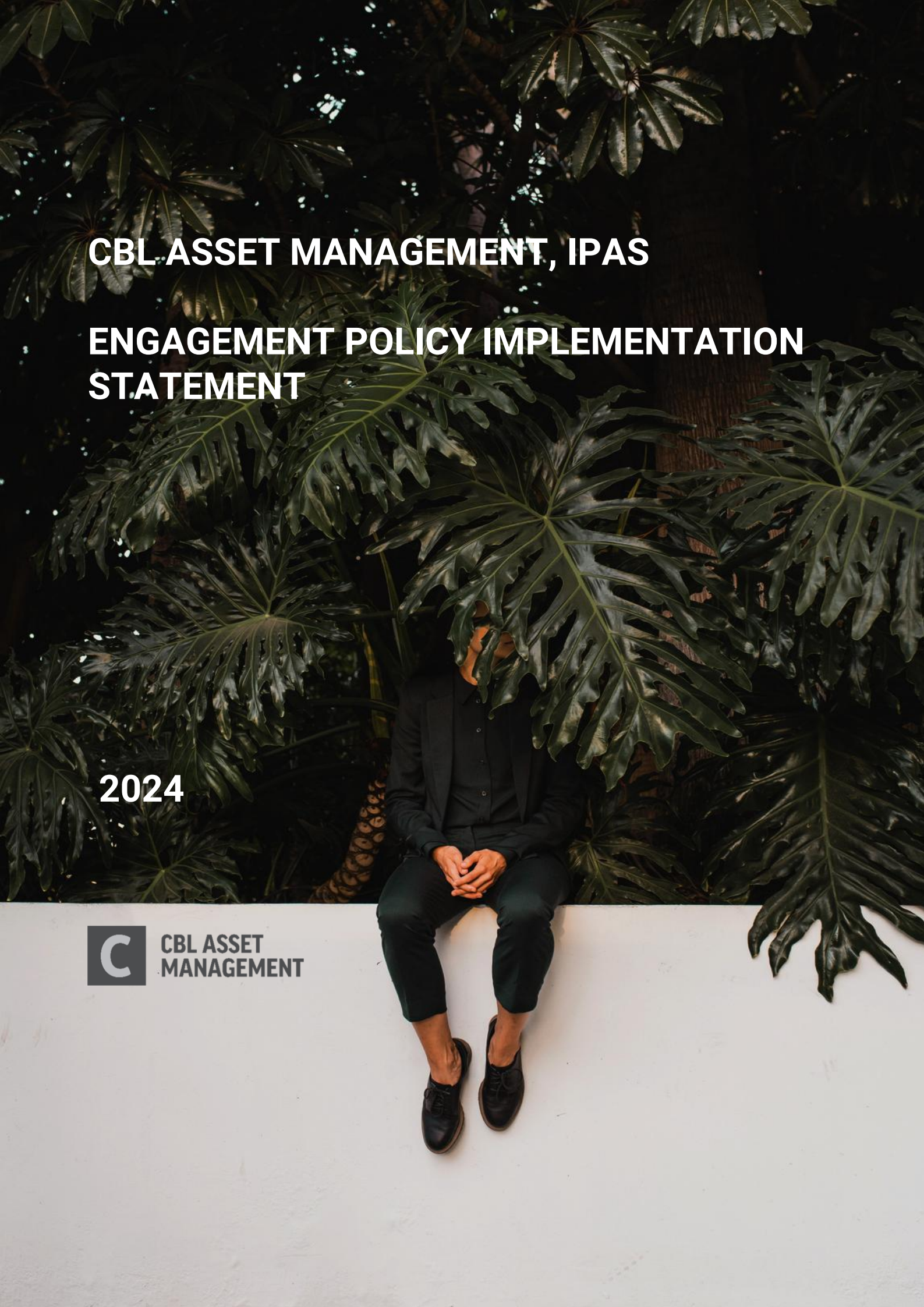


CBL ASSET MANAGEMENT, IPAS

**ENGAGEMENT POLICY IMPLEMENTATION
STATEMENT**

2024



INTRODUCTION

This Statement provides the annual information required by Directive (EU) 2017/828 of the European Parliament and of the Council, the Law on Investment Management Companies, the Law on Private Pension Funds, the Law on the Financial Instruments Market and the Law on Alternative Investment Funds and their Managers regarding the implementation of the Engagement Policy by CBL Asset Management (hereinafter referred to as the Asset Manager), including information on how the investment management company has exercised its voting rights, disclosing an explanation of the most important votes. The data cover the period from 1 January to 31 December 2024.

The Asset Manager's Sustainability and Engagement Policy provides for priority engagement in the management of companies in which funds, investment plans or portfolios of financial instruments (hereinafter referred to as the Entities) are invested, through the exercise of its voting rights, in particular where the Asset Manager's voting rights represent at least 5% of the total number of votes. The managers of the funds, investment plans and of the portfolios of financial instruments are responsible for the implementation of the engagement activities.

During the period under review, the Asset Manager has not exercised its voting rights as it has a small position in the investment portfolios, which does not exceed the threshold for participation in voting. However, the Asset Manager has undertaken a number of engagement activities in direct communication with the Entities, which are presented in this Statement by products offered by the Asset Manager.

ABBREVIATIONS

SFDR - Regulation (EU) 2019/2088 of the European Parliament and of the Council of 27 November 2019 on sustainability-related disclosure in the financial services sector.

PRI - UN-supported Principles for Responsible Investment (available at www.unpri.org).

CBL GLOBAL EMERGING MARKETS BOND FUND (investment fund under article 8 of SFDR)

During the reporting period, the Asset Manager has carried out seventeen engagement activities in direct communication with the Entities. The Managers have called on companies to disclose financial information, to improve their disclosure practices of information relevant to investors, including various policies promoting good governance, with the aim of ensuring better investor protection. The managers chose not to participate in the vote of the bondholders of an individual issuer because the proposed amendments were not favourable to the bondholders. At the same time, the Asset Manager has implemented one engagement measure collaboration with other major bond holders in connection with the initiation of the restructuring of the bond issuer. Managers have also responded to surveys of companies on the impact of sustainability factors, seeking the views of stakeholders.

CBL EASTERN EUROPEAN BOND FUND (investment fund under article 6 of SFDR)

During the reporting period, the Asset Manager has carried out twelve engagement activities in direct communication with the Entities. The Managers have called on companies to disclose both financial information and explain possible deviations from the terms of the contract, as well as to improve their sustainability information disclosure practices, including various policies promoting good governance, with the aim of ensuring better investor protection. The managers chose not to participate in the vote of the bondholders of an individual issuer because the proposed amendments were not favourable to the bondholders. At the same time, the Asset Manager has implemented one engagement measure in collaboration with other major bond holders in connection with the initiation of the restructuring of the bond issuer.

CBL EUROPEAN LEADERS EQUITY FUND UN CBL US LEADERS EQUITY FUND (SFDR 6. PANTA IEGULDĪJUMU FONDI)

During the reporting period, the Asset Manager has not carried out engagement activities.

CBL OPPORTUNITIES FUNDS (SFDR 6. panta ieguldījumu fonds)

During the reporting period, the Asset Manager has not carried out engagement activities.

TIER 3 PENSION PRODUCTS

Pension Plan “CBL Index”

During the reporting period, the Asset Manager has not carried out engagement activities.

Pension Plan “CBL Active USD”

During the reporting period, the Asset Manager has not carried out engagement activities.

Pension Plan “CBL Balanced”

During the reporting period, the Asset Manager has implemented one engagement activity in collaboration with other major bond holders in connection with the initiation of the restructuring of the bond issuer.

Pension Plan “CBL Active”

During the reporting period, the Asset Manager has implemented one engagement activity in collaboration with other major bond holders in connection with the initiation of the restructuring of the bond issuer.

TIER 2 PENSION PRODUCTS

“CBL Universal investment plan”

During the reporting period, the Asset Manager has implemented two engagement activities related to the availability of sustainability information to be disclosed to investors and in collaboration with other major bond holders in connection with the initiation of the restructuring of the bond issuer.

“CBL Active investment plan”

During the reporting period, the Asset Manager has implemented one engagement activity in collaboration with other major bond holders in connection with the initiation of the restructuring of the bond issuer.

“CBL Lifecycle plan Millennials”

During the reporting period, the Asset Manager has not carried out engagement activities.

“CBL Sustainable Opportunities Investment plan”

During the reporting period, the Asset Manager has not carried out engagement activities.

“CBL Index plan”

During the reporting period, the Asset Manager has not carried out engagement activities.

FINANCIAL INSTRUMENTS PORTFOLIO MANAGEMENT SERVICE

During the reporting period, the Asset Manager has not carried out engagement activities.

CBL ALTERNATIVE INVESTMENT FUNDS (investment fund under article 6 of SFDR)

During the reporting period, the Asset Manager has not carried out engagement activities.

INFORMATION ON USING SERVICES OF PROXY ADVISERS

During the period under review, the Asset Manager did not use the services of proxy advisers (within the meaning of Section 1 Paragraph one clause 106 of the Law on the Financial Instruments Market).

PLAN FOR THE YEAR 2025

The Asset Manager is continuously increasing the transparency of its information reports, following the evolution of market best practices, and paying more attention to the expectations of customers and the public. In 2025, the Asset Manager plans to improve its approach to engagement by including the following tasks in its work plan:

- (i) regularly update the engagement policy and align our engagement reports to the standards of leading market players;
- (ii) participate in collaboration of engagement activities of PRI signatories that are in line with the Asset Manager's priority Sustainable Development Goals;
- (iii) prepare the annual PRI report according to one of the options offered – the full report or the senior management statement or ORO (Other Responsible Investment Obligations);
- (iv) prepare periodic statements of principal adverse impacts of funds for which this is foreseen in pre-contractual disclosures, subject to SFDR requirements.

MORE INFORMATION:

This Statement is available for download at: <https://www.cblam.lv/lv/sustainability/>

CONTACTS:

Comments, suggestions or questions that you may have about the Engagement Statement are welcome at: asset@cbl.lv

Website: <https://www.cblam.lv/lv/home/>