Principal Asset Management℠

Principal Global Investors Funds (PGIF)

Global Sustainable Food and Biodiversity Fund [“the Fund”]

Website disclosure pursuant to Article 10 of the EU Sustainable Finance Disclosure Regulation

a) Summary

The Fund complies with Article 9 of SFDR [1] and has a sustainable fund objective which is to achieve a positive, measurable social and environmental impact by investing in equity securities of companies that deliver the solutions to feeding the world sustainably and /or deliver solutions that contribute to improved biodiversity.

A minimum of 90% of investments will be sustainable investments with a social objective, allowing for up to 10% buffer for cash and hedging instruments.

The Sub-Investment Manager analyses potential investee companies identified pursuant to the process outlined in the investment strategy section of the SFDR Annex of the Fund Supplement, to determine whether they are consistent with the sustainable investment objective of the Fund.

All companies need to contribute towards the sustainable investment objective, and thus contribute to the Focus SDGs outlined in the investment strategy. The Sub-Investment Manager has identified 4 Focus SDGs to which Companies that make a positive contribution to feeding the world sustainably are most likely to contribute: UN SDG 2 - Zero hunger, UN SDG 3 - Good health and well-being UN SDG 6 - Clean water and sanitation UN SDG 12 - Responsible consumption and production.

The Sub-Investment Manager expects 90% of the Net Asset Value of the Fund to contribute to at least one of the Focus SDGs, as well as applying specific exclusions to the portfolio, following a 4 -step process to validate each investment’s adherence with the forementioned criteria (“binding elements”).

The Fund invests in companies that do not cause significant environmental or social harm and have good governance practices, as determined by the Sub-Investment Manager’s criteria.

The Sub-Investment Manager is responsible for implementing the investment strategy, to ensure that the sustainable investment objective is met throughout the lifecycle of the Fund.

Firm-wide investment exclusions apply to Principal Global Investors (Ireland) Limited (“PGII”) funds. These include Issuers that manufacture controversial weapons, and issuers involved in major controversies in terms of corporate governance or environmental and social responsibility with no adequate remediation efforts.

For full details on the PGII exclusions policy please refer to:

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[1] Regulation (EU) 2019/2088 of the European Parliament and of the Council of 27 November 2019 on Sustainability-related disclosures in the financial services sector (SFDR

https://brandassets.principal.com/m/1a3a361cc99a3b7a/original/PGII-Platform-Exclusions-Policy.pdf

The Sub-Investment Manager is responsible for determining whether an investment meets the criteria of a sustainable investment as outlined in the Fund's Investment Policy and SDFR Annex.

Additional information regarding the Sustainable Investing Policy for PGII Funds can be found:

https://brandassets.principal.com/m/56744c79659e015a/original/PGII-SFDR-Sustainable-Investment-Policy.pdf

The Sub-Investment Manager believes that any limitations in methodologies or data sources will not affect the attainment of the sustainable investment objective for reasons including, but not limited to, the fact that the data required to report on many material KPIs related to the SDGs is straightforward and readily available in the majority of cases.

b) No significant harm to the sustainable investment objective

Prior to investment, the Sub-Investment Manager assesses companies for the presence of actions and behaviours that may cause significant harm to the sustainable investment objective of the Fund. The Sub-Investment Manager relies on engagement with potential investee companies and its own fundamental research supplemented with the research of third-party providers to determine if a company is engaging in operations or behaviours that do significant harm.

All investments qualifying as making a positive contribution to the sustainable objective are deemed to do no significant harm to the sustainable investment objective in their efforts to achieve contributions to at least one of the 4 Focus SDGs as outlined above. Relevant indicators used in screening potential portfolio holdings for behaviours that may cause significant harm include the mandatory indicators (1 – 14) as specified in Table 1 of Annex I of the RTS, as well as Water Usage and Recycling (6 from Table 2 of Annex 1 of the RTS) and Lack of a Supplier Code of Conduct (4 from Table 3 of Annex 1 of the RTS) based on most recently available data.

In instances where new information about an investee company indicates the potential presence of behaviours causing significant harm, the Sub-Investment Manager will first engage with the company in question in order to determine whether the company is engaging in operations or behaviours that may do significant harm and whether there is any plan for immediate mitigation in place. Where the Sub-Investment Manager makes the final determination that the company in question is now engaging in operations or behaviours that are causing significant harm to the sustainable investment objective, the Sub-Investment Manager will discontinue investment in that company as soon as practical.

c) Sustainable investment objective of the financial product

The investment objective of the Fund is to seek capital growth over the medium to long term while achieving positive, measurable social and environmental impact by investing in equity securities of companies that deliver the solutions to feeding the world sustainably and/or improving biodiversity.

No reference benchmark has been designated for the purpose of attaining the sustainable investment objective.

d) Investment strategy

The Sub-Investment Manager analyses potential investee companies identified pursuant to the process outlined in the investment strategy section of the SFDR Annex of the Fund Supplement to determine whether they are consistent with the Fund's Sustainable Investment objective as further detailed below.

The Fund is an actively managed, high conviction thematic strategy focused on investing in a concentrated number of companies whose valuation is under-appreciated in the market relative to their potential for growth and delivering excess returns, and where they are seen to be actively delivering solutions to improve sustainable agriculture and food security across the food and agriculture value chain and/or improving biodiversity.

The strategy incorporates active alignment with key Sustainable Development Goals (SDGs). Specifically, the strategy emphasizes sustainable consumption and production (SDG 12), clean water and sanitation (SDG 6), good health and well-being (SDG 3), and contributing to improved nutrition and reduced hunger (SDG 2). Under normal market conditions, over 90 % of the Fund's portfolio holdings will align with one or more of these Focus SDGs (as measured by MSCI or independently by our analysts in the case of non-covered securities or deficiencies by MSCI) based on the 4-step process for sustainable investments as described in the SFDR Annex.

The investment process combines strong thematic screening disciplines with the Sub-Investment Manager's long established fundamental, bottom-up stock selection framework.

The strategy is global in scope, but focused primarily on developed markets with vibrant agricultural, food production and consumption economies, including trade and export competitiveness.

The first step in the process is to identify signs of positive contribution in an investee company. Indicators of positive contribution could be determined from sources such as accelerating sales volumes, increased market share or improved financial statements which demonstrate value generation potential through delivering solutions that are aligned to the fund's sustainable objective.

The Sub-Investment Manager then seeks to identify the catalysts underlying the positive contribution, through proprietary screening to determine whether they are internal catalysts (investee company driven) and/or external catalysts (industry driven). Internal catalysts could be driven by internal investee company operational initiatives, from cost cutting to expanding distribution, better capital deployment and improved corporate governance. External catalysts could be driven by favourable product cycles, changing industry dynamics and regulatory changes. The foregoing analysis of catalysts enables the Sub-Investment Manager to evaluate the durability and excess return potential of the catalysts contributing to the sustainable objective and whether the change is likely to be structural or cyclical in nature. The Sub-Investment Manager will have an investment preference for investee companies whose catalysts are therefore likely to be long term and structural in nature. This enables the Sub-Investment Manager to substantiate investee companies that are considered to be making a positive contribution to the sustainable objective and whose valuation is therefore under-appreciated in the market relative to their potential for making a positive contribution towards feeding the world sustainably and/or improving biodiversity.

The binding elements of this strategy are as follows:

1) The Sub-Investment Manager expects 90% of the Net Asset Value of the Fund to contribute to at least one of the Focus SDGs, . The Fund's Focus SDGs (described in detail above) are:

- UN SDG 2 Zero hunger

- UN SDG 3 Good health and well-being

- UN SDG 6 Clean water and sanitation

- UN SDG 12 Responsible consumption and production

The Sub Investment Manager follows a 4 -step process to validate each investment's adherence with the binding elements. These are:

- all investments are checked with the proprietary SDG alignment tool,
- all investments have a revenue alignment that should be above 20% based on fundamental modelling, and
- all investments go through the process for setting SDG contribution points (as described above).
- active ownership focus requires focused company engagement to ensure continued contribution to the key SDG contribution points.

2) The Fund also applies exclusions across the following categories and criteria:

a) excludes thermal coal producers from the Fund's holdings as defined by Global Industry Classification Standard (GICS) Sector classification.

b) excludes companies where more than 5% of their revenue is derived from involvement in producing tobacco, as defined by the GICS Industry Sector classification.

A minimum of 90% of investments will be deemed sustainable investments.

The Fund exclusions also include as per the Paris Aligned Benchmark ("PAB") exclusions as outlined in the SFDR Annex.

Please refer to the Prospectus for further information on the Exclusions Policy which is also applicable for the Fund's investments in addition to any Fund specific exclusions.

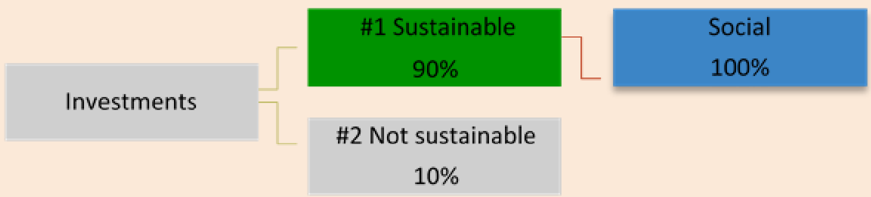
e) Proportion of investments

A minimum of 90% of investments are expected to be sustainable investments with a social objective, allowing for up to 10% exposure to cash and hedging instruments.

Sustainable investments with a social objective are also expected to be sustainable investments with an environmental objective. This is because the Sub-Investment Manager views environmental contributions from companies that help deliver solutions towards feeding the world sustainably and improving biodiversity as closely linked to a company's social contribution as a provider of basic economic infrastructure rather than as a standalone objective.

While the Fund promotes environmental characteristics, the Fund's investments do not take into account the criteria for environmentally sustainable economic activities, including enabling or transitional activities within the meaning of the Taxonomy Regulation. As such, a minimum of 0% of the Net Asset Value of the Fund shall be invested in Taxonomy-aligned investments.

The “do no significant harm” principle applies only to those investments underlying the Fund that take into account the criteria for environmentally sustainable economic activities within the meaning of the Taxonomy Regulation.



#1 Sustainable covers sustainable investments with environmental or social objectives.

#2 Not sustainable includes investments which do not qualify as sustainable investments.

f) Monitoring of sustainable investment objective

The Sub-Investment Manager is responsible for implementing the investment strategy, to ensure that the sustainable investment objective is met throughout the lifecycle of the Fund. The Sub-Investment Manager uses fundamental research, third party data and engagement with investee companies to review and update their internal ESG processes and methodologies on an ongoing basis, with a regularity of at least once a quarter. Any changes or updates will be considered as part of the investment decision making process.

Given its explicit sector focus, as noted above the Sub-Investment Manager has identified 4 Focus SDGs to which Companies that make a positive contribution to feeding the world sustainably are most likely to contribute, as well as the individual targets and indicators that are most applicable to each type of company and which vary depending on subsector and/or country of operation. Expected contributions must be measurable and disclosed at the time of investment. An investee company’s contribution to an SDG is assessed based on a combination of qualitative and quantitative factors that may vary by infrastructure sub-sector and country in which such company operates.

The Sub-Investment Manager relies on engagement with potential investee companies and its own fundamental research supplemented with the research of third-party providers to determine that sustainable investments are aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights.

The Manager's compliance and risk function will monitor the integration of ESG requirements through a combination of automated, manual and periodic reviews. Monitoring of exclusions are automated and monitored on a pre and post trade basis to prevent and detect investments that would not be compliant with the investment strategy.

g) Methodologies

The Sub-Investment Manager uses three indicators to measure sustainable investment:

1) Proprietary SDG exposure tool: The strategy utilises a proprietary quantitative Sustainable Development Goal ("SDG") tool, that is based on text analytics. The SDG tool proposes which of the SDGs the companies have exposure to and the Sub-Investment Manager then validates the output for the 4 Focus SDGs (defined above) which they believe the Fund's portfolio best aligns to as part of the investment process.

2) SDG & thematic revenue mapping measures how much of the Fund's portfolio is aligned to the SDGs: Bottom-up mapping of revenue alignment of the 4 Focus SDGs and the theme. All investments will have their revenue mapped to the Focus SDGs and at least 20 % of revenue aligned to establish positive contribution points.

3) Defined positive SDG contribution points: Key SDG contribution points are set for each company to ensure alignment with thematic impact. Contribution points are an engagement focus that pinpoint the most important factors that individual companies need to deliver on in order to be aligned with the Focus SDGs. This means that the Sub-Investment Manager identifies the most material SDG “point” and then conducts focused engagement to ensure that the SDG impact continues.

The principal adverse impacts on sustainability factors are considered as part of the Sub-Investment Manager’s proprietary ESG scoring methodology and as such, the indicators are reviewed at regular intervals or when newly reported information becomes available.

Consideration of principal adverse impacts on sustainability factors will be confirmed as part of the periodic reporting to be disclosed in the annual report for the Fund.

h) Data sources and processing

The Sub-Investment Manager integrates MSCI, ISS and Bloomberg ESG analytics in its processes and monitoring tools at the company specific level and portfolio level. This equips analysts and portfolio managers with company-specific ESG scores, but more importantly with trends in the scores and underlying measures over time, as well as notification of potential controversies and other notable ESG risk considerations.

Where relevant data is not available, it is estimated on a best-efforts basis. The Sub-Investment Manager seeks only to use estimated data when it has confidence that it is a reasonable representation of actual data.

Data sourced from MSCI's ESG research is able to be overridden by the covering analyst within the Sub-Investment Manager where more accurate and/or more recent information is known to be available.

Where relevant data is not available, it is estimated on a best-efforts basis. The Sub-Investment Manager seeks only to use estimated data when it has confidence that it is a reasonable representation of actual data.

i) Limitations to methodologies and data

One of the key limitations impacting the methodologies and data is the reliance on third party data providers and the availability and quality of ESG related data. Such data is not yet systematically disclosed by underlying investee companies and may be estimated by data providers or remain unavailable, and when disclosed may follow various methodologies.

In order to overcome these limitations, the Sub-Investment Manager chooses not to rely upon any one data provider. The Sub-Investment Manager expects to utilize the raw data from each vendor, rather than solely rely upon their ESG rankings. This increases the correlation of data across data vendors, but does not eliminate the limitations, and therefore the oversight of the Sub-Investment Manager is needed in the decision-making process. The portfolio managers and analysts supplement the data with qualitative assessments based on company and industry research and/or alternative data sources.

The Sub-Investment Manager believes that any limitations in methodologies or data sources will not affect the attainment of the sustainable investment objective for reasons including, but not limited to, the fact that the data required to report on many material KPIs related to the SDGs is straightforward and readily available in the majority of cases.

The Investment Manager and the Sub-Investment Manager also engage with the companies directly to try to obtain required ESG information if they are not provided by current ESG data sources.

The Investment Manager and the Sub-Investment Manager review the internal ESG methodology on an ongoing basis to ensure the data and calculations are effective and up to date and monitors the investments against the binding criteria in order to attain sustainable investment objective of the Fund.

j) Due diligence

The integration of ESG considerations is embedded within the fundamental research conducted by the Sub-Investment Manager, as the Sub-Investment Manager feels they are best placed to determine the importance of such factors in relation to a specific company or industry. The Sub-Investment Manager provides the essential insights into industry trends and company-specific considerations including ESG issues. These insights are crucial to the evaluation of sustainable competitive advantages and risks at a company-specific and industry level. The Sub-Investment Manager has discretion to focus on the considerations and concerns it feels are most important and impactful to sustainable earnings, sentiment, and relative valuation.

The Sub-Investment Manager uses its qualitative analysis to assist in validating ESG data and the overall scores which indicate whether a holding has environmental or social characteristics as outlined in the Fund’s supplement. In addition, the Sub-Investment Manager conducts due diligence on the underlying investee companies as part of the investment process. This process assesses the investee companies and rules out investments where it can be reasonably assumed that they severely violated generally accepted global norms in their business practices and conduct.

The Sub-Investment Manager's investment analyst and/or portfolio manager conducts in-depth fundamental research of the ESG risk level and trajectory with a particular focus on governance risk. This takes into account third party data sources such as MSCI, as well as fundamental research and experience. For companies with high risk or moderate risk with a deteriorating trajectory, the investment team provides further analysis to determine the extent to which they are comfortable holding the securities, as well as further engagement or action points as required.

The Manager conducts due diligence on the Investment Manager and the Sub-Investment Manager on an ongoing basis to ensure that processes and procedures are being followed appropriately and in accordance with the Fund supplement.

k) Engagement policies

The Sub-Investment Manager engages with companies on ESG issues on the basis that direct communication between investors and companies on ESG matters is an important element of the overall investment process. Engagement may lead the Sub-Investment Manager to make decisions that favour actions intended to maximize a company's shareholder value and contribute to the overall research to develop a holistic fundamental view of the company.

The Sub-Investment Manager's engagement policy is designed to guide engagement and not necessarily prescribe specific criteria in making investment decisions. As a result, the Sub-Investment Manager commits to:

Engage and collaborate with investee companies to encourage responsible ESG practices
Encourage greater transparency by investee companies on their ESG practices.
Encourage investee companies to manage risks related to ESG factors
Seek out ESG research that will further the Adviser's overall knowledge on a company.
Keep records or notes on relevant engagement activities.

The Sub-Investment Manager also engages with companies' impact on biodiversity and/or contribution to sustainable food solutions to encourage the adoption of science-based targets to ensure an impact focus in alignment with the Fund's sustainable objective. Specifically a company's track record of improvement is considered with respect to engagement towards 1) how much and how quickly a business needs to reduce their greenhouse gas emissions to prevent the worst effects of climate change; and 2) the companies adopting strategies for biodiversity.

l) Attainment of the sustainable investment objective

Refer to section f) above for information on how the Sub-Investment Manager attains the sustainable investment objective.

Definitions:

- The “Manager” shall mean Principal Global Investors (Ireland) Limited
- The “Investment Manager” shall mean Principal Global Investors, LLC
- The “Sub-Investment Manager” shall mean Principal Global Investors (Europe) Limited
- “Supplement” shall mean, in the context of any one sub-fund, the relevant Fund supplement.
- “ESG” shall mean environmental, social and governance.
- “Sustainable Finance Disclosure Regulation (SFDR)” shall mean Regulation (EU) 2019/2088 of the European Parliament and of the Council of 27 November 2019 on sustainability-related disclosures in the financial services sector.
- “United Nations Sustainable Development Goals or SDGs” shall mean a collection of 17 interlinked global goals designed to be a blueprint to achieve a better and more sustainable future for all. The SDGs were set in 2015 by the United Nations General Assembly and are intended to be achieved by the year 2030. They address global challenges including poverty, inequality, climate change, environmental degradation, peace and justice. Below the list of the 17 UN SDGs for your reference:

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Important information:

This document is intended for institutional, professional or retail investor use only in permitted jurisdictions as defined by local laws and regulations. It is intended for information purposes only. It is not an offer or a solicitation to anyone to subscribe for units in the Fund. It should not be construed as investment advice.