

Sustainable Total Return Strategy – Moderate Risk EUR

Periodic Disclosure 1st April 2021 to 31st March 2022

Barclays Bank Ireland PLC (BBI) has categorised Sustainable Total Return Strategy – Moderate Risk EUR (“the Strategy”) as meeting the provisions set out in Article 8 of the Sustainable Finance Disclosures Regulation¹ (SFDR) for financial products which promote, amongst other characteristics, environmental and/or social characteristics. This document provides you with information to help you understand the extent to which the environmental and/or social characteristics promoted by the Strategy are met.

The Strategy promotes environmental and social characteristics, and ensures that the companies in which investments are made follow good governance practices. Whilst the Strategy invests in sustainable investments, as defined under SFDR, it does not have sustainable investment as its objective. The Strategy aims to invest in companies whose business practices actively address at least one of the UN’s Sustainable Development Goals (SDGs). This includes environmental characteristics such as climate action, renewable energy and social characteristics (reducing inequality and promoting gender equality).

The specific environmental and social characteristics promoted by the Strategy will vary from time to time dependent on the composition of the equity or fixed income securities in which it invests. In times of market stress, the Strategy may increase the allocation to cash, as well as hold derivatives/structured products in order to protect capital. It also includes third party collective vehicles. The Discretionary Portfolio Management (DPM) team reviews the environmental, social and/or governance (ESG) due diligence processes of each of the funds.

The Strategy may also include instruments for which ESG metrics are not applicable. Such instruments may include, but are not limited to: cash and cash-like/short term securities, commodities, hedging instruments and derivatives. These instruments are usually held for risk mitigation/diversification purposes. No ESG risk assessment is carried out for these instruments.

How environmental and social characteristics promoted by each Strategy are met

1. Baseline screen

Our baseline screen uses a third party commercial data provider to avoid exposure to controversial companies and industries that may be in conflict with the non-financial objectives of our clients.

BBI excludes from the Strategy investments or classes of investment who derive revenue from certain industries or business activities based on revenue thresholds. Excluded industries include alcohol, armaments, adult entertainment, tobacco, gambling and fossil fuels. Our fossil fuel exclusion includes all companies that have proven and probable coal reserves and/or oil and natural gas reserves used for energy purposes. Reserves are considered to be used for energy purposes in the case of companies with the following Global Industry Classification Standard (GICS) classification:

- (a) Oil, Gas and Consumable Fuels Industry
- (b) Energy Equipment and Services Industry
- (c) Utilities Sector
- (d) Diversified Metals and Mining Sub-Industry.

The Strategy also excludes any business that fails to comply with the United Nation’s Global Compact Principles, which cover human rights, labour standards, the environment and anti-corruption.

The exclusion of these industries alongside our compliance with the UN Global Compact helps to support the principle of doing no significant harm.

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.

2. ESG consideration

BBI performs a fundamental analysis of the ESG quality of each business, and its ability to mitigate against ESG risks, using systematic and company specific quantitative data points, which then directs further qualitative research. This could include, but is not limited to, gaining an understanding of the corporate cultures and workplace environments of the companies, their dependence on human capital or physical resources, and their ability and desire to drive sustainable change within their supply chains.

This assessment is supplemented by information from a number of third party commercial data providers.

Whilst we use independent ESG research as one of several data inputs, third party ESG ratings can be useful for demonstrating the overall ESG quality of a portfolio. MSCI ESG Research rates the Strategy 'AAA'.

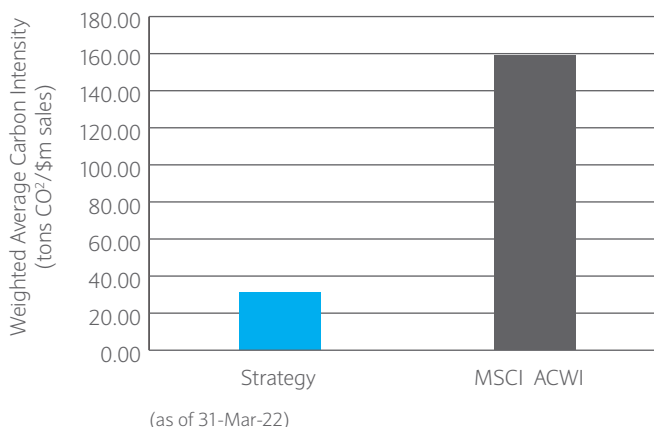
ESG is incorporated into the investment due diligence of all of our investment strategies. This Sustainable Strategy takes this ESG analysis a step further and seeks to invest into businesses with "best-in-class" ESG quality. We believe this is one of several critical pillars for maximising risk-adjusted returns over the long term.

Given the focus of the Strategy's investment philosophy on investing in quality businesses with high levels of cash flow return on invested capital, with a focus on intellectual capital, the resource intensity of our investee companies is typically lower than average. The weighted average carbon intensity and water withdrawal intensity are both meaningfully below that of the wider market. Our exclusionary approach means that the Strategy does not invest in the six most controversial industries, while our focus on "best-in-class" ESG quality and businesses with strong corporate cultures typically means a lower level of human rights violations.

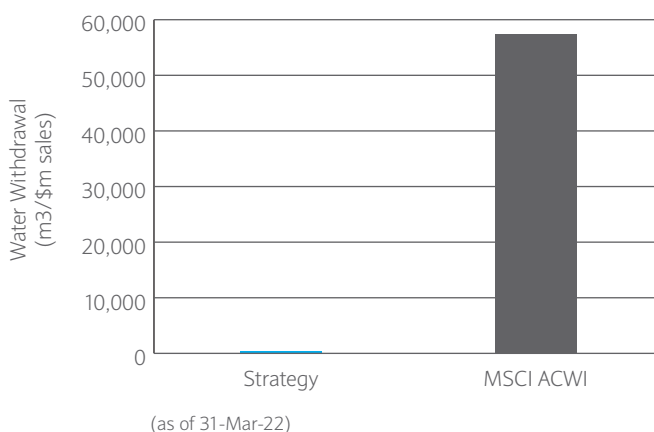
By looking to identify businesses with "best-in-class" ESG quality, we hope to avoid the worst offenders and support the principle of doing no significant harm.

Environmental

The Strategy has 80.6% lower weighted average carbon intensity than the MSCI All Country World Index

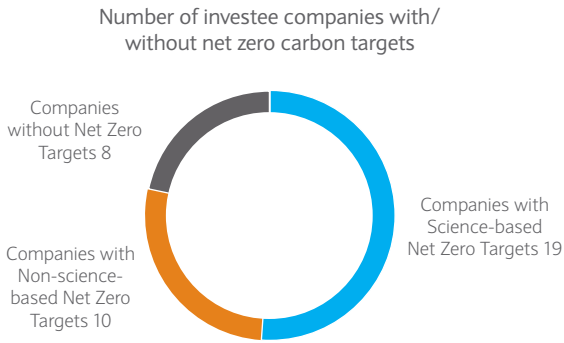


The Strategy has 99.2% lower water withdrawal intensity than the MSCI All Country World Index



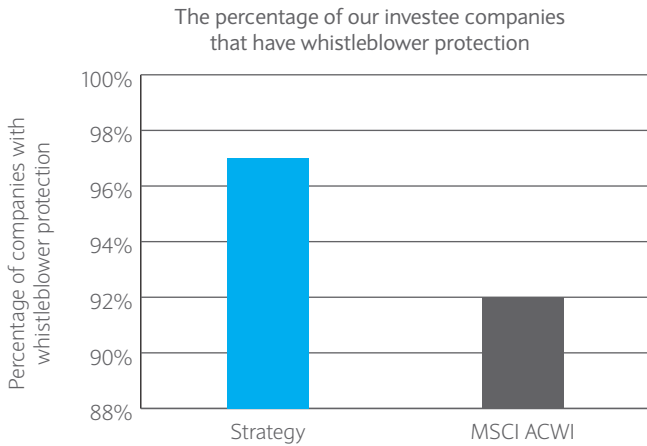
Our Top 10 Recyclers (% of waste recycled)	
Nike	97.2%
L'Oreal	96.8%
Schneider Electric	96.4%
Adobe Systems	95.0%
TSMC ADR	95.0%
ASML	93.8%
Johnson & Johnson	86.4%
Intuit	83.0%
Microsoft	78.6%
Apple	70.3%

(as of 31-Mar-22)



(as of 31-Mar-22)

Social



(as of 31-Mar-22)

Our Top 10 Companies for Gender Pay Gap*	
Discover Financial Services	102%
Adobe Systems	100%
Amazon.com	100%
Apple	100%
Ecolab	100%
Microsoft	100%
Nike	100%
ServiceNow	100%
UnitedHealth	100%
VISA	100%

* Percentage of remuneration of women to men, often for doing the same work
(as of 31-Mar-22)

Governance

Whilst the promotion of environmental and social objectives is critical to returning the world to a more sustainable footing, it is the governance underpinning these companies that drives that change. The Strategy looks to invest in companies with good governance practices, which include, but are not limited to, sound management/board structures, good transparency with market participants, fair and equal remuneration policies, tax compliance, and a lack of accounting red flags.

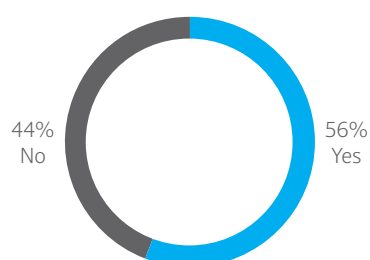
The Strategy also considers information that is available in connection with companies' employee relations.

Governance	% of Total Strategy Holdings	MSCI All Country World Index
Lack of Board Independence	0.0%	10.2%
Companies with no female directors	0.0%	2.2%
Female representing at least 30% of directors	60.3%	63.5%
Females on the Board	29.7%	21.1%
Independent Board Members	73.9%	56.7%

(as of 31-Mar-22)

Whilst sustainable investing is still nascent, we also put an emphasis on identifying companies that incorporate ESG objectives into executive management compensation. We often see companies that have done so for a number of years benefit from sustainability being taken into consideration at decision points throughout the organisation.

Percentage of equity holdings where ESG forms part of management compensation



(as of 31-Mar-22)

3. Positive Analysis – UN Sustainable Development Goals (SDGs) Alignment

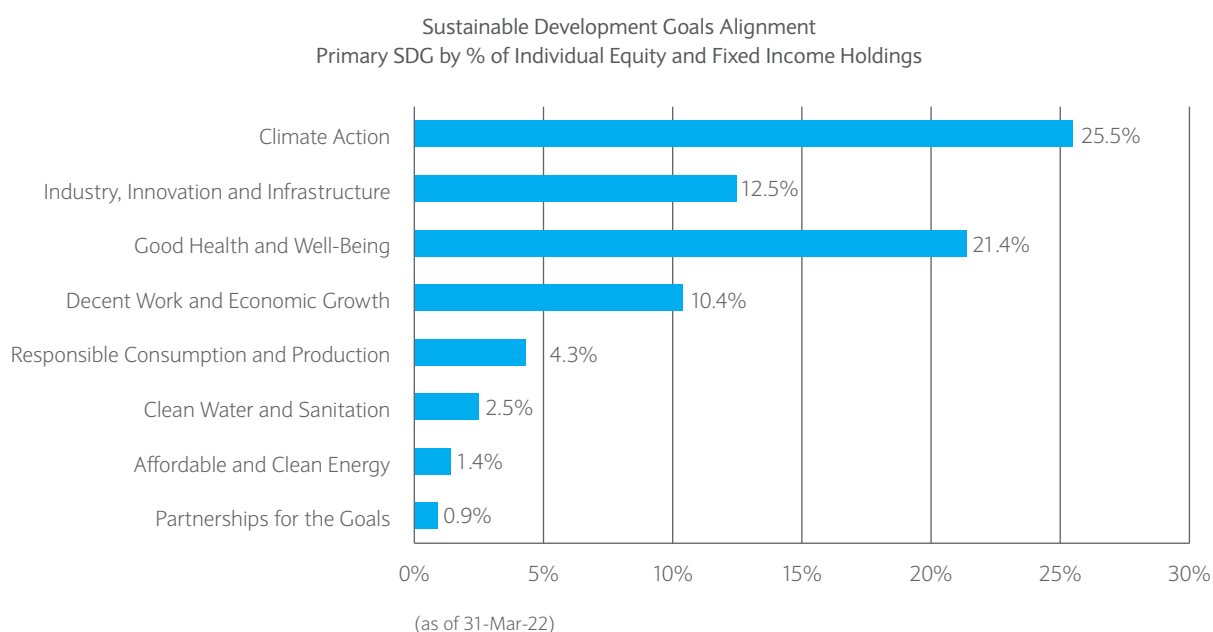
Finally, our positive analysis identifies companies whose business practices actively address at least one of the UN SDGs.

The UN SDGs reflect a fifteen year agenda to tackle the greatest challenges facing the world today. They recognise that ending poverty and other deprivations must go hand-in-hand with strategies that improve health and education, reduce inequality and spur economic growth – all while working to reverse climate change and preserve our oceans and forests.

Before selecting an investment, we apply a positive analysis process:

1. Identify companies that are committed to sustainable business practices
2. Positively screen for companies whose business practices actively address at least one of the UN’s SDGs
3. Screen out companies whose practices, on balance, materially conflict with the UN SDGs

We have carried out an analysis of our individual equity and fixed income holdings to determine how their business practices are aligned to the UN SDGs. The chart below shows the distribution of the primary SDGs to which our individual equity and fixed income holdings contribute. For each holding, we have identified what we believe to be the primary SDG addressed by its business practices. For some holdings, business practices may contribute to multiple SDGs. In these instances, a subjective judgement has been made to determine the primary SDG being addressed.



Please note this is not marketing material. This report refers to the period of 1st April 2021 to 31st March 2022. All data is correct as of 31st March 2022.

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