

Wellington Management's California AB 1305 Disclosure

DISCLOSURES UNDER CALIFORNIA HEALTH AND SAFETY CODE, SECTION 44475

Operational carbon neutrality

Within Section 5 of our annual firmwide Climate Report, we set out our operational carbon footprint in line with the GHG Protocol, including Scope 1, Scope 2 and partial Scope 3 emissions.¹ Along with developing strategies to further reduce our footprint, we aim to achieve carbon neutrality for 2023 operational emissions.²

[2023 Climate Report](#)

This approach is further complemented by our approach to renewable energy usage. In 2021, Enel Green Power North America and Wellington agreed to terms for a 10-year virtual power purchase agreement (VPPA) for an 11 MW portion of the energy delivered to the grid by Enel Green Power's Rockhaven wind project. In 2023, the arrangement delivered approximately 41 GWh of wind energy to the grid. Under the agreed terms, the clean energy contracted for Wellington is expected to equal or exceed the electricity needs for all Wellington US corporate offices as well as residential electricity usage of our US employees, in line with our hybrid work approach.

[Groundbreaking renewables initiative](#)

We evaluate the credibility of the carbon offsets we purchase to cover our remaining published Scope 1, Scope 2 and partial Scope 3 emissions. As available tools and technologies improve and become economical at scale, we expect to evolve our approach. In 2023, we purchased the following offsets to cover our remaining 2022 emissions.

CARBON OFFSETS PURCHASED IN 2023

Name of the business entity selling the offset	Lune Climate Limited	Respira International
Offset registry or program	American Carbon Registry	Verra
Project identification number	ACR499	1477
Project name (as listed in the registry or program)	Bluesource - Kootznoowoo Improved Forest Management Project (as listed on the American Carbon Registry Standard)	Katingan Peatland Restoration and Conservation Project
The offset project type	Improved Forest Management (IFM) Project/Removals and Emissions Reduction	Forestry and Land Use/ Avoided Emissions
Site location	Prince of Wales-Hyder, Alaska, USA	Central Kalimantan Province, Indonesia
Specific protocol used to estimate emissions reductions or removal benefits	American Carbon Registry Improved Forest Management Methodology for Quantifying GHG Removals and Emission Reductions through Increased Forest Carbon Sequestration on Non-Federal U.S. Forestlands, Version 1.3 (April 2018)	REDD+, CCB Triple Gold
Independent third-party verification	Calyx Global	Be Zero, Calyx Global, and Sylvera

¹ This excludes, for example, Scope 3 GHG protocol category 1 (purchased goods and services) and category 15 (investments).

² Our operational carbon neutral status does not have independent third-party verification, though our emissions calculations are conducted by a third party.

Information regarding claims made by Wellington Management and affiliated or related entities regarding the achievement of net zero emissions, carbon neutrality and/or significant reductions in greenhouse gas emissions, including how claims are determined to be accurate or actually accomplished, and how interim progress is measured is included in our firmwide Climate Report, our Wellington Management International Climate Risk Report and our Singapore Environmental Risk Report.³

[2023 Climate Reports](#)

Investment-level emissions reduction claims

Certain investment funds managed by Wellington Management and its affiliates may make claims regarding the achievement of net zero emissions, carbon neutrality, commitments to SBT exposure⁴, and/or reductions in greenhouse gas emissions. Where applicable and required by law, information regarding such claims, how interim progress is measured, and whether there is independent third-party verification is disclosed in the respective fund's offering documents and/or periodic disclosures made to investors in those funds.

Wellington Management is also a member and signatory to the Net Zero Asset Managers initiative (NZAM). Information on the measurement of interim progress, integration of SBTs, methodologies used for various glidepaths, and tools utilized to meet our commitment is included in the white paper below.

["Our commitment to net zero" white paper](#)

³ Wellington does not have third-party verification on metrics and targets disclosures included in these reports.

⁴ While Wellington does not commit to SBTs at the firm level, we may work with certain companies on SBTs.