

SASB Standards Index

Breckinridge has been a longstanding supporter of the Value Reporting Foundation (formerly Sustainability Accounting Standards Board) Sustainability Accounting Standards Board (SASB) and its mission of standardized corporate sustainability reporting. We are members of SASB’s Alliance as well as its Investor Advisory Group. To advance our commitment, we adopted their recommended reporting standards for the Asset Management & Custody Activities Industry for the first time in 2018. The following index provides readers with our 2021 answers or reference locations where they can find disclosure information within this report. Please visit the [SASB website](#) for information on the SASB standards.

Code	Metric	Direct Answer
FN-AC-000.A	(1) Total registered and (2) total unregistered assets under management (AUM)	(1) \$440,300,003.92 (2) \$46,285,103,030.82
FN-AC-000.B	Total assets under custody and supervision	\$18,381,788,097.48

Topic	Code	Metric	Report Location / Direct Answer
Transparent Information and Fair Advice for Customers	FN-AC-270a.1	(1) Number and (2) percentage of covered employees with a record of investment-related investigations, consumer-initiated complaints, private civil litigations, or other regulatory proceedings	(1) Zero (2) 0%
	FN-AC-270a.2	Total amount of monetary losses as a result of legal proceedings associated with marketing and communication of financial product-related information to new and returning customers	\$0
	FN-AC-270a.3	Description of approach to informing customers about products and services	General information is available on our website . More specific information is available via the U.S. Securities and Exchange Commission (SEC) website . Detailed information is provided to clients initially and updates are provided as a part of ongoing relationship management.
Employee Diversity and Inclusion	FN-AC-330a.1	Percentage of gender and racial/ethnic group representation for (1) executive management, (2) nonexecutive management, (3) professionals and (4) all other employees	Breckinridge tracks employee diversity through a voluntary self-identifying survey. See page 11 for more information on DEI practices. Below, we provide a breakdown as of 12/31/21. <ul style="list-style-type: none"> Executive management (Executive Committee/C-Suite): 78% Male, 22% Female; 89% White, 11% Asian Nonexecutive management (Managers of employees or business lines. Includes department heads, directors, and SD office manager): 78% Male, 22% Female; 94% White, 6% two or more races Investment professionals: 69% Male, 31% Female; 83% White, 11% Hispanic or Latino, 3% Asian, 2% two or more races All employees: 66% Male, 34% Female; 83% White, 1% Black, 7% Hispanic or Latino, 8% Asian, 1% two or more races
Incorporation of Environmental, Social and Governance Factors in Asset Management	FN-AC-410a.1	Amount of assets under management, by asset class, that employ (1) integration of environmental, social and governance (ESG) issues, (2) sustainability-themed investing and (3) screening	See page 14 of this report.
	FN-AC-410a.2	Description of approach to incorporation of environmental, social, and governance (ESG) factors in investment and/or wealth management processes and strategies	General information is available on our website . Detailed information is provided to clients initially and updates and reporting are provided as a part of ongoing relationship management.
	FN-AC-410a.3	Description of proxy voting and investee engagement policies and procedures	It is our policy to vote proxies in the best interest of clients. When a proxy is received, we will engage our investment team to review the proposals and decide on a vote. Should a material conflict of interest be identified, we may engage a third-party consultant to recommend votes on the ballot. The recommended votes are binding. Proxy voting is handled internally by our compliance department. Since proxy voting in fixed income is a rare occurrence, we have implemented an engagement policy that focuses on direct, strategic conversations with issuer management teams.
Business Ethics	FN-AC-510a.1	Total amount of monetary losses as a result of legal proceedings associated with fraud, insider trading, antitrust, anticompetitive behavior, market manipulation, malpractice, or other related financial industry laws or regulations	\$0
	FN-AC-510a.2	Description of whistleblower policies and procedures	As part of Breckinridge’s Code of Ethics and overall compliance program, employees are encouraged to report any actual or suspected violations of applicable laws or policies, as well as any fraud or illegal activity involving our business, to the firm’s CCO. All reports are treated confidentially to the extent permitted by law and investigated promptly. Breckinridge will use best efforts in keeping the employee’s identification confidential and will only disclose the identity when necessary. While we encourage employees to report violations to the firm, they also have an option to report violations to the applicable regulatory agencies, such as the Securities and Exchange Commission’s Office of the Whistleblower .