ERIC STURDZA
INVESTMENTS

Responsible Investment Policy

As adopted by E.I. Sturdza Funds plc

Our Philosophy

Eric Sturdza Investments is mindful of the global issues that humanity faces and our obligation to take steps whenever possible to support initiatives that seek to address these. Eric Sturdza Investments believes that high standards of corporate responsibility will generally make good business sense and have the potential to protect and enhance investment returns.

We seek to gain an understanding of the relevant Environmental, Social and Governance ("ESG") issues applicable to our investments through our monitoring process and to identify those issues which may potentially threaten the value of portfolio investments.

With this in mind, Eric Sturdza Investments has established a Responsible Investment (RI) policy which has the following pillars:

- Requires the portfolio management teams we work with to integrate ESG considerations into their investment process.
- Focus on investments in companies that have fully adopted, or those that are actively transitioning, their business models / processes to more sustainable approaches; whilst discouraging investments in companies that are falling short in this regard.
- Directly support charitable and social initiatives that address such considerations.

To help us achieve this, we have developed a two-step RI approach:

1. Established an exclusion list of industries that are prohibited for investment; and
2. Working with our portfolio management teams to ensure that ESG considerations are integrated into their investment processes.

This policy applies to all collective investment schemes where EISSML has been appointed as Investment Manager.

Accurate, reliable and extensive ESG research is crucial to our process. As such, we have engaged with Sustainalytics as our data provider. Sustainalytics is a global leader in ESG and Corporate Governance research and ratings. Founded over 25 years ago, the firm supports hundreds of the world's foremost investors in meeting their responsible investment objectives.

Eric Sturdza Investments believes that responsible investment is best embodied by the UN supported Principles for Responsible Investment (PRI). To confirm our approach to responsible investing, we are a signatory to the PRI, and are committed to its six guiding principles. In the longer term, our goal is to offer clients access to a suite of sustainable investment portfolios which truly align ambitions for investment returns with supporting the UN's Sustainable Development Goals.

We want our investment strategies to achieve two objectives (in addition to their financial targets):

- Incentivise corporates and governments to improve their environmental, social and governance impact.
- Make investments which align with the United Nations Sustainable Development Goals *(see Appendix 1 for further detail).*

Our Process

ESG analysis is carried out at Portfolio Manager level within Eric Sturdza Investments and at the level of our Investment Advisers in analysing ESG factors when making investment decisions. We believe that this is the most effective way to drive positive change in standards of corporate social responsibility.

Eric Sturdza Investments has an ESG Committee which is comprised of senior management and which governs the definition and application of its exclusion policy subject to the approval of the Eric Sturdza Investments' Board.

We will be guided by international conventions and applicable laws and directives and will rely on specialist research when defining our ESG criteria.

Our exclusion list will be reviewed annually unless a specific event necessitates an out-of-cycle review.

1. Exclusion List

a) We will not knowingly invest in companies that are involved with Controversial Weapons.

b) We will not knowingly invest in companies that derive a significant proportion (we define significant as being greater than 10%) of their revenue from the following product areas:
   - Thermal Coal
   - Oil Sands
   - Arctic Oil and Gas Exploration
   - Shale Energy
   - Small Arms
   - Predatory Lending
   - Whaling
   - Tobacco Products
   - Adult Entertainment

Please see Appendix 2 for additional information regarding each of the product areas we exclude.

Why do we not exclude all fossil fuels from our portfolios?

Currently, the global economy still needs traditional energy (oil, coal, gas, etc.) in order to operate. If traditional energy production were to halt overnight, economic activity would collapse and we would not have the resources to address the outstanding issues facing society.

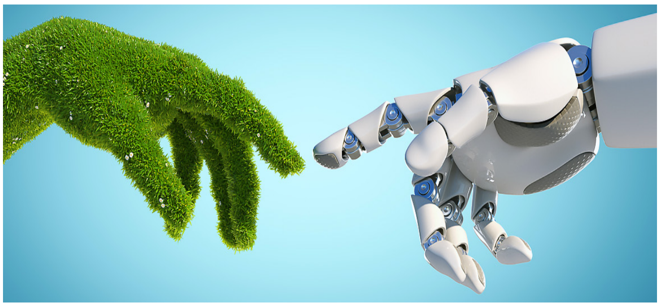
Logically, if we were to screen out all traditional energy providers, we would also have to screen out all companies that use traditional energy as an input; this would include vast swathes of the investable market. Secondly, whilst it might be a small proportion of their business activity, some energy companies are investing in renewable energy and / or carbon capture technology.

The majority of these companies are large and therefore their investments are significant and have the potential to affect change at an accelerated pace. We want to encourage those firms that are transitioning quickly and penalise those who are not. Thus, when we invest, it is only in those companies that have considered the ESG impacts in their sector and are making improvements for the future.

We think this approach will incentivise energy companies to invest in cleaner technology.

2. ESG Integration

In addition to using traditional methods when selecting portfolio constituents (fundamental analysis / valuation methodologies etc.) we also require our delegated Investment Advisers to incorporate a consideration of ESG factors into this process.



We would anticipate that the following factors should be considered (note that this list is not exhaustive):

Governance

- Size, diversity and independence of board.
- Board and management quality.
- Board commitment towards ESG factors.
- Transparency (remuneration policy).
- Exposure to corruption.

Environmental

- Energy and resource use (carbon emissions / water usage).
- Production of pollution / hazardous waste.
- Positive contribution to environment.
- Production of "green" technologies.
- Supply chain considerations.

Social

- Influence on communities / stakeholders.
- Unlawful activities and business practices.
- Ethical working practices (health and safety).
- Positive contribution to society via charities and other programmes.

We provide access to externally sourced ESG research to our Investment Advisers. We expect ESG research to form an important part of the stock selection process. Additionally, we expect our Investment Advisers to actively engage with the underlying companies. We also emphasise the importance of using voting rights in order to ensure a culture of strong corporate governance.

We use the resources of Institutional Shareholder Services (ISS), a leading voting services provider, to assist with this. Annual voting reports will be published on our website and we aim to vote on all of our proxies.

Furthermore, we monitor the social and environmental characteristics through actively monitoring all portfolios on a regular basis to ensure compliance with our responsibilities as a signatory to the UN Principles for Responsible Investment and under our own defined objectives outlined in this policy.

We are also a member of the Institutional Investors Group on Climate Change (IIGCC), a European membership body for investor collaboration on climate change. Under this obligation, we intend to monitor the carbon footprint of each portfolio using data provided by Sustainalytics, and to encourage Investment Advisers to engage with the underlying companies on strategies to improve their carbon footprint and to reduce / mitigate climate-related risks. In addition, we will collaborate with other members to advocate for better practices in addressing climate risks.

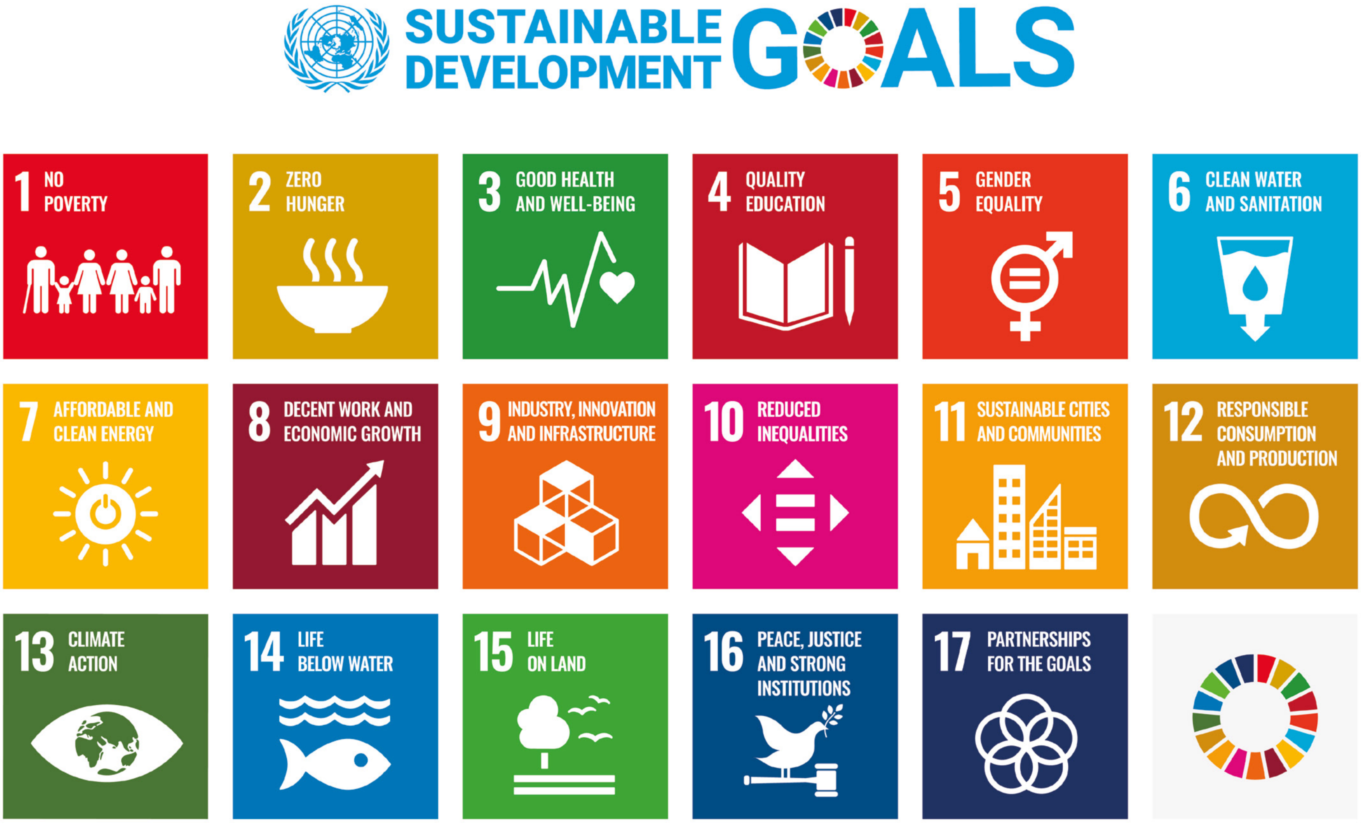
When we identify any material ESG risk in an individual position, we will look to the Investment Adviser to justify why they are holding that position, perhaps the investee company is looking to make improvements or perhaps the Investment Adviser, utilising their own experience, disagrees with Sustainalytics.

In either case we expect the Investment Adviser to have engaged with the investee company and to provide justification. If we are not satisfied with their explanation, then we will require them to divest within a reasonable time frame in the best interests
of investors.

The Investment Manager and Investment Advisers also comply with requirements issued by the French authorities (AMF position DOC-2020-03) as set out in Appendix 3.

Appendix 1

In 2016, the United Nations launched its 17 global goals for sustainable development. Following collaboration between governments, businesses, civil society and individual citizens, the global goals on poverty, inequality, injustice and climate change were agreed, with the purpose of making positive changes in all these areas by 2030.



Further informaton on the UN Sustainable Development Goals can be found here: https://www.un.org/sustainabledevelopment/blog/2015/12/sustainable-development-goals-kick-off-with-start-of-new-year/

Appendix 2

Thermal Coal – on a lifecycle basis thermal coal is more carbon intensive than other fossil fuel sources, while from an energy generation perspective it is easily substitutable. Thermal coal, also known as energy coal, or steam coal, is mainly used in power generation.

Oil Sands – considered unconventional because extraction is extremely carbon intensive, and dirty. Extraction methods cause air pollution 'in situ', as well as water withdrawal, and contamination from mining.

Artic Oil and Gas Exploration – exploring for oil and natural gas in the Arctic is controversial in the context of global climate change as well as because of the increased risk of environmental disasters.

Shale Energy – production involves environmental risks like water pollution and carbon emissions. Rock fracture, fracking, is needed to make natural gas flow through the shale, which poses environmental concerns due to its potential effects on the watershed. Shale energy is also associated with slightly higher carbon emissions than conventional resources.

Controversial Weapons – Eric Sturdza Investments acknowledges the right of nations to use legitimate weapons for national self-defence and national security purposes as set forth in the Charter of the United Nations. We accept that various types of weapons are necessary for achieving internationally accepted goals such as peacekeeping missions.

However, the defence industry is complex, and we are very mindful that the industry entails significant risks related to various types of controversial weapons and their potential use where international humanitarian laws could be violated; or used for purposes other than national security and self-defence.

As such, we have resolved to exclude companies which are involved to any extent in the production, trade, stockpiling, transferring or facilitating the use of weapons which could be used to breach fundamental human rights. In this context, we focus specifically on controversial weapons. These are weapons which (could) inflict large-scale suffering on civilians, or the victims of which are civilians. This involves six types of weapons within the following categories:

1. Weapons of mass destruction:
   a) Nuclear weapons.
   b) Chemical weapons.
   c) Biological weapons.

2. Weapons which impose considerable risk to civilian victims during and / or after the cessation of hostilities:
   a) Anti-personnel mines.
   b) Cluster bombs.
   c) Munitions with depleted uranium.

We use the Sustainalytics Product Involvement tool to independently identify companies that are involved with Controversial Weapons.

Small Arms – considered controversial as they are reported to be a major factor in the increase of armed conflict worldwide. They are the weapon of choice for many terrorist groups around the world and often hinder smoother rebuilding and development after a conflict has ended. Besides the loss of human life and physical harm, armed violence also has significant (direct and indirect) economic costs.

Predatory Lending – considered controversial due to its questionable or immoral business ethics and the potential socio-economic impacts of high interest rates and / or unfavourable terms on borrowers.

Whaling – considered controversial since the number of whales has declined increasingly during years of overexploitation and some species are at the point of becoming extinct. The controversy on an ethical level also concerns the suffering that the animals are subjected to when hunted.

Tobacco Products – the harmful effects of the tobacco industry are well documented:

Appendix 2 continued

- Tobacco kills up to half of its users and more than 8 million people per year.
- Around 80% of the world's 1.1 billon smokers live in low and middle income countries.
- In some countries, children are employed in tobacco farming to boost family income.
- Big tobacco actively conceals the dangers its products cause.

Source: World Health Organisation (https://www.who.int/news-room/fact-sheets/detail/tobacco).

In 2017, the UN Global Compact (a UN initiative to encourage businesses to adopt sustainable policies) excluded tobacco companies from participating in the initiative. Their decision recognised that tobacco products are in direct contravention of UN goals, particularly the right to public health and well-being.

In our view, there is a fundamental and irreconcilable conflict between the tobacco industry's interests and public health interests. The tobacco industry produces and promotes a product that has been scientifically proven to be addictive, to cause death and disease and to give rise to a variety of social ills, including increased poverty.

It is clear that engagement with the industry will not lead to change, as tobacco companies will not stop producing cigarettes. As such, we have determined that investing in tobacco is not compatible with our commitment to being a socially responsible investor.

Adult Entertainment – considered controversial as it is claimed that it may undermine faith and family values. Other concerns are that the materials show the subordination of those involved. Additionally, the industry is considered by many as being exploitative.

Appendix 3

To comply with requirements issued by the French authorities (AMF position DOC-2020-03) the Investment Manager and Investment Advisers will also:

- Ensure the average ESG risk rating of the Fund portfolio will be better than the average ESG risk rating of the universe into which the Fund can invest.
- The proportion of the Fund's portfolio with an ESG rating must be higher than:
  - 90% for equities issued by large capitalisation companies whose registered office is located in developed countries, debt securities and money market instruments with an investment grade credit rating, or sovereign debt issued by developed countries;
  - 75% for equities issued by large capitalisation companies whose registered office is located in emerging countries, equities issued by small and medium capitalisation companies, debt securities and money market instruments with a high yield credit rating or sovereign debt issued by emerging countries.

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