Quintet Asset Management S.A.

RESPONSIBLE INVESTMENT POLICY

Responsible Investment Policy

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I. KEY DEFINITIONS

- **Active ownership** – Represents actively exercising one's rights as the shareholder of a company, particularly active engagement with management, voting at Annual General Meetings (AGMs), and discussion on both financial and non-financial environmental, social, and governance (ESG) factors.

- **Engagement** – The act of undertaking constructive dialogue with investee companies/issuers with a view to improve environmental, social, and governance (ESG) practises.

- **ESG factors** – environmental, social or governance aspects. Examples of such aspect are pollution, carbon emissions, health & safety, labour conditions, board diversity, and corruption.

- **Exclusion** – The act of barring an entity's securities from being purchased for a portfolio due to business activities that are deemed unethical, harmful to society, or in breach of laws or regulations.

- **PAIs** – principal adverse impacts (PAIs). This refers to the negative impacts of investment decision-making on sustainability factors.

- **Responsible Investment** – Being an active owner and incorporating ESG issues into investment analysis and decision-making processes in order to achieve both financial and societal outcomes.

- **SFDR** – Regulation 2019/2088 of European Parliament and the Council of 27 November 2019 on sustainability-related disclosures in the financial services sector, also referred to as Sustainable Finance Disclosure Regulation (SFDR) as amended and/or updated from time to time. SFDR is a European regulation introduced to improve transparency in the market for sustainable investment products, to prevent greenwashing and to increase transparency around sustainability claims made by financial market participants.

- **Sustainability risk** – An environmental, social or governance (ESG) event or condition that, if it occurs, could cause a material negative impact on the value of the investment.

- **Voting** – Shareholders (typically) receive – and can choose to exercise – voting rights to be cast at annual or extraordinary general meetings on a range of strategic and environmental, social, and governance (ESG) matters.

II. INTRODUCTION

Where considered relevant, regulatory requirements and terminology of SFDR and the EU Taxonomy regulation have been taken into consideration in the development of the Policy as well as Climate and Environmental Risk. Responsible Investment is an integral part of QAM's business and our clients and society expect no less. The aim of this document (hereafter: the "RI Policy") is to state the key rules, governance, and procedures related to Responsible Investment (RI) within QAM. Where considered relevant, regulatory requirements and terminology have been taken into consideration in the development of the RI Policy. The RI Policy applies to QAM QAM's activities.

The owner of this document is the Authorized Manager responsible for portfolio management. This policy has been approved by Board of Directors of QAM and is to be reviewed annually.

Effective: 01/09/2025

III. POLICY PROVISIONS

3.1.MINIMUM ESG REQUIREMENTS

QAM has developed minimum ESG Requirements for all investments. The development of the QAM Responsible Investment Policy has been based on the organisation's views on what constitutes being a good corporate citizen, internationally recognised standards such as the United Nations (UN) Global Compact principles (for an overview of the 10 UN Global Compact Principles, please refer to Appendix I.).

The minimum ESG Requirements can be seen as the base expectation for all investments and are expected to evolve over time. Since the investment process and applicability differs per asset class and investment method, the application of the requirements will differ between investments, such as in the case of direct investments compared to externally managed assets (i.e. via third-party asset managers, see section 3.7[1]). Also, the consequences of a violation of the minimum ESG Requirements depend on various criteria, such as regulatory requirements, the nature of the violation, and the feasibility of engaging with the entity that is considered to be in violation.

EXCLUSIONS

If an issuer operates in violation of QAM's defined exclusion criteria and either the desired changes related to resolving the violation cannot be achieved given the nature of the violation, or the issuer has not resolved the violation with the timeframe set by QAM, such issuer is excluded from QAM's investment universe. The exclusion criteria for direct investments are categorised as follows:

1.Equities and bonds issued by companies directly and indirectly involved in controversial weapons;

2.Bonds issued by countries under an EU arms-embargo, as well as equities and bonds of companies owned by these countries;

3.Equities and bonds issued by companies deriving significant revenue from the extraction of thermal coal or thermal coal power generation;

4.Equities and bonds issued by companies that are non-compliant with the principles of the UN Global Compact (UNGC) when engagement is not or no longer considered feasible.

For further information on each of these categories, see below:

1. ***Controversial Weapons***:

Controversial weapons are weapons that can have a disproportionate and indiscriminate impact on the civilian population. The following weapon types are considered controversial by QAM: anti-personnel mines, biological weapons, chemical weapons, cluster munitions, depleted uranium ammunitions, and white phosphorus weapons. In addition, involvement by corporate issuers in

[1] As the minimum ESG requirements are most applicable to equities and bonds, more specific guidelines may be developed to ensure that all investment instruments are suitably covered, such as structured products and derivatives, in line with any emerging market practices, data availability or regulatory guidance.

nuclear weapons related to countries that are not a signatory to the Non-Proliferation Treaty (NPT) is considered to be a violation of QAM's minimum ESG Requirements.[2]

*2. **EU arms embargoes:***

QAM considers sovereign issuers and sovereign-related issuers to be in violation of the minimum ESG Requirements in case of EU arms embargoes targeted at the central government. Since QAM already adheres to regulations concerning various types of sanctions, these regulations are assumed to be co-equal with the minimum ESG Requirements. As such, any explicit criteria in this Policy related to sovereign or sovereign-related issuers must be understood as being in addition_to any applicable regulations.

3. Thermal coal:

Thermal coal is widely used as a principle means of generating electricity in much of the world. The International Energy Agency (IEA) found that CO2 emitted from coal combustion was responsible for over 0.3°C of the 1°C increase in global average annual surface temperatures above pre-industrial levels. This makes coal the single largest source of global temperature increase. Thermal coal is inherently in contradiction with the ambitions of the Paris Agreement.

When corporate issuers are deriving more than 10% of revenues either from thermal coal extraction or thermal coal power generation, they are excluded.

An exception to this requriement are Green Bonds, as QAM believes that investing in green bonds can help companies fund environmental projects that will decrease their reliance on thermal coal in favour of greener technologies. This is consistent with QAM's philosophy to deploy investment in order to create positive change.

4. United Nations Global Compact principles:

QAM expects companies it invests in to operate in accordance with international law and regulations. QAM uses the United Nations Global Compact principles as a reference framework to QAM the conduct of corporate issuers. Corporate issuers that we have determined to severely and structurally violate these principles are considered to be in violation of QAM's minimum ESG requirements. When that's the case, such issuers are only eligible for investment when there's an active engagement process with that issuer to resolve the violation. This is maximised at three years. When engagement is not or no longer considered feasible, such issuers need to be excluded.

3.2. ESG INTEGRATION

QAM believes that investors can make better investment decisions if Environmental, Social, and Governance (ESG) factors and responsible business practices are an integral part of the investment process. ESG integration provides a fuller picture of the opportunities and risks related to individual investments and a portfolio as a whole.

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[2] Please note that these criteria always include what is mandated by (local) law and regulation, but also go beyond these requirements (and are therefore stricter), for example with respect to the types of weapons that are considered a violation.

In this policy document, the term ESG integration refers to the use of ESG factors in the investment process to enhance the risk-adjusted return profile by either increasing returns or lowering risk.

The investment processes within QAM can differ between funds. As such, the ESG integration approaches are likely to be different as well, including implementation at the two levels mentioned above. QAM does therefore not have a centralised, prescriptive approach on how to integrate ESG factors, but has taken the following steps:

- In order to stimulate and facilitate ESG integration, investment staff members have access to relevant ESG research and are expected to consider this information in their investment process and to demonstrate how they have done so.
- QAM investment teams have developed internal guidelines, tools, training modules, and supporting materials to further enhance the ESG integration efforts. ESG integration may be either a quantitative or qualitative approach, at either level.
- QAM has identified sustainability risks in the form of environmental, social or governance (ESG) events or conditions that, if they occur, could cause a material negative impact on the value of an investment. These precede and influence investment decisions, continuously managed and monitored. For further details on our approach to the integration of sustainability risks in investment decision-making, please refer to QAM Sustainability Risk Policy.
- In addition, where external (investment) research is a significant part of the investment process, QAM will engage with the investment research provider to ensure ESG factors are considered in the financial analysis and valuation of individual securities.

3.3. ADVERSE IMPACTS

QAM considers and mitigates principal adverse impacts (PAIs) of its investment decision-making, where possible and feasible, through a combination of methods (exclusion, the incorporation of ESG factors and limits in portfolio construction, engagement, and voting). The first two methods are specifically used by QAM to consider various adverse impacts in the investment due diligence process for single lines (equities, bonds). For investments in funds managed by external fund managers this is conducted via QAM's fund due diligence process. The exact way adverse impacts are taken into account differs between external fund managers.

These methods are further described in this Policy document. QAM does not prioritise certain adverse impacts over others, however, some adverse impacts are steered on more explicitly than others. This is particularly the case for those PAIs for which explicit criteria have been formulated in this Policy document. Given the variety of financial products that QAM employs to meet different client needs, the exact way and degree the adverse impacts are considered depends on the type of financial product and is further detailed in product-specific disclosures.

3.4. ADDITIONAL SINGLE LINE SUSTAINABLE INVESTMENT CRITERIA FOR PORTFOLIO CONSTRUCTION

QAM has developed a sophisticated additional ESG criteria for portfolio construction for single lines, which are applied to funds managed by QAM and are in these cases applied on top of the minimum ESG requirements described in section 3.1.

Given the large variety of financial products that QAM employs, the exact way in which the additional single line ESG investment criteria depend on the type of financial product and is detailed in product-specific disclosures.

These criteria reflect QAM's view on activities, products and conduct of companies that are, or are not considered sustainable. They cover a range of indicators that ensure investee companies align with our expectations with regards to involvement in controversial practices, sustainability risk, and provision of products and services in line with a sustainable future. Please note that the portfolio construction rules described below are in some areas less strict and some areas stricter than the SFDR definition of a sustainable investment. For any product disclosures related to for example the percentage of the sustainable investments in a financial product, QAM applies additional criteria to ensure that such investments meet the SFDR definition of sustainable investments. For more information please refer to QAM Sustainable Investment Framework

Principles for ESG portfolio construction:

1. Sustainability score at sector level: Subindustries with an average ESG risk rating of Negligible, Low, or Medium will pass. If the average ESG risk rating for a subindustry is High or Severe, a company can still pass if it ranks in the top 25th percentile for ESG risk within its specific subindustry.

2. Sustainability score at company level of most material ESG risks: A company will pass if the ESG risk score of the company is below the 90th percentile relative to it's subindustry.

3. Product involvement: the company's revenue derived from activities listed below is within boundaries (refer to point 4 below).

4. Controversy severity level: A company shall pass if it has a maximum controversy level of 4 or below.

For further information for each, see below:

1. Sustainability score at sector level

The sustainability score at sector level is based on Sustainalytics risk scores. Sub-industries which have an average ESG risk score of either negligible, low or medium are deemed as not conflicting with a sustainable transition. We believe that companies demonstrating a strong commitment to sustainable transition, even those operating in sub-industries with high or severe ESG risks, can play a pivotal role in advancing their sectors. By identifying "best-in-class" companies—those recognized as industry leaders—we focus on organizations actively driving meaningful change and leading their industries towards a sustainable future. We believe companies which are in the top 25th percentile for ESG risk in high/severe ESG risk subindustries, as demonstrating an ability to drive positive change and be industry leaders for sustainability within their subindustry.

2. Sustainability score at company level of most material ESG risks Material

ESG risks are assessed using Sustainalytics' ESG risk scores. The score measures the degree to which a company's economic value is at risk driven by ESG factors, or more technically speaking, the magnitude of a company's unmanaged ESG risks. An issue is material within the ESG Risk Ratings if its presence or absence in financial reporting is likely to influence the decision made by investors. To be considered relevant in the ESG Risk Ratings, an issue must have a potentially substantial impact on the economic value of a company and, hence, its financial risk- and return profile from an investment perspective. Group Responsible Investment Policy Page 10 of 17 ESG risk scores are composed of three building blocks that contribute to a company's overall rating score: 1) Material ESG issues, 2) the baseline issues: corporate governance & stakeholder governance, and 3) Systemic ESG issues & Idiosyncratic issues. The ESG risk score, the company's full unmanaged risk, is calculated as the sum of the individual material ESG Issues' unmanaged risk scores. For more information on ESG risk score please refer to Sustainalytics methodology.

3. Product involvement

This research includes details on how a company is involved in one or more business activities that can be considered of a controversial nature as well as the degree of involvement, generally using revenue as a proxy. For greater detail on the product involvement approach, please refer to Appendix II.

4. Controversy severity level

Controversies are incidents and events that may pose a business or reputation risk to a company due to the potential impact on stakeholders or the environment. Controversies are classified by Sustainalytics in five categories; low (level 1), moderate (level 2), significant (level 3), high (level 4) and severe (level 5). Severe controversies (level 5) have a highly negative impact on the environment and society with serious business risk. They reflect exceptional egregious behaviours, high frequency of incidents, and / or companies with poor management of the controversy. If a score is not available for a company a score of n/a is given.

3.5 ACTIVE OWNERSHIP

QAM believes that active ownership enhances the long term economic and societal value of the investee company over time. As such, exercising the influence QAM has as an investor and investment manager in order to achieve beneficial change, is consistent with both our fiduciary duty towards our clients and our objective to be a responsible company. QAM's ownership practices consist of dialogue and engagement with investee companies, and the exercise of voting rights to hold investee companies' management accountable.

In addition, since QAM invests a significant share of the assets entrusted to us by our clients via third-party funds, QAM is well positioned to stimulate active ownership and Responsible Investment practices of fund managers through the work of Quintet's Fund Solutions Team. By actively engaging with fund management companies and allocating capital to their funds on the basis of ESG and RI considerations, Quintet, acting on behalf of QAM, can further contribute to the development of Responsible Investment in the asset management value chain.

3.5.1. VOTING

QAM believes that exercising shareholder rights enhances the economic value of companies and contributes to the goal of providing an optimal return to our clients. In addition, QAM considers voting to be an essential part of being an active owner, and will therefore seek to vote, where possible and feasible, at shareholder meetings of the companies in which we invest for our clients. Our Active Ownership policy and voting guidelines, which draw upon the expertise of our external service provider, emphasises governance, environmental, and social matters. We partner with GlassLewis, a global proxy voting provider, to for proxy research and recommendations and to cast our votes. We review in detail voting when the investment is large or there is an increased level of controversy, or on request from members of our investment team, as further explained in our Active Ownership Policy.

Voting is currently implemented for direct line equities across Rivertree and Beheerstrategie N.V. funds.

3.4.2. ENGAGEMENT

The primary focus of QAM's engagement is to address companies' key risks, challenges, and opportunities, covering environmental, social, governance, strategy, risk and communication matters. Our ultimate objective is to create value for investors, the company, and people and the planet.

Since QAM represents a diverse group of clients with diverse holdings across the investment universe, we invest in a wide range of companies. As many of these companies are large, our direct investments may be small relative to the size of the firm. To be effective in engaging with these companies, we believe that collaborative engagement is likely to achieve better results than efforts we might undertake on our own. We have therefore partnered with EOS[3] at Federated Hermes, a specialised service provider, which conducts engagement on our behalf. In cases where collaborative engagement is not practical, we may undertake direct engagement ourselves with the companies we invest in.

We have instructed our engagement partner to give special attention to companies that violate the principles of the UN Global Compact, or that are involved in significant ESG controversies.

QAM allocates a significant portion of its client's assets to external managers. In addition to engagement for direct lines, QAM engages with external fund managers. Active ownership to create sustainable investor value is important for all investments, and we incorporate this conviction into the selection and monitoring of external managers. We also engage with these managers to communicate our beliefs and to understand theirs, and for insight into their active ownership policy and practice.

For more Information on our engagement policy and practices please refer to our Active Ownership Policy.

3.6. REPORTING AND TRANSPARENCY

Reporting is an integral part of being a responsible investor. In addition to any regulatory requirements for entity and product level reporting, Quintet group reports to external stakeholders about its Responsible Investment activities including QAM in the following ways:

- Annual active ownership report
- Disclosure of QAM's voting decision's online, dating back to the past 12 months.
- PRI transparency report

Furthermore, depending on the exact product or proposition, QAM also provides Responsible Investment related reporting to clients beyond regulatory requirements, such as for example on specific engagement cases and the ESG performance of their portfolios.

[3] Equity Ownership Services

3.7. THIRD-PARTY MANAGED ASSETS[4]

Since QAM's RI Policy includes all asset classes, QAM also applies RI requirements to third party managed assets held in Rivertree funds, which are intended to reflect the intentions and objectives behind the guidelines for internally managed assets.

While QAM cannot unilaterally determine the investment approach in pooled investment funds, we can leverage our position in the asset management value chain as a fund selector. By asking questions, stimulating certain types of behaviour/approaches, and ultimately, allocating capital accordingly, QAM can positively influence the development of the Responsible Investment field as a whole.

QAM makes a distinction between:

- Funds managed by a third-party for which QAM can determine the investment approach
- Funds managed by a third-party for which QAM cannot determine the investment approach
- Funds managed by a partner of Quintet Group
- Passive Funds

3.7.1 FUNDS MANAGED BY A THIRD-PARTY FOR WHICH QAM CAN DETERMINE THE INVESTMENT APPROACH

For third-party managed assets that are managed for by QAM on a discretionary basis (i.e. where QAM has a formal say on how the assets are managed) external managers are expected to follow the same requirements and guidelines as QAM applies to its internally managed assets. Feasibility and (potential) cost implications will be assessed on a case by case basis.

3.7.2. FUNDS MANAGED BY A THIRD-PARTY FOR WHICH QAM CANNOT DETERMINE THE INVESTMENT APPROACH

For that activity, QAM relies on the capabilities of Quintet group Fund Selection Team that has developed specific third party fund selection RI guidelines, which utilises research in order to validate that fund managers stick to their commitments. Quintet Fund Selection Team require fund managers to fill out a rigurious questionnaire in order to assess how ESG factors have been integrated into the investment process.

All fund managers should at least meet QAM's Responsible Investment criteria:

1) Integrate ESG factors in financial analysis and portfolio construction (for active funds)
2) Be active owners: engage with investee companies and where applicable vote at shareholder meetings.
3) Exclude issuers involved in controversial weapons (applies only to issuers of cluster munitions)

Furthermore, funds held in Rivertree that have stronger sustainable characteristics are analysed based on the following 5 key pillars:

1. Intentionality (explicit and intended link to ESG in the objectives)
2. Sustainability of the portfolio (sustainable characteristics of the holdings)

[4] In this section, we refer interchangeably to "assets," "funds," and "mandates."

3. Quality of sustainable research (sufficient skill, capacity & tools embedded in robust methods and processes)
4. Active ownership (high quality engagement and proxy voting, supported by clear policies)
5. Transparency (frequent reporting on voting, engagement and progress on ESG targets)

For a more detailed information about this approach, please refer to Quintet Group fund sustainability due diligence policy.

3.7.3. PARTNER PRODUCTS

Quintet, mother company of QAM has several partner products, which are manufactured by Blackrock in collaboration with Quintet, or under Quintet Guidelines. Quintet has provided investment guidelines for these products which must follow the rules set out in this policy.

3.7.4. PASSIVE FUNDS

With passive funds or ETFs no interview with the fund manager is conducted. The questionnaire is partly answered by the fund manager and partly by the underlying index provider.

In line with QAM requirement that funds should engage with investee companies, when the fund managers engage with the index provider on ESG matters with regards to the constituents of the index, we consider this as meetingour expectation.

APPENDIX I – THE UN GLOBAL COMPACT PRINCIPLES

Human Rights

Principle 1: Businesses should support and respect the protection of internationally proclaimed human rights; and

Principle 2: make sure that they are not complicit in human rights abuses.

Labour

Principle 3: Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining;

Principle 4: the elimination of all forms of forced and compulsory labour;

Principle 5: the effective abolition of child labour; and

Principle 6: the elimination of discrimination in respect of employment and occupation.

Environment

Principle 7: Businesses should support a precautionary approach to environmental challenges;

Principle 8: undertake initiatives to promote greater environmental responsibility; and

Principle 9: encourage the development and diffusion of environmentally friendly technologies.

Anti-Corruption

Principle 10: Businesses should work against corruption in all its forms, including extortion and bribery.

APPENDIX II – SINGLE LINE THRESHOLDS FOR PRODUCT INVOLVEMENT

These investment criteria apply to single lines and do not apply to third party products.

Product Involvement	Thresholds				Criteria
Adult Entertainment	Adult Entertainment Production	Adult Entertainment Distribution			
This involvement area provides an assessment of whether companies derive revenue from adult entertainment. This includes producers of adult movies, cinemas that show adult movies, adult entertainment magazines, and the broadcasting of adult entertainment.	5%	15%			revenue %
Alcoholic Beverages	Alcoholic Beverages Production	Alcoholic Beverages Retail	Alcoholic Beverages Related Products/ Services		
This involvement area provides an assessment of whether companies derive revenue from alcoholic beverages. These include producers of these beverages as well as retails and distributors and suppliers of alcohol-related products/services to alcoholic beverage manufacturers.	25%	25%	25%		revenue %
Gambling	Gambling Operations	Gambling Supporting Products	Gambling Specialized Equipment		
This involvement area provides an assessment of whether companies derive revenue from gambling. This includes companies that offer gambling services (operation of casinos, lotteries, bookmaking, online gambling, etc.), gambling products (slot machines and other gambling devices) or supporting products/services to gambling operations.	5%	15%	15%		revenue %
Genetically Modified Organisms (GMO)	Genetically Modified Plants and Seeds Development	Genetically Modified Plants and Seeds Growth			
This involvement area provides an assessment of whether companies derive revenue from the development and/or cultivation of genetically modified seeds and/or plants, as well as the growth of genetically modified crops	5%	15%			revenue %
Tobacco	Tobacco Products Production-	Tobacco Products Related Products/Services	Tobacco Products Retail		
This involvement area provides an assessment of whether companies derive revenue from tobacco products including cigarettes, cigars, tobacco, electronic cigarettes, paper used by end consumers for rolling cigarettes, filters, snuff tobacco, etc. It includes tobacco products manufacturers, retailers and distributors, as well	0%	5%	5%		revenue %

as companies providing tobacco-related products or services.					
Civilian Weapons	Small Arms Civilian customers (Assault weapons)	Small Arms Civilian customers (Non-assault weapons)	Small Arms Retail/distribution (Non-assault weapons)	Small Arms Retail/distribution (Assault weapons)	
This involvement area provides an assessment of whether companies derive revenue from firearms. It includes manufacturers of firearm weapons such as guns, rifles, and pistols, manufacturers of components of these weapons and retailers.	0%	0%	5%	5%	revenue %
Nuclear weapons	Nuclear Weapons Non tailor-made or non essential	Nuclear Weapons Tailor-made and Essential			
This involvement area provides an assessment of whether companies are involved in the manufacturing of nuclear weapons or components or services thereof. Nuclear weapons, in contrast to conventional weapons, have a disproportionate and indiscriminate impact on civilian populations as well as consequential impacts to surrounding ecosystems.	involvement	involvement			Involvement or no involvement