

ENVIRONMENTAL, SOCIAL AND GOVERNANCE (ESG) POLICY

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At CAIM, we believe that high standards of corporate responsibility make good business sense and have the potential to protect and enhance investment returns. Therefore, our investment process takes ESG considerations into account where such issues may have a material impact on either investment risk or return.

We are dedicated to achieving the best possible risk-adjusted returns for our investors and we believe that responsible investment is essential in maximising these returns. We strive to gain an in-depth understanding of the relevant ESG issues applicable to our investments through our internal research process and we seek to identify such issues before they escalate into events that may potentially threaten the value of investments. ESG considerations form an integral part of the decision-making process when selecting appropriate investments for client portfolios.

Our data sources include financial analysis, companies' published reports and accounts, articles from specialist technical journals, historical long-term business drivers, adherence to environmental sensitivities, board composition, governance standards and any other relevant information. We do not seek information that is not generally available to the public or any information that could be deemed 'inside information'.

We utilise internationally recognised benchmarks, codes and standards as guidelines for corporate best practice within our ESG analysis, but we are pragmatic in our recognition that no "one" model of ESG management applies, and that each company must be considered in respect of the industry and markets in which they operate.

We are supportive of companies that seek to develop their businesses successfully and sustainably in the interests of shareholders. The use of positive ethical criteria in assessing companies is incorporated within the investment process. Criteria have been identified across the following broad areas:

- Corporate governance practice
- Regard for human rights; and
- Sustainable environmental practice, especially in the Developing World

We reserve the right to avoid investment in companies whose management practices fail to meet the prescribed criteria or are judged to be otherwise unacceptable.

Our definition of responsible investment is:

'the integration of ESG considerations into investment management processes and ownership practices as these factors can have an impact on financial performance.'

In accordance with our definition and the United Nations principles for Responsible Investment (UNPRI), we adhere to the following six principles:

Principle 1: Incorporating ESG issues into investment analysis and decision-making processes

Principle 2: Being active owners and incorporating ESG issues into policies and practices

Principle 3: Seeking appropriate disclosure on ESG issues by the entities in which investments are completed

Principle 4: Promoting acceptance and implementation of the principles within the investment industry

Principle 5: Working together to enhance effectiveness in implementing the principles

Principle 6: Reporting on our activities and progress towards implementing the principles

For more information on UNPRI please visit www.unpri.org

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