SEILERN
Investment Management Ltd.

RESONSIBLE INVESTMENT POLICY

February 2021

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Contents

Introduction

The highest priority of Seilern Investment Management is the preservation and enhancement of client capital. We aim to be responsible stewards of that client capital. We focus on clients' long-term interests by investing in companies that we believe can grow sustainably over time.

These businesses will typically have superior business models, stable and predictable business economics and a sustainable competitive advantage. We look for strong management teams, which exhibit high integrity and whose interests are closely aligned with long-term shareholders. Importantly, investee companies tend to have strong structures in place in order to consider ESG risks.

Investment Philosophy

We believe that over time, earnings drive share prices. As such, it is an essential component of our investment process to understand the sustainability of the earnings growth for investee companies. ESG risks can be material to a company's ability to grow in the long-term. As a result, our bottom up fundamental research focuses on a wide rangeof criteria, both financial, and non-financial.

The ten required criteria that investee companies must demonstrate are:

1. Superior Industry Growth
2. Consistent Industry Leadership
3. Scalable Business Model
4. Sustainable Competitive Advantage
5. Strong Organic Growth
6. Wide Geographic & Customer Diversification
7. Low Capital Intensity & High ROIC
8. Solid Financial Position
9. Transparent Accounts
10. Excellent Management & Governance

IA Responsible Investment Framework & Definitions

As part of Seilern's commitment to transparency and accountability and as members of the UK's Investment Association (IA), we have chosen to adopt the IA's framework on sustainability. We believe that utlising these common definitions will increase clarity surrounding ESG issues and implementation.

Therefore, we shall use the below definitions for commonly used terms:

Stewardship: Stewardship is the responsible allocation, management and oversight of capital to create long-term value for clients and beneficiaries leading to sustainable benefits for the economy, the environment and society. Examples include setting expectations, oversight of assets, engaging with issuers, voting.

ESG Integration: The systematic and explicit inclusion of material ESG factors into investment analysis and investment decisions. Examples include statement of commitment, firm-wide policies.

Exclusions: Exclusions prohibit certain investments from a firm, fund or portfolio. Exclusions may be applied on a variety of issues, including to align with client expectations. They may be applied at the level of sector, business activity, products or revenue stream, company or jurisdictions/countries. Examples include ethical, values-based or religious exclusions.

Sustainability Focus: Investment approaches that select and include investments on the basis of their fulfilling certain sustainability criteria and/or delivering on specific and measurable sustainability outcomes. Examples include sustainability themed, positive tilt, best in class.

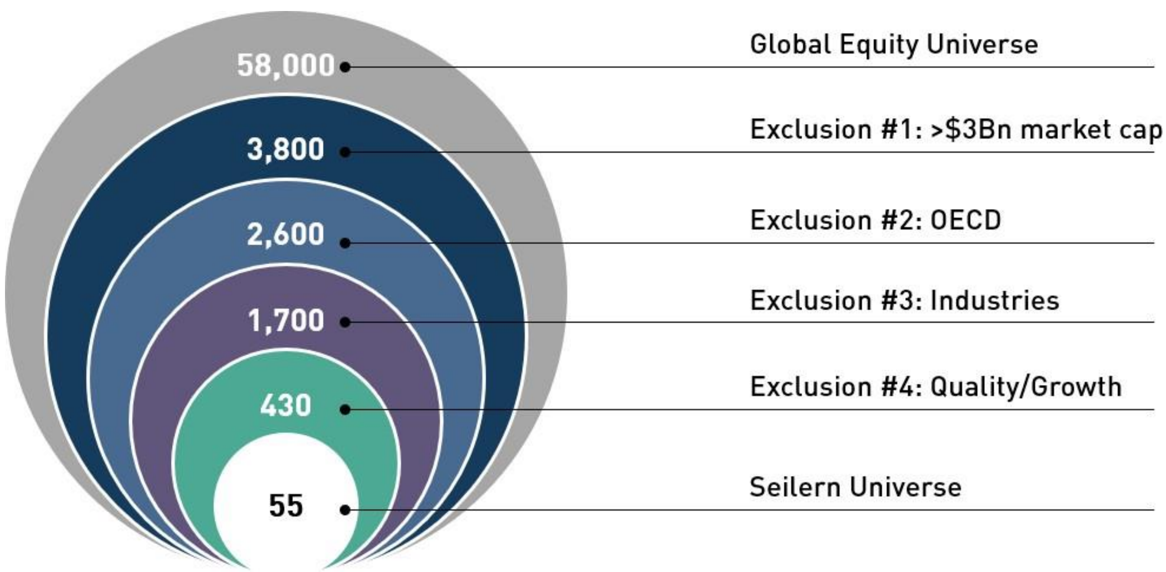
Impact Investing: Investments made with the intention to generate positive, measurable social and environmental impact alongside a financial return. Examples include social bond funds, private impact investing.

Source: The IA Responsible Investment Framework, November 2019

In line with this framework, we consider ESG at a firm-wide level, rather than at a fund level as Seilern does not presently offer any funds with a sustainability focus. As such, this report will focus on firmwide policies for exclusions, Seilern's approach for integrating ESG into all investment research and the manner in which we engage with investee companies.

Exclusions

The first stage of the investment process relies on an exclusion-based process, which eliminates industries that do not fit our investment criteria.



ESG exclusions are incorporated throughout each stage. We filter out non-OECD countries as well as several other countries within the OECD which demonstrate governmental and legal instability, leaving countries, and therefore companies, that enjoy higher standards of governance.

We apply the following sector and industry exclusions:

- **i.** Telecommunications
- **ii.** Automobiles
- **iii.** Tobacco
- **iv.** Energy (including Oil, Gas and Consumable fuels)
- **v.** Banks
- **vi.** Insurance
- **vii.** Heavy Industrials (including Aerospace & Defence)
- **viii.** Materials

ix. Metals & Mining
x. Utilities (including Electric, Gas & Water)

As a result of these exclusions, our portfolios have very low exposure to carbon intensive industries as well as industries which typically have a poorer record with labour relations.

Integration

Once a company passes the initial screens and exclusions listed above, it is subject to rigorous scrutiny by our investment analysts before admission into our investible universe, the Seilern Universe. They will review:

- the business model and financials;
- the sector and value chain;
- the long-term dynamics and risks of the company's growth; and
- Sustainability risks (described further below).

Once admitted to the Universe, each analyst reviews their companies on an ongoing basis in order to keep research up to date. This takes the form of research updates which are communicated in report form as well as deep-dive investigations at the team's regular investment meetings.

Sustainability Integration Considerations: Further Detail

We identify and integrate sustainability risk as part of the integration process described directly above, in accordance with Regulation (EU) 2019/2088 of the European Parliament and of the Council of 27 November 2019 on sustainability-related disclosures in the financial services sector (the "SFDR").

Sustainability risk is defined as an environmental, social, or governance event or condition that, if it occurs, could potentially or actually cause a material negative impact on the value of a Sub-Fund's investment.

Sustainability risks can either represent risks of their own or have an impact on other risks. Sustainability risks may contribute significantly to risks such as market risks, operational risks, liquidity risks or counterparty risks. The assessment of sustainability risks is complex and may be based on environmental, social, or governance data, which is difficult to obtain, incomplete, estimated, out of date and/or otherwise inaccurate. Assessment of these risk can also be qualitative in nature.

The primary tool to manage sustainability related risks is via our exclusion process. By formally excluding those sectors with the highest sustainability risk (see above) we considerably reduce the funds exposure to such risks in the first instance. SIM looks to invest in companies that can deliver sustainable earnings growth with a high degree of forecastability. Investment analysts will report on the companies under their coverage on an ongoing basis and are responsible to flag any matter which poses a risk to the long-term sustainability of our investments. These include, among others, issues concerning corporate governance, matters that adversely impact their reputation, matter that could lead to regulatory fines or disproportionate behaviour towards stakeholders as well as the environment in which they operate.

1. Engagement

A thorough understanding of our portfolio companies is the cornerstone of our investment philosophy and engaging with these companies is an essential part of this process. During the initial research process and once admitted to the universe, companies are continuously scrutinised and monitored. From an ESG perspective, the team will look to identify any possible issues that might affect the long-term sustainability of the company's earnings, such as controversies that might negatively affect the company or material changes in management and stakeholder relations.

This includes reviewing annual reports and meeting with company management, on regular intervals. We aim to have continuous contact with the companies that we invest in and our analysts strive for, wherever possible, ongoing open communication with the management of investee companies, in order to refine their investment analysis, and will discuss an investee company's corporate governance, long-term strategy, leverage and financial statements.

As long-term owners of these companies, we have developed relationships with a number of management teams over a period of many years. The resulting depth of knowledge and long-term investment horizon facilitates meaningful dialogue with management teams of investee companies.

While engagement at the most senior levels of our companies is important, we also place strong value on engaging across various levels of the companies we invest. We find that we can glean essential insights by engaging with stakeholders of all levels, including vendors, clients and competitors of our investee companies. This gives our analysts a clearer picture of a company's values, corporate culture and treatment of stakeholders – intangible qualities that can factor into our overall assessment of a company.

Adverse Sustainability Impacts

As at the date of this policy, we do not currently consider the principal adverse impacts ("PAI") of investment decisions on sustainability factors, within the meaning of Article 4(1)(a) of the SFDR. Sustainability factors are defined as environmental, social and employee matters, respect for human rights, anti-corruption and anti-bribery matters.

Unlike the consideration of sustainability risk as part of the investment decision-making process (which measures how sustainability conditions will impact the investment), adverse sustainability impacts address how an investment decision affects environmental, social and/or governance factors.

Meaningful consideration of PAI is not currently possible due to (i) the absence of final regulatory technical standards relating to PAI and (ii) the difficulty in obtaining the requisite data on which we would be obligated to report on in accordance with the SFDR, and in any case, the possibility that such data may be incomplete, estimated, out of date and/or otherwise inaccurate.

Notwithstanding the aforementioned barriers to the identification and prioritisation of PAI, Seilern will re-assess its position following the adoption of the regulatory technical standards referred to above, giving due consideration to market developments and this policy will be updated accordingly if required.

Conflict of Interest

Seilern has produced a Conflict of Interest Policy, to address actions or transactions, which may give rise to actual or potential conflicts of interest.

Seilern's Board of Directors is responsible for establishing and maintaining such controls as are appropriate to its business. Seilern is required to establish, implement and maintain an effective conflicts of interest policy that is set out in writing and is appropriate to the size and organisation of the firm and nature, scale and complexity of its business.

As part of Seilern's conflicts of interest policy, employees are also required to declare any relevant interests, adhere to the firm's Personal Account Dealing and Insider Trading Management policy as part of our transactions procedures.

The Conflict of Interest Policy is reviewed by the Board of Directors on an annual basis. A copy of the current Conflict of Interest Policy is available on the Seilern website.

Proxy Voting

As of 2020, Seilern aims to vote at all shareholder meetings and engaged Institutional Shareholder Services (ISS) ProxyExchange to facilitate this. Our starting point is that we vote with management, as agreeing with a company's strategy and approving of management are core requirements for our investments. In the event that an analyst believes a proposed motion is not in the long-term interests of investors, they will put this forward in an investment meeting, where it will be discussed by the full team. Before a vote can be cast against management's recommendation, it requires the approval of the Head of Research, the Analyst covering the company, and the directly affected Fund Managers. Before voting against management, we will seek to engage the company to share our views and discuss the relevant topics. In extreme cases, we may choose to divest our position in the company. Both the decisions and their rationale are documented. A summary of voting records will be available to clients on request.

Resources

To gather and assess ESG information and risks, Seilern leverages its in-house research team, but also utilises two specialised firms to expand their knowledge and understanding of ESG risks. These external partners are Sustainalytics and ISS and they have been selected based on the quality of the information provided and scope of coverage.

These resources are available to supplement in-house research but are not the basis of automatic exclusions or investment decisions, rather they provide guidance and may provide triggers for additional research.

- **Sustainalytics** is a leader in ESG and corporate government research, rating and analysis, and highlights a company's exposure to a list of controversial product lines, such as tobacco and controversial weapons.
- **ISS** provides proxy voting information and recommendations.
- Additionally, we use **Morningstar Direct** for look-through portfolio analysis and carbon footprint reporting. These reports are available to all current and prospective investors.

Principles of Responsible Investment (PRI)

Seilern is a signatory of the Principles of Responsible Investment, effective January 2019. As such, we strive to apply the following principles and behaviors:

1. We will incorporate ESG issues into investment analysis and decision-making processes.
2. We will be active owners and incorporate ESG issues into our ownership policies and practices.
3. We will seek appropriate disclosure on ESG issues by the entities in which we invest.
4. We will promote acceptance and implementation of the Principles within the investment industry.
5. We will work together to enhance our effectiveness in implementing the Principles.
6. We will each report on our activities and progress towards implementing the Principles.

Seilern is currently undergoing the completion of its first reporting and assessment questionnaire to measure its progress and adherence to these principles. Once published, this will be made available on Seilern's website.

External Ratings

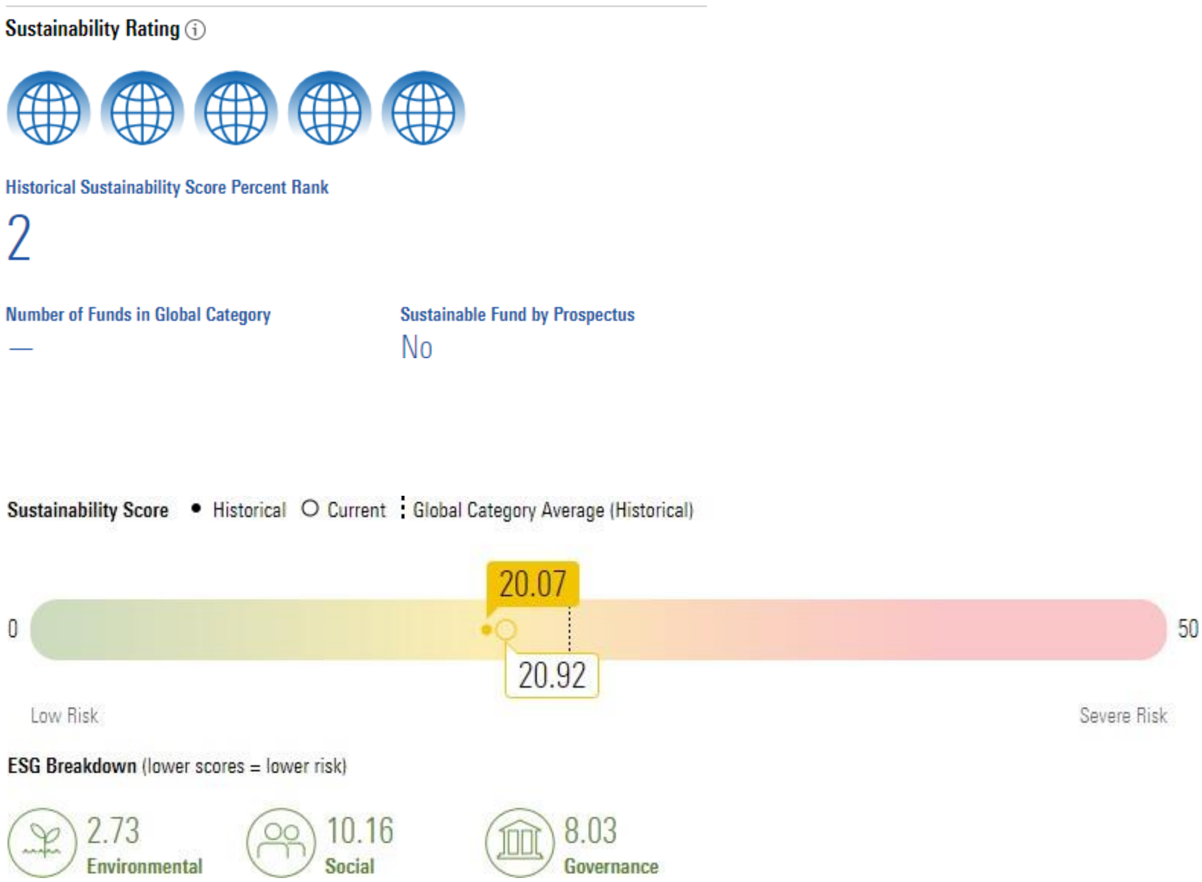
Seilern has received the top ratings from Morningstar & MSCI for Sustainability for all three of the Seilern International funds.

The Morningstar Sustainability Rating (1-5 globes) is a measure of how well the portfolio holdings are managing their ESG Risk relative to the portfolio's Global Category peer group. The Morningstar Historical Sustainability Score is a weighted average of the trailing 12 months of Morningstar Portfolio Sustainability Scores. Historical portfolio scores are not equal-weighted; rather, more-recent portfolios are weighted more heavily than older portfolios. Based on their Morningstar Historical Sustainability Score, funds are assigned absolute category and percent ranks within their Morningstar Global Categories. A fund's Morningstar Sustainability Rating (Globe Rating) is its normally distributed ordinal score and descriptive rank relative to the fund's global category. Higher ratings are better and indicate that a fund has, on average, more of its assets invested in companies that have lower ESG risk as characterized by Sustainalytics**.** (Morningstar, 31 October 2019)

The MSCI ESG Fund Ratings is designed to assess the resilience of a fund's aggregate holdings to long term ESG risks. Highly rated funds consist of issuers with leading or improving management of key ESG risks. (MSCI ESG Research, July 2019)

Seilern World Growth

Seilern World Growth holds the highest rating from Morningstar, with five globes, and an A rating from MSCI.

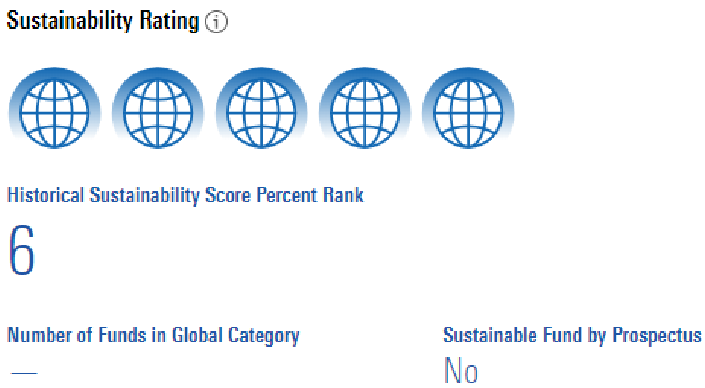


Source: Morningstar Direct, Sustainability score based on 100% of AUM | Global Category: Global Equity Large Cap | Sustainability Score as of Nov 30, 2019. Sustainability Rating as of Nov 30, 2019.

Source: MSCI, USD U I share class, as at 31 December 2019

Seilern America

Seilern America holds the highest rating from Morningstar, with five globes, and an AA-rating from MSCI.

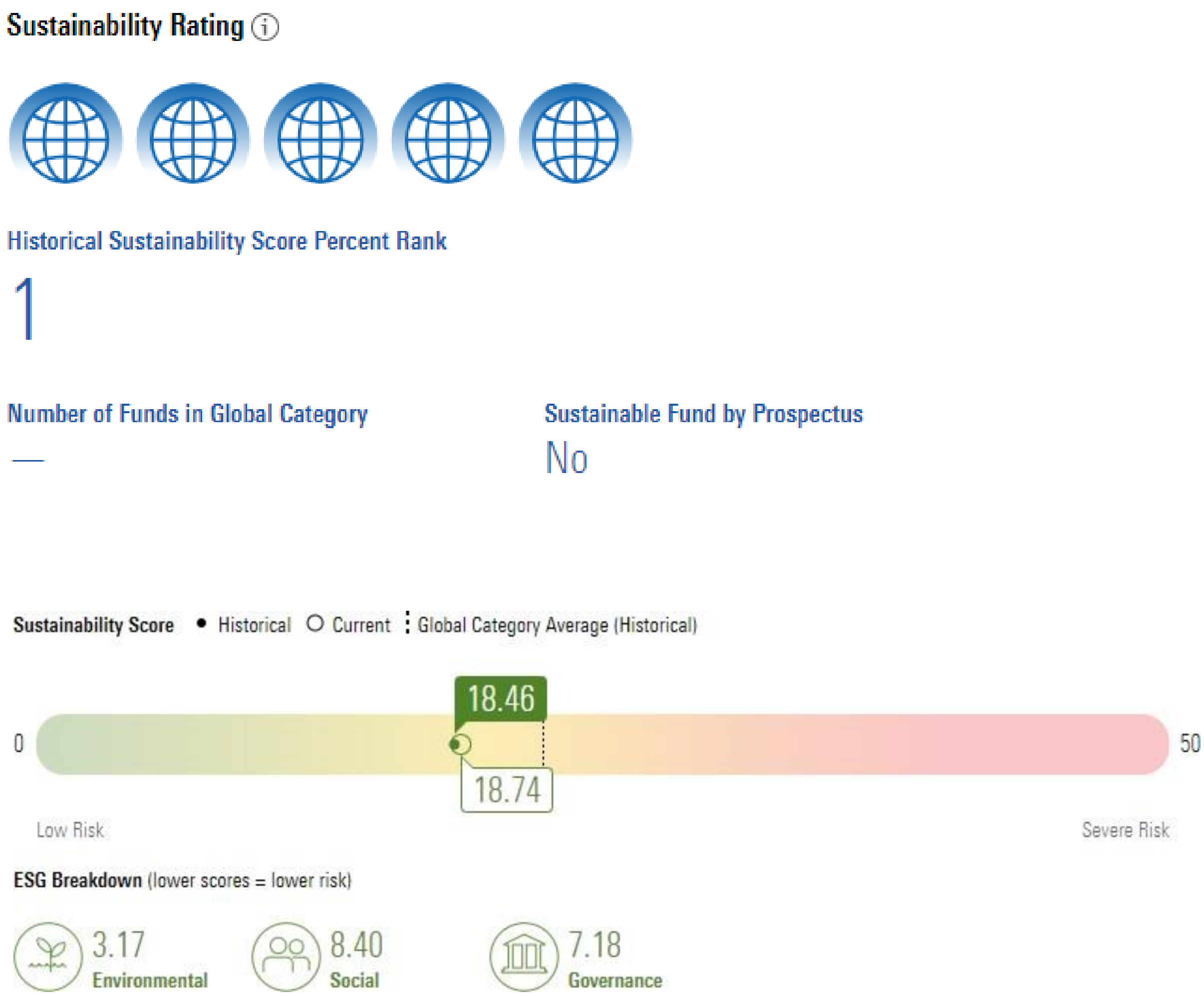


Source: Morningstar Direct, Sustainability Score based on 100% of AUM | Global Category: US Equity Large Cap | Sustainability Score as of Sep 30, 2019. Sustainability Rating as of Sep 30, 2019.

Source: MSCI, USD U I share class,
as at 31 December 2019

Seilern Europa

Seilern Europa holds the highest rating from Morningstar, with five globes, and an AA-rating from MSCI.



Source: Morningstar Direct, Sustainability Score based on 100% of AUM | Global Category: Europe Equity Large Cap | Sustainability Score as of Sep 30, 2019. Sustainability Rating as of Sep 30, 2019.

Source: MSCI, Founders share class, as at 31 December 2019

Carbon Footprint

All three funds have received a low carbon risk score[1] from Morningstar, and zero fossil fuel involvement[2].

Fund Name	Carbon Risk Score	Category Average	Fossil Fuel Involvement	Category Average
Seilern World Growth*	2.04	6.31	0	4.46
Seilern America**	3.17	5.77	0	4.26
Seilern Europa***	1.78	5.89	0	0.7

Source: Morningstar Direct, Carbon metrics as of Sep 30, 2019

*Category: Global Large-Cap Growth Equity as of Sep 30, 2019 | Based on 92% of AUM | Data is based on long positions only.

**Category: US Large-Cap Growth Equity as of Sep 30, 2019 | Based on 87% of AUM | Data is based on long positions only.

***Category: Europe Large-Cap Growth Equity as of Sep 30, 2019 | Based on 94% of AUM | Data is based on long positions only.

[1] The portfolio Carbon Risk Score is displayed as a number between 0 and 100 (a lower score is better). A portfolio's Carbon Risk Score is the asset-weighted sum of the carbon risk scores of its holdings, averaged over the trailing 12 months. The carbon risk of a company is Sustainalytics' evaluation of the degree to which a firm's activities and products are aligned with the transition to a low-carbon economy. The assessment includes carbon intensity, fossil fuel involvement, stranded assets exposure, mitigation strategies, and green product solutions.

[2] Fossil Fuel Involvement % is the portfolio's asset-weighted percentage exposure to fossil fuels, averaged over the trailing 12 months. Companies with fossil fuel involvement are defined as those in the following subindustries: Thermal Coal Extraction, Thermal Coal Power Generation, Oil & Gas Production, Oil & Gas Power Generation, and Oil and Gas Products and Services.