



Aravis Capital ESG Policy

Introduction

Aravis Capital recognises the importance of integrating ESG principles into our business practices. By doing so, we believe that we are acting in the best long-term interests of our employees, investors, clients and partners.

Our ESG Policy sets out our strategic commitment as a third-party marketer to have a positive social and environmental impact on the asset management industry. In delivering on our value proposition and carrying out our business activities, we will take steps to deliver our services in a sustainable and ethical manner, having due consideration for our employees, clients, investors, partners and the environment.

Our policy is implemented across our whole business and reflects our commitment to integrating social wellbeing, economic growth, environmental, ethical and sustainability behaviour into our day-to-day business activities. As a sign of our commitment, we became a voluntary signatory to the UN Principles for Responsible Investing (UN PRI) in 2020. These voluntary principles provide us with a practical framework for incorporating ESG into our business practices.

ESG Principles

Our ESG commitments are based on the following ESG principles connected to the United Nations 17 sustainability goals:

Environmental

We seek to reduce our impact on the environment by minimising our corporate carbon footprint. We do this by reducing business travel, promoting more sustainable means of transportation and using modern technology to replace business travel with digital meetings. In our office, we actively conserve energy, manage waste and promote recycling schemes.

Economic

To build a long-term sustainable business, ensure compliance with local laws and regulations and apply rigorous governance standards to the operation of the company, we carefully manage our financial position and capital base. We focus on liquidity to meet our short-term and long-term obligations whilst re-investing profits for future growth. By



doing so, we promote sustained and sustainable economic growth and take responsibility towards our clients, employees, partners and investors.

Social and ethical

We will conduct our business with integrity and ethics in line with our values, policies and industry regulation. To our clients, investors, employees and partners - we commit to delivering the highest ethical and transparency standards when carrying out our services. Our management and governance structure facilitates transparency and accountability to protect our stakeholders.

We promote equal job opportunities and gender equality and offer an attractive and positive work environment for all employees. Our people are our most important asset - all of our employees have an ability to influence the direction of our company, are given ample opportunity for personal and professional development and share in the financial success of the company. The company actively supports employees to work flexibly and puts a high value on the right balance between working life and personal interests outside of work.

Aravis Capital promotes the acceptance and implementation of the PRI principles amongst the fund managers we work with. We share our knowledge about the PRI Principles and ESG integration best practices with the fund managers we represent to help them develop an informed view and improve their understanding of ESG. In addition, we encourage them to develop, integrate and demonstrate their ESG capabilities to investors where possible.

Monitoring and reporting

The Head of ESG and our appointed ESG committee is responsible for the implementation and monitoring of this policy. The Managing Director provides sufficient resources to support the implementation of the Aravis Capital ESG Policy.

We report on our ESG activities on an annual basis through the PRI reporting submission and make our report available in the PRI database. Further information about our ESG activities is provided on our website.

Review

This policy was reviewed and approved by the Board of Directors on 12 May 2021.