

Environmental, Social, and Governance (ESG) Policy Statement

Goodbody Asset Management is a boutique asset manager specialising in active global investment funds. We believe outperformance comes from adhering to a structured and transparent investment process. We undertake deep and detailed fundamental research to identify attractive investments that we believe can deliver superior risk-adjusted returns over the long term.

We subscribe to the view that 'ultimately, successful investment depends on a vibrant economy, which depends on a healthy civil society, which is ultimately dependent on a sustainable planet'*.

Therefore - Environmental, Social and Governance (ESG) analysis is explicitly incorporated into our investment research process. We view a company's ability to manage ESG factors as a proxy for prudent risk management. It is our view that failure to address ESG issues properly could expose a company to potentially significant legal, regulatory, product, and reputational risks.

We are an '**ESG Engaged**' Investment Manager and recognise that integrating ESG analysis into our investment process has the potential to improve risk adjusted returns. We seek to invest in companies that can generate sustainable long term returns from well-governed and sustainable assets.

Our investment approach (Quality/Growth) favours companies that tend to display high overall ESG rating scores which tend to have a positive correlation with investment quality and profitability factors.

We define **ESG integration** as explicitly incorporating select, relevant ESG information into our investment research process alongside traditional financial analysis to help enhance the risk adjusted returns of the Funds we manage.

Research and decision-making are based on a team approach, which extends to ESG analysis and the integration of these factors into the team's overall investment process.

Our Approach

1. ESG analysis is defined as an explicit pillar within the overall investment process.
2. ESG data screening of investment candidates as part of our due diligence process.
3. Detailed qualitative governance appraisal of all investment candidates.
4. Ongoing monitoring and review of relevant ESG characteristics of all Fund holdings.

Data used in the review of ESG factors is sourced from third parties including Bloomberg, MSCI and directly from company reports.

Quantitative inputs include:

Environmental

1. Emissions - Total Greenhouse Gas (GHG) Emissions of a company, in thousands of metric tons.
2. Energy Consumption - Total Energy Consumption in thousands of megawatt hours (MWh).
3. Water Usage - Total amount of water used to support a company's operational processes, in thousands of cubic meters.

Social

1. Gender Diversity - % of females in the company workforce.
2. Employee Turnover %.
3. Health and Safety Policy.
4. Human Rights Policy.

Governance

1. Duality of CEO and Chairperson.
2. Size of the board.
3. % of Independent board members.
4. % of female board members.
5. Average age of board members.
6. Attendance at board meetings.
7. Business Ethics policy.
8. Tenure of the CEO.