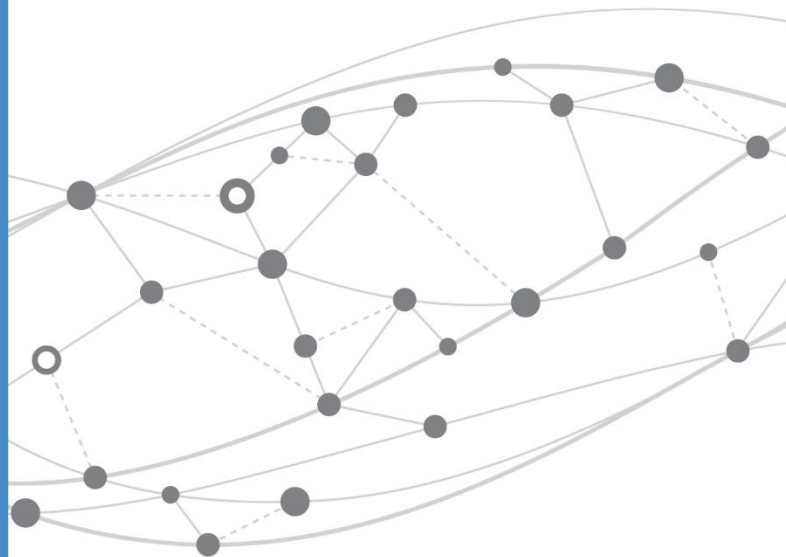


GAM SUSTAINABILITY EXCLUSION POLICY



August 2021

1. Introduction

This Policy sets out the minimum sustainability exclusions that are applied to those equity and corporate debt funds that are categorised under Article 8 and Article 9 of the EU Sustainable Finance Disclosure Regulation. This policy is additional to the GAM Exclusion Policy covering controversial weapons.

2. Key Principle

GAM Investments will not knowingly hold any security where there is strong evidence of involvement, at the indicated revenue threshold, in the activities outlined below. Fuller definitions are provided in the Appendix.

Activity	Brief description	Restriction Criteria / Threshold (revenue)
Controversial Weapons	Controversial weapons including anti-personnel mines, biological and chemical weapons, blinding laser weapons, cluster munitions, incendiary weapons and non-detectable fragments	Any involvement
Nuclear Weapons	A nuclear weapon is a device that is capable of releasing nuclear energy in an uncontrolled manner, due to fusion and/or fission reactions, making it a highly destructive explosive. The indiscriminate and disproportionate impact on civilians makes nuclear weapons a controversial weapon.	Any involvement
Depleted Uranium	Depleted Uranium (DU) munitions are projectiles (bullets, rockets, etc.) that have been equipped with the radioactive chemical substance DU.	Any involvement
Civilian Weapons	Companies that manufacture handguns, pistols, shotguns, rifles, revolvers, and ammunition for civilian use.	Derive over 10%
Conventional Weapons	This involvement area provides an assessment of whether companies derive revenue from the manufacturing of weapons or weapon components or from providing tailor-made products or services to the army or the defence industry.	Derive over 10%
Tobacco	Tobacco production - manufactures tobacco products	Derive over 5%
	Tobacco retail - distribution and/or retail sale of tobacco products	Derive over 25%
Fossil fuels	Oil sands - extraction of oil sands	Derive over 25%
	Thermal coal extraction	Derive over 25% (unless there is a clear phase-out plan)
	Thermal coal power generation - generation of electricity from thermal coal	Derive over 25% (unless there is a clear phase-out plan)
UN Global Compact	Serious breaches of the UN Global Compact. These ten principles cover human rights, labour rights, the environment and anti-corruption.	Serious breach (unless substantial actions to address)

Ownership

Parent companies of majority-owned subsidiaries with involvement, i.e. companies that own >50% of a subsidiary involved in a screened business category inherit the involvement of the child company (including involvement type and revenue).

Subsidiaries

Companies that are owned at least 50% by a company flagged for Whole Weapons Systems Manufacturer, Intended Use Components, Dual Use Components, and/or Delivery Platforms will inherit from the screened involvement.

3. Scope of the Policy

We apply these exclusions to all actively managed GAM-branded equity or corporate debt funds that are categorised under Article 8 and Article 9 of the EU Sustainable Finance Disclosure Regulation. 'Sustainable' funds may have additional exclusions applied to them. These exclusions are applied to single-security holdings, not to broad index holdings or to collective investment schemes.

4. Governance and Implementation

The list of excluded issuers is compiled using independent third-party research and is reviewed at least on a quarterly basis. This list is obtained and implemented on a best-efforts basis.

Where existing holdings become in breach of these exclusions, we will seek to engage directly to address the breach. Other than in the circumstances outlined below, we will seek to divest any holdings that become non-compliant within 90 business days.

Limited exceptions from the exclusions are permitted in the case of thermal coal exposure and assessment of a UN Global Compact breach, in the circumstances outlined below. Any exceptions are required to be approved by our Sustainability Committee. This cross-functional oversight committee reports to both our Group Management Board and Holdings Board on a quarterly basis.

- Thermal coal involvement – we will consider investing in securities deriving over 25% of their revenue from thermal coal extraction or thermal coal power generation only where there is clear public commitment to phase out coal by 2030 in the OECD and EU, and by no later than 2050 in the rest of the world and where no new coal capacity is being added.
- UN Global Compact breaches – if, following engagement with the company, we have received assurances of substantial actions to remedy the violation, then we may consider continuing to hold a company that has become non-compliant.

This exclusion policy will be reviewed on an annual basis.

Please email GRI@gam.com for any further information.

5. Appendix

Activities

Type of Weapon	Category of involvement	Definitions
Controversial and Nuclear Weapons	Biological/Chemical Weapons	Companies that manufacture biological or chemical weapons, which are defined as weapons that use pathogens such as viruses, bacteria, and disease-causing biological agents, toxins or chemical substances that have toxic properties that kill, injure or incapacitate.
	Blinding Laser Weapons	Laser weapons that temporarily cause blindness, destroy the target or cause burns.
	Cluster Munitions	A bomb, missile, rocket or shell that carries submunitions and disperses them over an area.
	Incendiary Weapons	Components of incendiary non-weapons munitions that happens to use white phosphorus. These include but are not limited to smokescreens and illuminators, tracers and chafes, flares etc.
	Landmines	Anti-personnel landmine: a munition that is placed under, on, or near the ground or other surface area and explodes by the presence, proximity or contact with a person or upon command by an operator from a remote location.
	Nuclear Weapons	A nuclear weapon is defined as “an explosive device that derives its destructive force from nuclear reactions, either fission or a combination of fission and fusion” and this category includes but is not limited to nuclear warheads, intercontinental ballistic missiles and corresponding air- an land-based delivery platforms, and, ballistic missile submarines capable of delivering nuclear warheads.
	Depleted Uranium	Depleted Uranium (DU) munitions are projectiles (bullets, rockets, etc.) that have been equipped with the radioactive chemical substance DU.
Civilian Firearms	Small Arms	Companies that manufacture and sell assault weapons to civilian customers. It includes manufacturers of firearm weapons such as guns, rifles, and pistols, manufacturers of components of these weapons and retailers.
Conventional Weapons	Military Contracting	Companies that manufacture weapons or weapon components or provide tailor-made products or services to the army or the defence industry.
Tobacco	Tobacco products	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.
Fossil fuels	Thermal coal	Companies that derive revenue from mining thermal coal or from generating electricity from thermal coal. On a lifecycle basis thermal coal is more carbon intensive than other fossil fuel sources.
	Oil Sands	Oil sands are considered unconventional because they are extremely carbon intensive, and their extraction methods cause air pollution ‘in situ’, as well as water withdrawal, and contamination from mining.
UN Global Compact	Breaches	Serious breaches of the UN Global Compact. These ten principles cover human rights, labour rights, the environment and anti-corruption. The company is implicated in one or more controversy cases where there are credible allegations that the company or its management inflicted serious large-scale harm in violation of global norms.

Type of involvement

Type of Weapon	Types of Involvement
Controversial Weapon	This includes companies that manufacture, dual use components, intended use components, smart weapon and where a company owns 50% or more of an involved subsidiary, that company is given a direct involvement tie.
Nuclear Weapons	The company is involved in the core weapon system, or components/services of the core weapon system that are considered tailor-made and essential for the lethal use of the weapon.
Depleted Uranium	The company is involved in the core weapon system, or components/services of the core weapon system that are considered tailor-made and essential for the lethal use of the weapon.
Conventional Weapons – Military Contracting	The company manufactures military weapon systems and/or integral, tailor-made components or these weapons.
Civilian Firearms	The company manufactures and sells assault weapons to civilian customers.
Tobacco	Tobacco production – manufacture of tobacco products. Tobacco retail - distribution and/or retail sale of tobacco products.
Fossil Fuels	Mining of thermal coal or generating electricity from thermal coal, unless the issuer has published a coal phase-out plan. Extraction of oil sands.
UN Global Compact	Serious breach