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# **Sustainability-Related Disclosures Davy ESG Multi-Asset Fund (The “Fund”)**

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## Summary

The Fund promotes environmental and social characteristics but does not have as its objective sustainable investment.

The Fund in accordance with Article 8 under Regulation (EU) 2019/2088 (“SFDR”) pursuant to its investment policy seeks to promote environmental and social characteristics (“ESG”) (i) by investing primarily in securities of high-quality companies whose ESG profiles rank at the higher end of a scale provided by an external third-party data provider (ii) by avoiding investing in companies which violate humanitarian principles or labour rights by reference to the UN Global Compact (“UNGC”) Principles; and (iii) by excluding companies that: (a) manufacture cluster munitions or landmines (b) derive more than 10% of their revenue from the production of thermal coal (c) derive revenues from the production of tobacco products (d) derive more than 5% of their revenue from gambling-related business activities (e) derive more than 5% of their revenue from armaments (f) derive revenues from pornography activities (g) derive revenues from the manufacture of abortifacients; and (h) derive more than 10% of their revenue from the manufacture of alcoholic products. The Fund will also avoid investing in fixed income securities issued in respect of countries ranked in the bottom quartile of countries by a proprietary Sovereign Issuer Ranking (“SIR”) system, based on a relative review by a third-party data provider of key performance indicators across environmental, social and governance factors.

The Investment Manager engages in quantitative and qualitative techniques and methodologies in determining the investable universe of companies in which to invest and the monitoring of the Fund’s holdings in pursuit of the promotion of the Fund’s ESG characteristics in accordance with Article 8 of SFDR, including consideration of sustainability indicators to achieve the environmental and social characteristics of the Fund. Potential investee and investee companies and issuers are rated for good governance practices using a third-party ratings provider, with ESG data provided to the Investment Manager

including details on the company’s corporate governance which is then analysed by the Investment Manager via an in-house research function.

The primary data sources used in the assessment and monitoring of each of the environmental and social characteristics promoted by the Fund are provided by a third-party data provider, MSCI. The Investment Manager also conducts its own research and may engage directly with companies and issuers as part of its assessment and ongoing monitoring of potential and current investments in pursuit of the promotion of the Fund’s characteristics.

A minimum of 65% of the Fund’s investments will be invested directly in the securities of companies that promote ESG. The Fund will primarily invest directly in securities of companies but may gain some indirect exposure to companies, for example, through the use of FDI from time to time. The Fund does not intend to make sustainable investments and the Investment Manager does not currently commit to a minimum proportion of investments of the Fund that are Taxonomy aligned.

As outlined in the section “Monitoring of environmental or social characteristics”, the Fund uses certain sustainability indicators to measure the attainment and monitoring of the environmental or social (“E/S”) characteristics promoted by the Fund, being:

- ESG ratings provided by an external third-party data provider. The Fund will invest at least 65% of its investments in securities of companies which score in the top three gradings of a seven-point rating system (AAA, AA and A) and will not hold any companies scored in the bottom grading (CCC)
- The Fund will not invest in securities of companies that derive any revenues from (i) the manufacture or sale of cluster munitions or landmines (ii) the production of tobacco products (iii) pornography activities (iv) the manufacture of abortifacients
- The Fund will not invest in companies that derive more than 10% of revenues from (i) the production of thermal coal (ii) the manufacture of alcoholic products

- The Fund will not invest in companies that derive more than 5% of revenues from (i) gambling-related business activities (ii) armaments (weapons systems, components, and support systems and services)
- Violations of UNGC Principles and Organisation for Economic Cooperation and Development (“OECD”) Guidelines for Multinational Enterprises. A third-party data provider is used to identify a violation; measured by the severity and number of human and labour rights controversial incidents recorded for a company (denoted by a “red flag”). The Fund will not invest in any companies with such violations
- Countries ranked in the bottom quartile of countries by a proprietary SIR system. The Fund will not invest in the fixed income securities of such countries.

The above sustainability indicators are included in an exclusionary screen as part of the Investment Manager’s detailed monitoring process, and companies identified as breaching the Fund’s environmental or social characteristics and the sustainability indicators are added to an exclusions framework. Further details are set out in the section “Monitoring of environmental or social characteristics”.

The Fund will measure how the social and environmental characteristics promoted by the Fund are met by applying screens to measure the sustainability indicators, which narrows the universe to a sub-set of potential investments which comply with the exclusion criteria applicable to the Fund.

The data used to attain the environmental and social characteristics promoted by the Fund is sourced from a third-party data provider, currently MSCI, and collated on an internal database on a monthly basis. MSCI data used to determine whether a company is in breach of the sustainability indicators is not expected to be estimated. Investments (including proposed investments) of the Fund are reviewed against the sustainability indicators using this MSCI data, coupled with internal research by the Investment Manager. Data quality assessment forms part of the initial and ongoing due diligence

processes conducted against the data provider and cross-checks of MSCI data is undertaken. There are no material limitations on the scope of methodologies or data coverage for the sustainability indicators to note.

Due diligence on investee or potential investee companies includes incorporating the sustainability indicators in the investment screening process to narrow the universe to a sub-set of potential investments which comply with the exclusion criteria applied for the Fund. Internal research may include reviewing additional data points, third-party sources, and engagement with investee company management to form a complete view of whether the sustainability indicators are being respected by the investee company.

The Investment Manager may engage with an investee or potential investee company 1) as part of the assessment of sustainability risk 2) as part of the assessment of good governance practices and/or 3) if a company is identified as an outlier on specific or several principal adverse impact data points. If sufficient understanding and resolution on the issue is not achieved, the ESG risk profile of the company would be raised, which may ultimately lead to a decision to exclude the company from the investable universe or divest of the position.

## No sustainable investment objective

This financial product promotes environmental or social characteristics, but does not have as its objective sustainable investment.

## Environmental or social characteristics of the “financial product”

The Fund invests in fixed income and equity securities of high-quality companies whose ESG profiles rank at the higher end of a scale provided by an external third-party data provider. These ratings are used to indicate the ESG

performance of companies in the Fund's investment universe. The Fund will invest at least 65% of its investments in equities and corporate bonds of companies which score in the top three gradings of a seven-point rating system (AAA, AA and A). The Fund will not invest in any asset eligible for such a rating which scores in the bottom grading (CCC) and will dispose of any investment it may hold that is downgraded to this level within a time period which ensures that such disposal occurs in the best interests of the Fund.

The Fund will not invest in fixed income securities issued in respect of countries ranked in the bottom quartile of countries by a proprietary SIR system, based on a relative review by a third-party data provider of key performance indicators across environmental, social and governance factors.

The Fund avoids investing in companies which violate humanitarian principles or labour rights by reference to the UNGC Principles. A third-party data provider is used to identify a violation; measured by the severity and number of human and labour rights controversies incidents recorded for a company.

- The Fund excludes investing in companies which are subject to an Exclusionary Screen ("ES"). The ES is based on ethical criteria set by the Investment Manager and changes to the ES will be implemented on an annual basis, with notification provided to Shareholders. The ES prevents the Fund from investing in companies that:
  - (i) manufacture cluster munitions or landmines
  - (ii) derive more than 10% of their revenue from the production of thermal coal
  - (iii) derive revenues from the production of tobacco products
  - (iv) derive more than 5% of their revenue from gambling-related business activities
  - (v) derive more than 5% of their revenue from armaments
  - (vi) derive revenues from pornography activities
  - (vii) derive revenues the manufacture of abortifacients or

(viii) derive more than 10% of their revenue from the manufacture of alcoholic products

- Additionally, the Fund will not invest in securities issued in respect of countries ranked in the bottom quartile of countries by a proprietary SIR system. The Fund will not invest in the fixed income securities of such countries

## Investment Strategy

The investment approach utilises a combination of both quantitative and fundamental analysis and quantitative screens including consideration of sustainability indicators, to invest in equity securities (i.e. shares), fixed income securities (i.e. bonds issued by government, government agency, municipal, supranational and corporates) and cash.

- The equity selection process includes (i) the application of a proprietary multi-factor Quality Model to identify high-quality companies (ii) the application the Exclusionary Screen (detailed above) (iii) the exclusion of any companies ranking CCC or below by a third-party data provider
- Fixed income selection includes the application of (i) a proprietary Fundamentals, Valuations and Technical framework to identify securities (ii) the application of the Sovereign Issuer Ranking system (detailed above) for government, government agency and municipal issuers; (iii) the application the Exclusionary Screen (detailed above) in respect of corporate issuers; and (iv) the exclusion of any companies ranking CCC or below by a third-party data provider in respect of corporate issuers

Prior to investment and on an ongoing basis, the investee companies are rated for good governance practices using a third-party ratings provider. This ESG data that is provided to the Investment Manager in this manner includes, but is not limited to, information in relation to a company's corporate governance, including board diversity, executive compensation, anti-competitive practices, ownership and control. The investment team then analyses and seeks to verify the ESG

data and ratings in respect of such companies (the "ESG Information") by using data that they have compiled through their own proprietary in-house research function. By way of example, the in-house research function will engage directly with such companies to seek clarification on, and/or further information in relation to, the ESG Information, if required. If sufficient understanding and resolution on the issue identified is not achieved, the ESG risk profile of the company is raised, which may ultimately lead to a decision to liquidate the position.

## Proportion of investments

The Fund will invest a minimum of 65% of its investments in companies which align with the environmental and social characteristics of the Fund. The Fund will primarily invest directly in the securities of companies, but may gain some indirect exposure to companies, for example, through the use of FDI for efficient portfolio management from time to time.

The Fund may invest a maximum of 35% of Net Asset Value in cash and/or other assets which are not aligned with the Fund's environmental or social characteristics on the basis that minimum environmental and social safeguards are not applicable due to the nature of the investments. The Fund does not intend to make sustainable investments and the Investment Manager does not currently commit to a minimum proportion of investments of the Fund that are Taxonomy aligned. Accordingly, the percentage of investments of the Fund aligned with the EU Taxonomy is 0% of the Net Asset Value of the Fund.

## Monitoring of environmental or social characteristics

The following sustainability indicators are used to measure the attainment of the environmental or social characteristics promoted by the Fund:

- ESG ratings provided by an external third-party data provider. The Fund will invest at least 65% of its holdings in equities of companies which score in the top three gradings of a seven-point rating system (AAA, AA and A) and will not hold any companies scored in the bottom grading (CCC).
- The percentage of revenues derived from the manufacture or sale of cluster munitions or landmines. The Fund will not hold any companies with exposure to this indicator
- The percentage of revenues derived from the production of thermal coal. The Fund will not hold any companies that derive more than 10% of their revenue from this indicator
- The percentage of revenues derived from the production of tobacco products. The Fund will not hold any companies with exposure to this indicator
- The percentage of revenues derived from gambling-related business activities. The Fund will not hold any companies that derive more than 5% of their revenue from this indicator
- The percentage of revenues derived from armaments (weapons systems, components, and support systems and services). The Fund will not hold any companies that derive more than 5% of their revenue from this indicator
- The percentage of revenues derived from pornography activities. The Fund will not hold any companies with exposure to this indicator
- The percentage of revenues derived from the manufacture of abortifacients. The Fund will not hold any companies with exposure to this indicator
- The percentage of revenues derived from the manufacture of alcoholic products. The Fund will not hold any companies that derive more than 10% of their revenue from this indicator.
- Violations of UNGC Principles and OECD Guidelines for Multinational Enterprises. A third-party data provider is used to identify a violation; measured by the severity and number of human and labour rights controversial incidents recorded for a company (denoted by a "red flag"). This Fund will not invest in any companies with such violations attaching
- Regarding fixed income securities issued by government, government agencies and municipals, the Fund will not invest in fixed income securities issued in respect of countries (or associated countries) ranked in the bottom quartile of countries by a proprietary SIR system, based on a relative

review of key performance indicators provided by a third-party data provider across environmental, social and governance factors

The Investment Manager's Investment Risk team conducts pre-trade compliance checks on all potential investments to prevent the purchase of securities of companies which breach the sustainability indicators. Companies that are identified as breaching the sustainability indicators are recorded in the Investment Manager's database and excluded from investment in the Investment Manager's pre-trade approval systems. Additionally, the Fund's portfolio is formally reviewed against the sustainability indicators monthly by the Investment Manager's Investment Risk team.

## Methodologies

The Investment Manager will measure how the social and environmental characteristics promoted by the Fund are met by applying screens to measure the sustainability indicators outlined under the section "Monitoring of environmental or social characteristics". This screening process, updated monthly, which utilises third-party data coupled with internal research, narrows the universe to a sub-set of potential investments which comply with the exclusion criteria applicable to the Fund.

## Data sources and processing

The data used to attain the environmental and social characteristics promoted by the Fund is sourced from a third-party data provider (currently MSCI) and collated on an internal database on a monthly basis. MSCI data used to determine whether a company is in breach of the sustainability indicators is not expected to be estimated and MSCI has indicated that the data is collated from third party sources (for example news media services, NGO reports and websites, government data, company websites). Investments (including proposed investments) of the Fund are reviewed against the sustainability

indicators using this MSCI data, coupled with internal research by the Investment Manager.

Data quality assessment forms part of the initial and ongoing due diligence processes conducted against the data provider and cross-checks of MSCI data against that of alternative data providers and data provided by prospective and investee companies is regularly undertaken. Should a notable variance be identified, the Investment Manager will engage with the third-party data provider to understand and request an explanation and, if necessary, correction of any error consequently identified in the data.

## Limitations to methodologies and data

There are no material limitations on the scope of methodologies or data coverage for the sustainability indicators to note.

## Due diligence

Due diligence includes incorporating the sustainability indicators in the investment screening process, which utilises third-party data coupled with internal research, to narrow the universe to a sub-set of potential investments which comply with the exclusion criteria applied for the Fund. Internal research may include reviewing additional data points, third-party sources, and engagement with investee company management to form a complete view of whether the sustainability indicators are being respected by the investee company.

The sustainability indicators are subject to a formal internal monthly review by the Investment Manager's investment risk team.

## Engagement policies

The Investment Manager may engage with an investee or potential investee company 1) as part of the assessment of sustainability risk 2) as part of the assessment of good governance practices and/or 3) if a company is identified as an outlier on specific or several principal adverse impact data points. If sufficient understanding and resolution on the issue is not achieved, the ESG risk profile of the company would be raised, which may ultimately lead to a decision to exclude the company from the investable universe or divest of the position.

Any such engagement may include a structured, multi-stage process to drive progress in the management and resolution of the issue identified, including for example collaborative engagement with other asset managers or asset owners. The engagement process is recorded in an internal database.

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\*Information correct as of 6 October 2022

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