

Banca Aletti Suisse's Environmental, Social and Governance (ESG) Investment Policy Statement

As a Private and Investment Management Bank, Banca Aletti Suisse's mission is to deliver superior investment returns, solutions and service to our clients. For over 20 years, we have worked relentlessly to help investors pursue their objectives – regardless of shifting market conditions. Integrating ESG factors into the investment process is becoming essential to deliver on our clients' financial objectives, to maintain our high performance culture by engaging top partners and to support long-term, sustainable economic growth globally.

This ESG Investment Policy Statement details Banca Aletti Suisse's commitments to the integration of ESG factors into our research process and to the offering of sustainable investment solutions to our clients. This statement is designed to apply broadly to our firm's long-term investment process and to our dedicated ESG investment solutions.

ESG INTEGRATION

At Banca Aletti Suisse, we define ESG Integration as the consistent consideration of material ESG factors into our investment research process to enhance our clients' risk-adjusted returns. We believe incorporating relevant ESG factors should be part of a robust investment process.

We recognize that ESG factors are increasingly essential inputs when evaluating global economies, markets, industries and business models. Material ESG factors are important considerations when evaluating long-term investment opportunities and risks for all asset classes in both public and private markets.

ENVIRONMENTAL RESPONSIBILITY: We expect companies to manage environmental matters that affect their businesses in a responsible manner, to be able to identify the factors that are material for their business. This include setting and reporting on ambitious targets aligned to the UN's Paris Agreement on climate change. We expect portfolio companies to minimize the negative externalities caused by their businesses. This includes monitoring product quality, and the chemical safety of products for both the environment and human health upon disposal.

SOCIETAL RESPONSIBILITY: We expect companies to manage their relationship with all their key stakeholders. This means, among others, a fair treatment of workers, decent wages, the provision of safe working conditions with a good management of health and safety risks. It also means that we expect companies to adhere to high standards of digital ethics especially in the management of data privacy risks and cybersecurity threats.

CORPORATE GOVERNANCE: We expect companies to have a robust corporate governance framework that can define long term, innovative strategies and implement them for the benefit of all stakeholders. Vision and effective oversight are key to building a company with sustainable long-term success. Main focal points will be: board effectiveness, an ethical corporate culture, a well-designed remuneration structure with the alignment of the interests of shareholders and other key stakeholders, transparency with reference to all relevant accounting practices and tax policies.

Integrating ESG factors into the evaluation process does not mean that ESG information is the sole or primary consideration for an investment decision; instead, Banca Aletti Suisse's portfolio managers evaluate and weigh a variety of financial and non-financial factors, which can include ESG considerations, to make investment decisions. The relevance of ESG considerations to investment decisions varies across asset classes and strategies. By increasing and diversifying the information assessed by the portfolio management team where relevant we believe that we are able to generate a more holistic view of an investment, which we believe will generate opportunities to enhance returns for our clients.

BANCA ALETTI SUISSE'S ESG PORTFOLIO SOLUTIONS

At Banca Aletti Suisse, we are eager to partner together with clients to identify and deliver sustainability objectives that fit with their specific needs.

For its clients Banca Aletti Suisse can build ESG portfolios on two guiding principles:

➤ **EXCLUDE**

We exclude issuers fundamentally misaligned with sustainability principles – both by their governing terms and in practice.

➤ **EVALUATE**

Using external providers and synergies with qualified global partners, Banca Aletti Suisse has developed an independent ESG scoring system, seeking to optimize managed portfolios to emphasize companies in each industry with leading ESG practices, limited carbon footprint and high quality green bond frameworks.

In drafting its Sustainable Investment Policy, the Bank took into consideration the recommendations provided by SFAMA and Swiss Sustainable Finance published in 06/2020, indicating the basic rules concerning the organization, philosophy and interpretation of the sustainability aspect on which the analysis and management criteria of the various products and the various asset classes are based, the integration of ESG aspects in the customer advisory activity, the risk management and reporting aspects.

Socially responsible investing is qualitative and subjective by nature, and there is no guarantee that the criteria utilized, or judgment exercised, by Banca Aletti Suisse will reflect the beliefs or values of any one particular investor. Information regarding responsible practices is obtained through voluntary or third-party reporting, which may not be accurate or complete, and Banca Aletti Suisse is dependent on such information to evaluate a company's commitment to, or implementation of, responsible practices. Socially responsible norms differ by region. There is no assurance that the socially responsible investing strategy and techniques employed will be successful. **Past performance is not a guarantee or reliable indicator of future results.**

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