

Atlantic Premium Capital Partners SA - ESG Policy

As long-term investors, we acknowledge that sustainability risks, if not adequately managed, can impact the performance of investments. It is part of the Atlantic Premium Capital Partners values to integrate the analysis of such sustainability risks into our investment process, whether they be of an environmental, social or governance nature.

The sustainability factors that Atlantic Premium Capital Partners consider are presented across the following ESG framework:

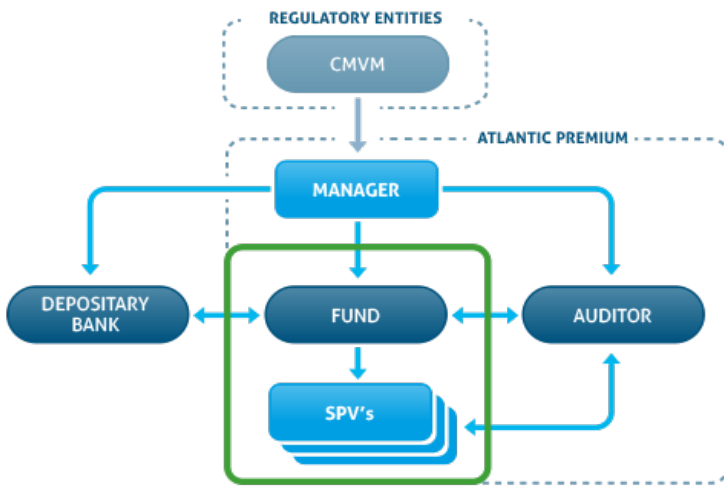
Environmental	Social	Governance
Carbon emissions	Human rights	Anti-corruption
Energy efficiency	Labour practices	Political Risk
Pollution and waste	Health & Safety	Anti-bribery
Climate change		Corruption & Political Instability
Deforestation		Business Ethics
		Risk Management

Policy

To implement our philosophy, we combine a number of responsible investment methodologies throughout our investment process. ESG screenings (norm-based screenings, sector restrictions, “worst-in-class” filters) are applied to exclude companies from the investable universe.

ESG integration is then applied to investment analysis and decisions, adopting the definition provided by the UN Principles for Responsible Investment – namely “the explicit and systematic inclusion of ESG issues in investment analysis and decisions”. This means that, in strict adherence to the Atlantic Premium Capital Partners investment process, our investment teams perform both financial and ESG information analysis on any potential investee company or asset to identify material ESG risk factors that might compound financial risks. Once identified, our teams then assess their potential impact on company performance. Investment decisions will thus include considerations of both financial and material ESG factors.

Operating model of an investment fund



ESG Integration is focused between the Fund and SPV's or investments, highlighted in green.

People

ESG Oversight:

Senior Leadership Team

- Atlantic Premium Board and Senior Leadership Team are regularly updated on sustainability issues.
- Atlantic Premium Head of ESG reports directly to the Chief Executive Officer, Chairman and Legal officer.

Sustainability Committee

- Formal committee tasked with supporting Sustainability strategy execution across working groups.

Investment Professionals / Fund Managers

- Atlantic Premium investment professionals responsible for incorporating ESG factors into investment processes.

Process

Atlantic Premium Capital Partners investment process aims to maximise opportunities for achieving superior returns on its investments across different asset classes through effective execution and responsible investment strategies aligned with sound ESG principles. The fund seeks to increase the weight of investments with low sustainability risks and/or decrease the weight of investments with high sustainability risks and, as a result, aims improve its environmental, social and governance (ESG) profile.

Exclusions

The fund excludes companies that are in severe breach of international norms or have significant activities with adverse impacts on society or the environment.

Active ownership

The fund may engage with the management of companies on material ESG issues and may discontinue investment if progress proves unsatisfactory.

Engagement

While the ESG engagement effort can take various forms, most often through private meetings with the respective companies, we strive to always establish a two-way dialogue and avoid the pitfall of lecturing our investee companies.

Due Diligence

Our due diligence process of companies covers the following points:

- The clarity and robustness of the company's long-term strategy
- The functioning and calibre of governance structures and effective leadership
- The financial strength and performance of companies and the fair valuation of underlying investments
- Sustainability risks & opportunities and adverse impacts of potential investments on society and/or the environment

Stewardship

We practise stewardship so as to extend the implementation of our sustainable investment philosophy, with the ultimate goal of better protecting and enhancing the assets entrusted to us by our clients.

