RESPONSIBLE INVESTMENT POLICY

FEBRUARY 2025

Equity Trustees

Signatory of:

PRI Principles for Responsible Investment

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1. INTRODUCTION

Equity Trustees Limited is a wholly owned subsidiary of EQT Holdings Limited, an ASX-listed diversified financial services company. Equity Trustees was established as an independent Trustee and Executor company in 1888 and has grown to become one of Australia's largest specialist trustee companies.

Our purpose is to help people take care of the future. We seek to:

- **Safeguard** people's wealth now and for generations to come
- **Provide** trustee services to help clients protect members' and investors' interests
- **Act** as a trusted, independent partner to grow and manage clients' wealth
- **Empower** clients to improve the lives of others and support the community

Equity Trustees Asset Management is a wholly owned business of Equity Trustees who are directly responsible for managing investments across multiple asset classes on behalf of over 2000 clients including trusts, foundations, and for-purpose organisations.

Our investment philosophy is to preserve and grow the real value of capital over the long term. The key objective of incorporating Responsible Investment (RI) practices into our investment decision making process remains financial performance, recognising that robust RI practices can lead to positive financial and social outcomes, assisting to manage risk and improve investment returns. Our definition of Responsible Investing is articulated in section 3 of this policy.

The objective of this policy is to demonstrate Equity Trustees Asset Management's approach and consideration of RI in the investment management process. We are dedicated to preserving and growing our client's wealth, while ensuring the way we direct capital is aligned with the values of our clients and progressing positive economic, environmental, and social outcomes.

OUR VALUES

TRUSTED
We do what we say we will and put the best interests of our clients first.

ACCOUNTABLE
We own our responsibilities and speak up about ways we can do better.

EMPOWERING
We give ourselves, our workplace and our community the support, strength and confidence to grow.

2. OUR COMMITMENT

Equity Trustees Asset Management are committed to continued evolvement in RI as the space progresses over time. As part of this commitment, Equity Trustees Asset Management are a proud member of the Responsible Investment Association Australasia (RIAA) and a signatory to the United Nations supported Principals for Responsible Investment (PRI).

As a signatory to the PRI, we commit to the following:

1. We will incorporate Environmental, Social and Corporate Governance (ESG) issues into investment analysis and decision-making processes.
2. We will be an active owner and to incorporate ESG issues into our ownership policies and practices.
3. We will seek appropriate disclosure on ESG issues by the entities in which we invest.
4. We will promote acceptance and implementation of the principles within the investment industry.
5. We will work together to enhance our effectiveness in implementing the principles.
6. We will report on our activities and progress towards implementing the principles.

We are dedicated to developing the way we implement these principles across asset classes, and we will continue to work with local and global industry bodies to remain at the forefront of the developments in the responsible investing sector.

3. DEFINITIONS

There are many interchangeable terms used when it comes to describing RI. For Equity Trustees, our definition of RI embodies a suite of approaches which are clearly articulated by the Global Sustainable Investment Alliance (GSIA) in the Global Sustainable Investment Review 2020 and summarised in the table below.

ESG integration	The systematic and explicit inclusion by investment managers of environmental, social and governance factors into financial analysis.
Corporate engagement & shareholder action	Employing shareholder power to influence corporate behaviour, including through direct corporate engagement (i.e., communicating with senior management and/or boards of companies), filing or co-filing shareholder proposals, and proxy voting that is guided by comprehensive ESG guidelines.
Norms-based screening	Screening of investments against minimum standards of business or issuer practice based on international norms such as those issued by the UN, ILO, OECD and NGOs (e.g. Transparency International).
Negative/exclusionary screening	The exclusion from a fund or portfolio of certain sectors, companies, countries or other issuers based on activities considered not investable. Exclusion criteria (based on norms and values) can refer, for example, to product categories (e.g., weapons, tobacco), company practices (e.g., animal testing, violation of human rights, corruption) or controversies.

Best-in-class/positive screening	Investment in sectors, companies or projects selected for positive ESG performance relative to industry peers, and that achieve a rating above a defined threshold.
Sustainability themed/ thematic investing	Investing in themes or assets specifically contributing to sustainable solutions – environmental and social – (e.g., sustainable agriculture, green buildings, lower carbon tilted portfolio, gender equity, diversity).
Impact investing and community investing	**Impact investing** Investing to achieve positive, social, and environmental impacts - requires measuring and reporting against these impacts, demonstrating the intentionality of investor and underlying asset/investee, and demonstrating the investor contribution. **Community investing** Where capital is specifically directed to traditionally underserved individuals or communities, as well as financing that is provided to businesses with a clear social or environmental purpose. Some community investing is impact investing, but community investing is broader and considers other forms of investing and targeted lending activities.

Source: Global Sustainable Investment Review 2020

The range of RI approaches that are currently integrated across our investment processes include:

- ESG Integration
- Corporate Engagement & shareholder action
- Negative Screening
    - Equity Trustees Asset Management will not actively invest in manufacturers of tobacco, tobacco-based products, nicotine alternatives, controversial weapons (as defined by MSCI) including cluster munitions, landmines, biological / chemical weapons, depleted uranium weapons, blinding laser weapons, incendiary weapons, and/or non-detectable fragments and nuclear weapons.
- Indirect Investments – listed and non-listed funds
    - Where we do not invest directly in individual companies but rather in funds or exchange traded funds (ETFs), the implementation of these exclusions is more complex. Therefore:
    - We integrate into our investment manager selection process the requirement for managers to comply with these exclusions and we review the underlying holdings of these funds at least semi-annually using Morgan Stanley Capital International's (MSCI) portfolio screening tool.
    - When investing in ETFs which track an index, the index may be exposed to sectors which contravene our screen which can't be avoided. In this instance, there may be an incidental exposure to companies in the sectors described above.
- Sustainability themed investing

A summary of how these RI principles are applied across each asset class and investment offering is detailed in section 5.

4. OUR PHILOSOPHY

Beginning at Board level, Equity Trustees is committed to a Responsible Investing Framework driven by the desire to be aligned with our client base which are predominately in the for-purpose sector, and as such are interested in the merits of our actions as well as financial outcomes.

Our objective is to outperform the benchmark over the long term. To achieve this objective, we focus on investing in quality assets and companies. We believe that if we're able to invest in quality companies at a reasonable price, they will provide sustainable outperformance over the long term.

Applying an RI lens to our investment approach assists to achieve this objective. We believe that well managed companies that exhibit strong corporate governance and develop and maintain a "social license to operate" through strong E and S policies and behaviours will overwhelmingly also prove to have more sustainable and robust business franchises and prove to be better investments over the longer term.

We are active investors and believe in active ownership through proxy voting and engagement with companies. This is a key element of our approach, and we view this component of RI as a valuable tool in generating long-term value for our clients.

While we do offer some strategies for clients that 'negatively screen' or exclude certain companies or sectors for ethical or philosophical reasons, we feel that RI has the capacity to have the greatest impact through active implementation and engagement. Active incorporation of ESG principles enhances both the ability to generate attractive risk-adjusted returns as well as driving positive social outcomes.

5. OUR APPROACH

AUSTRALIAN EQUITIES

ESG integration

The Equity Trustees Australian equities team incorporate Environmental, Social and Governance analysis into the investment decision making process, explicitly evaluating, querying, and assessing ESG risks and opportunities in their fundamental analysis and interactions with companies.

Companies are subjectively scored by the analyst covering the stock. The analyst scores the company on a number of qualitative criteria, the inputs are reviewed at regular intervals and taken into consideration in construction of the portfolio.

We then overlay the internal scoring system with the use of specialist ESG research provider MSCI to augment our views and understanding.

We utilise MSCI's team of over 300 ESG specialists to help identify and analyse ESG related issues and provide a ratings scale for listed companies in our investable universe.

An outline of our ESG analysis process is as follows:

1. Proprietary checklist completed by each analyst for the companies in their universe scored across 50 factors for each company.
2. Company is Scored relative to industry and market overall.
3. Scores are generated for Environmental, Social and Governance, as well as an "Other".
4. Red Flags to reflect an absolute level of risk.
5. The scores are then weighted to produce an ESG Checklist Weighted Average Score for each company.
6. Momentum indicators used to see if there are improving trends.
7. Equity Trustees ESG Database Quantitative Rating – a quantitative (z-score) based on third party data as a cross check to our internal analysis.
8. MSCI ESG Ratings reviewed as an additional information source and cross check on analysts score.

Example of the qualitative ESG factors assessed through this process are outlined below.

Environmental:

- When it comes to environmental sustainability, we seek to understand the impacts of climate change and the energy transition on earnings and share prices and to invest accordingly.
- Examples of the factors assessed include:
  - Whether the company is exposed to significant environmental challenges.
  - The impact of the company's products/services on the environment.
  - Whether the company sources its resources/energy from sustainable sources.
  - Stranded asset risk.
  - The impact of the introduction of climate policies on the company.
  - Whether the company, its products, and services, have an overall positive impact on environment.

Social:

- The company's treatment of their customers and whether they have a history of treating customers poorly.
- The company's treatment of their staff and whether they treat staff/ franchisees fairly.
- Whether the company use's contractors to avoid responsibility for worker entitlements.

- Whether the company operate in countries/industries prone to bribery and corruption issues.
- An assessment of the company's products/services and whether they have a material negative impact on society.
- Whether the company, its products, or services, have a positive impact on improving inequality.

Governance:

- Are management incentives aligned with shareholders.
- Do we consider remuneration excessive.
- Does the company have a track record of questionable investments/diversification/strategy decisions.
- Whether there has been significant recent staff turnover.
- Whether there has there been material insider selling.
- An assessment on whether the company have a sufficiently diverse board and/or management team.
- An assessment on whether the board have appropriate director experience/skill sets.

The material ESG risks and opportunities identified through our ESG integration process can inform our engagement agenda and proxy voting outcomes. Please see the sections on ‘Corporate Engagement’ and ‘Proxy Voting’ for a more detailed overview of our approach to stewardship.

These issues are monitored by the analyst covering the stock for impacts on a company’s earnings estimates or valuation or their investment thesis.

Negative Screening

Negative screening involves the exclusion or limiting of exposure to sectors, companies or countries from a portfolio based on activities considered not investable. We apply a negative screen to the EQT Responsible Investment Australian Share Fund, excluding investment in companies that generate more than 10% of revenues from business activities involved in the:

- provision of gaming products/services
- manufacture of alcoholic beverages
- manufacture of tobacco products*
- manufacture of military armaments*
- provision of adult entertainment

*Equity Trustees Asset Management will not actively invest in manufacturers of tobacco, tobacco- based products, nicotine alternatives, controversial weapons (as defined by MSCI) and nuclear weapons.

Sustainable Investing

Within the EQT Responsible Investment Australian Share Fund, companies which are identified as attractive through Equity Trustees’ ‘quality at a reasonable price’ (QuARP) investment process, and which satisfy our financial and ESG assessment criteria are then mapped to the 17 Sustainable Development Goals (SDGs) to identify those that make a positive impact on society through the advancement of one of more of the SDGs detailed in diagram 1.

To assess alignment of companies to the SDGs, we reference an analysis tool developed by an external sustainability expert. Using this tool, we assess the positive and negative contribution of company’s products and services towards advancement or detraction of the SDG’s, mapping each line of revenue to the 17 SDG’s and underlying targets. The tool applies a materiality factor of high, medium, or low to reflect the strength of each segment’s alignment.

Diagram 1: United Nations Sustainable Development Goals

Source: United Nations

Corporate Engagement

Corporate engagement is a key element of our RI approach, we believe active ownership through engagement with companies on ESG issues is a valuable tool in generating long-term value for our clients.

For our Australian equity investments, we aim to engage with all companies we're directly invested in, and those on our watchlist to better understand ESG risks and opportunities. We aim where possible to be active advocates for positive change when interacting with companies.

Our research team actively meet with company management and representatives with the objective of:

- Building strong relationships with senior management to share our views, and to support companies undertaking positive changes.
- Engaging with an effort to improve how they manage ESG performance or issues over divestment.
- Engaging proactively to address an issue identified through the 'ESG analysis' process or reactively in response to a significant controversy.

Although our engagement efforts are typically one on one, EQTAM will participate in collaborative engagements wherever possible, and when in the best interests of our investors. We recognise the value of collective action which can enable us to benefit from the expertise of other investors (and vice versa) and it can be a more effective and powerful tool to communicate ESG concerns by collectively representing a larger portion of a company's shareholder base than if we were to engage individually.

Proxy Voting

Equity Trustees Asset Management view proxy voting rights as a valuable tool for investors. We intend to vote on all company resolutions put forward to shareholders.

The responsibility of proxy voting sits with the analyst who will assess all company resolutions on a case-by-case basis. To enhance this process, Equity Trustees Asset Management have appointed an external proxy voting adviser.

The role of the proxy voting adviser is to review each resolution put forward for approval and provide voting recommendations on those resolutions.

Our analysts review recommendations provided by our proxy adviser, and at times will vote against their recommendation. More detailed review and investigation are typically carried out when the vote is controversial, for example our proxy voting adviser recommends we vote against management. This will prompt us to engage directly with the company for further questioning and additional information.

Escalation

Our preference is to engage with companies on the specific ESG risks and opportunities impacting them, and it is our preferred approach over divestment. If we feel a specific ESG issue has not been resolved over time, or handled effectively by the company we will seek to escalate the issue through the execution of our voting rights by either voting against specific directors or resolutions.

GLOBAL EQUITIES

EQT Responsible Investment Global Share Fund

Our core global equities exposure is implemented using a multi-manager investment approach. Equity Trustees Asset Management is responsible for sourcing and actively selecting external investment managers utilising an internally developed research and due diligence process favouring managers that are assessed as possessing a both a strong investment capability, together with a demonstrated process in integrating the responsible investing principals detailed below.

A key component of our selection process involves actively seeking investment managers which have a clearly articulated responsible investment policy in place, detailing their responsible investment practices and application through the investment decision making process. We conduct a deep dive assessment underpinned by a detailed questionnaire and seek to better understand and rate the managers approach in the following key areas:

ESG, Culture and Values of the Manager

We seek to understand the culture of the organisation, how ESG risks and opportunities are considered from the top down, and whether values of the investment manager are in line with those of Equity Trustees and our clients.

Responsible Investment Policy

We assess whether the manager has a well document Responsible Investment policy which clearly articulates their processes, systems and views around ESG integration, Positive/Negative screens, Corporate Engagement, and Proxy Voting.

ESG Integration process

We evaluate how ESG factors are incorporated into the investment decision-making process, who has the ultimate responsibility, the resources available, how ESG risks and opportunities are assessed and acted on and incorporated into the manager’s overall valuation methodology.

Negative Screening

The underlying investment managers must not knowingly invest in any company with any involvement (generating more than 0% of revenue) from business activities involved in the manufacture of tobacco, tobacco-based products, nicotine alternatives and controversial weapons (as defined by MSCI) and nuclear weapons.

Focus on Sustainability

Sustainable equity funds are viewed favourably in the manager selection process. Higher scores and priority are assigned to managers with a demonstrated and consistent process in selecting sustainable companies that have positive contribution to one or more of the United Nations’ Sustainable Development Goals (SDGs). A Summary of the 17 SDGs is detailed in diagram 1.

Engagement and Proxy Voting

Engagement and proxy voting is left to the discretion of the underlying investment manager. Managers are assessed on their approach to stewardship including their approach to determining stewardship priorities, how stewardship activities are integrated into the investment process, their approach to proxy voting and engagement, as well as whether the approach has been formalised in a stewardship policy.

Responsible Investment Assessment

The result of this process is an overall numerical score and corresponding rating of positive, neutral, or negative which allows us to consistently compare RI performance across managers. This process is integral in creating a shortlist of managers for inclusion in the Fund. Our aim is to construct a portfolio of managers which are complimentary in their styles and diversified in their investment approach but share a common theme of imbedded Responsible Investment practices in their process in line with our Responsible Investment policy.

Ongoing Review and Monitoring

We evaluate managers on their responsible investment activities quarterly using MSCI to view the portfolio from an ESG lens to ensure our screening requirements are met, and to highlight material ESG risks within the portfolio. The outcomes of the analysis shape our discussions with portfolio managers in our in-person meetings with the investment, operational and responsible investment teams. Underlying managers are required to transparently report their holdings to us on a quarterly basis at minimum.

EQT Eight Bays Global Fund

The EQT Eight Bays Fund is primarily invested in ETFs which are typically an indexed or actively managed group of stocks.

ESG factors are taken into consideration as part of the investment process to the extent they could have a material impact on the financial performance of the underlying ETFs within the Fund.

Eight Bays subscribes to ESG ratings research from VettaFi for comprehensive ESG information on each ETF.

The ESG rating for an ETF is assessed by the research provider through a series of metrics including:

1. Environmental: Revenue exposure to environmental Impact, severe environment controversies and sustainable impact solutions
2. Social: Revenue exposure to social impact and sustainable impact solutions
3. Governance: Severe governance controversies and board independence/diversity

The Fund utilises these ETF specific ESG ratings when assessing ETF investments.

DEFENSIVE ASSETS

Fixed Income & Cash

EQT Diversified Fixed Income Fund

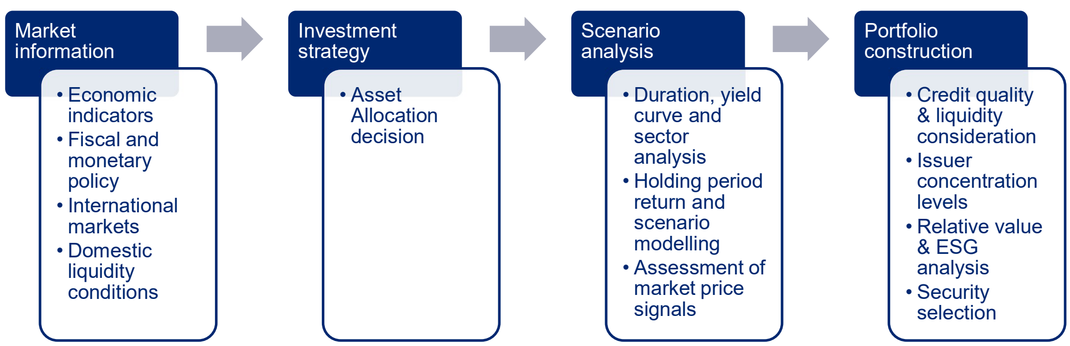
The EQT Diversified Fixed Income Fund is managed with the objective of providing investors with an exposure to high-quality income yielding investments predominantly in Australian government bonds, State (semi) government bonds, supranational bonds, investment grade corporate bonds, and other fixed income securities, adopting a concentrated approach to security selection, in part due to the relatively small size of the Australian credit market.

EQT Cash Management Fund

The EQT Cash Management Fund invests in a range of highly liquid securities including cash deposits, bank floating rate notes, short-dated fixed income securities and commercial paper.

Our investment approach across each fund has a focus on quality, fixated on offering capital stability and a regular income stream. In line with this approach, the credit quality of an issuer is front of mind in the investment process.

Diagram 2: Summary of Investment Selection Process



In assessing the appropriateness of a security for inclusion in our portfolios, several financial factors are used to filter the investment universe. The funds invest predominantly in investment grade securities using the higher of Standard & Poor's (S&P) or Moody's ratings. The credit ratings assigned by these well-recognised agencies reflect an assessment of material environmental, social and governance (ESG) factors relating to an issuer and its bond issue. The ESG assessment is incorporated into the agencies credit rating methodology, providing confidence that the overall rating applied to an issuer reflects ESG risks that can materially influence the creditworthiness of the rated entity or issue. Global rating agencies such as S&P and Moody's are now increasing transparency over how they consider ESG factors as part of their assessments.

Consistent with our Australian equities approach, an additional ESG lens is applied to further filter the universe when analysing corporate debt issues. This is particularly relevant when selecting between instruments that have similar financial characteristics. In this instance, ESG performance will be the differentiating factor. In assessing the ESG risks of the underlying corporate issuer, the fixed income team leverage the proprietary ESG scoring system created by our Australian equities team and MSCI's ESG ratings research.

Sustainable investing identifies and allocates capital to projects related to certain environmental or social outcomes, such as clean energy or energy efficiency, sustainable management of biodiversity and ecosystems and investment in social housing. Types of sustainable fixed income investments include social bonds, sustainability bonds and green bonds which are all rapidly growing categories of fixed income securities. It is our preference to invest in this category of bond issue where there is sufficient liquidity to create a meaningful position and the investment thesis is sound. Investment selection of this category of bond will follow the same selection process summarised above, with added criteria of third-party certification.

Spectrum Strategic Income Fund

The Spectrum Strategic Income Fund is an actively managed credit fund that invests in a range of debt and hybrid securities with the objective of maximising income whilst preserving capital. The portfolio holds a diversified number of securities with risk limits imposed and actively monitored across security type, credit risk, industry, and issuers. Issuers include government bodies, banks, and corporates.

Spectrum has a strong belief that ESG plays an important role in reducing the risk of systemic issues that can lead to a significant deterioration in the credit quality or profitability of an organisation.

In assessing the appropriateness of a security for inclusion in the portfolio, Spectrum consider several factors including the macro environment, technical drivers, asset class valuation and security valuations, sector assessment and credit risk. ESG factors are considered in the investment selection process to the extent they could have a material impact the credit quality or profitability of an organisation.

Governance is a core aspect of credit investing and forms a key pillar of Spectrum's ESG assessment process. In doing so Spectrum consider factors such as the makeup of the board of directors and remuneration.

Spectrum overlay their own ESG research with Refinitiv scoring methodology to inform their views and assessment of the fixed income securities. ESG is monitored monthly via Refinitiv and scored/monitored at least semi-annually using the MSCI ESG research methodology.

A list of issuers may be compiled to create a Blacklist. This list may change over time and is used as a guide by the Manager to assist in the investment decision. The list may highlight possible issues which could lead to underperformance. When investing a note may be made if there are issues relating to the investment. Such an issue could lead to not investing or having a lower weighting.

Negative Screen

A negative screen is applied to the EQT Diversified Fixed Income Fund, EQT Cash Management Fund and Spectrum Strategic Income Fund. These offerings exclude investment in issuers that generate more than 10% of revenues from business activities involved in the:

- provision of gaming products/services
- manufacture of alcoholic beverages
- manufacture of tobacco products*
- manufacture of military armaments*
- provision of adult entertainment

* Equity Trustees Asset Management has zero revenue tolerance for manufacturers of tobacco, tobacco-based products, nicotine alternatives, controversial weapons (as defined by MSCI) and nuclear weapons.

IMPACT INVESTING

Impact investments are investments made with the intention of generating measurable social and environmental outcomes, alongside a financial return. We have clients who wish to participate in impact investments, often viewed as complimentary to their philanthropic activities and in alignment with their values.

We asses impact investment opportunities on a case by case basis driven by client demand. We engage an asset consultant who has the depth of experience and specialisation in this sector to build out an impact investing framework, including an articulated strategy, with stated risk parameters, as well as the ongoing sourcing and due diligence of impact investing opportunities in the market.

6. REPORTING & REVIEW

Equity Trustees are a signatory to the PRI. As a signatory we are required publicly report our progress towards implementing our RI activities annually. We are required to report on the following key areas:

1. Our method of incorporating RI practices into our investment management process across asset classes
2. Investment stewardship approach and practices.
3. External manager selection process.

This policy is maintained by the General Manager, Responsible Investing and will be reviewed annually.