

Annual SRDII Transparency of Asset Managers Disclosure

In accordance with the EU Shareholder Rights Directive II we are required to disclose how our investment strategy and its implementation contributes to the medium to long-term performance of the assets of the asset owner.

EFGAM is a client-focused organisation, committed to delivering strong investment performance based on the Green Bundle concept that pairs the financial dimension with environmental and social considerations, resulting in strong performance and positive environmental and social returns in comparison to traditional investments.

The EFG Group entrepreneurial culture enables the firm to attract and retain the very best investment professionals, allowing them freedom to perform to meet clients' needs within a strong governance framework that dictates the minimum common denominator that all our investments have to guarantee to provide the highest standard of performance. ESG is part of this approach. In addition to this, EFGAM allows its fund managers a high degree of independence to use their own proven processes.

The key, material medium to long-term risks associated with the investments

EFGAM adopts a long-term, active investment approach which enables clients to achieve their medium and long-term financial goals. We use a research-driven approach and believe that ESG integration leads to better-informed investment decisions and risk-adjusted returns. In addition to using third party data, we have developed proprietary measurement tools to further our integration of material ESG risks and gain a comprehensive view of company performance. During the course of our investment process, a wide range of risks are considered, including market, liquidity and counterparty risk. Portfolio exposures are monitored and evaluated on a regular basis.

For our UCITS funds, more information on the key risks and the synthesis risk and reward indicator is set out in the Key Investor Information Documents (KIIDs).

Portfolio composition

Portfolios such as UCITS funds or client specific mandates are constructed in line with prevailing regulations or client instructions. We also consider our ESG policies as part of the research process when selecting companies for investment. Respective prospectus for each fund are available at: www.efgam.com/newcapitalfunds/Funds.html.

Turnover and costs

The turnover of the fund varies by investment style and strategy, aligning with our active, long-term approach. Monitoring is conducted by our Investment Risk Committee.

The transaction cost details can be found in the European MIFID Template (EMT).

Securities lending

There is a securities lending program in place for certain funds. When shares are on loan, we are unable to exercise voting rights for these shares. We do not recall shares on loan to vote.

Proxy voting

Through proxy voting, EFGAM takes an active approach to monitor companies and act as a responsible steward of the investments made on the behalf of clients. We have partnered with ISS in order to put forward our shareholders' claims and have subscribed to the ISS Climate Policy. Our Engagement and Voting Report is published annually. For discretionary portfolios EFGAM does not retain the right to vote but instructions may be taken from clients on a case by case basis. To maintain the necessary flexibility to meet client needs, EFGAM's offices may determine a voting policy which addresses local market issues.

Conflicts of interest

Integrity of action and the importance of managing potential conflicts of interest on behalf of clients are part of our efforts. EFGAM acts in line with the Code of Conduct and Conflict of Interest Policy of the EFG Group.

This statement is reviewed annually and updated as necessary.