Ownership Capital B.V. ("Ownership Capital" or the "Investment Manager")

Disclosure of Principal Adverse Impacts Policies (the "PAI Statement")

Introduction

Ownership Capital acknowledges that all investments have real-world impacts, including potentially adverse impact on sustainability factors. "Adverse impacts" are the negative effects that investment decisions might have on environmental, social and employee matters, respect for human rights, anti-corruption and anti-bribery matters (together, "Sustainability Factors").

The Investment Manager manages a single investment strategy, which is applied across all investment products. "Investment products" includes funds and managed accounts. This PAI Statement describes how the Investment Manager considers the principal adverse impacts of investment decisions on Sustainability Factors as of the date of this statement, taking into account of the nature of its activities and the type of fund or managed account under management.

For the purposes of this PAI Statement, 'financial market participant' means the Investment Manager in respect of its role as the Investment Manager delivering services for funds and managed accounts.

Consideration of Principal Adverse Impacts of Investment Decisions on Sustainability Factors

Ownership Capital assesses material impacts of investee company operations and products/services on Sustainability Factors through analysis conducted during the investment due diligence process, and regular monitoring throughout the holding period. For sustainable investments this means ensuring that the investments do no significant harm to any environmental or social objective.

Description of policies to identify and prioritise principal adverse sustainability impacts

The Investment Manager assesses the company through its own environmental, social and governance ("ESG") analysis tool, which is an extensive questionnaire based on different ESG factors. ESG factors are defined as measures used to evaluate the company across Management, Environmental, Social and Governance categories. Examples of these criteria include:

- Management - Succession Plan and Managerial Strength.
- Environmental - Formal Environmental Policy, Climate Change and Greenhouse Gas Emissions, Pollution, Waste Management and Energy and Water Usage.
- Social - Health and Safety Certifications and Human Capital Management.
- Governance - Board Independence, Ethics and Compliance.

The questionnaire is completed based on quantitative and qualitative data available through its internal research, information made available by the issuer through company reporting and publicly available data sources, as well as direct interactions with the company. The Investment Manager uses its own assessments of ESG issues and may also consider standards as set forth by recognized global organizations.

Included in the Investment Manager's ESG analysis tool are criteria related to the impact of the investee company's business on Sustainability Factors, including but not limited to:

GHG Emissions	*Climate and other environment-related indicators*
Board Diversity	*Social and Employee, Respect for Human Rights, Anti-Corruption and Anti-Bribery Matters*
Exposure to controversial weapons	*Social and Employee, Respect for Human Rights, Anti-Corruption and Anti-Bribery Matters*

Amongst other things, the assessment enables members of the investment team to identify principal adverse sustainability impacts for each company. Ownership Capital considers “principal adverse sustainability impacts” to be characterized by the high likelihood of a severe adverse impact on Sustainability Factors. Since Ownership Capital identifies principal adverse sustainability impacts for each company in the portfolio individually, the material principal adverse impacts may differ per company depending on factors such as industry, geography and size.

Description of actions to address principal adverse sustainability impacts

The Investment Manager typically does not invest in companies with a high likelihood of generating severe principal adverse impacts on Sustainability Factors, as the Investment Manager believes that companies with business strategies that are executed in a sustainable, and well-governed manner are most likely to deliver strong investment results over the long term.

The full list of principle adverse impact (PAI) indicators currently monitored and evaluated include:

Adverse sustainability indicator		Metric
CLIMATE AND OTHER ENVIRONMENT-RELATED INDICATORS		
Greenhouse gas emissions	GHG emissions	Scope 1 GHG emissions
		Scope 2 GHG emissions
		Scope 3 GHG emissions
		Total GHG emissions
	Carbon footprint	Carbon footprint
	GHG intensity of investee companies	GHG intensity of investee companies
	Exposure to companies active in the fossil fuel sector	Share of investments in companies active in the fossil fuel sector
	Share of non-renewable energy consumption and production	Share of non-renewable energy consumption and non-renewable energy production of investee companies from non-renewable energy sources compared to renewable energy sources, expressed as a percentage
	Energy consumption intensity per high impact climate sector	Energy consumption in GWh per million EUR of revenue of investee companies, per high impact climate sector
Biodiversity	Activities negatively affecting biodiversity-sensitive areas	Share of investments in investee companies with sites/operations located in or near to biodiversity-sensitive

		areas where activities of those investee companies negatively affect those areas
Water	Emissions to water	Tonnes of emissions to water generated by investee companies per million EUR invested, expressed as a weighted average
Waste	Hazardous waste ratio	Tonnes of hazardous waste generated by investee companies per million EUR invested, expressed as a weighted average
SOCIAL AND EMPLOYEE, RESPECT FOR HUMAN RIGHTS, ANTI-CORRUPTION AND ANTI-BRIBERY MATTERS		
Social and employee matters	Violations of UN Global Compact principles and Organisation for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises	Share of investments in investee companies that have been involved in violations of the UNGC principles or OECD Guidelines for Multinational Enterprises
	Lack of processes and compliance mechanisms to monitor compliance with UN Global Compact principles and OECD Guidelines for Multinational Enterprises	Share of investments in investee companies without policies to monitor compliance with the UNGC principles or OECD Guidelines for Multinational Enterprises or grievance /complaints handling mechanisms to address violations of the UNGC principles or OECD Guidelines for Multinational Enterprises
	Unadjusted gender pay gap	Average unadjusted gender pay gap of investee companies
	Board gender diversity	Average ratio of female to male board members in investee companies
	Exposure to controversial weapons (antipersonnel mines, cluster munitions, chemical weapons and biological weapons)	Share of investments in investee companies involved in the manufacture or selling of controversial weapons

However, in certain cases where material principal adverse impacts are identified, the Investment Manager may still choose to invest and engage with the company to improve their business from a sustainability perspective. If the Investment Manager determines there is an openness from the company management team to reduce the principal adverse impact through engagement, they may choose to invest and engage with the company, rather than exclude or divest. If the

Investment Manager determines there is no openness from the company management team to reduce the principal adverse impact through engagement, they will not invest, or will divest the company.

Following selection, the Investment Manager actively engages with all investee companies on a continuous basis to mitigate the likelihood and severity of potential principal adverse impacts on Sustainability Factors. This engagement includes addressing key areas such as carbon emissions, board diversity or policies related to human rights. Working together with management, the Investment Manager encourages investee companies to manage the impact of their business on material Sustainability Factors in order to achieve sustainable growth and business durability that is the foundation of long-term success.

Engagement Policies

Engagement is undertaken by our investment team and is seen as vital to our investment process. We believe engagement is useful in assessing the performance and suitability of investee companies' management teams and is key in influencing these teams, including in the potential mitigation of principal adverse impacts of their business on Sustainability Factors.

In accordance with the Shareholder Rights Directive II, the Investment Manager has put in place a shareholder engagement policy which addresses the Investment Manager's approach to stewardship as referred to in article 5:87c sub 1,2 and 6 of the Dutch Financial Supervision Act ("Wet op het financiëel toezicht"), as transposed into Dutch legislation from the Shareholder Rights Directive II (SRD II).

The SRD II is part of EU-wide measures intended to promote effective stewardship and long-term investment decision making. SRD II aims to achieve this by enhancing transparency on engagement policies and investment strategies across the institutional investment community.

A full copy of the Investment Manager's shareholder engagement policy is available on their website here.

Responsible Business Codes

Ownership Capital seeks to comply with the United Nations Principles for Responsible Investment (UNPRI) and reports annually on our adherence to the standards. As signatories to the Montreal Carbon Pledge, Ownership Capital discloses the carbon footprint of the investment portfolio annually within regular reports to clients. Furthermore, Ownership Capital is a supporter of the Task Force on Climate-Related Financial Disclosures ("TCFD").

Review

This PAI Statement is effective from 10 March 2021 and coincides with the first reference period of 1 January 2022 to 31 December 2022. Reporting over that reference period on the indicators for adverse impacts referenced in this PAI Statement will take place in 2023, following the measurement of the first reference periods (Q1 2022 - Q4 2022). The PAI Statement will be reviewed at least annually.