



# SilverCross Global Small-Cap Fund

## ESG Engagement Policy

As long-term investors, we believe in active ownership. Our focus is on building long-term relationships with our investee companies by engaging on material issues with the relevant personnel. We regularly engage with the management teams of our investee companies on their operations, including environmental, social and governance (ESG) factors.

Engagement topics are determined by our bottom-up analysis and are prioritised in terms of sustainability risk and impact. Engagement is conducted through one-on-one meetings and supplemented with conference calls, emails and, where possible, site visits.

Our engagement process can be broken down into four key stages:

### 1. Initial Due Diligence and Engagement:

As part of our initial due diligence process, we conduct business involvement screening research to identify whether a company has been involved in any sustainability-related controversies. If a company is involved in any significant controversies, they are excluded from our investable universe. Companies are then assessed against ESG indicators and risks in our in-house ESG analysis template. This is to determine where a company performs well, and where a company can improve, both relative to its peers and best practice. Key areas for improvement, including any past or minor controversies, are highlighted as points for engagement with senior management. Senior management often pass us onto the person internally responsible for driving forward their ESG initiatives for further in-depth engagement.

### 2. In-depth Engagement:

Due to our in-depth and proprietary research, we are often asked by companies for our feedback and advice on how they can improve their ESG credentials. We provide companies with in-depth guidance on the key areas where they are underperforming as well as what we believe to be industry-specific best practice.

### 3. Proxy Voting:

We believe that proxy voting is a key component of being an active owner. Proxy voting can be an important tool for signaling which practices we believe are aligned with strong ESG performance and those that are not. We are committed to consistently exercising our voting rights in investment mandates where proxy voting is delegated to us. We publicly disclose a summary of our proxy voting activity on a quarterly basis.

### 4. Continued Monitoring and Reporting:

We maintain an engagement database which details engagement topics, format, timings and outcomes. We continuously update our internal ESG template as our portfolio companies release new information and implement new policies and procedures. We maintain a constant dialogue with all our portfolio companies to help them evolve their ESG credentials as their business grows. Controversies are evaluated on a periodic basis. If any controversies are identified, we discuss these with management to assess any potential material impact on the value of the investment and wider society.

We will publish an annual engagement report outlining priority topics and summarising our engagement activity for the prior year.

This Policy will be reviewed annually.