

Responsible Investment Policy

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1. Policy statement

Investing capital in a way that recognises our fiduciary duty to act in the best economic interests of our clients but also encompasses environmental, social and governance (ESG) issues is an important consideration for Fisher Funds Management Limited (Fisher Funds).

Fisher Funds aims to achieve these ESG investment goals in three ways. The first is by employing tools to maintain a Prohibited Companies List (the List) that identifies companies that do not meet our ESG standards. Fisher Funds will not invest in companies on the List. Secondly, we incorporate ESG considerations in all our fundamental research and engagement with companies. Lastly, we exercise our proxy voting rights in a way which takes into account our ESG standards.

2. Commitment

As an important part of our commitment to ESG, Fisher Funds is a signatory to the United Nations sponsored Principles for Responsible Investment.

3. Implementation

Fisher Funds has established an ESG Committee consisting of members of the Fisher Funds leadership group.

The ESG Committee will maintain the List. Companies may be placed on the list because the products they produce, services they engage in, or their past conduct does not meet our ESG investment goals.

The ESG Committee will consider the following principles when compiling the List.

1. We will not invest in companies that we are aware produce core components or systems used in weapons whose normal use would cause indiscriminate or unjustifiable suffering. This includes, but is not limited to, cluster munitions, landmines, chemical and nuclear weapons.
2. We will not invest in companies where a significant proportion of their core business includes the production of thermal coal or where they are significant contributors to thermal coal production.
3. We will not invest in companies that manufacture cigarettes, or that generate a significant proportion of their revenue from the manufacture of other tobacco related products.
4. We will not invest in companies that have exhibited unacceptable corporate behaviour that we regard as a fundamental breakdown of the integrity of the business.
5. We will consider demonstrable evidence of change in company governance, activities or behaviour when making inclusion decisions.

ESG factors are considered whenever we undertake qualitative research on individual securities or companies. Insights from this research are incorporated into the final recommendation on whether the individual security or company would be a suitable investment for clients of Fisher Funds.

We will use tools and methodologies from respected ESG service providers to assist in improving our principles and generating the List, however companies placed on the List will be determined at the sole discretion of the ESG Committee (other than where it is illegal to invest in certain companies due to the products and/or services they provide).

4. Divestment of prohibited securities

If we hold a security that is subsequently placed on the List we will divest the holdings from the relevant funds as soon as is practicable to do so.

5. Responsibility, training and reporting

The List will be updated at least quarterly by the ESG Committee. Existing portfolios will be reviewed against the List whenever they the List is updated, and on a regular basis.

Portfolio Managers must take the List into account when determining new portfolio additions. In addition, the Head of Trading will not action a purchase of a security on the List.

Investment staff will be introduced to this policy at induction.

The ESG Committee will provide a regular report to the Investment Strategy Committee.

6. Transparency

We will maintain open communication with our clients and give them an opportunity to contribute to our deliberations on ESG issues.

7. Review of policy

The Responsible Investment Policy will be reviewed annually or more frequently if required. This Policy is subject to change at any time.

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Reviewed: Monique Bon	Date: Oct 2017
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