Arisaig Partners ESG and Constructive Ownership Approach

January 2023

Table of Contents

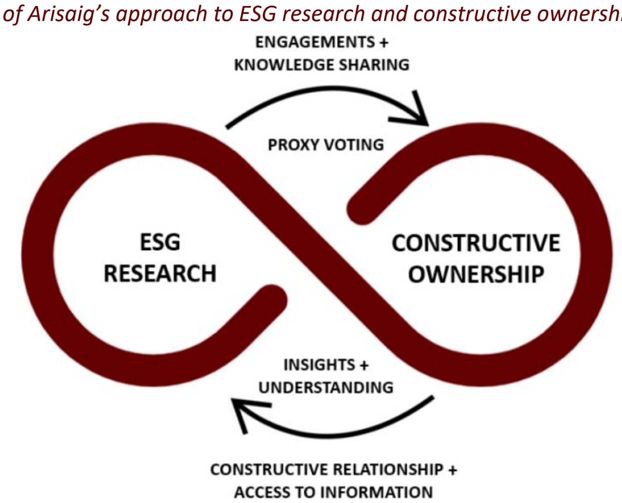
1. Why do we need an approach to ESG and constructive ownership?

Our Investment Philosophy is based around the core belief that the practice of 'Purposeful Growth' delivers superior operating performance for our holdings and supports long-duration compound earnings growth. We make long-term investments in a concentrated number of exceptional businesses which grow with purpose by taking a multi-stakeholder view of the world. This means they are motivated not by short-term profitability but rather the value they create for customers, employees, communities, the environment, and ultimately shareholders.

An understanding of how a company manages material environmental, social and governance (ESG) issues is fundamental to assessing whether it meets our criteria for 'Purposeful Growth'. Ineffective management of such ESG issues could significantly impair long-term prospects of a business. On the flip side, capturing ESG opportunities can lead to significant long-term value creation. ESG research and assessment, leveraging both internal and external resources, are therefore integral to how we invest (our 'Research Excellence Process' – see separate document for more details on this).

Moreover, our concentrated[1] buy and hold approach[2] gives us sufficient time to: (i) build trusted relationships with our holdings; (ii) use these relationships to actively engage companies to make meaningful positive changes to their ESG practices; and (iii) reap the superior shareholder returns that we believe such change brings about in the long-term. We call this approach 'constructive ownership'. This active engagement in turn provides insights for our ESG research and assessment, thereby creating a virtuous cycle.

Figure 1: Virtuous cycle of Arisaig's approach to ESG research and constructive ownership



Source: Arisaig Partners

2. What are the underlying principles guiding our Approach?

Our approach to ESG and constructive ownership follows the same underlying principles as that of our overall approach to Research Excellence, namely: clear focus, systematic due diligence, thoughtful judgement, endurance investing, and continuous learning (see Research Excellence Process document for more information).

In addition to the above principles, we incorporate responsible investing best practice and guidance from leading organisations such as the UN Principles for Responsible Investment (PRI), the Taskforce

[1] Our portfolios hold c. 25 stocks (as of January 2022)

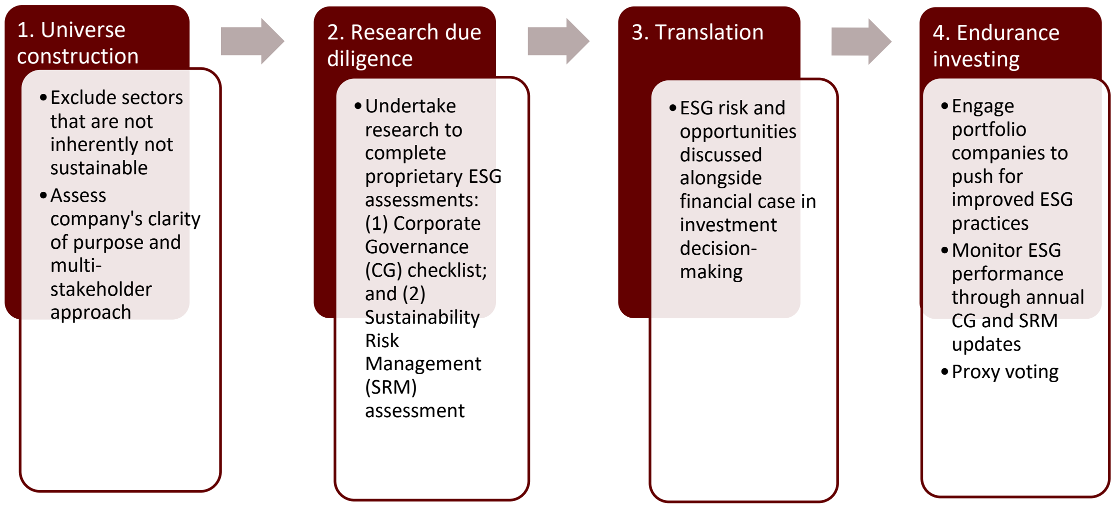
[2] Our average holding period is 8.5 years based on last five years (source: Arisaig analysis, as of January 2022)

for Climate-Related Disclosures (TCFD), and the UN Global Compact (UNGC). We continuously try to improve our understanding of ESG issues through attending specialist conferences, talking to experts in the field, conducting our own thematic research, and commissioning third party research on important issues. These resources are also useful allies in our engagement efforts with companies. We also try to do our bit to promote more sustainable investment practices globally, including participating in working groups, sharing research, and speaking at events.

3. What is the process?

ESG and constructive ownership are considered alongside financial considerations throughout our 'Research Pathway'.

Figure 2: ESG and constructive ownership through our research pathway



Source: Arisaig Partners

Step 1. Universe construction

Right at the start of the research process, we screen out sectors that we do not see complying with our investment philosophy of purposeful growth. This means excluding from our investable universe any companies generating 5% or more of its consolidated revenue from tobacco, fossil fuels, pornography, gambling[3], or weapons[4]. By excluding such sectors, we also avoid investing in companies with greatest exposure to climate change and other nature-related risks.

At this stage, we also seek to understand (at a high-level) whether the company is clear on its purpose, and whether its business is aligned to that purpose. This includes looking for evidence that the company takes a multi-stakeholder approach, for example by examining its corporate strategy and

[3] We apply the Cambridge Business English Dictionary definition of gambling as: "*the activity of risking money on the result of something, such as a game or horse race, hoping to make money*". This is commonly manifested in casino operations, betting agencies and lotteries.

[4] The exception to this rule is with regards to retailers, where rather than applying an explicit threshold to revenues derived from products such as tobacco or pornography, we prefer to adopt an engagement-centric approach to understand what they are selling and how (i.e. whether they following responsible retailing policy or firmly committed to doing so). The rationale is that in emerging markets, such retailers are often providing a regulated, accountable alternative to informal channels for purchasing products such as tobacco.

speaking to third parties such as ex-employees and industry experts. Our sense of the company's 'clarity of purpose' is further refined through the due diligence stage.

Finally, we conduct a search using a comprehensive international database as well as of general press to identify ESG red flags (e.g., severe human rights violations, incidents of major corruption, sanctions) for a company before it enters our due diligence funnel.

Step 2. Research due diligence

There are three stages at the 'due diligence' stage of our research funnel: 2-pager, Investment Case (IC) Draft, and IC Final. ESG research takes place in the first two of these.

2-pager stage: Corporate Governance checklist

The first stage of due diligence is for the research analyst to prepare a '2-pager', which includes the outputs of undertaking our proprietary Corporate Governance (CG) checklist. This consists of c. 70 questions covering shareholder rights, transparency and related parties, audit and accounting, board oversight and executive oversight and compensation. The checklist has been developed over 20+ years for investing in emerging markets and reflects the issues we believe to be the most pertinent. These tend to be in line with global best practices, which are often over and above what is mandated by local regulation in emerging markets.

Figure 3: Sample summary output of CG checklist

	Raw Score	Out of	%	Weighted Raw Score	Out of	Final Score (%)
Overall CG Score	51	70	73%	103	141	73%
Shareholder Rights	11	12	92%	25	26	**96%**
Transparency & Related Parties	9	13	69%	20	31	**65%**
Audit & Accounting	11	14	79%	22	26	**85%**
Board Oversight	10	15	67%	18	28	**64%**
Executive Oversight & Incentivisation	10	16	63%	18	30	**60%**

Source: Arisaig Partners

IC Draft: Sustainability Risk Management assessment

For companies that progress through the 2-pager, the covering analyst prepares a draft investment case. It is at this point that the analyst conducts a detailed assessment of how well a company is managing environmental and social issues using our Sustainability Risk Management (SRM) assessment. The SRM is an internally developed framework that considers five to ten issues that are most likely to be material based on the company's sector. For example, for a food and beverage company, the health and nutrition profile of its products will likely be material, whereas this will not be the case for a software business.

Each material issue is assigned a weighting based on its relative importance. For each issue, we then rate the company's management on a scale of 0 to 3 in terms of three dimensions:

- Strategy & Policy: Does the company have a comprehensive and suitably ambitious strategy to manage this issue? Does it have corresponding policies and governance structure to implement the strategy?
- Disclosure: How thoroughly and consistently does a company disclose its performance on this issue?
- Performance: How is the company performing against its objectives, over time and relative to peers?

A weighted average score across all dimensions/material issues is calculated and is translated into a consolidated ‘SRM rating’ for each company, ranging between ‘A’ and ‘E’.

It is worth noting that our internal scoring guidelines use international best practice as reference points (i.e., a score of ‘3’ reflects best-in-class by international standards). Therefore, a company that achieves an ‘A’ rating in our SRM is typically in line with global leaders and far outdoing typical domestic emerging market peers. We have set this high bar intentionally as we believe the highest quality emerging market companies have the potential to achieve this in time.

Figure 4: Example SRM summary

Social and Environmental Risk Management	
Summary Scores	**Summary Comments**
Risk Management Score: 6.9 **Risk Management Rating: B**	is one of the regional leaders from an ESG standpoint with a detailed strategic focus on broader business sustainability. The company produced a detailed sustainability report in 2018 with an effort to bring the business more in sync with the Sustainable Development Goals. While long term goals have been set, work needs to be done to develop short term targets.

Key Issue	E or S	Weighting	Strategy	Policy/Disclosure	Performance	Final Score
Supply Chain Footprint	E	10.0%	3	2	2	
Product Safety	S	35.0%	3	2	2	
Health and Nutrition	S	15.0%	3	2	3	
Water Management	E	15.0%	3	2	2	
Energy Management	E	10.0%	3	3	3	
Packaging Life cycle Management	E	15.0%	2	1	1	
Grade			**A**	**B**	**B**	**B**

0	1	2	3

Source: Arisaig Partners

Data sources

Given the paucity of bulk reliable ESG data sets for emerging market companies, we rely primarily on our own proprietary research to complete our CG and SRM assessments. We scour published data from the company itself, namely annual reports, earnings releases, investor presentations, and CSR/sustainability reports. In certain cases, we will approach the company directly for more information if we cannot find the information we require (see ‘information exchange’ engagements below). This is very much a manual, time-consuming process: ESG assessment for one company can take two or three days for an analyst to complete, not including peer review time.

We do supplement our research using ESG data from carefully selected third-party providers where we cannot obtain it by other means. For example, emerging market companies’ disclosure of GHG emissions has been very sparse historically, although this is gradually improving. In these cases, we try to triangulate and sense-check the data based on our deep knowledge of our holdings. We also use third-party ESG data to help meet regulatory disclosure requirements (e.g., where primary data from companies is not available, to provide estimates on Principal Adverse Impact indicators in accordance with the EU Sustainable Finance Disclosure Regulation).

Integration into due diligence

The outputs of both the CG Checklist and the SRM Framework are integrated, alongside commentary from the covering analyst, into the IC Report (ICR) for the company. ICRs are a structured research document that underpins the due diligence of every company on our watchlist.

ESG research, where relevant, are also factored into the Arisaig Crystal Ball (ACB), our long-term valuation tool. The ACB includes an 'ESG scenario' which allows the analyst to factor in the implications of an ESG risk or opportunity, for example by changing future costs or revenue growth. We have used the ESG scenario to introduce shadow carbon pricing into our ACB calculations. We apply a shadow carbon price of USD 75/tCO2e[5] to the estimated future emissions of the company and calculate what impact this would have on the company's margins (and consequently our expected long-term returns) should it be required to absorb this cost. While simplistic, this gives a sense of the company's sensitivity to the introduction of carbon pricing.

Step 3. Translation

The third step in our research pathway involves applying research backed judgement to portfolio decision making. Arisaig's Investment Committee is responsible for making investment decisions for our strategies. To decide what companies to invest in and what weighting they should have in portfolios, the Investment Committee considers how well a company is managing its ESG risks and opportunities, as documented within the ICR and our internal reporting systems.

Step 4. Endurance investing

Engagement

We view our engagement style as being that of a 'Constructive Owner'. Over time, we hope to become trusted partners of our investee companies, helping them to become better versions of themselves. Our specialist focus – exclusively emerging markets, generally consumption-driven businesses – allows us to maintain detailed knowledge of global best practices, which (we hope) makes us a valuable partner to investee companies. Another benefit of being established emerging market investors is that we hold trusted relationships and are of sufficient scale, which gives us a greater positive influence on public companies than the average investor.

Given the importance we place on engagement, we have set a target to engage directly with at least 60% of holdings every year, which we monitor on a quarterly basis. For this target, we define engagement as purpose-driven communication with our holdings with a deliberate objective to influence corporate behaviours or practices. It is distinct from dialogue as part of the normal course investment analysis and monitoring.

Stimulus for proactive engagement can come from the weaknesses identified in the CG and SRM assessments, occurrence of unexpected ESG incidents, and/or through our thematic research on topical ESG issues (which currently includes carbon emissions, gender equality, and data security).

We undertake two types of engagement:

(1) Information exchange: Purpose of these is to better understand a company's strategy or practices e.g., around employee rights or supply chain management. In some cases, the information provides sufficient comfort that the company is suitably managing the issue. In other cases, we may decide that we should push for behavioural change.

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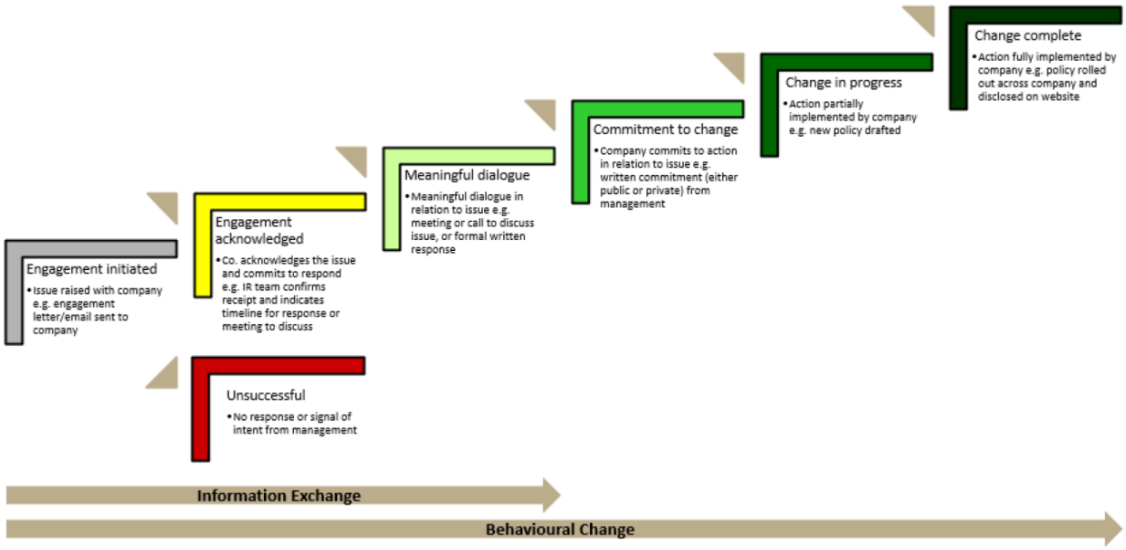
[5]Consistent with the IMF's estimate of the carbon price needed by 2030 to meet carbon targets https://blogs.imf.org/2019/10/10/fiscal-policies-to-curb-climate-change/

(2) Behavioural change: These engagements have an objective to change the behaviour of the company. It involves setting clear expectations with management about what we believe should be done differently and why.

Successful engagements can take years. One study found on average it takes 35 months for an ESG engagement to be successfully completed[6]. Fortunately, as buy and hold investors we can not only see these engagements through, but also reap the resulting benefits to shareholder returns. To keep track of progress, we have an internal engagement tracking module. Each 'interaction' with the company (e.g. a meeting, significant written correspondence, proxy vote) is recorded in the system alongside progress against our milestones system.

Figure 5: Engagement progress milestones



Source: Arisaig Partners

Where an engagement appears to have stalled (a sign of which could be no milestone progress for over 12 months), we consider the individual circumstances of each case rather than apply a blanket approach to escalation.

- In certain cases, we can afford to be patient – for example where management have expressed that change is in progress and provided a clear timeline.
- If we believe the issue is urgent or that more concerted effort is needed to create change, we will look for potential collaboration opportunities with fellow shareholders to improve the negotiating position. This can include a discourse with other stakeholders such as the stock exchanges.
- Finally, if we feel the company is still unwilling to respond on what we feel is a material business risk that will affect its long-term growth prospects, we will look to sell out of the position.

We strive to avoid any hostile or public exchanges as this rarely results in good outcomes from our experience.

Monitoring

On annual basis we update the CG checklist and SRM assessment of every holding. Through our engagement efforts, we hope to see gradual improvements in these scores over time. Significant

[6] Hoepner et al. (2018) ESG Shareholder Engagement and Downside Risk https://papers.ssrn.com/sol3/papers.cfm?abstract_id=2874252

improvements can, and have, resulted in increased conviction in, and position sizing of, a holding. In other cases, these re-evaluations have led to disposals.

We also continuously monitor our holdings for significant negative ESG events. Examples include lawsuits or regulatory fines, allegations of human rights abuse, or natural disaster-related supply chain disruption. All such incidents are reviewed to determine the scope of the issue and determine whether it is systemic. We then run through the below process to determine the subsequent investment decision or engagement activity.

Figure 6: ESG incident escalation approach

Trigger	Question	A: Yes?	A: No?	Timeline
ESG Incident	*Is this issue systemic?*	**Sell out** as alignment of interests is broken	Understand sources of issue and **engage** the company on how it should respond	3 Months
Company mitigative action	*Is the company responding to this issue?*	Track activities and verify if suitable to remedy the issue	**Escalate** with company before deciding whether to sell out	6 months
Verification of change	*Is there meaningful evidence of change?*	Consider **topping up** position with added conviction in management quality	**Escalate** with company before deciding whether to sell out	12-18 months

Source: Arisaig Partners

Proxy voting

We see a proactive approach to voting on our shares as an important engagement mechanism through which we can encourage improved corporate governance practices. We vote on all available shareholder resolutions, whether through physical attendance at shareholder meetings or via proxy. We strive to vote decisively on all items and will typically only abstain if the necessary evidence to make an informed decision is not made available on time. Each vote is cast in line with the 'best practice' criteria set out in our Corporate Governance Checklist. This includes the following principles:

- Oversight of a suitably skilled, diverse, and independent Board of Directors
- Sensible, long-term orientated remuneration policies
- Disciplined, value accretive capital allocation
- Respect for minority shareholder interests (e.g., use of related-party transactions, royalties and voting rights)
- A strong corporate culture and citizenship, reflecting the interests of wider stakeholders.

More information is available in our Proxy Voting Policy.

4. Governance and learning

Our **Research Team** is responsible for the day-to-day implementation of our ESG research and constructive ownership approach. We believe this is the most effective way of ensuring that ESG is fully integrated. It also ensures that those that have the closest relationships with the companies are also informed on the key ESG issues and empowered to engage with company leadership to understand how these issues are being managed and, if necessary, to push for change.

All analysts are required to go through external ESG training (CFA and/or PRI) to provide them with the foundational knowledge to carry out their ESG responsibilities. Analysts refine their knowledge and optimise their use of Arisaig's proprietary ESG tools through regular internal training sessions led by the Research Director (Impact and Engagement), who sits within the Research Team. How well an analyst has integrated ESG and engaged with companies is a key component of their annual performance review.

The **Research Director (Impact and Engagement)** is responsible for our approach to ESG integration, our ESG research strategy, and for overseeing engagement activities of the Research Team, including sharing learnings across offices. They are also responsible for monitoring and reporting on ESG progress to internal and external stakeholders.

Arisaig's **Investment Committee** is responsible for ensuring our Strategies are invested in purposeful growth companies. The Research Team provides the Investment Committee with relevant insights to allow the Committee to assess this. The Investment Committee also reviews ESG management information (see below) on a quarterly basis and engages with the Research Team if there are any concerns.

The Fund Boards are responsible for ensuring that the Strategy meets its mandate of generating sustainable long-term returns. It reviews selected management information on Arisaig's ESG objectives at board meetings and raises any concerns with the management entity.

The Boards of the management entities (AP Asia and APRS UK) are responsible for ensuring that the firm meets its mandate of generating sustainable long-term returns across its strategies. The Research Department and Investment Committee are responsible for updating the Board on progress against ESG objectives and justifying any deviations from its policy.

Management information

To monitor whether the Research Team is meeting Arisaig's ESG objectives, relevant management information is tracked every quarter such as:

- The percentage of holdings engaged in the last 12 months (target is >60%)
- Engagement progress on priority engagements
- Any holdings for which the CG checklist or SRM assessment is > 12 months old
- Progress on net zero commitments (see Climate Change Approach)
- Proxy voting statistics, such as % votes against management
- The average CG and SRM scores for each portfolio.

The management information is reviewed by the Research Excellence Forum (which consists of our Global Head of Research and all Research Directors) on a quarterly basis. A selection of the management information is also shared every quarter with the Boards of Directors of each strategy.

Updates

One of Arisaig's core principles is continuous development. We update this Approach document on an annual basis to reflect improvements to our framework and processes.

5. Thematic issues

Climate change

Climate change and its most disruptive outcomes pose an existential threat to humanity itself and, therefore, all businesses. Emerging markets are particularly vulnerable to these risks given their geographic positioning (many are located between the tropics, where many of the most extreme weather events are concentrated) and economic fragility (they tend to lack the infrastructure and fiscal resources to respond to and/or mitigate the effects of climate change).

In recognition of this, we have committed 100% of our assets under management to be managed in line with net zero by 2050. More information on our climate-related strategy, targets, and processes can be found in our Climate Change Approach (available on our website).

Biodiversity

Biodiversity is the living component of natural capital, forming ecosystems that support everything we need to survive. Loss of biodiversity threatens food security and access to clean water; even facilitating the spread of novel infectious diseases like Covid-19 through illegal wildlife trade. According to the World Economic Forum, half of global GDP or $44 trillion worth of assets to be reliant on nature, highlighting the financial materiality of nature loss[7].

While biodiversity loss affects all sectors of society, it has a disproportionate impact on the rural poor in emerging markets which are more dependent on natural capital. The Swiss Re Institute estimates that the emerging markets of Kenya, Vietnam, Pakistan, India, and Indonesia have the highest share of GDP dependence on ecosystem services. This exposes Arisaig's portfolio companies and their consumer base to the increasingly systemic risk of nature loss.

90% of anthropogenic pressures on biodiversity stem from four main value chains – food, energy, infrastructure, and fashion[8]. This occurs through five drivers: land and sea use change, overexploitation of natural resources, climate change, pollution, and the spread of invasive species.

Biodiversity and climate go hand in hand. Climate change is one of the main drivers of biodiversity loss through destruction of ecosystems, which then inhibits nature's ability to regulate greenhouse gas (GHG) emissions, accelerating climate change further. We cannot reach net zero without also protecting and restoring biodiversity. At the same time, our efforts to mitigate climate change have a positive impact on biodiversity.

Integration into research

As part of our research due diligence (see Section 3 above), our analysts assess the ESG risks of every prospective holding. This includes analysing nature-related risks. As one of the key drivers of biodiversity, climate change is always assessed. Additional due diligence is required for companies in sectors that have greatest dependencies and/or adverse impacts on biodiversity. To identify such higher-risk sectors, we have initially used Natural Capital Finance Alliance's ENCORE tool[9]. Our exclusion policy means we do not invest in the sectors with the most severe biodiversity impacts, including fossil fuels extraction and mining businesses. We also do not invest directly in producers of agricultural commodities such as palm oil, beef, or timber.

Of the sectors we do invest in, we found that our greatest exposure is from our packaged fast moving consumer goods (FMCG) businesses. For such businesses, our SRM assessment incorporates metrics from the Taskforce for Nature-related Financial Disclosures (TNFD). We consider the company's own operational eco-efficiency (e.g., energy and water efficiency) as well as supply chain management and raw material sourcing.

During 2023, we intend to commission third party research to get a deeper understanding into our biodiversity exposure at the asset-level. This analysis will provide us with more granular data with which to identify risk hotspots, create a new biodiversity engagement program, and set appropriate nature-related targets.

Engagement

In line with our constructive ownership approach (see Step 4, section 3 above), we believe we should leverage our position as shareholders by taking an active role in encouraging our holdings to

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[7] https://www3.weforum.org/docs/WEF_The_Global_Risks_Report_2022.pdf
[8] https://www.bcg.com/publications/2021/biodiversity-loss-business-implications-responses
[9] https://encore.naturalcapital.finance/en

mitigate adverse impacts on nature. In the past, we have run thematic engagements on topics including plastics and palm oil sourcing (encouraging companies to use RSPO certified palm oil).

Metrics and reporting

GHG emissions are relevant for both climate change and biodiversity analyses. We report on our GHG emissions and progress against our climate change targets in our annual ESG Review and UNPRI Transparency Report. In addition, we screen and report Principal Adverse Impacts (PAIs) for funds which are required to under the EU's Sustainable Finance Disclosure Regulation (SFDR). The PAIs include reporting on exposure to companies with adverse impacts on biodiversity sensitive areas.

As mentioned above, during 2023 we intend to conduct a detailed assessment of our biodiversity impacts and dependencies. Once this is complete, we intend to set biodiversity targets and metrics for reporting progress. We will also consider joining initiatives such as Finance for Biodiversity and formally adopting recommendations from the TNFD.

Human rights

As a business, Arisaig has a responsibility to respect and uphold human rights in line with the UN Universal Declaration of Human Rights in our own operations and throughout our supply chains. We also expect that our portfolio companies to do the same.

Integration into research

As part of our research due diligence (see Section 3 above), our analysts assess the ESG risks of every prospective holding. This includes assessing human rights risks, considering the UN Global Compact Principles and the OECD Guidelines for Multinational Enterprises. Our approach incorporates the following relevant processes from the OECD's Responsible Business Conduct for Institutional Investors:

1) Applying a risk-based and on-going due diligence approach in our investment policies and processes to identify responsible business conduct risk;
2) Using leverage as investors to influence investee companies to prevent or mitigate adverse impacts relating to responsible business conduct risk;
3) Tracking and appropriately communicating performance in managing responsible business conduct risks and impacts;
4) Remediation is an expectation in situations where an enterprise causes or contributes to adverse impacts. As a minority shareholder in listed companies, Arisaig may be linked to adverse impacts caused by investee companies but would not cause or contribute to these. Therefore, we have not embedded processes to provide remedies as a shareholder but would instead encourage our investee companies to do so.

Under the UN Guiding Principles on Business and Human Rights ('the Principles'), to meet their responsibility to respect internationally recognised human rights, businesses should have in place policies and processes appropriate to their size and circumstances, including:

a) A policy commitment
b) A human rights due diligence process
c) Processes for remediating any adverse human rights impacts caused or contributed to.

In certain markets, the domestic context (including local regulations and judicial systems) renders it impossible to meet this responsibility fully, as recognised by the Principles. In the circumstances, the Principles state that businesses are "*expected to respect the principles of internationally recognized* *human rights to the greatest extent possible in the circumstances, and to be able to demonstrate their efforts in this regard*"[10].

Our due diligence process for assessing human rights risk includes understanding:

- Has the company or key executives been implicated in corruption, money laundering, or other criminal or unethical activity?[11]
- Is the company a member of the UN Global Compact?
- Has the company publicly endorsed the OECD Guidelines for Multinational Enterprises?
- Does the company have a policy commitment and due diligence process that explicitly covers human rights, including right to remediation?
- Is the company operating in a high-risk market[12] or high-risk sector[13] with respect to human rights violations?
- Have there been any reports or allegations of human rights violations? This includes, but is not limited to, forced labour, failure to pay minimum wage or benefits, unsafe working conditions, child labour, and harassment or discrimination relating to nationality, race, religion, sexual orientation, or gender.

For holdings, reports or allegations of human rights incidents are continuously monitored as part of our analysts' day-to-day responsibilities. If such incidents are discovered, we apply the ESG escalation process (see Figure 6).

Engagement

In line with our constructive ownership approach (see Step 4, section 3 above), we believe we should leverage our position as shareholders by taking an active role in encouraging our holdings to improve their policies, practices, and impact with regards to human rights. For example, we will engage companies that do not have a public human rights policy aligned to UNGC Principles/OECD Guidelines for Multinational Enterprises. For companies in high-risk sectors or markets, we will seek to understand their human rights due diligence processes. Where a potential human rights violation is uncovered, we will engage to assess the nature, impact and access to remedy (see escalation process in Figure 6).

Metrics and reporting

We screen and report Principal Adverse Impacts (PAIs) for funds which are required to under the EU's Sustainable Finance Disclosure Regulation (SFDR). This includes assessing whether companies have policies aligned to UNGC Principles/OECD Guidelines for Multinational Enterprises, and whether there have been any severe human rights violations. This is reported annually as part of the financial statements for relevant funds.

[10] Guiding Principles on Business and Human Rights, UN Human Rights Office of the High Commissioner pg 26
[11] We rely on a combination of our own research and Refinitiv's World Check database to assess this
[12] We consider countries ranking in the bottom quartile of Cato Institute/Fraser Institute's Human Freedom Index as high risk with respect to human rights
[13] We refer to the UNGC's Business & Human Rights Navigator to help identify high risk sectors

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