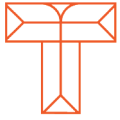


TURA
CAPITAL

ENVIRONMENTAL, SOCIAL AND GOVERNANCE (ESG) POLICY (INVESTMENTS)

July 2024



TURA
CAPITAL

Document control sheet

Document Summary

Document title:	ESG Policy – Tura Capital
Document owner:	Tura Capital Portfolio Manager
Phone:	0403538794
Email:	brad.partridge@turacapital.com.au
Version:	<ul style="list-style-type: none">1.0 Policy created September 2023. Noted ARCC and Board November 20231.1 Reviewed by Global Investment Committee January 20241.2 Updated for CAR appointment

ESG Policy

1 Commitment to the Policy

Tura Capital is committed to effectively managing Environment, Social and Governance (ESG) issues such that risks and opportunities are identified and properly assessed.

This ESG Policy (the Policy) has been adopted by Tura Capital and presents the framework upon which it will meet both its regulatory obligations and broader stakeholder considerations.

In implementing this ESG Policy, consideration is given to any actual or potential conflicts of interest that may arise, so that they can be disclosed, managed, controlled or mitigated in accordance with its Conflict-of-Interest Policy and Procedure.

Where there is any doubt as to the requirements contained in this Policy, regard is given to the principle that Tura Capital will always ensure it conducts its financial services business in an efficient, honest and fair manner in line with the regulatory objectives of ensuring market integrity and consumer protection.

2 Policy owner

The owner of this Policy is the Tura Capital Portfolio Manager (policy owner).

3 Purpose of this Policy

This Policy relates to Tura Capital which is a subsidiary company of DNR Capital Pty Ltd (DNR Capital) and a corporate authorised representative (Rep. No. 1309809) of an Australian Financial Services ('AFS') licensee DNR AFSL Pty Ltd. (AFSL 301658). and should be read in conjunction with the company's Climate Change, Corporate Engagement and Proxy Voting Policies.

The purpose of this Policy is to support the company's investment governance framework and set out a high-level overview of Tura Capital's policy and approach to managing ESG issues in its investment decisions within the Tura Capital global equities investment process.

4 Who should know and understand the Policy

The following people should be aware of the contents of this Policy:

- Directors
- Tura Capital investment team and members of the Global Investment Committee
- All staff employed by DNR Capital who are directly or indirectly involved in providing financial services under the AFS License 301658.
- All authorised representatives
- Anyone providing services to Tura Capital or DNR Capital that the policy owner determines should comply with the Policy (e.g. service providers, agents, contractors and temporary staff)
- Tura Capital clients and investors
- Anyone else that the policy owner determines should comply with the Policy.



Where functions of Tura Capital are outsourced (e.g., to service providers, agents, contractors and temporary staff), Tura Capital remains responsible and accountable for those outsourced functions. Tura Capital may include specific requirements in the outsourcing or other agreements to ensure compliance with this Policy and other regulatory obligations.

To ensure all officers, employees and agents are aware of the contents of this Policy; it will be made available on the intranet of Tura Capital. This Policy is also made available on the Tura Capital website.

5 Obligations under this Policy

What is ESG?

ESG is an acronym for Environmental, Social and Governance. Tura Capital recognises that ESG factors can be financially material and that companies with good ESG practices can enhance risk adjusted shareholder returns.

Tura Capital has adopted an ESG integration and engagement investment strategy. This strategy is complementary to its investment philosophy, and paired with its research capability, enhances investment decision-making.

DNR Capital has been a signatory of the PRI, the global ESG investment industry governing body, since 2009. DNR Capital is also a member of the Responsible Investment Association Australasia (RIAA).

Why is ESG important?

Tura Capital recognises that ESG factors have the potential to impact investment risks and returns. Quality companies with strong ESG capabilities are more likely to make better business decisions across the company, which drive long-term risk adjusted returns.

Furthermore, Tura Capital believes that including ESG issues in its investment process is consistent with its objectives as an active investment manager.

ESG assessment framework

The Tura Capital investment team has adopted an ESG integration and engagement strategy to enhance risk-adjusted performance. ESG is one of eight components of its proprietary 'quality lens', which is used to assess the quality of companies. ESG risks, where material, are also factored into its view on company valuation. The outcomes of these assessments inform investment decision-making and portfolio construction.

Tura Capital has a long-term investment horizon and takes a long-term view on ESG factors. Tura Capital have an in-house investment team who conduct ESG analysis, the Global Investment Committee monitor that these analyses are conducted in line with this Policy.

ESG integration and investment decision making

Tura Capital integrates ESG into the assessment of quality during the quality screening process (the "quality lens"). The Tura Capital investment team utilises data provided by independent ESG research provider, ISS. The process applies a 15% weighting to the company ISS ESG performance score in the quality assessment. We consider this sufficient to distinguish two otherwise similar companies and sensibly informs universe and portfolio construction. .



Once a company is assessed to meet Tura Capital's quality criteria, detailed company analysis and valuation work is conducted to determine whether sufficient risk-adjusted return upside exists. Consistent with Tura Capital's ESG integration and engagement investment strategy, ESG risks and opportunities are also factored into this assessment. Where the expected ESG valuation impact is material, it is either explicitly factored into a company's earnings forecasts or balance sheet items, or implicitly through the determination of the company's terminal value, discount rate or perpetuity growth rate. We consider a material impact being an expected impact of 10% or more of our assessed value of the stock.

The outcomes of the ESG risk assessment and valuation assessment are regularly reviewed to ensure perspectives are current, as they inform investment decision-making and portfolio construction.

The investment team utilises the Independent ESG data provider, ISS, their own analyses, independent expert networks, industry and government reports to consider the following ESG factors in this process:

Environmental guidelines:

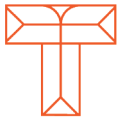
- Monitor environment related indicators over time.
- Monitor and track incidents through ESG data base provider.
- Consider environmental performance, where material, including the following:
 - Environmental governance and strategy.
 - Environmental commitments and targets.
 - Environmental track record.
 - Water, air and waste management plan.
 - Resource efficiency; and
 - Biodiversity
- Where material environmental risk is identified, company engagement may be conducted.

Social guidelines:

- Monitor social related indicators over time.
- Monitor and track incidents through ESG data base provider. Consider social performance, where material, including the following factors:
 - Employee engagement.
 - Diversity & inclusion.
 - Health & safety.
 - Local stakeholder relationships; and
 - Modern slavery
- Consider management of supplier performance on the proceeding factors
- Where material social risk is identified, company engagement may be conducted.

Governance guidelines:

- Monitor governance related indicators over time.
- Monitor and track incidents through ESG data base provider.
- Consider governance performance, where material, including the following:
 - Board skills, experience and diversity and capacity.
 - Board composition.
 - Remuneration policy.
 - Management quality.
 - Corporate disclosure.
- Where material governance risk is identified, company engagement may be conducted.



Climate change

Tura Capital supports the long-term goal of the Paris Agreement ¹ to limit global warming through reduced carbon emissions. Climate change has been identified by the Board as a material risk and is included in its Risk Register. Please refer to Tura Capital's Climate Change Policy for detail on how climate change is incorporated into global equities investment decision-making.

The Tura Capital investment team use the following guidelines to identify and assess climate risk and opportunity at the company and aggregate portfolio level:

- Monitor company climate related indicators over time.
- Monitor and track incidents through ESG data base provider.
- Where material climate risk is identified, a deep dive risk assessment may be conducted, including review of:
 - climate governance.
 - climate strategy and its implementation.
 - climate risk management.
 - net zero strategy, integrity, and reliance on offsets.
 - climate scenario analysis,
 - physical climate risk assessment; and
 - climate disclosures.
- Conduct biannual ISS Climate Impact Assessment Report for the Tura Capital portfolio.
- Monitor and track portfolio carbon footprint for the Tura Capital portfolio over time.
- Monitor portfolio climate related indicators over time.
- Where material climate risk is identified, company engagement may be conducted.

Modern slavery

Modern slavery has been identified by the Board as a material risk and it is included in enterprise-wide Risk Register.

For these purposes, 'Modern Slavery' means conduct which would constitute an offence under the Modern Slavery Act 2018, and this includes trafficking of persons, illegal forms of child labour, slavery, forced labour, deceptive recruiting, debt bondage or offences involving non- citizens working in Australia without the correct visa.

Modern slavery risk is considered at the firm level, and at the underlying investment level. Whilst Tura Capital is not a reporting entity under the Modern Slavery Act 2018, and does not therefore propose to issue a Modern Slavery Statement, it is committed to:

- ensuring that it has processes in place to review its risks on modern slavery practices in operations and supply chains.
- maintaining a list of its material external service providers which also identifies the countries in which the service or product is procured.
- engaging with those service providers to ascertain how they identify and handle modern slavery risks; and
- as part of its commitment to corporate engagement, making due enquiry of its investee companies.

¹ UN Climate Change Conference (COP21) in Paris, agreement reached 12 December 2015.



At the investment level, the Tura Capital investment team use the following modern slavery guidelines to identify and assess modern slavery risks:

- Monitor modern slavery related indicators over time.
- Monitor and track incidents through ESG data base provider.
- Where material modern slavery risk is identified, a deep dive risk assessment may be conducted, including:
 - Modern slavery governance (remuneration alignment, Board experience, engagement);
 - Modern slavery strategy and its implementation (resourcing);
 - Modern slavery risk management.
 - Modern slavery disclosure.
- Where material modern slavery risk is identified, company engagement may be conducted.

Diversity and inclusion

Diversity and inclusion describe a company's representation of different race, ethnicity, gender and sexual orientation groups. Tura Capital is developing its approach to diversity and inclusion, with the following initiatives:

- Diversity and inclusion indicators are tracked and monitored over time; and
- Board composition, including diversity, are considerations in Tura Capital's proxy voting recommendations.

Corporate stewardship

The integration of ESG factors into investment decision-making is supplemented by a corporate stewardship program, including company engagement and proxy voting.

Where material ESG risks and opportunities are identified in the investment decision-making process, Tura Capital engages with the company to understand their ESG governance and risk management strategies and to advocate for best practice. Tura Capital's stewardship initiatives are conducted by investment analysts, in conjunction with portfolio managers. As such, the insight gained from each initiative is incorporated into the research and investment decision making process.

Further details are outlined in Tura Capital's Corporate Engagement Policy.

6 Reporting

Tura Capital will report to clients on ESG related investment and engagement initiatives through client reporting, marketing presentations and bespoke client requests.

7 Roles and Responsibilities

The Board

Tura Capital is a subsidiary company of DNR Capital. The Board and executive level management of DNR Capital have formal oversight over and accountability for responsible investment at Tura Capital.

Tura Capital's Global Investment Committee oversees the implementation of ESG policies and integration of ESG into investment decision-making.

Investment team

Tura Capital's ESG integration and engagement initiatives are conducted by the Tura Capital investment team. As such, the insight gained from the process is incorporated into the research and investment decision-making process.

8 Risks of non-compliance

Regulatory risk – the risk that Tura Capital, its officers, employees, or agents will be subject to criminal, civil or administrative penalties or sanctions. This may include licensing actions, enforceable undertakings, investigative action, or total loss of licence for non-compliance with:

- Financial services laws and regulations
- The AFS License conditions
- Organisational standards
- Internal policies and procedures

Business risk – the risk that failing to consider ESG related matters may result in poor business outcomes, with a key risk being loss of its status as an authorised representative of an AFS Licensee and a direction to cease operations. Compliance with this Policy will enable the Board and delegated staff to appropriately manage this risk by implementing appropriate investment governance procedures).

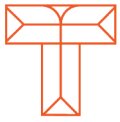
Reputational risk – the associated damage to Tura Capital's reputation as a result of public reporting of non-compliance with its obligations or by being perceived as non-compliant within the market or not meeting the undertakings made to its clients and investors. This may also have a detrimental effect on the profitability of the company due to loss of confidence by clients and investors. By approving and implementing a robust approach to ESG concerns, Tura Capital intends to mitigate its reputational risk.

9 Monitoring compliance with the Policy

The Head of Risk and Compliance for DNR Capital Group is responsible for monitoring compliance with this Policy on an annual basis or as required. Tura Capital's ESG capability will be reviewed annually by a third party as required by the Australian Institute of Superannuation Trustees (AIST).

Any instances of non-compliance by officers, employees and/or agents of Tura Capital will be reported to the management team of DNR Capital. Instances on non-compliance will also be treated as a potential or actual breach and dealt with according to the DNR Capital Breach Management Policy.

Where instances of non-compliance with the Policy have been identified the Head of Risk and Compliance in conjunction with the Policy Owner and/or the CEO of DNR Capital are responsible for determining and/or recommending appropriate remedial action.



Intentional or reckless non-compliance with this Policy is not tolerated by the Board. Depending on the nature and extent of non-compliance, remedial action could include:

- Additional training
- Additional monitoring or supervision
- Formal reprimand
- Notification to relevant regulatory body or industry association
- Termination of employment (in particularly serious cases)

In determining what remedial action will be appropriate, the Head of Risk and Compliance in conjunction with the Policy Owner and CEO of DNR Capital may have regard to the following matters:

- the number or frequency of similar previous instances of non-compliance by the officer, employee and/or agent (including or service providers)
- whether the non-compliance was intentional or reckless
- the impact the non-compliance has on the ability of Tura Capital to continue to provide the financial services covered by the AFS License of DNR AFSL Pty. Ltd.
- the actual or potential loss arising to Tura Capital or a client of Tura Capital as a result of the non-compliance.
- actions outlined in the Code of Conduct & Ethics for DNR Capital
- any other relevant facts associated with the non-compliance, and
- any other relevant issues raised.

10 Review of the Policy

The policy owner shall review the contents of this Policy annually to ensure it remains current and relevant to the operations of Tura Capital.

As part of the review, the Head of Risk and Compliance shall also ensure that any related policies or procedures are reviewed by relevant officers, employees and/or agents. The Head of Risk and Compliance will maintain a schedule of reviews to be undertaken as part of the review of this Policy.

11 Training on the Policy

As Tura Capital is committed to ensuring the continued compliance with this Policy, a program of regular training sessions will be provided to staff both when they commence and on an ongoing basis.

Induction Training

The Head of Risk and Compliance will provide training on this Policy as part of the induction training for all new officers and investment team employees. Completion will be recorded in the Training Register, and it is the responsibility of the Head of Risk and Compliance to review whether relevant staff have completed the training.

Ongoing Training

The Head of Risk and Compliance will also provide refresher training on the Policy and procedure at least annually (or as required, where a material change is made to the Policy).



12 Applying discretion to the Policy

Notwithstanding any requirement contained in this Policy, the Tura Capital Portfolio Manager can apply reasonable discretion in considering how to apply the requirements of the Policy.

When applying discretion in relation to a particular matter, the Tura Capital Portfolio Manager shall have regard to the level of risk posed by that matter and the regulatory objectives of ensuring market integrity and consumer protection.

Whenever discretion has been exercised in relation to the Policy, it should be recorded and reported to the DNR Capital Management Team.

13 Related policies

The following policies contain provisions which are directly or indirectly related to the contents of this ESG Policy:

- Corporate Engagement Policy
- Proxy Voting Policy
- Climate Change Policy
- Conflict of Interest Policy and Procedure (DNR Capital Policy)
- Tura Capital investment team policies and procedures
- Approach to Class Action Participation. (DNR Capital Policy)

14 Further information

If you need further information regarding this Policy and how it is implemented, please contact the policy owner.