WHEB ASSET MANAGEMENT LLP

European SRI Transparency Code

Seventh Statement of Commitment

01 January 2023 – 31 December 2023

WHEB Asset Management LLP is solely responsible for the information provided this document.

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EUROPEAN SRI TRANSPARENCY CODE (VERSION 4.0)

Statement of Commitment

Sustainable and Responsible Investing is an essential part of the strategic positioning and behaviour of WHEB Asset Management. We have been involved in SRI since 2009 and welcome the European SRI Transparency Code.

This is our seventh statement of commitment and covers the period January 2023 to December 2023. Our full response to the European SRI Transparency Code can be accessed below and is available in the annual report of the retail funds and on our web site.

Compliance with the Transparency Code

WHEB Asset Management (WHEBAM) is committed to transparency and we believe that we are as transparent as possible given the regulatory and competitive environments that exist in the countries in which we operate. WHEBAM meets the full recommendations of the European SRI Transparency Code.

February 2023

European SRI Transparency Code V4.0
1. List of funds covered by the Code 2. General information about the fund management company 3. General information about the SRI fund(s) that come under the scope of the Code 4. Investment process 5. ESG controls 6. Impact measures and ESG reporting

1. List of funds covered by the Code

Name of the fund(s): • WHEB Sustainable Impact Fund					
Dominant/preferred SRI strategy	**Asset class**	**Exclusion standards and norms**	**Fund capital as at 31/12/22**	**Other labels**	**Link to relevant documents**
✓ Impact Investing ✓ Sustainability themed	Actively managed international shares	None of the negative areas listed has ever been invested in	US$80m		www.whebgroup.com

2. General information about the fund management company

2.1 Name of the fund management company that manages the applicant fund

WHEB Asset Management

2.2 What are the company's track record and principles when it comes to integrating SRI into its processes?

WHEB Asset Management is a boutique investment business that is wholly focused on sustainable investing. The essential philosophy underpinning the strategy is that high quality companies which provide solutions to society's most pressing needs and challenges will generate superior financial returns over the long-term.

The underlying strategy has existed for seventeen years having originally been run at Henderson Global Investors as the Industries of the Future Fund. For the last ten years we have run the global strategy at WHEB. The team running the strategy have spent the bulk of their careers working on sustainability and investment. Ted Franks, the fund manager and partner, has been managing or co-managing the strategy since 2009 and before that was involved in renewables and water investments at Dresdner Kleinwort. Seb Beloe, Head of Research and partner, was formerly Head of SRI Research at Henderson and before that was Vice President of Research and Advocacy at the management consultancy SustainAbility. He also has two degrees in Environmental Science and Technology. George Latham, the Managing Partner, was previously Head of SRI at Henderson and before that set up the SRI strategies at Threadneedle Asset Management.

2.3 How does the company formalise its sustainable investment process?

WHEB Asset Management is a B Corporation with an overall mission '*to advance sustainability and create prosperity through positive impact investing*' (http://www.whebgroup.com/about-us/mission-and-values/). The whole business is therefore dedicated to sustainable investment. Within the actual investment process, sustainable investment is integrated into our approach to research, stock selection and engagement, based on three interlinked beliefs, as follows:

- **Sustainability is creating new growth markets**

The long-term social, demographic, environmental and resource challenges facing the world today are reshaping the economic landscape, creating new investment opportunities for those companies providing solutions to these challenges, and growing risks for those sectors that deplete human and natural capital. Our experience suggests that the selection of sustainability themes is a powerful source of value, due to the secular dynamics underlying the sustainability agenda.

- **A long-term, fundamental approach to stock selection leads to out-performance**

Financial markets are not entirely efficient and we believe that active investment management can add value over passive approaches. We make high conviction investment decisions using a pragmatic, bottom-up approach to stock selection, based on a fundamental analysis of a company's prospects. We take a distinctive long-term approach to investing, tending to hold a stock for an average of more than five years and seek to be flexible in style, avoiding the pitfalls of out-and-out value or growth investment styles.

- **Analysis which integrates ESG factors enables better stock selection**

Our investment methodology includes in-depth analysis of a company's non-financial environmental, social and governance (ESG) practices which help uncover hidden risks and opportunities. Our in-house analysis is complemented by the insights we gain through our programme of active engagement with companies which sheds further light on a company's ability to respond to non-financial challenges.

This investment approach is underpinned by a set of corporate policies which present a broad set of principles that frame our investment process. This includes:

- A core mission statement as described above (http://www.whebgroup.com/about-us/mission-and-values/)
- An overall responsible investment policy which describes the four key principles that underpin our approach to responsible investment including that we will: 1) integrate ESG issues into our investment analysis and decision-making, 2) Be active owners and integrate ESG into our ownership policies and practices, 3) encourage appropriate disclosure on ESG issues by entities in which we invest and 4) that we will report on our progress in implementing these principles (https://www.whebgroup.com/investing-for-impact/sustainability-policies).
- A set of Stewardship & Engagement policies that are included in our Stewardship and Engagement Policy statement and Stewardship Report (https://www.whebgroup.com/reporting-impact-investment/stewardship-reports). These set out in more detail our approach to voting and engagement including commitments to engage with companies whenever we vote against management and to push for progressive practices on critical ESG issues at investee companies. We also report quarterly on our voting and engagement activities including assessing the outcomes of this engagement (https://www.whebgroup.com/investing-for-impact/sustainability-policies).

2.4 How are ESG risks and opportunities – including those linked to climate change – understood/taken into account by the company?

ESG risks and opportunities are taken into account through the investment process. The initial step in the investment process is to find companies that have material exposure (on average >80% of revenues) to one or more of nine sustainability themes. These are: Cleaner Energy, Education, Environmental Services, Health, Resource Efficiency, Safety, Sustainable Transport, Water Management and Well-being. Only companies that are providing solutions to these issues through the products and services that they supply qualify for investment in the strategy.

In practice, we start with an initial screen of companies in the MSCI World index. Companies that are in sectors that are not aligned with our focus on sustainability themes are screened out of our investable universe. Sectors with significant negative impacts (oil and gas, tobacco and agrichemicals as well as more 'neutral' sectors - banking and finance, ICT and consumer goods companies) are excluded. Together these sectors account for approximately 80% of the MSCI World that is screened out of our investable universe.

We do also invest in companies that are outside of the MSCI World index. We also screen these companies based on their revenue exposure to products and services that qualify in our sustainability themes. Where this exceeds 50% these companies qualify for investment. However, and in addition, no company with more than 5% of revenues derived from activities linked to alcohol, tobacco, cannabis, gambling, pornography, weapons, fossil fuel exploration or production, nuclear power generation, intensive farming or fishing practices, unsustainable timer products, unsustainable palm oil, genetically modified organisms that are released into the natural environment or cosmetics involving animal testing will qualify for inclusion in WHEB's investment universe.

In this way, any companies which are less than 50% exposed to positive impact or are outside the scope of our impact assessment are excluded from the initial universe, which comprises the MSCI World Index and companies outside of this Index where more than 50% of their revenue is exposed to products and services which qualify in our sustainability themes.

We then also consider ESG issues in the way in which companies are managed. We consider a range of issues that are material to the sector in question as part of our fundamental analysis of a company and include this data in our assessment of the overall quality of a company and its management team.

If we consider climate change as an example of an ESG issue, it is first considered in constructing our investment universe. As described above, no fossil fuel business is providing a solution to a sustainability challenge and so will not qualify for the investment universe. We have, for example, no exposure to oil, gas or coal companies nor indeed to businesses that derive significant revenue from the provision of services to these sectors. Stranded asset and transition risk is therefore extremely low for this strategy.

We then also consider scope 1 and 2 carbon emissions from investee companies in the portfolio. We publish an annual carbon footprint report on the portfolio which shows that the fund is 1) structurally underweight high emitting sectors and 2) that the fund stock selection process favours companies which have low emissions relative to their industry peers. Consequently, the portfolio is well-positioned competitively with regard to increasing transition risks. A full TCFD report is available in our 2021 Impact Report.

WHEB's entire assets under management of £1.4 bn (as at 31/12/2022) is invested in strategies that contribute to and enable the 'transition economy'.

2.5 How many employees are directly involved in the company's sustainable investment activity?

100% of our employees (20 employees) are focused on the company's sustainable investment activity as this is all we do. We ensure that the team has access to training and support in ensuring that sustainability is fully integrated into our activities. The investment team spends substantially all of its time researching and analysing sustainability themes and investment ideas. Seb Beloe, our Head of Research, supports this work by providing training on new tools and frameworks for the team. In recent years this has included implementing our impact engine for more systematic analysis of positive impact, articulating a 'theory of change' for each of our investments and providing support on the interpretation and application of new regulatory frameworks such as the Sustainable Finance Disclosure Regulation (SFDR) in the EU and the Sustainability Disclosure Requirements (SDR) in the UK.

In addition, new team members with less experience of sustainability are encouraged to participate in third-party training courses such as those offered by the Cambridge Institute for Sustainability Leadership (CISL) and the CFA's ESG Certificate. Beyond this, as a B Corporation we provide multiple opportunities for employees to learn more about and participate in initiatives aimed at improving the sustainability performance of the business. We also provide company wide training on issues such as diversity, equity and inclusion and run a regular book-club that focuses on books, documentaries and films that address sustainability issues.

The full team list is:
George Latham – Managing Partner
Ted Franks – Portfolio Manager
Seb Beloe – Head of Research
Ty Lee – Associate Portfolio Manager
Victoria Maclean – Associate Portfolio Manager
Ben Kluftinger – Senior Analyst
Claire Jervis – Senior Analyst
Sarita Kashyap – Risk and Performance Analyst
Kavitha Ravikumar – Senior Impact Analyst
Katie Woodhall – Climate and Data Analyst
Rachael Monteiro – Stewardship Analyst
Fanny Ruighaver – Business Development, Europe (via FundRock, Distributor for WHEB Asset Management in Europe)
Libby Stanley – Marketing Manager
Susie Winstanley – Marketing Manager
Sarah Briscoe – Business Development Manager
Jaya Govindan – Client Services Manager
Laura Grenier –Director of Operations
Danny Smith – Team Assistant
Esther Muschamp – HR Manager
Sandhuni Correa – Management Accountant
We are also supported by:
Jayne Sutcliffe – Non-Executive Chair
Martin Rich (Future Fit Foundation) - Independent Advisory Committee Member
Abigail Rotheroe (Independent) - Independent Advisory Committee Member
Alice Chapple (Independent) – Independent Advisory Committee Member
Carole Ferguson (Partner Signal Climate Analytics) – Independent Advisory Committee Member

2.6 Is the fund management company involved in any RI initiatives?

Yes, we are active participants in a wide range of initiatives including:

- UN PRI
- UKSIF
- Institutional Investors Group on Climate Change
- Net Zero Asset Manager's Initiative
- Net Zero Carbon 20
- B Corporation network (we are a B Corp)
- FRC UK Stewardship Code
- CDP
- FutureFit Business
- The Big Exchange
- Montreal Carbon Pledge
- Portfolio Decarbonisation Coalition
- Chemical Footprint Initiative
- And many others

2.7 What is the total number of SRI assets under the company's management?

All of our assets are invested in sustainability strategies which was £ 1.4bn as of 31/12/22.

3. General information about the SRI fund(s) that come under the scope of the code

3.1 What is the fund(s) aiming to achieve by integrating ESG factors?

We seek to achieve positive impacts on society and the environment by investing in companies that are providing solutions to sustainability challenges. These impacts include Cleaner Energy, Education, Environmental Services, Health, Resource Efficiency, Safety, Sustainable Transport, Water Management and Well-being.

In addition to wider reporting on the positive impact that is associated with investments in the fund, we have specifically identified four key performance indicators covering respectively an environmental, social, governance and human rights issue. We report performance against each of these on a quarterly basis with a specific objective to outperform the MSCI World Index on Carbon Efficiency (measured as tonnes of CO_2e emissions per $1m of revenue) and Human Rights, the relevant measure being the proportion of the portfolio in violation of the UN Global Compact principles and / or OECD Guidelines for Multinational Enterprises.

3.2 What internal or external resources are used for the evaluation of the issuers who make up the investment universe of the fund(s)?

All six members of our investment team conduct ESG analysis as a core part of the stock level research used in our investment process. Specific aspects of this research are supported by the Impact research team which provides specialist support on impact analysis, carbon and stewardship.

Within the team, Seb Beloe, Partner and Head of Research leads on the investment team's analysis of sustainability and ESG issues. Seb has two degrees in Environmental Science and Technology, is a Chartered Environmentalist and has spent over twenty years analysing company performance on ESG issues. Together with the team, he has developed our integrated approach to assessing ESG issues. Each team member is responsible for undertaking this analysis with support from Seb and the rest of the impact research team.

Our research is sourced primarily through data supplied by sell-side brokers, Bloomberg and company communications. We also use data supplied by SASB and develop our own bespoke assessment process as described above.

Beyond the core data supplied by companies, Bloomberg, SASB and sell-side analysts, we will utilise a wide range of additional data sources including:

- A wide range of governmental and regulatory databases (for example OFWAT in the UK for water utilities and the Federal Railroad Administration in the US on train companies).
- Reports produced by non-governmental organisations and third-party consultancies including for example ChemSec's analysis of chemical companies in Europe, The Climate Group's analysis of markets for energy efficient lighting and Transparency International reports on corruption and bribery.
- Monitoring of media stories and discussion through a subscription to Meltwater and through controversy screening provided by ClarityAI and by ISS's norms-based screening service which records company activities that are at odds with widely established norms of corporate behaviour.
- In 2023 we have also started sourcing climate data from ImpactCubed and product/service level impact data from Net Purpose.
- We also have a contract with ISS (www.issgovernance.com/) which provide us with a perspective on the governance standards and systems at companies that we are researching as well as with proxy voting guidance.

We do also utilise a wide range of external resources including sell-side broker notes, ad hoc third-party research (e.g. from NGOs, government agencies etc.), company meetings and reporting, social networks etc.

3.3 What ESG criteria are taken into account by the fund(s)?

It is worth stressing at the outset that, because of our focus on sustainability themes, we are not investing in the sectors (such as mining, oil and gas, banks, apparel companies etc.) that have the most serious environmental and social issues associated with them.

That said, there are still of course a variety of ESG issues that are relevant, but as described above, we believe that it is critical to contextualise these when considering how they are relevant to investment decisions. Fundamentally, in our view it is much more important for a company to manage a small number of important ESG issues really well than have a long list of policies covering all conceivable issues. It is for this reason that we only look at ESG issues that are relevant to the company that we are assessing, and the way that it conducts its business. So for example, we believe that health and safety and resource efficiency are genuinely meaningful to the success of rail-road companies, but are less relevant for companies developing, for example, computer software which instead should focus on talent attraction and development and core governance and business ethics issues such as Board-level independence and business ethics training and monitoring.

We take into account all material ESG criteria that we believe have a bearing on the performance of a given stock over the long-term. This will include a subset of issues which are relevant to the majority of the companies we look at. This would include: employment practices (diversity, training, benefits etc.), supply-chain standards and quality (environmental, social and quality issues in supply-chains), energy use and carbon emissions, governance quality (independence of directors, audit quality, remuneration and shareholder rights) and business ethics standards (training, whistleblowing hotlines) and overall transparency and accountability of the business.

We use the Sustainability Accounting Standards Board (SASB) guidelines to help us focus on the material ESG issues by sector. Each of these issues is considered as part of the core analysis done by the investment team. For a speciality chemicals business this will include a wide range of environmental and health and safety data including for example management of wastes (including hazardous wastes), environmental management standards, energy and water use, health and safety data, exposure to hazardous chemicals etc. For a software business the ESG issues will be completely different and will likely be more focused on employee-related issues.

3.4 What principles and criteria linked to climate change are taken into account by the fund(s)?

As described above, we take a systematic approach to considering the risks and opportunities presented by climate change to equity markets. Five of our nine investment themes and approximately 50% of the strategy is directly related to climate change. Investments in these themes will, we believe, strongly benefit from efforts to reduce carbon emissions in line with the targets set out in the Paris Agreement. These include companies involved in renewable energy generation, energy efficiency in buildings and transport, pollution control, water and wastewater treatment and solid waste management and recycling.

In addition to focusing our investments on businesses that are set to benefit from an increased focus on carbon emissions across the economy, we also seek to manage carbon risk by avoiding highly carbon exposed sectors. For example, we do not invest in companies that own carbon reserves or are involved in the exploration and production of fossil fuels.

We have no direct exposure to fossil fuel extractive businesses. Furthermore, less than 3% of total investments are indirectly exposed to activities associated with fossil fuel extraction. Transition and physical risks are, though, clearly evident in the operations of businesses that we invest in. Transition risk is particularly apparent in businesses that are significant users of energy in their own operations. Physical risks are also experienced by businesses with assets vulnerable, for example, to flooding and other natural hazards. We seek to understand these risks and mitigate them by investing in businesses with good performance and low carbon exposure relative to their peers. We undertake a carbon footprint of the strategy on an annual basis to understand these exposures.

The strategy is specifically positioned to benefit from an increasing focus on carbon across the global economy. In addition to the opportunities and threats facing WHEB's ability to attract market interest in our product(s), we actively manage carbon-related risks in the Strategy. Specifically, this involves targeted engagement with companies in our portfolio that have a higher level of ESG risks relative to peers. Previous analysis of the carbon footprint of the Strategy identified a small number of stocks with relatively poor carbon profiles relative to their peers. We used this analysis in discussions with these companies which have subsequently announced more ambitious plans to tackle their carbon exposure (specifically in terms of carbon emissions). The carbon footprinting analysis described above clearly signals that the stock selection that we have made is a strongly positive feature of the carbon profile of the Strategy. Nonetheless, the analysis does reveal some relative underperformers and as in previous years, we engage these businesses to encourage more aggressive action to reduce their exposure.

More recently, we have cemented our commitment to reducing the exposure to climate change within the strategy by becoming a founding member of the Net Zero Asset Manager's[1] Initiative in December 2020. In doing so, WHEB Asset Management commits to a goal of net zero emissions from our investment portfolio by

[1] https://www.netzeroassetmanagers.org/

2050 or sooner. This initiative builds on the Net Zero Carbon 10 (NZC10) initiative that we became a member of in 2019 and also complements our own target to be a net zero carbon business by 2025, also set in 2019.

The Net Zero Asset Managers Initiative represents a very significant undertaking. In it, WHEB has committed to several carbon reduction targets. The first set of targets relate to the NZC commitments made by portfolio companies. We have met our first target which was that by 2025 at least 50% of portfolio companies should have set a net zero carbon commitment. At the end of 2022 54% of the portfolio had made such a commitment. We have therefore upgraded these targets which are now that by 2025 85% of portfolio carbon emissions should be covered by a NZC target and that by 2030 100% of emissions should be covered by such a commitment.

Critically, under the initiative we have also committed to absolute carbon emission reductions. This includes having a net zero carbon portfolio by 2050 at the latest. We have also set an interim target to achieve absolute carbon reductions by 2030 that are consistent with a 50% global reduction in carbon emissions. This 50% reduction is what is considered necessary to achieve global net zero carbon emissions goal by 2050. These commitments cover WHEB's entire investable assets.

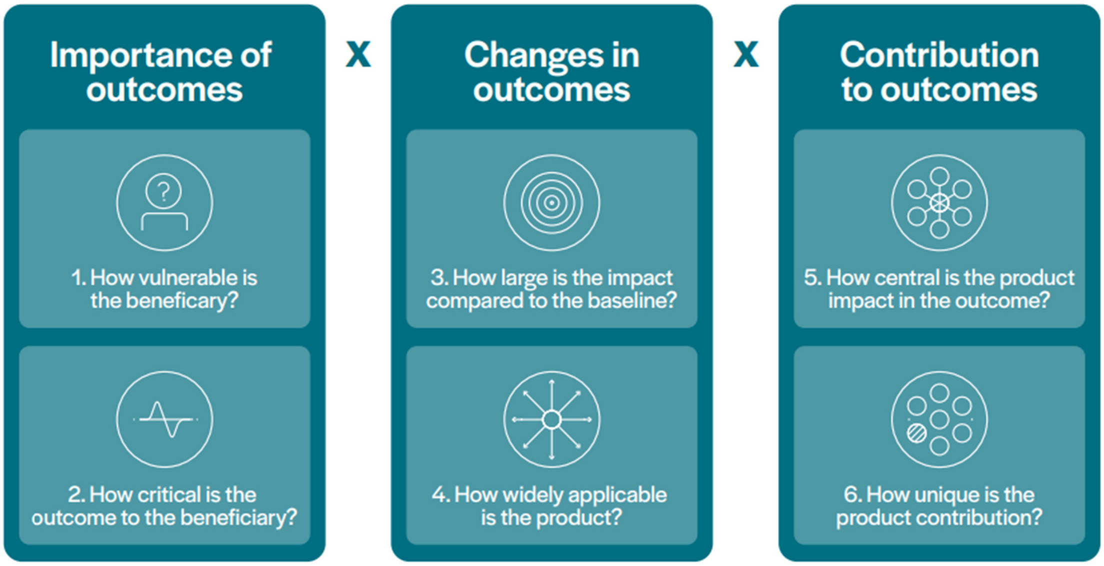
Finally, we are aware of the physical risks posed by climate change and have been involved in some initial work looking at potential adaptation strategies for our portfolio companies. This is still at a relatively early stage, and we plan to develop our approach in this area in the coming years.

According to our carbon footprint analysis, the strategy generated approximately 24 tCO_2e per £1m invested in 2021, compared with c.161 tCO_2e from in 2020. The key contributors to this footprint are the relative weightings in key industry sectors compared to the benchmark, and the stock selection within those sectors. In terms of the sector contributors, our absence from the oil and gas sector and our strong overweight position in healthcare helped to reduce our footprint relative to the benchmark. An overweight position in industrials (which provides many of the investments in our environmental themes) and in utilities, where we are primarily exposed to water-focused utilities, weighed on the footprint of the strategy.

3.5 What is the ESG analysis and evaluation methodology of the fund manager?

ESG analysis is done initially on the products and services that companies supply. We assess the 'intensity' of the positive impact delivered by different products by applying our 'impact engine' methodology to the products and services supplied by a particular business. This assessment focuses on three areas of impact: 1) the importance of the ultimate outcomes associated with the product impact;
2) the changes in outcomes as a consequence of the product impact; and
3) the specific contribution made by the company.

Within each of these sections there are two questions as shown in the figure below. Each of these questions is assessed and scored from 1-3. These are then used to generate an overall impact intensity rating for the company as a whole.



Further details on the methodology that sits behind the impact engine are available from our website at https://www.whebgroup.com/investing-for-impact/how-we-invest/our-methodology

We also assess the management of ESG issues that are relevant to the operations of businesses that we consider for investment. We believe that a range of environmental, social and governance (ESG) issues can have a material bearing on the financial performance of a company over a three to five-year time horizon. Our approach is to assess ESG performance through an integrated analysis of these issues within an overall assessment of the quality of a given business. We believe this enables us to spot trends, risks and opportunities which may go unnoticed by analysts looking solely at traditional financial factors.

Our approach is informed by reference to a range of underlying principles and norms including those articulated in intergovernmental settings particularly the UN (e.g. UN Global Compact, UNEP, SDGs etc.) as well as by analysing sector-level initiatives (for example the Electronic Industry Code of Conduct, Forestry and Marine Stewardship, Carbon Disclosure Project etc.).

We first seek to determine whether a given company fits into one or more of our sustainability investment themes. Having established this, we then assess companies that are candidates for the strategy based on the quality of their position in a given market and the strength of their management systems and approach. The areas that we consider are listed below, highlighting the key ESG issues at each stage.

- Market attractiveness

From a sustainability viewpoint, we gauge the likely impact of regulation on the company’s sector and any other long-term trends, such as changes in consumer preferences, resource scarcity issues or the impact of extreme weather, which may affect the company’s growth opportunities.

- Competitive position

We aim to understand the business of the company and how its approach to sustainability provides it with a lasting competitive advantage. Key drivers of the business are identified as well as areas of risk and opportunity. We look for innovation and product leadership, in companies that are well invested as well as other competitive strengths in terms of brand value, reputation and customer loyalty.

- Value-chain analysis

From a sustainability point of view, we consider a company's buyer relations, its supplier relations and its quality control. We will look for evidence that the business manages its suppliers well. Is there sufficient diversity of suppliers? Does the firm audit its suppliers on ESG issues in some way? Have there been any disruptions from suppliers in the past? We also look for evidence of a strong safety culture as well as effective management of raw materials and any wastes underpinned by management standards such as ISO 14001 and OHSAS 18001.

- Quality of Management

We look at a management team's history of managing and delivering against expectations and controlling risks when unforeseen events occur. We analyse a company's corporate governance and its ethical policy and record. What is the ownership structure of the company and what is its governance structure? Is there a separate chairperson and CEO? We assess risk checks and balances, risk control and look for evidence of ESG disclosure and risk management.

- Growth strategy

We scrutinise sustainability opportunities for growth as well as the quality of earnings. We will assess any stated growth targets or goals and how achievable they are as well as the track record of achieving such targets. We assess new product development opportunities as well as M&A opportunities and the company's track record in making acquisitions.

3.6 How often is the ESG evaluation of the issuers reviewed? How are controversies managed?

ESG issues are continually being evaluated on the basis of new news or information. Where new information is received, the analyst responsible for the stock will reassess the quality rating based on this new information and will revise the score in consultation with the rest of the investment team.

In cases where there is a negative controversy associated with a specific company, we will engage the business to understand their response to the issue in question. We will attempt to work with the company to resolve the issue. Where this is not possible, and the issue in question represents a material threat to the reputation or operations of the business, we will consider exiting the stock.

4. Investment Process

4.1 How are the results of the ESG research integrated into portfolio construction?

The ESG analysis described in section 3.5 is only undertaken on companies that are already in our investable universe. The investable universe is defined by companies that receive more than half of their revenues from products or services that address one or more of our investment themes. Typically, the portfolio is composed of companies that receive in excess of 80% of revenues from the themes.

4.2 How are criteria specific to climate change integated into portfolio construction?

As described above, five of our nine investment themes and approximately 50% of the strategy is directly related to climate change. Investments in these themes will, we believe, strongly benefit from efforts to reduce carbon emissions in line with the targets set out in the Paris Agreement. These include companies involved in renewable energy generation, energy efficiency in buildings and transport, pollution control, water and wastewater treatment and solid waste management and recycling.

4.3 How are issuers that are present in the portfolio, but not subject to ESG analysis evaluated?

No issuers are present in the portfolio that have not been subject to thorough ESG analysis.

4.4 Has the ESG evaluation or investment process changed in the last 12 months?

We have not made any changes in the way ESG information is used in the management of the strategy in the last 12 months. The last major change took place in 2020 when we finalised and implemented our 'Impact Engine'. As described above, this tool provides a methodical approach to evaluating impact performance by codifying impact and allows systematic comparison across different themes and end markets. It is used alongside our fundamental analysis which looks at both financial and ESG characteristics of potential investments, and valuation analysis.

The Impact Engine draws on the work of the Impact Management Project and the Future Fit Foundation, both of which we participate in and contribute to. All impact reporting and outcomes of our impact engine can be found on our impact map - https://www.whebgroup.com/investing-for-impact/how-we-invest

4.5 Is a part of the fund(s) invested in entities pursuing strong social goals/social enterprises (impact investing)?

The strategy is an impact strategy, as defined by the Global Impact Investing Network as every investment is into a company that has a positive impact through the products and services that it supplies.

4.6 Does the fund engage in securities lending activities?

No

4.7 Does the fund use deriviatve instruments?

No

4.8 Does the fund invest in mutual funds?

No

5. ESG Controls

5.1 What internal and/or external control mechanisms are in place to ensure compliance of the portfolio with the ESG rules on managing the fund(s) as defined in section 4?

The principle control mechanism that ensures compliance with ESG rules on managing the strategy is the Independent Advisory Committee. This group is composed of 4-6 external members along with WHEB's Non-Executive Chairman. The Committee is composed of independent experts with experience in sustainability and investment. They meet every four months to review the composition of the strategy and specifically any new holdings. They review these holdings to determine whether they believe that they are consistent with the strategy. The summary minutes of these meetings are then published on the WHEB website. These can be found at https://www.whebgroup.com/reporting-impact-investment/advisory-committee-minutes

6. Impact measures and ESG reporting

6.1 How is the ESG quality of the fund assessed?

All holdings in the portfolio are published every four months on the WHEB website. In addition, a detailed description of each company is provided which also gives the theme that the stock is related to as well as a justification for why it fits that theme is provided https://www.whebgroup.com/investing-for-impact/our-portfolio .

In addition to the full portfolio holdings and the independent advisory committee meeting minutes, we also publish an annual impact report and associated website. These resources give detailed information on key parameters including the positive impact of the strategy in absolute terms categorised according to the UN Sustainable Development Goals. They also detail performance based on key ESG criteria, such as gender balance and carbon footprinting data at a portfolio level.

6.2 What ESG indicators are used by the fund?

We have identified four key performance indicators for the strategy, encompassing an environmental, a social, a governance and a human rights issue. These are detailed in the table below with performance figures for the portfolio as at 31st December 2022:

	KPI	unit	Coverage	WSIF fund	Benchmark
Environmental	Carbon efficiency	Tonnes of GHG (Scope 1 & 2) emissions per $1M revenue	85%	79.74	158.24
Social	Absence of workplace accident prevention policies	Percentage	100%	0.00%	17.13%
Governance	Executive pay	Ratio of executive level pay to average employee pay	93%	66.2x	102.6x
Human rights	Violations of UN Global Compact principles and OECD Guidelines for Multinational Enterprises	Percentage	100%	0.00%	12.29%

WHEB will seek to outperform the benchmark on a minimum of two of these metrics, the primary measures selected being Human Rights and Carbon Efficiency (noting that this is in accordance with the requirement for a minimum coverage of 90% for the first and 70% of the second).

6.3 What communication resources are used to provide investors with information about the SRI management of the fund?

- Annual Impact Report - https://www.whebgroup.com/reporting-impact-investment/impact-reports
- Quarterly client reports including data on enagement and voting - https://www.whebgroup.com/impact-investment-funds/sustainable-impact-fund-icav/quarterly-reports-wheb-sustainable-impact-fund-icav
- Website providing detailed case studies on engagement, links with the UN SDGs, an interactive impact calculator - https://www.whebgroup.com/investing-for-impact/stewardship/engagement-case-studies

- Independent Advisory Committee summary meeting minutes - https://www.whebgroup.com/reporting-impact-investment/advisory-committee-minutes
- Full voting records - https://www.whebgroup.com/investing-for-impact/stewardship/voting-records
- Annual stewardship report (https://www.whebgroup.com/reporting-impact-investment/stewardship-reports)
- UN PRI transparency and assessments reports - https://www.whebgroup.com/reporting-impact-investment/external-reports
- Full portfolio holdings updated every four months - https://www.whebgroup.com/investing-for-impact/our-portfolio
- Regular blogs and videos describing key aspects and performance of the fund - https://www.whebgroup.com/our-thoughts
- An annual client conference where we present information and receive questions from clients of all sizes (all clients are invited to attend).

6.4 Does the fund management company publish the results of its voting and engagement policies?

Yes – these are available as detailed above.