

## ENVIRONMENTAL, SOCIAL AND GOVERNANCE ESG POLICY

### Introduction

NFS Network Financial Services Limited (hereinafter “NFS” or “the Company”) has established, maintains and monitors an Environmental, Social & Governance Policy (hereinafter the “Policy” or ESGP”), appropriate to its size, organisation, nature, scale and complexity. We believe that consideration of Environmental, Social & Governance factors should be included in our operating philosophy and our investment process.

We aim to ensure that clients are aware of the sustainability factors and risks on returns as part of our investment process and to assist in determining a client’s ESG preferences.

### What is ESG?

Sustainable finance refers to the process of taking environmental, social and governance (ESG) considerations into account when making investment decisions in the financial sector, these are non-financial factors used to measure an investment or company's sustainability. Environmental factors look at the conservation of the natural world, social factors examine how a company treats people both inside and outside the company and governance factors consider how a company is run.

ESG factors that may be incorporated into our investment evaluation and monitoring processes include, but are not limited to, the following:

Environmental	Social	Governance
<ul style="list-style-type: none"> <li>Carbon emissions</li> <li>Air and water pollution</li> <li>Deforestation</li> <li>Green energy initiatives</li> <li>Waste management</li> <li>Climate Risk</li> </ul>	<ul style="list-style-type: none"> <li>Employee gender and diversity</li> <li>Data privacy and security</li> <li>Product quality</li> <li>Customer satisfaction</li> <li>Employee health and Safety</li> <li>Human rights at home and abroad</li> <li>Labour relations and practices</li> </ul>	<ul style="list-style-type: none"> <li>Diversity of board members</li> <li>Corporate governance &amp; oversight</li> <li>Risk Management</li> <li>Conflicts of Interest</li> <li>Transparency</li> <li>Fraud and anti-bribery/corruption controls</li> </ul>

### Company ESG considerations

NFS aims to integrate ESG factors throughout its own corporate operations and we focus on areas that are meaningful to our employees and investors. We apply our insights to drive change across our operating philosophy, including where possible by:

- Increasing the use of clean energy across our corporate office
- Implementing recycling to help reduce waste harmful to the environment.
- Fostering diversity, including anti-discrimination practices in talent acquisition.
- Training through continuous professional development and Annual Compliance Training, including topics such as data protection and privacy, ethics, fiduciary duties, conflicts of interest, in addition to training during initial engagement.
- Engaging the entire firm in cybersecurity awareness to recognize and report suspicious activities.

### ESG Integration in the Investment Process

Sustainability risks means an environmental, social or governance event or condition that, if it occurs, could cause an actual or a potential material negative impact on the value of an investment.

Sustainable investment means (as defined in Article 2, point 17, of Regulation (EU) 2019/2088), an investment in an economic activity that contributes to an environmental objective, as measured, for example, by key resource efficiency indicators on the use of energy, renewable energy, raw materials, water and land, on the production of waste, and greenhouse gas emissions, or on its impact on biodiversity and the circular economy, or an investment in an economic activity that contributes to a social objective, in particular an investment that contributes to tackling inequality or that fosters social cohesion, social integration and labour relations, or an investment in human capital or economically or socially disadvantaged communities, provided that such investments do not significantly harm any of those objectives and that the investee companies follow good governance practices, in particular with respect to sound management structures, employee relations, remuneration of staff and tax compliance.

We aim to integrate sustainability risk into our investment process. This does not apply to clients who are trading with us on an Executions only basis. We consider ESG client preferences when determining suitability and will review any client requests for certain investment sectors or industries to be included or avoided in our recommendations whilst at the same time ensuring our clients are made aware of any adverse impacts on sustainability factors and sustainability risks on returns.