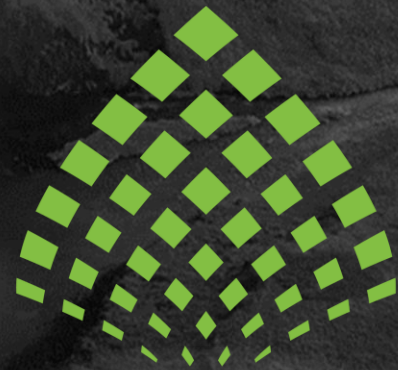


ESG INVESTMENT POLICY

Our active approach to ESG

Eden Global Natural Resources UCITS ESG Fund



eden


ASSET MANAGEMENT

At Eden, ESG integration is thoughtful, practical, research-based, & forward-looking

ESG is an acronym for **Environmental, Social, and Governance**, often referred to as **Sustainability**.

Within Eden's investment sphere, sustainability pertains to how a company's business model promotes sustainable development through its products and services. It also involves a company's approach to risk management, particularly in how it operates to reduce adverse impacts.

ESG and sustainability within the **mining and agriculture sectors** involve practices & strategies that aim to mitigate environmental impact, promote social responsibility, encourage diversity, and ensure effective governance to support long-term viability and ethical operations.



“As an active asset manager, incorporating financially significant ESG factors into our investment decisions is crucial to achieving the outcomes our clients expect”

Eden's ESG Investment Principles

Eden Global Natural Resources UCITS ESG Fund (the "Fund") considers external ESG ratings for investment decisions and conducts due diligence on ESG policies and reporting for companies without available ratings.

Key Principal Adverse Impacts (PAIs)


- The Fund promotes the following environmental characteristics: the transition of the global economy to a more sustainable basis through the exploration and production of **Critical Minerals***.
- The Fund promotes the following social characteristic: promotion of **diversity and inclusiveness** in the workforces in investee companies.

"We believe that carefully managed ESG integration is an indispensable tool for proper risk management and a prerequisite for long-term healthy returns"

* **"Critical metals"** or **"critical minerals"** are essential metals and non-metallic minerals vital to the economy and national security, susceptible to supply disruptions. In Eden's context, these also include metals pivotal for transitioning from fossil fuels and enabling modern technologies like electric vehicle batteries, renewable energy systems, and modern electronics. This includes lithium, cobalt, vanadium, copper, nickel, uranium and manganese. Additionally, Eden's investment universe includes **precious metals** such as gold, silver, and PGEs, which offer significant portfolio diversification, serve as a hedge against inflation and monetary debasement, and provide a safe-haven during geopolitical and macroeconomic uncertainties.

Our approach to sustainable investment

- Weight our portfolio towards sustainable investments within the resources sector;
- Exclude investments which do not meet our sustainability objectives; and
- Give preference to businesses which, whilst they may not have a directly sustainable objective, can demonstrate that sustainability considerations are implemented in the operation of their business over those that do not.



"Critical minerals are the cornerstone of ESG investing, powering sustainable technologies and driving responsible growth for a greener future."

What is the importance of being “Light Green” under Article 8

- The term "Light Green Fund under Article 8 of the EU Sustainable Finance Disclosure Regulation (SFDR)" refers to a specific category of investment funds as classified by the SFDR, which is a regulation implemented by the EU to increase transparency in how financial market participants consider ESG factors in their investments.
- **Article 8 “Light Green” funds**, promote environmental or social characteristics but do not have sustainable investment as their core objective.
- These funds consider ESG factors in their investment decisions and must disclose how they integrate these factors into their investment strategies

“Eden’s overarching strategy is aimed at driving investments towards projects that prioritise environmental and social responsibility in the Global Natural Resources space”



Portfolio Parameters and Strategy

Investment Strategy

- **Specialist natural resources investment:** the Fund will seek exposure to companies with natural resource assets across the metals and mining, energy and agriculture sectors at different points in the development cycle, to include producing assets, projects seeking financing for development and advanced exploration assets.
- **Deliver risk-adjusted returns through active management:** stock selection employs top-down analysis of the investment universe incorporating a macro asset allocation process to generate a shortlist of eligible stocks which are then subjected to bottom-up due diligence.
- **Disciplined portfolio construction process:** focus on delivering key metrics including liquidity, volatility and diversification across commodities.
- **Special situations resources investment:** up to 30% of portfolio to be allocated to special situations investments in companies with smaller market capitalisations (typically <A\$500m), with selections driven by assessment of underlying asset, management, liquidity and participation in corporate transactions / equity placements:
 - Investing in companies engaged in project development can yield significant alpha returns under favourable sector conditions. Eden's strategic location and specialized team enable access to these opportunities and facilitate the necessary due diligence.

Portfolio Construction

Market segment	Minimum portfolio weighting
Metals & Mining	10%
Energy	10%
Agriculture	10%
Cash	0 - 10%
Special Situations	0 - 30%

Fund parameters	Range
Market capitalisation range	Typically \$50m – \$350bn (large cap focus)
Number of holdings	70 – 120 securities
Geographical	Global – preference for low risk jurisdictions, i.e. Australia and Canada

Key Principal Adverse Impacts (PAIs) (PAI is any impact of investment decisions or advice that results in a negative effect on sustainability factors):

- The global economy's shift towards sustainability is driven by the exploration and production of **Critical Minerals**, which are vital for the **energy transition**.
- Promotion of **diversity and inclusiveness** in the workforces in investee companies.

Located in the Capital of Critical Minerals & World's Premier Mining Jurisdiction

Underlining Perth's strategic importance in accessing leading Miners & advancing the green energy transition

- Fund strategically located in Western Australia, home to >700 listed Mining firms, underlining its role as a **major hub for the mining and exploration sectors globally**.
- Several of the world's largest mining leaders capable of influencing the global energy transition are HQ'd in Perth incl. **BHP, Rio Tinto, South32, & Fortescue Metals**.
- Producer of a dominant supply of the world's Critical Minerals including: **Lithium, Nickel & Copper**.
- Home to the world's **highest grade, and most profitable Lithium mine** (Greenbushes)
- Home to the western World's largest producer of **Rare Earth Elements** – critical for modern technology, Electric Vehicles & defence tech.
- **Enables access to an extensive network of technical, commercial and strategic knowledge of the resources sector ⇒ ⇒ POINT OF DIFFERENCE WITH OTHER GLOBAL RESOURCES FUNDS**



Eden Global Natural Resources UCITS 'Light Green' ESG Fund

As an Article 8 'Light Green' ESG Fund we:

EXCLUDE

Fund will only invest in firms which have progressive ESG policies & screen for those which do not meet required stds.

Excluded firms are those involved in:

- Mining, processing and generating energy from thermal coal, oil and gas and fossil fuels ;
- Negative impact to local biodiversity
- Any violations of UN Global Compact principles and Organization for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises
- Exposure to controversial weapons (anti-personnel mines, cluster munitions, chemical weapons and biological weapons)
- Manufacture of tobacco

PROMOTE

Additional weighting will be given to investments which have sustainable characteristics

Environmental

- Renewable energy generation
- Mining and processing of Critical Minerals.
- Sustainable food production

Social

- OHS responsiveness
- Active promotion of diversity and inclusiveness in the workforce
- Inclusive culture welcoming and supporting local communities and indigenous groups.

CONSIDER

The fund also considers the below principal adverse impacts on:

Sustainability Factors:

- Green house gas emissions
- Exposure to companies active in the fossil fuels sector
- Activities negatively affecting biodiversity-sensitive areas
- Violations of the UN Global Compacts principles and OECD guidelines for multinationals
- Exposure to controversial weapons.
- Firms engaging in unsafe / poorly designed tailings management

ESG considerations are central to Eden's investment process

Companies with strong and properly applied ESG policies are less likely to:

- incur reputational damage;
- incur environmental related fines;
- incur downtime due to health and safety concerns; and
- be impacted by the implementation of negative externality policy such as the pollution charges or carbon taxes.



All companies for which an investment by the Fund is contemplated will be subject to ESG due diligence, and portfolio investments will be subject to ongoing monitoring.

ESG scores

- Where coverage is available, Eden will utilise the ESG scores provided by external data providers. Underlying ratings for specific components of the overall ESG scores will also be analysed.
- These ratings will be compared against industry benchmarks and, where the overall ESG rating of the company falls materially below the benchmark, the proposed investment will be excluded

Due diligence

- Through our experienced team and industry insight, we are able to meaningfully incorporate ESG into our investment strategy. Whilst the Funds objective is not sustainable investment, effective ESG-conscious investing in the global resources sector will be a key determinant of performance for strategies in our sector
- We expect that the application of ESG data in our investment process will also be subject to change over time. We pride ourselves on being at the cutting-edge expectations and requirements for ESG standards.

ESG and sustainability within the mining and agriculture sectors

ESG and sustainability within the mining and agriculture sectors involve practices and strategies that aim to mitigate environmental impact, promote social responsibility, and ensure effective governance to support long-term viability and ethical operations. Here's how these concepts are generally applied:

ENVIRONMENTAL CONSIDERATIONS

Mining:

- Reducing Environmental Impact: Mining companies focus on reducing their ecological footprint by improving waste management, using water responsibly, rehabilitating mining sites, and minimising landscape disruption and pollution.
- Energy Efficiency and Climate Change: Efforts are made to lower greenhouse gas emissions through the use of renewable energy sources and innovative technologies.



Agriculture:

- Sustainable Farming Practices: This includes the use of organic farming, integrated pest management, and conservation tillage to protect soil health and biodiversity.
- Resource Efficiency: Optimizing the use of water and energy, and reducing the dependency on chemical fertilizers and pesticides to minimize environmental harm.



ESG and sustainability within the mining and agriculture sectors

SOCIAL CONSIDERATIONS

Mining:

- Community Engagement and Support: Mining operations often involve close interactions with local communities. Companies focus on gaining social license to operate through transparent communication, supporting local economies, and respecting indigenous rights.
- Health and Safety: Ensuring the safety and health of employees with stringent safety protocols and health initiatives.



Agriculture:

- Labor Practices: Promoting fair labour practices, ensuring safe working conditions, and providing fair wages and benefits.
- Community Relations: Engaging with local communities and smallholders, and supporting local development through various initiatives.



ESG and sustainability within the mining and agriculture sectors

GOVERNANCE CONSIDERATIONS

Mining and Agriculture:

- Corporate Governance: Strong corporate governance frameworks are critical, involving clear policies on corruption, ethical business practices, and legal compliance.
- Transparency and Reporting: Both sectors are increasingly held accountable for their ESG performance, requiring transparent disclosure and detailed sustainability reporting to stakeholders.



SUSTAINABILITY GOALS

Mining and Agriculture:

- Long-Term Viability: Both sectors aim to operate sustainably to ensure they can continue to produce essential resources without depleting natural resources or causing irreversible environmental damage.
- Alignment with Global Standards: Many companies align their practices with international standards and commitments such as the United Nations Sustainable Development Goals (SDGs) to improve their global footprint and operational sustainability.



ESG Providers - Digbee



Digbee helps mining companies successfully measure, manage and disclose their ESG ratings. And offers investors and other stakeholders greater transparency and accuracy in evaluating mining data. Together, we're setting a new trusted benchmark for the good of all.

Digbee Ltd, a leading name in responsible mining intelligence, proudly announces a strategic partnership with the **Eden Global Natural Resources UCITS ESG Fund** to support their Light Green Article 8 (SFDR) Fund. This collaboration marks a significant milestone in the pursuit of sustainable investments within the global natural resources sector.

Key highlights of the partnership include:

Enhanced Due Diligence: Digbee will provide comprehensive responsible mining intelligence to strengthen due diligence processes, ensuring that investments through the ESG Light Green Article 8 (SFDR) Global Resource Fund adhere to the best practice ESG standards.

Strategic Advisory Services: The collaboration will feature joint efforts in offering strategic advisory services, leveraging the collective expertise of Digbee and Eden Asset Management's Global Natural Resources UCITS ESG Fund to guide investors towards sustainable opportunities.

Transparent Reporting: Both organisations are committed to transparent reporting practices. Through this partnership, they aim to set new benchmarks for disclosure in the sustainable investment landscape.

Innovation in Sustainable Technologies: Digbee and Eden Asset Management will explore opportunities to promote the development and adoption of innovative, eco-friendly technologies within the natural resources sector.

This document does not constitute an offer or public offering of interests of interests in eden partners, its subsidiaries or any of its associated entities



ESG Providers - Parvate & Treety



PARVATE are a full service leader in ESG transformation solutions

Providing practical, accessible solutions to complex, real issues.

ESG Literacy & Awareness
ESG Assessment & Reporting
Strategy, Education & Training.



Treety makes measuring, tracking, and reporting your impact easy!

Treety's mission is to create a world where the economy is driven by purpose and measured by impact. Treety help funds and investors quantify their sustainability efforts by simplifying the process of getting important data - whether it comes from portfolio companies or third-party sources. They then take this data and transform it into practical insights, dashboards, and compliance reports that meet local regulations.

By creating comprehensive impact reporting solutions, Treety make it easy for investors to allocate capital towards impactful projects globally.

Eden Asset Management

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