

# ESG Investment Policy

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Spire Management Limited (“Spire”, “we”, “us”, or “our”) is committed to delivering high standards of professional behaviour and investment performance and ensuring that Environmental, Social, and Governance (“ESG”) principles operate throughout the organisation, in line with expectations placed on the investment processes and activities.

We are a signatory to the Principles of Responsible Investment (PRI), an investor initiative in partnership with the UNEP Finance Initiative and the UN Global Compact, and we support the UN’s Sustainable Development.

Spire is committed to considering material ESG issues throughout due diligence processes and in the monitoring of portfolio investments. Initial screening by the investment team of all potential new investments is aimed at ensuring any potential investments that do not fit with our ESG policy are declined at the earliest possible opportunity.

As an FCA-regulated company, we do not invest in any countries that are considered high-risk by the FATF for money laundering, bribery and terrorist financing.

ESG Goals:

- To consider environmental, public health, safety, and social issues associated with target investments when evaluating whether to proceed;
- To remain committed to compliance with applicable national, state, and local labour laws in the countries in which Spire invests;
- To provide a safe and healthy workplace in conformance with national and local law; and
- To respect the human rights of those affected by Spire’s investment activities and seek to confirm that Spire does not invest in companies that utilise child or forced labour or maintain discriminatory policies.