

Responsible Investment Policy

Paradice Investment Management Pty Ltd

Dated: 28 June 2024

Paradice Investment Management Pty Ltd (“Paradice”) provides investment management services to managed investment schemes and investors (wholesale and retail). The Paradice Board has delegated responsibility for the approval of this Responsible Investment Policy (the “Policy”) to the Sustainability Committee (hereinafter the “Committee”).

This Policy applies to investments directly managed by Paradice only.

Purpose and scope

The purpose of this Policy is to set out Paradice’s approach to responsible investing (“RI”), in particular how material environmental, social and governance (“ESG”) risks and opportunities are integrated within investment decision making, and our stewardship practices.

Paradice has developed an ESG Glossary to ensure the consistent application and understanding of commonly used ESG-related terms, including those used in this Policy.

Approach to Responsible Investing

Paradice is committed to RI and applies ESG integration and stewardship, consistent with our duty to our clients and our contractual responsibilities. We, as part of the Paradice Group,¹ are a signatory to the Principles for Responsible Investment (PRI), meaning that we endorse the six aspirational principles set out by the PRI to assist investors in incorporating ESG issues in all aspects of the investment process.

Our investment teams share an overarching belief in the link between sound management of ESG-related risk and opportunities, and a company’s long-term success and value creation for shareholders. In short, considering relevant ESG information can help us to make better informed investment decisions.

In actively managing investments on behalf of our clients, Paradice seeks to maximise long-term investment returns, subject to an acceptable level of risk. As such, we consider the fulfilment of our investment objective and RI to be interdependent.

While each investment team has autonomy over their respective investment strategy and has discretion to practice RI in a manner most relevant to their investment philosophy, Paradice views it as important to outline minimum expectations with respect to RI via this Policy. This helps to support consistency where appropriate.

¹ The Paradice Investment Management Group (Paradice Group) is a signatory to the PRI. The Paradice Group consists of Paradice Investment Management Pty Ltd (PIM Pty) and Paradice Investment Management LLC (Paradice LLC), a US entity.

ESG integration

Paradice recognises that ESG factors can financially impact our investments, both positively and negatively. Seeking to analyse and understand ESG information can help us better understand the full range of risks and opportunities to which a company may be exposed and assess whether it is adequately managing risks or pursuing opportunities in support of long-term value creation.

Where we identify an ESG factor as being financially material to a company within the strategy's investment time horizon, it is the ultimate responsibility of the respective portfolio manager to integrate this into the investment process, like any other investment-relevant factor. We consider this to be a part of fulfilling our duty to our clients, our contractual responsibilities and striving to produce superior risk-adjusted returns.

We apply ESG integration across our investments and a key resource in doing so is our dedicated ESG team which assists our investment teams in identifying the most material ESG issues in portfolio companies and other stocks of interest. The ESG team provides sub-sector specific guidance, which is informed by the Sustainability Accounting Standards Board's ("SASB") Materiality Map², as relevant. The ESG integration approach also directs analysts to draw upon company-specific knowledge to ensure idiosyncratic ESG risks are captured in the investment analysis and decision making. The outcome is a blend of both top-down and bottom-up approaches.

We also supplement this guidance with two in-house tools to support assessments of exposure to climate change and modern slavery risks. Paradice's individual investment teams may also tailor their ESG integration approach in a manner most relevant for their specific strategy.

Paradice also has access to a range of third-party investment research and data, including specialist ESG research. Additionally, as active managers, we gain ESG-relevant insights directly from companies through reading corporate disclosures and undertaking engagement with senior leaders.

We note that while ESG factors may be integrated in our investment analysis and decision making, financial factors remain the primary driver of all decision making, consistent with our duty to our clients and our contractual responsibilities. Further, even where ESG factors are identified as financially material and may change our view on matters such as a company's earnings forecast, valuation or quality of management, an ESG factor alone may not necessarily result in a buy, sell or hold decision. ESG factors complement a range of investment considerations most relevant to the respective strategy and its investment time horizon. Finally, we note that in many cases exposure to ESG risks will be within the strategy's risk appetite – it is the responsibility of the portfolio manager to manage the portfolio within this risk appetite and in compliance with any other established investment guidelines, including requirements of client-specific mandates.

We are committed to continuing to advance our ESG integration practices and progressively deepen our ESG analysis. We recognise that enhancing our capabilities in this area will support better investment outcomes. As such, both in-house and external training and education form an ongoing part of our overall RI approach.

ESG factors

ESG factors which have the potential to be financially material are many and varied. As part of our ESG integration approach, investment teams consider ESG factors including but limited to those outlined below.

² Paradice Investment Management LLC, or Affiliate, licences and applies the SASB Materiality Map® General Issue Categories in its work.

Environmental

- Climate transition-related risks, such as carbon pricing, regulatory, market and technology risks
- Risks relating to the physical impacts of climate change
- Environmental management, such as managing waste, pollution and resource scarcity
- Nature-related risks, such as biodiversity loss

Social

- Ethical conduct and maintaining “social licence”
- Workplace health and safety practices
- Human capital management, including talent attraction and retention, diversity and industrial relations
- Human rights and modern slavery risks
- Data privacy and cyber security
- Relations with First Nations people and cultural heritage protection

Governance

- Quality and composition of the board
- Effective policies and appropriate oversight of their implementation
- Executive remuneration
- Succession planning
- Appropriate representation of shareholder interests

Stewardship

Engagement

Engagement with companies is not just fundamental to Paradise’s RI practice, but our active approach to investment management. It includes all our interactions with company boards and management such as in-person meetings, site tours, conference calls and written communications. We believe engagement helps us make better investment decisions and manage investment risk, but it is also an important tool to help us enhance long term value.

We engage to deepen our understanding of the company. While our interactions cover a range of topics such as financials, risk management and the pursuit of opportunities, often these will also serve to ensure we fully understand the company’s ESG profile so we can feed this into our investment decision making.

In the context of ESG-related engagement we distinguish between “Engagement for change” and “Engagement for knowledge”.

- **Engagement for change.** We consider engagement for change to be those interactions with a company which are conducted, at least in part, with the purpose of improving practice on an ESG issue, enhancing ESG risk management, changing a sustainability outcome, or improving public disclosure.
- **Engagement for knowledge.** We refer to engagement for knowledge as those interactions with a company to gather information and better understand the business from an ESG perspective, such as the risks to which it is exposed or the opportunities it may be able to leverage. This can be an input to our ESG integration processes.

Where we have identified areas of concern or we see an opportunity to drive improved practices, we will also seek to constructively leverage the influence afforded to us through share ownership to achieve outcomes in the long-

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term interests of shareholders through engagement for change. Where we engage to drive change, we may encourage companies to adopt better practices with respect to corporate governance, ESG risk management and disclosure, or seek that they pursue relevant ESG opportunities.

At times our ability to engage may be impacted by the size of our shareholding, resourcing constraints, the location of the company or the asset class in which we are investing. Nevertheless, we strive to be as active in engagement as practicable and prioritise our efforts accordingly.

Proxy voting

Exercising the voting rights afforded to us through share ownership, referred to as proxy voting, is a responsibility we seek to fulfil in a considered manner. We believe that doing so is a key part of our investment stewardship and is in line with our commitment to RI.

The investment teams have access to specialist proxy research as well as other investment research which may be drawn upon in decision making. Paradise does not apply automated voting rules based off proxy adviser recommendations and considers each resolution on its merits.

Our approach is to cast votes in the best interests of our clients. Paradise has in place a Proxy Voting Policy and employees who have the authority to vote client securities must familiarise themselves with and strictly adhere to this Policy.

Escalation

On issues where Paradise is seeking change, direct engagement with the management and board of the company is the preferred option if appropriate/available. If we are dissatisfied with progress, investment teams can escalate the issue in several ways including, but not limited to, collaboration with other investors, filing a shareholder resolution, voting against resolutions at companies' annual meetings or divestment.

Investor collaboration

Paradice is a participant in several industry groups alongside other institutional investors, including some which facilitate collaborative engagement on ESG issues. We seek to be active participants and contributors where possible. We believe involvement in such organisations not only supports our own understanding of current and emerging ESG issues, but it also serves to drive change on complex and systemic issues where individual engagement is less effective.

Paradice is currently a signatory to or member of:

- PRI
- Climate Action 100+
- Responsible Investment Association Australasia
- Investors Against Slavery and Trafficking

We have also signed Tobacco Free Portfolio's Tobacco-Free Finance Pledge and as such have in place a formal exclusion of companies involved in the production of tobacco products.

Advocacy

We consider advocacy to refer to activities such as our membership of ESG-related industry associations or collaborative investor initiatives, participation in the shaping of relevant public policy, and contributing to knowledge-building of ESG issues. While advocacy can take many forms, it is generally undertaken in the interests of change

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with respect to ESG which we believe supports the long-term financial interests of our clients – whether at a company, sector, country or whole of system level.

Where appropriate, we support the improvement of RI practices across the finance industry, increased public debate and the shaping of policy to enhance understanding and management of ESG matters. Either directly or through our involvement in industry associations, we participate in relevant policy consultations or provide submissions to government as relevant. We also seek to participate in the public sphere such as through speaking engagements, and the publication of thought pieces on RI and ESG matters.

Paradice-wide exclusions

There are certain activities in which Paradice has chosen not to invest and, as such, we apply formal exclusions to avoid investments in companies involved in these activities, subject to any specific investment mandate instructions from our clients.

Specifically, it is our policy to not invest in companies which derive revenue from the:

- Production of tobacco products³
- Manufacture of controversial weapons⁴

Paradice has also made a commitment to not become a substantial shareholder (defined as owning more than 5% of the company) in a company which derives more than 25% of its revenue⁵ from mining thermal coal.

Our internal compliance and ESG teams monitor the portfolios to ensure that these exclusions are upheld, and the Committee has responsibility for oversight of this process. Paradice utilises a third-party provider to perform business involvement screening for the purposes of identifying companies that fit the exclusion criteria. The third-party provider has screening methodology in place for ongoing monitoring of companies using public disclosures, third party data sources and company communications. Paradice has no ability to influence, and no involvement in the development of, the third party's screening methodology which is subject to change.

Monitoring of companies is scheduled to take place throughout the year often within one quarter of the company's annual filings however certain companies are scheduled to be reviewed on a rolling basis within twelve months from the date of the annual filing. Where companies have not been screened by the third-party provider they may not be identified for the purpose of this exclusion.

Paradice updates exclusion lists from the source information on a quarterly basis. Formal portfolio restrictions are applied in our trading system from the source information.

Climate change

We acknowledge that we must consider how climate change will impact the investments we make on behalf of clients consistent with our duty or contractual responsibilities. Each investment team is responsible for considering climate change within the investment process like any other material financial risk or opportunity, in a manner most relevant to their strategy (refer to ESG Integration above). We also acknowledge that our engagement with

³ Specifically excludes companies that have applied for or hold license to manufacture tobacco products, including e-cigarettes, but have not yet started production, or companies that sell private-label tobacco products manufactured by a third party.

⁴ Controversial weapons is defined as involvement in the production of whole weapon systems, delivery platforms or components of cluster munitions; production of whole weapon systems or components of landmines and biological or chemical weapons; production of depleted uranium weapons, blinding laser weapons, incendiary weapons, or weapons with non-detectable fragments; or is involved indirectly through ownership ties to companies involved in such products. Nuclear weapons are not considered for this screen.

⁵ Our third-party research provider assesses Maximum Percentage of Revenue based on the company's reported revenue (or, where not disclosed, maximum estimated revenue) from the screened business activity as a percentage of total revenue in its most recently completed fiscal year. Expressed as a percentage, rounded to two decimal places, where a value of 1.00 represents 1%.

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companies can support the appropriate management of climate-related risks or opportunities by investee companies. It is in our interest to engage on climate change in order to enhance long term shareholder value.

Please see also the Paradise Climate Action Plan.

Human rights and modern slavery

We believe in respecting and upholding all human rights unconditionally and acknowledge that we may impact people indirectly through the investments we make. Paradise seeks to understand human rights risks within our investments so we can minimise our potential complicity in human rights abuses. We acknowledge share ownership provides investors with influence which can help us to hold investee companies to account with respect to their management of human rights.

Paradise also acknowledges we have a duty and an interest to support efforts to address modern slavery. Modern slavery refers to instances where workers are subject to forced labour or deprived of personal freedoms, often through coercion or deception. While addressing modern slavery is the right thing to do, it is also an issue that can present investment risks and as such we must understand our exposure via investee companies and their supply chains.

To support our understanding of human rights and modern slavery risk exposure, we have developed an in-house modern slavery risk assessment tool and utilise third party provider data to monitor relevant controversies such as those relating to labour issues. This supplements our core ESG research. Where we have concerns or believe a company's disclosure could be improved, we will undertake direct engagement as relevant.

Sustainability outcomes

We acknowledge that companies seeking to act in the interests of all stakeholders, including the environment, can be linked to value creation for shareholders, such as through maintaining social licence to operate. Where relevant and it is appropriate to do so, we may encourage companies to pursue efforts which contribute to broader sustainability outcomes. For example, to reduce negative impacts upon the environment or to positively contribute to the communities in which they operate. However, we do so in a manner consistent with our fiduciary duty to our clients and our contractual responsibilities.

Governance of RI

The Paradise Board has oversight of the firm's approach to RI. It has delegated accountability and responsibility for implementation of RI governance and practices to the Committee. The Committee has in place structures which ensure policies and procedures relevant to RI are implemented in an aligned and consistent manner. The Committee is required to escalate certain matters to either the Board or the Paradise Risk and Compliance Committee in a timely manner as relevant, as well as provide periodic reporting to the Board to enable its oversight of RI.

Managing conflicts

Paradise has in place a comprehensive Conflicts of Interest Policy. We acknowledge that a conflict could arise which may have implications for how we implement responsible investment. Any such conflict is to be avoided or otherwise managed in line with our Conflicts of Interest Policy.

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