Impax Global Sustainable Investment Policy[1]

June 2026

This Policy document (the “Policy”) is applicable to all regulated investment management entities of the Impax Group providing services to clients, namely:

- Impax Asset Management Limited (“Ltd”),
- Impax Asset Management (AIFM) Limited (“AIFM”),
- Impax Asset Management Ireland Limited, and
- Impax Asset Management LLC; all collectively defined as “Impax” or the “Firm”.

Impax Asset Management was founded in 1998 and is a leading investment manager dedicated to investment in companies and assets that are well positioned to benefit from the transition to a more sustainable economy.

We believe that:

- Capital markets will be shaped profoundly by global sustainability challenges including climate change, environmental pollution, natural resource constraints, demographic and human capital issues such as diversity, inclusion and equity.
- These trends will drive growth for well-positioned companies and create risks for those unable or unwilling to adapt.
- Fundamental analysis which incorporates long-term risks, including material sustainability factors, enhances investment decisions.

Impax offers a well-rounded suite of investment solutions spanning multiple asset classes seeking superior risk-adjusted returns over the medium to long-term. We seek higher quality companies with strong business models that demonstrate sound management of risk.

OVERVIEW OF IMPAX’S SUSTAINABLE INVESTMENT APPROACH

Impax believes strong investment outcomes can be generated by investors who better understand the opportunities and risks associated with the transition to a more sustainable economy. Our investment philosophy emphasises the identification and analysis of powerful secular forces – such as advancements in technology, changes in policy and regulation, and evolving social trends. These enduring and dynamic trends are not only reshaping the global economy but are also accelerating the transition to a more sustainable economy, creating significant opportunities and challenges for investors.

Across asset classes and investment strategies, Impax’s sustainable investment approach has three main components, firstly a sectoral- or activity-based assessment, identifying risks and opportunities in order to define and categorise investment universes or where additional analysis or engagement may be required, secondly company- or issuer-level resilience analysis, which will inform the third step, stewardship, which includes engagement with companies and issuers.

We take into account relevant regulations when considering our approach to sustainability, especially as it relates to reporting and disclosures.

Impax applies the following firm-wide exclusions/restrictions:

1. Compliance with **international standards and norms** is an investment requirement. Global standards screening assesses the extent to which a company or issuer causes, contributes, or is linked to violations of international norms and standards. This assessment covers the UN’s Global Compact Principles (including human rights, labour rights, environment, and anti-corruption), as well as the OECD Guidelines for Multinational Enterprises, the International Labour Organization’s (ILO) Conventions and the UN Guiding Principles on Business and Human Rights (UNGPs).

   We source information about company and issuer compliance with international standards and norms and involvement in related controversies from external research providers. If Impax determines a company or issuer is not compliant with international standards and norms, it will be excluded from the investable universe. Where a company or issuer is flagged

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[1] *This Policy relates to Impax’s listed investments. The equivalent policy for Impax’s New Energy Strategy (private equity) can be found here: https://impaxam.com/assets/pdfs/strategies/impax-new-energy-strategy-esg-policy-2023.pdf?pwm=1669*

for potential breaches, Impax will monitor and seek to engage, as appropriate. We also seek to review our investment universe for compliance with international sanctions, as applicable.

2. **Controversial weapons** are outlawed in multiple jurisdictions and international treaties. Impax seeks to exclude companies and issuers with involvement in controversial weapons from investment.

3. *Listed Equities:* Climate-related risks include material risks to companies with **fossil fuel-related assets and activities**, in the form of government intervention to regulate greenhouse gases, changes in consumer preferences, technological developments and other liabilities, like stranded asset risks, in addition to reputational and litigation risks.

   As such we apply a fossil fuel policy to our equities investment strategies. Categories of fossil fuel companies under this policy include companies that Impax determines are:
   - Deriving any revenues or profits from fossil fuel exploration and production[2]; or
   - Deriving > 5% of revenues or profits from fossil fuel refining, processing, storage, transportation and distribution, as well as utility power generation[3].

   We will not invest in companies or issuers in the first category above as we believe they face significant climate transition risks. Nor will our listed equity strategies invest in companies in the second category above, unless we have determined that they have credible plans for climate risk mitigation aligned with the transition to net zero.

   The policy does not apply to companies with indirect exposure (automotives, transport, industrials, financials) and provides for certain emerging market exceptions where transitional air quality solutions are being provided.

   Fixed Income: Across our fixed income strategies, we aim to build more resilient portfolios by managing risks, including climate-related risks. To mitigate or eliminate such risks, our fixed income strategies have adopted a fossil fuel policy as described below.

   We screen for the following activities:
   - Issuers deriving revenue from fossil fuel exploration and production; or
   - Issuers deriving revenue from fossil fuel refining, processing, storage, transportation, distribution, and utility power generation.

   Issuers in the first category are typically not investable, although individual strategies may employ distinct criteria based on geographical norms and regulatory considerations. This is the case for our US domiciled fixed income funds which have an approach fitting US market norms and demands. For these funds, activities with the most severe climate risk profiles (e.g. coal mining, oil sands producers, and arctic exploration and production) are excluded but exposure is otherwise allowed subject to certain conditions (e.g. if they demonstrate strong environmental management systems/initiatives, transparency about emissions and have a strong performance record).

   Issuers in the second category are available for investment across the fixed income range on a conditional basis (as above).

   The policy does not apply to issuers with indirect exposure (automotives, transport, industrials, financials).

INTEGRATING SUSTAINABILITY IN THE INVESTMENT PROCESS - LISTED EQUITIES

Actively Managed Listed Equities: There are three main parts in the integration of sustainability in the investment process for actively managed listed equities; 1. sectoral and activity analysis, taxonomies and frameworks helping to form the investment universe, 2. company-level resilience analysis and 3. stewardship, including company engagement and proxy voting. Each step is integrated in the investment process.

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[2] *Whether coal mining, or conventional oil and gas, or non-conventional sources such as shale gas, oil sands and arctic exploration.*
[3] *The listed equities fossil fuel policy does not apply to:*
- *Companies with indirect exposure to fossil fuels such as automotives, transport, industrials and financials.*
- *For example, emerging market utility, storage or distribution companies, as these companies are providing transitional air quality solutions, e.g., replacing coal in regions where coal represents a high proportion of the energy mix in the grid system.*

1. **Impax Sustainability Tools and Taxonomies (sector-level)**

   Impax *Sustainability Lens*: proprietary tool that identifies and scores opportunities and risks in the broad economy at sectoral level, taking a longer-term perspective.

   Impax Thematic Taxonomies: Impax's thematic investment universes are based on proprietary thematic taxonomies (classification systems), supported by company-level revenue analysis related to the respective theme:

   - *Environmental Markets*: This taxonomy, as well as the *Water* and the *Sustainable Food* taxonomies, identifies high-growth markets delivering solutions to environmental and resource efficiency challenges
   - *Climate*: Identifies companies enabling mitigation of climate change or adaptation to its consequences
   - *Sustainable Infrastructure*: Identifies infrastructure solutions that advance environmental and societal wellbeing
   - *Social*: Identifies long-term growth opportunities driven by demographics and societal needs

2. **Proprietary Corporate Resilience Analysis (CRA) (company-level)**

   We conduct a detailed, proprietary analysis of new companies considered for the investable universe and review the companies on a periodic basis. Impax considers five main pillars within this analysis:

   1. Corporate Governance: We analyse companies' governance structures, taking into account common and best practice in the areas of board structure, compensation, shareholder rights, internal controls and governance of sustainability.

   2. Material Sustainability Risks: We analyse companies' and issuers' environmental and social policies, processes and disclosures, identifying the most material risks. Materiality is defined as the sustainability issues or risks that may most materially disrupt a company's operations through financial, physical, or reputational loss or disruption. These risks can include: Resource use and dependencies, biodiversity risks, waste and pollution externalities, health and safety, supply chain complexities, product liabilities including cyber risks and data privacy and bribery & corruption. We seek investments in companies or issuers that have addressed the material risks with robust policies, processes, management systems and incentives that are scaled appropriately to the importance of the risk.

   3. Climate Change: Climate change is a systemic issue for all companies, and this pillar assesses the preparedness, management, target-setting, performance and disclosures by companies in terms of both climate transition risks (and Net Zero alignment) and physical climate risks.

   4. Human Capital and Inclusive Culture: Human capital and inclusive culture are critical issues for all companies. This pillar assesses the management, target-setting, performance and disclosures by companies for aspects of diversity in leadership (gender, racial/ethnic diversity in board and management teams), workplace equity (hiring/retention efforts, goals, disclosures), and human capital (talent pipeline, compensation/benefits and employee engagement).

   5. Controversies: This includes analysis of companies' past and ongoing controversies, seeking strong processes and management systems to address and avoid any repeat events. Analysis includes types of controversies or incidents (repeats, reputational, financial, operational), severity (widespread, systematic, isolated incident), and timeframe and status of issues (ongoing, closed, company has responded or addressed).

   The insights and outputs from the evaluations and the CRA scoring include an understanding of the companies' character, quality and resilience, their trajectory of progress, engagement priorities and investment and portfolio implications.

   For the analysis, company disclosures and reports are assessed and we use external, third party ESG research as input and support in the analysis. The CRA is the responsibility of the lead analysts and the Impax Sustainability Centre provides coordination, guidance, but also a peer review of all the evaluations, which includes confirming the overall CRA scores for the companies. Companies that do not have adequate levels of quality and resilience in their corporate governance structures, risk management approaches and transparency, are not eligible for investment.

   As part of our analysis of new companies and their potential introduction to our investable universe, the "A-list", a detailed "10-step analysis" is conducted, which includes financial and operative analysis, the proprietary CRA described above, but also an **Impax Key Sustainability Indicator (KSI) dashboard**, which provides an overview of a range of key internal sustainability, CRA and impact-related datapoints at the company level. KSIs complement the fundamental CRA with metric-level evidence and information of investee companies' sustainability characteristics. KSIs include sustainability data points related to thematic and sustainability revenue exposures, positive impact metrics and SDG alignment, norms-based screening, climate and social metrics, as well as SFDR Principal Adverse Impact (PAI) indicators. The sustainability data in the dashboard supports investment decision-making, target setting for stewardship activities and monitoring of companies' progress.

As part of the fundamental CRA process, Impax monitors companies' performance on the **SFDR PAI indicators**, especially for those strategies subject to SFDR, included in the KSI dashboard. Substantive underperformance on PAI indicators relative to respective sector averages are flagged in the "Portal", Impax's research and data platform.

3. **Stewardship – engagement and proxy voting**[4]

We view engagement as an important part of the investment process for listed equities, it is informed by the Corporate Resilience Analysis, (CRA). We engage with companies when we have identified **bottom-up company specific** sustainability issues or concerns, when we require further information regarding material sustainability issues that are not publicly disclosed and/or to encourage improvement in companies' policies, processes and disclosures. Companies' responses to engagements can also be highly informative of company character. Impax regularly collaborates with other investors and partners on engagements. Each year we also prioritise companies for engagement on critical **top-down priority themes**.

We engage with company management teams as part of regular meetings or through additional conference calls, meetings or email exchanges. Increasingly, expert organisations also drive and coordinate investors' engagements on important issues and Impax takes part in these.

We maintain an **engagement database** where engagement issues, objectives, actions, dates and outcomes are detailed. We review the status of our engagement dialogues regularly and follow up with companies or issuers as appropriate. Engagement is a process that often extends over years: as a long-term partner, Impax encourages companies to adopt best practices, improve disclosures and transparency, with topics continuously evolving, which improves overall corporate resiliency over time.

In cases where engagements are not progressing as anticipated, we will utilise our **escalation policy**, which includes seeking meetings with alternative contacts at investee companies, including board directors, seeking engagement together with other shareholders, combining policy advocacy with company engagement in so called "systematic engagements" and filing or co-filing shareholder resolutions.

Proxy voting is a key component in the ongoing dialogue with companies in which we invest. Through implementation of our voting policy and guidelines[5], we aim to enhance the long-term value of our shareholdings, foster corporate governance best practices and promote sustainability, accountability and transparency.

Our policy is to vote on all shares held where practicable. Our voting decisions are informed by our interpretation of corporate governance codes and best practice as well as external and internal sustainability and governance research, as described in the Impax Proxy Voting Guidelines.

Impax discloses a more detailed proxy voting policy and a quarterly summary of proxy voting records on the Impax website as part of our commitment to the UK Stewardship Code. The Impax Proxy Voting Guidelines and voting decisions are disclosed on the Impax website.

Systematic listed equity strategies: We have developed two proprietary rating frameworks that employ a quantitative approach to Corporate Resilience assessments for our systematic strategies. These frameworks are incorporated into portfolios that use quantitative optimization tools to manage risks relative to market benchmarks and target desired tilts in characteristics. These tilts involve integration of internal sustainability tools and ratings and external, third-party data and ESG ratings systematically alongside financial factors in portfolio construction through optimization.

1. Impax Gender Leadership Score: The Gender Leadership Score is a proprietary framework of gender leadership factors used to determine the constituents and weights of a global investment strategy designed to capture investment returns associated with gender diversity and women's leadership.

2. Impax Systematic Corporate Resilience Rating: The Systematic CR Rating is a proprietary, relative ranking framework designed to capture information regarding a company's management and performance related to material issues impacting companies' resilience. The framework is used to determine the constituents and weights in systematic portfolios.

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[4] *A detailed Stewardship Policy can be found on the Impax website*
[5] *Impax Proxy Voting Guidelines 2026*

Engagement and proxy voting are important parts of the investment process for Impax's systematic strategies and follow the same principles and guidelines for stewardship as the active listed equities.

IMPAX SUSTAINABILITY FRAMEWORK – FIXED INCOME

The Impax Fixed Income Sustainability Framework - three key components:

1. **Fixed Income Sustainability Tier System (sector-level)**
   Impax uses a proprietary Fixed Income Sustainability Tier System. This classification system uses proprietary inputs, including the Impax Sustainability Lens, to help categorise each fixed income sector (activity) into one of five tiers based on alignment with the transition to a more sustainable economy (TSE), with a focus on sustainability risks.

2. **Fixed Income Issuer Resilience Analysis (IRA) (issuer-level)**
   Impax has developed a proprietary Fixed Income analytical methodology to identify environmental, social and governance issues that have the potential to affect credit quality, with an emphasis on risk management.
   The key sustainability indicators (KSIs) and scoring framework used in this research and analysis are important components of Impax's proprietary and repeatable fixed income investment process.

3. **Stewardship & Issuer Engagement**
   Engagement is an important tool in monitoring and managing risk, and for influencing, encouraging and supporting investee companies and issuers to develop enhanced structures, processes and disclosures. There are similar drivers for engagement sourcing and prioritisation in fixed income, as for equities, i.e. engagements can be bottom-up, company and issuer-specific, top-down, based on themes, collaborative with other investors and/or organisations as well as systematic, combining policy advocacy and issuer-specific engagements.

   Fixed income-specific engagement priorities:
   - Company-specific risks (from the Impax proprietary FI IRA, especially those with weaker ratings)
   - Sector-specific risks - Tier 4 issuers (higher risk and hard to transition sectors)

Credit analysts at Impax are responsible for the integration of fundamental credit and issuer resilience analysis and related issuer engagement. Impax views the integration of financial, sustainability and resilience analysis as critical for the effective inclusion of sustainability risks in the company valuations and in the investment process. Members of Impax's Sustainability Centre provide insights and advice to the credit analysts, as well as oversight of investment-related sustainability risks and characteristics of issuers and portfolios through the Fixed Income Risk Committee (FIRC).

IMPAX MEMBERSHIPS:

Impax works collaboratively with peers and industry organisations[6] to support and expand sustainable investment practices. Current memberships are described on Impax's website.

Further important information with respect to proxy voting, collaboration and engagement

Impax exercises its proxy voting rights and conducts its global stewardship activities on an independent basis on behalf and in the best interests of its clients, in accordance with Impax investment policies regarding good corporate governance practices applicable for all investee companies and not to foster a control transaction for any particular company. The application of these policies is predicated on the acquisition and ownership of securities in the ordinary course of business and were and are not acquired or held for the purpose of and do not have the effect of changing or influencing the control of the issuer of such securities, and such securities were and are not acquired in connection with or as a participant in any transaction having such purpose or effect.

Where Impax participates in collaborative engagement activities with other shareholders it does so on an independent basis and in accordance with its own policies. The purpose of such collaborative engagements is to facilitate an independent and

[6] *While Impax may consult with other market participants on certain engagement efforts, Impax unilaterally determines whether and to what extent to engage with other stakeholders and all of Impax's investment decisions are independent and based on its own, unilateral strategy for maximizing return on investment.*

free exchange of ideas and views among shareholders that relate to seeking improvement of the long-term performance of investee companies and/or changes in investee company practices, without the purpose of acquiring, holding or disposing of securities to effect or influence a change of control in investee companies or as a participant in any transaction having such purpose or effect.

While Impax may consult with other market participants on certain engagement efforts, Impax unilaterally determines whether and to what extent to engage with other stakeholders and all of Impax's investment decisions are independent and based on its own, unilateral strategy for maximising return on investment.