

# ESG DUE DILIGENCE POLICY

TRIUM CAPITAL LLP

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## Background

This Policy has been drafted as required by the Regulation (EU) 2019/2088 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 27 November 2019 on sustainability-related disclosures in the financial services sector (“SFDR”) financial market participants and are required to act in the best interest of end investors, including but not limited to, the requirement of conducting adequate due diligence prior to making investments, provided for in Directives 2009/65/EC, 2009/138/EC, 2011/61/EU, 2013/36/EU, 2014/65/EU, (EU) 2016/97, (EU) 2016/2341, and Regulations (EU) No 345/2013 and (EU) No 346/2013.

In order to comply with their duties under those rules, financial market participants should integrate in their processes, including in their due diligence processes, and should assess on a continuous basis not only all relevant financial risks but also including all relevant sustainability risks that might have a relevant material negative impact on the financial return of an investment or advice. Therefore, financial market participants and financial advisers should specify in their policies how they integrate those risks.

## Scope

This Policy applies to Trium Capital LLP (“TCL” or the “Firm”) in its capacity as a financial market participant, i.e. an investment manager.

## ESG Due Diligence

In the investment due diligence process, the Firm must consider the principal adverse impacts, whether material or likely to be material, of investment decisions on sustainability factors. Sustainability factors as defined by SFDR are as follows:

- environmental,
- social and employee matters,
- respect for human rights,
- anti-corruption and
- anti-bribery matters.

Consequently, each Portfolio Manager (“PM”) shall consider any principal adverse impacts of investment decisions on sustainability factors, as part of their investment due diligence process. Each PM shall account for the considerations listed above in the monthly Trium Investment Committee (“TIC”) meeting. The purpose is for the Firm to demonstrate how it discharges its sustainability-related stewardship responsibilities. In particular PMs must account for any material adverse impacts.

The consideration of sustainability factors shall be:

- noted as a standing agenda item at each TIC; and
- minuted in each TIC meeting.

## Policy Review

This Policy shall be reviewed on at least an annual basis and approved by the Trium Executive Committee (“TEC”).

## Glossary

- ‘sustainability risk’ 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 the investment;

- 'sustainability factors' mean environmental, social and employee matters, respect for human rights, anti-corruption and anti-bribery matters.