
PURPOSE AND SCOPE

This Policy outlines Montaka Global Pty Ltd.'s ("Montaka") overarching philosophy as it relates to Responsible Investment (RI) and how it seeks to incorporate environmental, social (including labour standards), ethical and governance considerations ("ESG") into the investment process.

This Policy applies to all portfolios managed by Montaka.

PHILOSOPHY

Montaka recognises that ESG considerations can influence the long-term performance, resilience and valuation of businesses. We consider ESG considerations where we have determined they are relevant to understanding the durability of a company's competitive position, the quality of its management and governance, or the risks and opportunities that may shape future financial outcomes.

ESG considerations are determined by Montaka on a case by case basis. By way of example these may include (but are not limited to):

- Environmental factors – greenhouse gas and energy efficiency considerations;
- Social – use of child and slave labour, and predatory lending; and
- Governance – Board independence and conflicts of interest with related parties

Montaka does not have a predetermined view about how far ESG considerations will be taken into account when selecting, retaining and realising investments for the Fund, nor does it apply a fixed ESG scoring methodology across investment opportunities. Instead, Montaka incorporates ESG considerations into its research and decision-making when they are assessed to be financially material, meaning they may reasonably be expected to affect a company's financial position, financial performance, cash flows, access to finance or cost of capital over the short, medium or long term.

ESG INTEGRATION

At Montaka, ESG considerations are integrated into our investment process in a manner that is data-informed and focused on materiality. We recognise that ESG factors can influence long-term business performance and risk profiles, and approach ESG evaluation through the same lens as all fundamental research – grounded in facts, relevance and impact on long-term value. While we do not apply rigid ESG scoring or criteria, we consider ESG topics that are most relevant to the companies, sectors and geographies we cover, including where regulatory, operational or governance risks may affect business outcomes.

In practice:

- We periodically review ESG themes for each holding or area of focus, including emerging regulatory developments, stakeholder expectations, governance practices and company-specific risks or opportunities.
- Where ESG considerations are expected to be financially material, we reflect those effects directly into our valuation models (e.g., regulatory changes influencing tax, compliance or cost structures; governance affecting capital allocation; social/environmental factors affecting long-term demand etc.)

All financially material ESG considerations, whether identified through analyst review, company disclosures or external research are recorded in our investment research materials. This documentation supports consistency, transparency and traceability in our research process.

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EXCLUSIONS

There are certain activities that Montaka has chosen not to invest in and applies formal exclusions to avoid business involved in these activities. Montaka excludes from its portfolio opportunity set businesses that it determines are directly involved (i.e. 10% of net revenue, or greater) in the manufacturing of tobacco.

These exclusions apply only to Montaka's long portfolios.

Montaka utilises third party data vendors to screen companies according to the criteria set forth above. These vendors use company-reported revenue (where available) and estimates to determine revenue based levels of involvement. In limited cases, Montaka may override the exclusion if, after further review and due diligence, Montaka considers it is able to objectively substantiate that a company does not qualify for exclusion.

If an existing holding subsequently meets an exclusion threshold (ie due to the acquisition of a company), Montaka will sell down the holding within 3 months of identification.

ENGAGEMENT

Montaka exercises proxy voting rights for applicable holdings in accordance with our established Proxy Voting Policy. Our objective in voting proxies is to support the long-term interests of our investors. Montaka does not undertake proxy voting with the intention of influencing portfolio investee companies' ESG policies, nor do we target specific ESG outcomes through stewardship activities. While proxy voting forms part of our overall governance approach, it is not used as a tool for ESG advocacy. Montaka's Proxy Voting Policy is available at [link](#).

GOVERNANCE OF THE POLICY

Montaka's Chief Investment Officer is responsible for this Policy. Updates to this policy will be reviewed and approved by the Board of Montaka.