Sustainability Policy

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1. Our investment approach.

Based on our knowledge and experience, our investment team is committed to finding valuable assets in global capital markets and turning them into compelling investment strategies. Over the years we have developed our investment process, to ensure the ability to respond effectively to the opportunities and challenges of the different phases of the economic cycle while remaining faithful to our investment philosophy.

The three pillars of our philosophy are constant search for value, active risk taking and disciplined risk management.

2. Background and Disclaimer

BIS Blueport Investment Services Ltd (the ‘’Company’’) is gradually integrating Environmental, Social and Governance (ESG) metrics, KPIs, considerations and objectives into its investment process in different asset classes with the goal to minimize risks, improve financial returns and at the same time have a quantifiable improved ESG footprint.

Focusing on ESG performance helps us reduce risk and enhance value for our stakeholders & investors. Effective governance, ethical business conduct and support for our employees underpin both our business success and our approach to sustainability. Our firm’s core values guide our sustainability strategy to deliver results today while doing our part to contribute to a sustainable future.

This is a long-term process that may affect assets allocation, assets valuation, risk assessment and eventually returns. The Company developed this ESG Investment Policy and Strategy, which was integrated in its investment principles, with an aim to build a reliable policy and strategy for responsible investments, to adapt to forthcoming regulatory requirements as set by the EU Sustainable Finance Legal Framework (known as EU Taxonomy) and to minimize risks and maximize portfolio returns in the long-term.

In accordance to the Articles 3 and 4 of the Regulation of the European Parliament and of the Council on disclosures relating to sustainable investments and sustainability risks and amending Directive (EU) 2016/2341 [COM (2018) 354], an abstract of this ESG Investment Policy is available to all interested stakeholders, on the official website of the Company and will be updated as and when needed without notice in due time and course.

3. Being Responsible Investors

The Company aims to contribute to well-functioning markets and good corporate governance. We recognise a set of international standards and contribute to their further development. We believe that standards provide consistency across markets and raise the bar for all companies. For example, economic activity in one sector can impose considerable indirect costs on other sectors and society as a whole.

Our aim is to find companies that can deliver growth and positive sustainable impact to the society. We argue that the core of ESG investing as an investment discipline is all about time frame, specifically the long term. If a company effectively invests in its own structure, its people and its community, that company's long run performance will improve. The continuous monitoring of our investments and assessment of sustainability issues are part of our risk management and investment decision process, always by collaborating with investors and other stakeholders to advance standards, increase the information available and promote responsible practices.

4. Sustainability is part of our investment DNA

Environmental issues have always been parts of our investment philosophy and way of thinking and investing. For this reason, ESG research is included in the work of our portfolio manager(s) rather than employing a separate ESG research team. We believe that the most effective way to integrate ESG factors into an investment process over the long term is for investment teams themselves to research ESG factors and consider them alongside other inputs into the investment process. We believe that is important in our work to understand global trends that could affect long-term creation of financial value for our investments.

5. We take a stance on ethical issues by imposing absolute exclusions

There are some companies that we will not consider engaging in. Typically, this is where they are involved in business activities that are deemed unethical, harmful to society, or in breach of laws or regulations. We exclude these companies from our investment universe absolutely for sustainability or ethical reasons.

6. Our process

Blueport has adopted a six-stages process to implement an efficient investment policy and strategy. The result of this procedure is a well-structured process, which will allow the company to fully integrate ESG investing metrics:

i. Identification of risks/opportunities and analysis of ESG metrics integrated into the investment policy.
ii. Realignment of the vision, mission, policy and strategy to the extent of Company's fiduciary duty.
iii. Incorporating the six Principles for Responsible Investments (PRI) into the investment process.
iv. Combination of financial fundamental analysis with ESG assessment per asset class.
v. Systematic and explicit exclusion of material ESG factors into investment analysis and investment decisions.
vi. Planning and continuous monitoring of ESG policy.

7. ESG Investment Policy

Blueport's ESG Investment Policy:

i. Excludes specific sectors either absolutely or conditionally or specific companies with severe controversies or incidents
ii. Positive and Negative ESG screening depending on the impact on ESG material factors and scores with the aim to produce positive risk-adjusted returns on investments.
iii. Applies ESG generic criteria.

The Company has integrated the analysis of ESG Scores and the use of ESG filters into the investment process for Mutual funds on discretionary mandates, since such data, are widely available. Advisory mandates, cash and cash equivalent are excluded from our ESG Investment Policy and Strategy.

7.1 Defining ESG Investing according to UN PRI Definition

ESG Investing Definition:

The United Nations Principles for Responsible Investments (PRI) defines responsible investment as a strategy and practice to incorporate environmental, social and governance (ESG) factors in investment decisions and active ownership.

A central feature of ESG metrics is the identification of significant Environmental, Social, Governance KPIs at securities or funds as targets of investment (the combination of which reflect Risks and Opportunities) to take them into account by the design and implementation of the investment strategy in which the portfolio manager is going to invest.

In this context, Company's ESG policy establishes the exclusion framework and approach towards investments in sensitive sectors based on the ten principles of the United Nations Global Compact and the sectoral policies of the company. The United Nations Global Compact (www.unglobalcompact.org) is a globally recognized common framework that applies to all industrial sectors. Companies which violate one or more of these principles are excluded from the investments of the managed portfolios, and those for which a risk of non-compliance exists are closely monitored, or even excluded, where applicable. Companies that do not comply with the principles are excluded. The sectors concerned include (but are not limited to):

i. **Controversial Weapons**: weapons that are either banned, as their production and use is prohibited by international legal instruments or considered controversial because of their indiscriminate effects and harm that they may cause on human population. These include weapons of mass destruction (chemical, biological, blinding laser weapons, weapons with nondetectable fragments), depleted uranium ammunition and armour, anti-personnel mines, and cluster bombs.
ii. **Tobacco** (conditionally if they have more than 80% of the revenues from the sales of cigarettes/cigars. Companies that sell only electronic cigarettes could be included,

provided that sustainability actions mitigate the negative impacts and sound corporate responsibility policies are in place).

iii. **Casinos** (conditionally if they have more than 35% of the revenues from the sales).

iv. **Adult Entertainment related products**.

8. Integration of ESG into Investment Analysis

The Company approaches ESG integrations with the below Investment Strategies:

i. Negative Screening –Absolute & Conditional – (Exclusion ESG Strategy).

ii. Positive ESG Screening.

iii. Norms-based Screening (Norms based ESG Strategy).

When the Company will be assessing the ESG factors, it will rely on information from external data providers, and although a qualitative review is to be performed, the Company cannot be responsible for the accuracy of this data. Therefore, the Company does not, at the present time, consider the adverse impact of sustainability factors in its investment decisions or investment advice for the portfolio strategies it currently manages. Principle adverse impacts are, either not relevant now, or there is currently not available, accessible, relevant and comparable data to perform the adverse impact assessment.