

Shareholder Engagement Policy

1. Introduction

Under the European Shareholder Rights Directive II, the Company is required develop and publicly disclose an engagement policy that describes how it integrates shareholder engagement in its investment strategy. As a self-managed UCITS investment company authorised in accordance with Directive 2009/65/EC, the Company is an asset manager and has adopted this policy in accordance with the SRD.

This policy seeks to describe how the Company integrates shareholder engagement in its investment strategy and how the Company monitors investee companies in respect of relevant matters as set out below.

This policy will be available free of charge on Cantor Fitzgerald Ireland Ltd.'s (the "Investment Manager") website at <https://www.cantorfitzgerald.ie>

2. Integrating Shareholder Engagement in Investment Strategy

In general, the Companies shareholder engagement activities involve exercising voting rights on behalf of investors. This is carried out by the Investment Manager as it is the Investment Manager who places trades in respect of the assets of the Sub-Fund.

The investment objective of the Fund is to achieve long term capital appreciation through investment in ethically and ecologically oriented and socially sustainable stocks. For this purpose the Fund will only invest in stocks which are included in the NAI Index. To be admitted to the NAI Index a stock has to meet a number of selection criteria which were developed by experts with a demonstrable competence in ethically, socially and ecologically conscious investments and the respective evaluation of companies, products and processes. The Investment Manager is of the opinion that these criteria afford the reassurance that a fund which draws upon the NAI Index as its investment universe will be investing in ethically, ecologically and socially sound stocks.

3. Monitoring Investee Companies on Relevant Matters:

The Company shall, to the extent determined appropriate by the Company and having regard to, among other things, the Investment Strategy and the nature and size of its exposure to the relevant investee company, monitor the investee company's approach towards matters such as the investee company's business strategy, financial and non-financial performance and risk, capital structure, and social, environmental impact and corporate governance. The Company may base such monitoring on a variety of sources and mechanisms including, without limitation:

- (i) reviewing financial and non-financial information such as annual reports, financial statements and public announcements released on the relevant regulated market by the investee company, and
- (ii) considering third party analysis of the investee company, wider market developments and competitors of the investee company.

4. Conducting dialogues with Investee Companies:

In general, the Investment Manager will not engage in direct dialogue with investee companies, however, where a substantial share interest is held, engagement will be considered.

5. Engagement with investee companies:

The Company may, at its discretion and having regard to the Investment Strategy, engage with the investee company when the Company has concerns about any of the relevant matters.

6. Exercising Voting Rights and other Rights Attached to Shares :

The Investment Manager may exercise voting rights on behalf of the Company. The Investment Manager may, on behalf of the Company, engage a suitable provider of proxy voting advice and administrative services to assist in discharge of its obligations. The Investment Manager currently use the "Sustainability" voting guidelines, developed specifically to meet the standards consistent with the United Nations Principles for Responsible Investment (UNPRI).

The Sustainability policy approach uses ESG risk indicators to identify ESG risk factors in public companies. These ESG risk indicators cover topics including the environment, human rights and impacts of business activities on local communities, labour rights and supply chain risks, consumer product safety, bribery and corruption, and governance & risk oversight failures.

7. Records and disclosure

The Investment Manager directly or through the selected provider is responsible for tracking all proxies and receives feeds from client custodians. A record of all proxy votes and information relevant to such votes is to be maintained and reports on proxy voting activities are available upon request. The reports include a summary of voting activity, with details such as the percentage of all votes where the Investment Manager voted against management, but also lists every ballot voted on including the management recommendation, voting instruction, and voting rationale.

8. Management of actual and potential conflicts of interest

Where conflicts arise as between a policy and another policy, procedure of or role with the Company, the outcome will be managed according to the Conflicts of Interest Policy and the Connected Party Transaction Policy of the Company.

The Conflicts of Interest Policy of the Company is in accordance with the UCITS Rules which identifies, the circumstances which constitute or may give rise to a conflict of interest entailing a material risk of damage to the interests of the Company. Further the Company has adopted a Connected Party Transaction Policy which require that any transaction carried out with a "connected party" of the Company must be: (a) conducted at arms' length; and (b) in the best interests of shareholders in the Company. A "connected party" includes the Company's investment manager and depositary, the delegates and sub-delegates of the Investment Manager and Depositary, and any associated or group company of the foregoing.

9. Annual disclosure on implementation of this policy and review of policy

The Company shall, to the extent required by applicable law and regulation, disclose on the Investment Managers website at <https://www.cantorfitzgerald.ie> and/or by other means, on an annual basis:

(a) how it has implemented this policy, including a general description of voting behaviour, an explanation of the most significant votes and where applicable the use of services of proxy advisors; and

(b) how it cast votes in the general meetings of investee companies. Such a disclosure may exclude votes that are insignificant due to the subject matter of the vote or the size of the holdings in the investee company.

10. Review

The board of directors of the Company and the relevant Designated Person(s) will review this policy, as appropriate and on at least an annual basis.