



Responsible Investment Policy



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Introduction

Cantor Fitzgerald Ireland (“CFIL”, “the Group”) recognises sustainability as an important tool in determining the long-term capital growth prospects of investment propositions. The diverse nature of companies in the Group has brought together more than 30 years’ experience in the field of responsible investing. Today, environmental, social and governance (ESG) factors are synonymous with better managed companies and are a path to achieving better risk-adjusted returns.

The Sustainable Development Goals (SDGs)

We use the guidance of the SDGs in many of our processes to understand the interconnected challenges of sustainable development and the urgency behind each goal. The Sustainable Development Goals are a collection of 17 interlinked global goals agreed as an international framework of reference that addresses the most pressing challenges of sustainable development. The SDGs were agreed in 2015 by the United Nations General Assembly and are intended to be achieved by the year 2030.



Scope

This document describes how CFIL integrates sustainability risk into investment decisions and advice as well as financing activities. Where clients in our fixed income and equity trading and brokerage activities make their own investment decisions, they fall outside the scope of our sustainability policies.

As sustainability risk evolves over time, CFIL will periodically review and update our sustainability risk policy, procedures, and practices.

Policy Governance

We have a dedicated groupwide ESG Committee responsible for overseeing the implementation of this policy. The committee is composed of members of our compliance and Sustainability and Responsible Investing (SRI) teams. The ESG Committee works in close collaboration with all staff members and teams managing ESG risks and opportunities and reports directly to our Head of Compliance. Our marketing team works with all investment teams and SRI manager in communicating our responsible investment approach and reporting to relevant stakeholders through periodic reporting, conferences/webinars, etc.



Compliance with this policy is reviewed annually via internal reporting, monitoring, and client engagement.

Our Core Values

Professionalism: We strive for excellence in everything we do and set high standards for the manner in which we interact with clients and our peers.

Sustainability: We think long-term and challenge ourselves to improve continually our understanding of the interconnections and interdependency among environmental, social, and economic systems.

Integrity: We set and live up to high standards of ethical behaviour and corporate responsibility.

Service: We put our clients at the centre of everything we do and create solutions designed to help them meet their goals and risk needs.

Sustainability in Investing, Advisory and Financing Activities

Sustainability considerations are an important part of our offering. With over 30 years' experience delivering investment solutions that minimise sustainability risk, we have long acknowledged sustainable development as the way forward for our future. Our product approval committee ensures any product labelled as ESG has undergone the relevant due diligence before its approval. This approach ensures clients can achieve both their financial and sustainability objectives with products that meet their needs.

Whether we are acting in the role of asset manager, financial advisor or in corporate finance, at the core of our responsible investing approach we aim to reduce risk, create value for investors and support companies that make a positive contribution to the world.

Asset Management

Environmental, social and governance (ESG) issues inform our investment decision as we target sustainable long-term returns. The integration of ESG factors is therefore one component alongside other considerations in the investment process such as valuation, macroeconomic factors, and financial analysis to name a few. We subscribe to third party ESG research to identify leaders and laggards in ESG. We engage directly with companies when possible and use a number of public and industry ESG research sources. We utilise the expertise of our Tracker Quant team in the wider Global Cantor Group ("Cantor Global") to assist us in identifying emerging trends in ESG themes.

We use a range of sustainability strategies such as exclusionary screening, best in class, thematic approach, and impact investing to suit different investor profiles and their diverse sustainability concerns. How strategies are integrated into the investment process depends on the nature of the product/fund, and our due diligence policy provide further guidance on how we manage sustainability risk at product level.

Proxy Voting

We have engaged Institutional Shareholder Services Ltd (ISS), a leading, independent provider of proxy voting advice and administrative services to assist us in exercising investors' shareholder voting rights. ISS provide voting recommendations to CFIL, based on a pre-agreed set of policy guidelines (reviewed annually). We currently use the ISS "Sustainability" voting guidelines, which was developed specifically to meet the standards consistent with the United Nations Principles for Responsible Investment (UNPRI).



The ISS 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.

Wealth Management and Advisory Services

For our wealth management discretionary services to clients in respect of listed shares, we generally do not actively monitor ESG data; however, the portfolio managers have access to ESG data to inform their decision-making. The portfolio managers may also arrange with clients to include specific investment restrictions that relate to ESG issues. How such exclusionary strategies are implemented is explained in our sustainability due diligence policy.

We are committed to the continuous improvement of our capabilities and knowledge in areas of sustainability investing. This enables us to provide relevant investment advice and create products that deliver a competitive performance, and meet various investor needs and objectives in ESG. Training sessions on sustainability topics are arranged regularly and attendance is mandatory for all relevant teams. We are also committed to supporting clients' understanding of ESG issues related to our products and services. Podcasts and webinars on topics of sustainability with subject matter experts are organised for all clients and staff.

We engage with external asset managers and hold them to the highest standard in relation to their processes and procedures in responsible investing practices. For our ESG offering, we follow a detailed due diligence process with regards to investment manager selection, appointment, and monitoring.

Corporate Finance

Within private markets, we engage with clients and potential clients on environmental, social and governance matters to increase our understanding of the risks and opportunities they face in their industry and as an organisation. We focus on understanding the positive impact that companies can generate through their activities and review any potential deal against our own in-house positive impact score. We endeavour to develop and supply products that support sustainable development and map all deals against the SDGs.

Investing in themes of sustainable development is the path to resilient growth. We monitor companies on ESG factors and promote adherence to quality standards that can help them achieve excellence in the management of sustainability risks.

Collaboration and Industry Engagement

We engage with a wide range of stakeholders to advance the ESG agenda across all asset classes, from policymakers on issues of sustainable finance to government stakeholder groups advancing the Sustainable Development Goals (SDGs). We are founding members of the Sustainable & Responsible Investment Forum (SIF) Ireland, the national platform for policy makers, capital providers and intermediaries to advance the sustainable finance and ESG agenda across all asset classes. the Group's Sustainability and Responsible Investor desk continuously reviews this space and will facilitate engagement with investor initiatives when appropriate.

Transparency and Disclosure

We expect transparency from the companies in which we invest because our investment decision should always be based on the best available data, and sustainability data plays a key role. In the same



way, we commit to be transparent and to disclose our policies on how we integrate responsible business practices and follow through on the commitments we make in these policies.

A significant proportion of our clients have sustainability as one of their objectives and we report to them at least annually on the impact their investments have on sustainability issues. We use third party ESG data providers, as well as our own impact calculations based on data provided by external managers. We follow the guidance of the Sustainable Development Goals (SDGs) to help clients understand how their investments address pressing issues of sustainability in the world.

Managing Conflicts

We take all reasonable steps to identify conflicts of interest. We manage any conflict of interest so that it does not create any material risk of damaging the interests of our clients. Conflicts are prevented or managed through internal controls within the Group. The Group's summary policy on conflicts of interest can be accessed at the following [link](#). We review this policy on an annual basis to ensure it remains relevant and up to date.