



RESPONSIBLE INVESTMENT POLICY

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1. INTRODUCTION

1.1 Definitions

CFIL: Cantor Fitzgerald Ireland Ltd.

ESG: Terminology used in investing that sets specific criteria for assessing how companies address environmental, Social and Governance risks and opportunities.

SDGs: Sustainable Development Goals

SFDR: Sustainable Finance Disclosure Regulation (2019/2088/EU).

SRI Team: The Sustainability and Responsible Investing team.

Sustainability: Ability to maintain a balance of healthy environmental, social, and economic systems.

Sustainable Development: Economic growth that happens without the depletion of natural resources while meeting human development goals.

Task Force on Climate-Related Financial Disclosures (TCFD): An industry-led task force, established by the FSB, charged with helping to identify information required by investors, lenders, and insurance underwriters to understand material risks in relation to climate change.

1.2 Overview and Objectives

Cantor Fitzgerald Ireland Ltd. (“CFIL”) recognises sustainability as an important tool in determining the long-term capital growth prospects of investment propositions. More than 30 years’ experience in the field of responsible investing has given us a deep understanding of the challenges faced by society and our planet, and of the opportunities that lie ahead. Today, environmental, social and governance (ESG) factors are synonymous with better managed companies, as it is rapidly becoming a strategic business imperative.

This policy meets the requirements of the Sustainable Finance Disclosure Regulation (SFDR) and will periodically be reviewed and updated to support SFDR and other regulations adopted in the development and implementation of the EU Action Plan on Financing Sustainable Growth.

1.3 Scope

This document describes how CFIL integrates sustainability risk into investment decisions and advice, as well as product distribution. Where clients in our fixed income and equity trading and brokerage activities make their own investment decisions (execution-only), 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.

2. MAIN BODY

2.1 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 SDGs 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.



2.2 Roles and Responsibilities

This policy requires Board and its sub-Committee review and approval. Compliance with this policy is reviewed annually via internal reporting, monitoring, and client engagement. The outcomes of this review are presented to the Executive Committee on an annual basis. Our ESG Steering Committee provides feedback on the implementation of this policy and includes members of our executive team, compliance, senior managers, and specialists in sustainable investing across Cantor Fitzgerald Ireland. The Sustainability and Responsible Investing (SRI) team works in close collaboration with all staff members and teams managing ESG risks and opportunities. Our marketing team works with all brokers and investment teams as well as the SRI team communicating our responsible investment approach and reporting to relevant stakeholders through periodic reporting, conferences/webinars, etc.

2.3 Our Core Values: **C-I-P-H-E-R**

Clients are at the centre of all we do. We are disciplined and work hard for our clients. We are honest, diligent, and accountable. Part of our business value is in our client relationships.

Integrity: acting with honesty. Bad things happen because good people do nothing.

Partnership: we value our business partners; establishing long term relationships with those that share our values.

Honesty: what you do when no-one is looking.

Entrepreneurial: our Group, global and local has its roots in entrepreneurial approaches. We are committed to our strategy. This requires patience and discipline in identifying and developing investment opportunities for our clients and for the Company. We encourage creative thinking: it fosters flexibility, resourcefulness, and entrepreneurial spirit.

Respect: each other, our clients, our brand. Building trust with colleagues takes time. Our business value is made up of our Clients and our People. Teamwork and a collegial environment are central to our culture. We recruit outstanding people who are able to grow with us; we embrace diversity. Many of our senior team leaders have worked with us for many years.

2.4 Sustainability Risks and our Responsible Investment Approach

Sustainability risk refers to the risk that environmental, social, and governance-related events can lead to a material negative impact on the value of an investment. The objective of this section is to provide an overview of key processes and control measures that ensure the correct integration of sustainability considerations into our investment decision and advisory practices. 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 asset class, strategy, and client sustainability preferences.

Recording clients' sustainability preferences is becoming part of the overall suitability process in advisory and portfolio management services. We have engaged a leading provider of behavioural finance software to help us understand, using jargon-free language, what our clients need when it comes to meeting sustainability objectives. This ensures information is presented in an easy-to-understand manner whilst providing us with key feedback on the sustainability preferences expressed by clients. This is an evolving area with significant challenges, such as the availability of suitable products, which remains limited in a number of areas of sustainability.

Whether we are acting in the role of investment managers, financial advisors or product distributors, 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. Below we describe key areas of the business impacted by our RI policy.

2.4.1 Investment Management and Advisory Services

We consider sustainability risks and opportunities as another component of the investment process alongside other considerations such as valuation, macroeconomic factors, and financial analysis to name a few. Our team of analysts review the daily macro and corporate landscape, to maintain a dynamic Analyst Conviction List of equity names along with other investment insights and opportunities. We endeavour to integrate ESG factors consistently across the organisation, however, investment teams will tailor their approach depending on asset class, strategy, and client sustainability preferences.

We subscribe to third party ESG research for the effective management of sustainability risks. We use quantitative and qualitative ESG data from MSCI ESG Research and Bloomberg to produce an informed view of a company's risks and opportunities. We use our own Cantor ESG scoring methodology to help us identify companies that are most exposed to severe risks of ESG. Companies which score poorly are

generally more exposed to ESG and reputational risks. The MSCI ACWI is our index of reference for our investable world.

For Article 8 and 9 products as defined by the SFDR, we follow clear guidelines for how these products meet these characteristics through both public disclosure and internal procedures. Securities included in Article 8 and 9 investment portfolios are assessed for good governance practices. This assessment is performed on an ongoing basis. How these securities help the product meet its environmental and social characteristics / sustainable investment objective, is described under the specific product disclosure on our website.

In addition, CFIL considers the principle adverse impacts of investment decisions on sustainability factors, further details of which are set out in our Sustainability Due Diligence Policy (add link when available).

2.4.2 Product Distribution

Our Investment Committee and Product Approval Committee ensure products presented to the Committee undergo relevant ESG due diligence before approval for distribution. All sales staff are provided with relevant training on the ESG characteristics of a product which has been categorised as suitable for clients expressing sustainability preferences. This approach ensures clients can achieve both their financial and sustainability objectives with products that meet their needs.

We are market leaders in the provision of structured investments to a wide range of investor groups, including personal, pensions, corporates, charities, and credit unions. Sustainability risk is assessed when selecting the financial institution issuing the product. Sustainability risks to which the issuing bank may be exposed are reviewed as part of our counterparty risk assessment process.

Corporate finance products, which provide funding solutions to companies at various stages of development, is another area of expertise within the wider Cantor Fitzgerald Ireland Group. ESG considerations are currently being integrated at the product origination level, before a product is presented to the Investment Committee and Product Approval Committee.

2.5 Training and Continuous Improvement

We are committed to the continuous improvement of our capabilities and knowledge in area 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 compliance with sustainable finance regulation as well as our sustainability policies are provided and attendance is mandatory for all relevant teams. We are also committed to supporting clients' and intermediaries' understanding of ESG issues by participating in discussion panels and educational presentations on ESG topics. Podcasts, webinars and other media are also organised on topics of sustainability for all clients and staff.

2.6 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. The Sustainability and Responsible

Investing team continuously reviews this space and will facilitate engagement with investor initiatives when appropriate.

2.7 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. We have adopted the TCFD recommendations as our preferred standard for managing and reporting climate-related risks and opportunities. In addition to disclosure requirements, the TCFD guidelines cover aspects of governance, strategy, risk management and metrics and targets related to climate risks.

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.

2.8 Managing Conflicts

We take all reasonable steps to identify conflicts of interest that may arise from the integration of sustainability considerations into our investment advice and portfolio management. 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 Cantor Ireland. The 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.