

RESPONSIBLE INVESTMENT POLICY V1.02

Effective 10 August 2021

Version	Author	Date	Change
V1.01	John Harbot	21/10/2014	<ul style="list-style-type: none">• Initiation of version control.
V1.02	John Harbot	10/08/2021	<ul style="list-style-type: none">• Document sector / activities that will be excluded from the Ubique investment Universe.• Remove references to Ubique Australian Share Fund.

BACKGROUND:

Ubique Asset Management Pty Ltd (“Ubique”, “We” or “Our”) is a boutique investment manager that focuses on managing Australian equity portfolios and unit trusts on behalf of wholesale investors. Whilst Ubique does not offer specialist ethical or sustainable investing portfolios, we believe:

1. That we have a duty to act in the best long-term interests of our unit holders & clients;
2. That environmental, social, and corporate governance (“ESG”) issues can affect the medium to long term performance of investment portfolios; and
3. If poorly managed, ESG issues have the potential to destroy shareholder value.

We therefore believe that it is in our unit holders & client’s best interest for Ubique to:

1. Consider ESG issues (including Climate Change & Modern Slavery), in our investment process;
2. Encourage high standards of corporate governance and responsibility in the companies in which we invest; and
3. Continually improve our understanding of ESG issues and best practices.

COMMITMENT:

Ubique became a signatory to The Principles for Responsible Investment Initiative (a partnership between the United Nations and global investors – known by the name UNPRI) in October 2012, and committed to align our practices to the six principles prescribed by UNPRI.

Specifically, we intend to:

1. Address ESG in our investment decision making process;
2. Actively exercise voting rights;
3. Where required, support shareholder initiatives to promote ESG disclosure;
4. Promote the acceptance of the six principles;
5. Work where possible with other signatories in implementing the principles; and
6. Report annually on our progress in implementing the principles.

RESPONSIBILITY:

The board of Ubique is ultimately responsible for the implementation of this policy.

Each company in which we have an investment will have an Analyst nominated as the primary person responsible for reviewing all company resolutions, recommending voting direction, and for the inclusion of ESG considerations within fundamental research.

Our Portfolio Manager is responsible for final voting and oversight of any engagement activities.

VOTING:

Our policy is to make reasonable endeavours to exercise our Investment Management Agreement (“IMA”) clients voting rights by proxy in all circumstances.

IMA CLIENT CONSULTATION:

The implementation of our voting policy is often subject to any instructions from IMA clients.

Where Ubique has discretion under an IMA, as a general rule Ubique will not seek direction from the client prior to it exercising a vote.

Where possible Ubique will endeavour to liaise with any client that has a substantial investment in an entity where an issue has become contentious.

Some clients from time to time will direct Ubique on specific issues and Ubique will implement that direction to the extent we are able.

RECORD KEEPING / REPORTING:

Ubique will keep a register of how proxy votes are exercised and will document the reason supporting any vote cast against or any abstention.

Information on how Ubique has voted on specific resolutions is available to clients on request.

Any non-compliance with an IMA client voting instruction is reported.

ENGAGEMENT:

Our policy is to make reasonable endeavours to engage the management of the companies in which we have invested where we believe that their ESG performance can be improved to either reduce the companies' risks or to enhance their valuation.

INTEGRATING ESG IN OUR INVESTMENT PROCESS:

We commit to integrate ESG into our investment process in two key ways:

1. We will include "no material ESG issues" ¹ as a quality filter in our assessment of whether a company is eligible to be included in our investment universe; and
2. We will consider ESG issues in selecting the multiples or discount rates we use in our valuation techniques.

EXCLUDED SECTORS:

In addition to the above ESG Integration in our investment process, as of 10 August 2021, Ubique will exclude companies that are involved in the following sectors / activities due to their impact on the Environment (through Climate change) and/or the health (including mental health / addiction) of our Society from our Investment Universe:

- Thermal coal mining, where this activity is > 25% of revenue;
- Gaming, including casinos, book-making, electronic gaming machine (EGM) operation, lotteries and on-line gambling;
- Manufacturing of EGM and/or Online gambling games; and
- The manufacturing of tobacco.

¹ To provide context, a material ESG issue is one which, in our opinion, **substantially** increases the risk of loss to our unit holders and clients. Historical examples include 1) the Board composition and accounting practices of ABC Learning Centres, 2) the corporate restructuring activities of James Hardie in 2001 to insulate the company from claims by asbestos victims (D.Jackson, QC Inquiry 2004); and 3) the AWB breach of UN sanctions under the 1995 approved 'Oil for Food' programme between June 1999 and March 2003 (T.Cole, QC Inquiry 2006).