



Responsible Investment Policy

Firm Statement

Aubrey is a specialist investment manager with a focus on long-only growth equity strategies. Founded in 2006, it is authorised and regulated by the Financial Conduct Authority in the UK and is registered as an investment adviser with the U.S. SEC.

Aubrey manages client assets in the Aubrey Global Emerging Markets Strategy, the Aubrey Global Conviction Strategy and the Aubrey Defensive Income Strategy. Aubrey also provides various investment solutions for private clients.

Aubrey has a duty to act in its clients' financial interests and responsible investment values are fundamentally linked to this duty. Aubrey supports the UK Stewardship code and is a signatory to the Principles for Responsible Investment ("PRI").

Research Statement: Aubrey Global Emerging Markets Strategy and Aubrey Global Conviction Strategy

Within the Strategies above, Aubrey bases its measures for ESG analysis on the United Nations Global Compact. This framework provides us with a foundation for assessing corporate sustainability where we focus our analysis on four themes:

- Human Rights: Companies should respect the internationally declared human rights laws
- Labour: Elimination of discrimination in the workplace as well as all forms of forced labour
- Environment: Encourage companies to develop and create initiatives that promote sustainability
- Anti-Corruption: Businesses should eliminate corruption in all forms including bribery

The Investment Team will assess sustainability criteria when studying companies, and positively engage with management where material risks are identified. Companies are analysed through a bespoke in-house framework, which assesses Environment, Social and Governance categories and calculates an aggregate score.

European Commission Sustainable Finance Disclosure Regulation (SFDR) Classification: Aubrey Global Emerging Markets Opportunities Fund

The Aubrey Global Emerging Markets Opportunities Fund ("The Fund"), a Luxembourg domiciled SICAV, is classified under Article 8 of SFDR, as a Fund that promotes social and/or environmental characteristics. The Fund promotes companies that make a positive contribution to ESG factors which focus on both quantitative and qualitative aspects such as financial transparency, legal, compliance, environmental aspects (including resource usage, supplier screening), social aspects (including the companies' health and

safety policies, Data and Cyber security infrastructure, philanthropic activities as well as the corporate culture), or governance aspects (including the companies' corporate governance policies).

Responsibility

The responsibility for the evaluation and documentation of sustainability research for each applicable investment is integrated within the investment research carried out by the assigned analyst. The process is overseen by the Sustainability Committee by way of at least quarterly meetings. The Sustainability Committee reviews and updates, where relevant, the ESG Methodology and monitors the progress of the ESG Score of companies. The Sustainability Committee reports and makes recommendations with respect to the implementation of the ESG Methodology.

Reporting

For our Global Emerging Markets Strategy, Aubrey produces an annual Sustainability Report which includes information on portfolio scoring, company examples and engagement case studies.

Related Policies

[ACM Policy on Cluster Munitions and Anti-Personnel Mines](#)

[Proxy Voting Policy 2024](#)

[Engagement Policy 2024](#)

[Stewardship Code Statement 2024](#)

[Investment Exclusion Policy](#)

For Additional Information, please contact:

Aubrey Capital Management
10 Coates Crescent
Edinburgh
EH3 7AL

Tel +44 131 226 2083

Approved by the Sustainability Committee May 2025