



Responsible investment policy

Our ambition

At Coeli Asset Management we believe that we have the power to make a difference and make changes towards a better and more sustainable society. A responsible investment is not only about return of investments but also considers the environment, social aspects and how companies are managed. Our ambition is to invest in companies that are proactive in the environmental, social and governance issues, also called ESG issues.

Our clients are to a larger extent looking for investments that are responsible and sustainable and we believe we can add value to our clients. As a provider of actively managed investments we have the possibility to influence the companies we are investing in.

Policy for responsible investment

Coeli Asset Management's policy for responsible investments is based on international norms for the environment, human rights, work conditions, and corruption. This means that we do not invest in companies that are violating these international norms and where a dialogue has not led to the desired result. Coeli Asset Management does under no circumstances invest in companies that are involved in production or sales of illegal weapons, such as cluster munitions and anti-personal mines, or nuclear weapons.

Coeli Asset Management has signed the UN's Principles for Responsible Investments (PRI) and applies these principles to ensure responsible investments.

UN's six Principles for Responsible Investments

1. We will incorporate ESG issues into investment analysis and decision-making processes.
2. We will be active owners and incorporate ESG issues into our ownership policies and practices.
3. We will seek appropriate disclosure on ESG issues by the entities in which we invest.
4. We will promote acceptance and implementation of the Principles within the investment industry.
5. We will work together to enhance our effectiveness in implementing the Principles.
6. We will each report on our activities and progress towards implementing the Principles.

Our approach

We expect that the companies we invest in apply to international norms and conventions. If a company violates these norms and conventions Coeli Asset Management initiates a dialogue with the concerned company to achieve changes in management and behavior. If a dialogue does not lead to desired impact Coeli Asset Management will sell its holding in the company.

We ensure our investments apply to norms and conventions by working in different ways:

- The fund managers monitor on a daily basis the holdings in the funds.
- The fund managers have face to face meetings with corporate executives to gain better understanding of a business operation and management.
- Coeli Asset Management has defined a Risk Committee which is headed by the CIO, Chief Investment Officer. The Risk Committee follows up on a regular basis if investments are responsible and sustainable.
- The holdings are screened by the external and independent organization ISS-Ethix. ISS-Ethix helps companies to audit companies from an ESG perspective.



Responsible investment policy - Appendix

The Ten Principles of the UN Global Compact is the international norm that works as a base for Coeli Asset Management's policy for responsible investments. This means operating in ways that, at a minimum, meet fundamental responsibilities in the areas of human rights, labour, environment and anti-corruption.

Human Rights

Principle 1: Support and respect the protection of internationally proclaimed human rights

Principle 2: Make sure that own company are not complicit in human rights abuses

Labour

Principle 3: Uphold the freedom of association and the effective recognition of the right to collective bargaining

Principle 4: Elimination of all forms of forced and compulsory labour

Principle 5: Effective abolition of child labour

Principle 6: Elimination of discrimination in respect of employment and occupation

Environment

Principle 7: Support a precautionary approach to environmental challenges

Principle 8: Undertake initiatives to promote greater environmental responsibility

Principle 9: Encourage the development and diffusion of environmentally friendly technologies

Anti-Corruption

Principle 10: Work against corruption in all its forms, including extortion and bribery