



PUBLIC TRANSPARENCY REPORT

2025

Montanaro

Generated 24-11-2025

About this report

PRI reporting is the largest global reporting project on responsible investment.

It was developed with investors, for investors. PRI signatories are required to report publicly on their responsible investment activities each year. In turn, they receive a number of outputs, including a public and private Transparency Report.

The public Transparency Reports, which are produced using signatories' reported information, provide accountability and support signatories to have internal discussions about their practices and to discuss these with their clients, beneficiaries, and other stakeholders. This public Transparency Report is an export of the signatory's responses to the PRI Reporting Framework during the 2025 reporting period. It includes the signatory's responses to core indicators, as well as responses to plus indicators that the signatory has agreed to make public.

In response to signatory feedback, the PRI has not summarised signatories' responses – the information in this document is presented exactly as it was reported.

For each of the indicators in this document, all options selected by the signatory are presented, including links and qualitative responses. In some indicators, all applicable options are included for additional context.

Disclaimers

Legal Context

PRI recognises that the laws and regulations to which signatories are subject differ by jurisdiction. We do not seek or require any signatory to take an action that is not in compliance with applicable laws. All signatory responses should therefore be understood to be subject to and informed by the legal and regulatory context in which the signatory operates.

Responsible investment definitions

Within the PRI Reporting Framework Glossary, we provide definitions for key terms to guide reporting on responsible investment practices in the Reporting Framework. These definitions may differ from those used or proposed by other authorities and regulatory bodies due to evolving industry perspectives and changing legislative landscapes. Users of this report should be aware of these variations, as they may impact interpretations of the information provided.

Data accuracy

This document presents information reported directly by signatories in the 2025 reporting cycle. This information has not been audited by the PRI or any other party acting on its behalf. While this information is believed to be reliable, no representations or warranties are made as to the accuracy of the information presented.

The PRI has taken reasonable action to ensure that data submitted by signatories in the reporting tool is reflected in their official PRI reports accurately. However, it is possible that small data inaccuracies and/or gaps remain, and the PRI shall not be responsible or liable for such inaccuracies and gaps.

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SENIOR LEADERSHIP STATEMENT (SLS)

SENIOR LEADERSHIP STATEMENT

SENIOR LEADERSHIP STATEMENT

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SLS 1	CORE	N/A	N/A	PUBLIC	Senior Leadership Statement	GENERAL

Section 1. Our commitment

- Why does your organisation engage in responsible investment?
- What is your organisation's overall approach to responsible investment, and what major responsible investment commitment(s) have you made?

For Montanaro Asset Management (“MAM” or “Montanaro”), being Responsible Investors means considering anything that may influence the long-term financial performance of our investments. Research supports our view that there is a positive correlation between how well a company manages issues in relation to ESG (Environmental, Social and Governance) and what we are ultimately concerned with: the long-term return for our clients. We believe that this approach will help to foster a more sustainable form of capitalism. Responsible Investment forms an integral part of how we think, behave and invest. ESG was first included in our investment process 20 years ago and today is firmly integrated within our approach. Every analyst at Montanaro is responsible for conducting ESG and impact analysis on the companies under their coverage.

The result is that our investment decision makers “do” sustainability analysis. All research is conducted in-house, including fundamental analysis and ESG research. We recognise that this is resource and time consuming, especially in SmallCap (small market capitalisation equity investments), where managers cannot rely on third-party research. It is for this reason that we have a large team of sector specialist analysts. Our Analysts are trained to analyse a company's finances; ESG data; and qualitative aspects of a business, such as management and other aspects of ESG. Every investment we make must adhere to our Ethical Exclusion Policy and pass our proprietary ESG Checklist, as part of our quality assessment to determine eligibility for our Funds.

Alongside thorough ESG analysis of investee companies, our impact strategy (the Montanaro Better World Fund) incorporates this approach to invest in companies providing solutions to the world's major problems, as defined by the UN Sustainable Development Goals (UN SDGs). We have made major responsible investment commitments as a company. Montanaro became a certified “B Corporation” in 2019, verified for meeting high standards of social and environmental performance, transparency, and accountability. This required an amendment to our Articles of Association to recognise the impact of our business on our stakeholders. We are also a Living Wage accredited employer and a signatory to the UK Stewardship Code, having been included in the first approved wave of signatories to the updated 2020 version of the Code. We have committed that by 2030, Montanaro will have removed from the environment all the carbon it has emitted from its own operations since its founding in 1991, and we aim to become carbon negative as a business by that date. In parallel, we are working towards achieving net zero across our financed emissions by 2050. We have also signed the Tobacco Free Portfolios Finance Pledge, reflecting our broader commitment to sustainability and long-term stewardship.

Section 2. Annual overview

- Discuss your organisation's progress during the reporting year on the responsible investment issue you consider most relevant or material to your organisation or its assets.
- Reflect on your performance with respect to your organisation's responsible investment objectives and targets during the reporting year. Details might include, for example, outlining your single most important achievement or describing your general progress on topics such as the following (where applicable):
 - refinement of ESG analysis and incorporation
 - stewardship activities with investees and/or with policymakers
 - collaborative engagements
 - attainment of responsible investment certifications and/or awards

Over the past year, MAM continued to make meaningful progress on the responsible investment issue most material to our firm: climate action. This focus is embedded in both our investment and operational practices. Progress on climate action: We strengthened our climate strategy by advancing both elements of our dual net zero commitment. By year-end, financed emissions (Scopes 1 and 2) across our in-scope portfolios had decreased 69% since our 2019 baseline. This significantly exceeded our annual 7% reduction target, aligned with the IPCC 1.5°C P2 pathway. In parallel, 40.5% of our Approved List companies had set or committed to Science Based Targets, ahead of our interim 2030 target. Operationally, we remain on track to achieve carbon negativity by 2030, supported by an emissions reduction target and investment in high-integrity carbon removal solutions via our partnership with Klimate. Refinement of ESG analysis and incorporation: During the year, we completed the implementation of our new ESG Checklist combining analyst insight with over 80 third-party data points, enhancing our investment research process.

We also updated our proprietary Impact framework to align with best practice and the UK's Sustainability Disclosure Requirements (SDR). Stewardship and collaborative engagement: Our stewardship programme expanded to include direct engagement on biodiversity and nature-related risks. We published a dedicated Nature Policy and joined the TNFD Forum, committing to early adoption. We contributed to CDP's UK Transition Plan Taskforce consultation and participated in the ShareAction LIPH Air Quality Working Group to support improved corporate air pollution disclosure. Collaboratively, we engaged with companies through the CDP Non-Disclosure Campaign and maintained our advocacy for a Global Plastics Treaty via the Ellen MacArthur Foundation and WWF coalition.

These efforts reflect our belief in the importance of systemic and cooperative approaches to sustainability challenges. Recognition and awards: Montanaro retained its B Corporation status with an improved score of over 105, reflecting stronger performance across all impact areas. We were recognised as ESG Company of the Year by the FT and Investors' Chronicle for the second consecutive year. In addition, the Montanaro Better World Fund was named "Best ESG Global Equity Fund" in 2024 by MainStreet Partners. These developments underscore our ongoing commitment to responsible investment and our determination to contribute meaningfully to the transition to a more sustainable global economy.

Section 3. Next steps

- What specific steps has your organisation outlined to advance your commitment to responsible investment in the next two years?

MAM has the following responsible investment priorities in the next two years:

- Climate action MAM will continue to pursue its dual climate goals: achieving net zero financed emissions by 2050 and becoming carbon negative in our operations by 2030. In the next two years, we will maintain our 7% annual emissions reduction target across in-scope portfolios, aligned with a 1.5°C pathway, and work to increase the share of assets under management exposed to companies with approved Science Based Targets. We will also expand our engagement efforts on Scope 3 emissions, encouraging more detailed transition planning and improved disclosures from investee companies.
- Collaborative engagement We will remain actively involved in collaborative stewardship efforts where they align with our sustainability priorities.

We aim to deepen our involvement in collaborative work focused on air quality, biodiversity and plastic pollution. Where relevant, we will look to engage directly with clients and industry peers to advance shared responsible investment goals.

- ESG and impact integration We will continue to refine the integration of sustainability factors into our investment process. Over the coming period, we intend to further enhance our internal research process to ensure consistency with evolving regulatory standards such as the UK Sustainability Disclosure Requirements and ISSB and update our proprietary impact analysis framework. Particular attention will be paid to incorporating new biodiversity indicators in line with our Nature Policy and emerging disclosure expectations. We will also continue to expand our use of external ESG and impact data to support risk management.

These steps reflect our commitment to continuous improvement and to the promotion of a more sustainable financial system.

Section 4. Endorsement

'The Senior Leadership Statement has been prepared and/or reviewed by the undersigned and reflects our organisation-wide commitment and approach to responsible investment'.

Name

Cedric Durant des Aulnois

Position

Chief Executive Officer

Organisation's Name

● A

'This endorsement applies only to the Senior Leadership Statement and should not be considered an endorsement of the information reported by the above-mentioned organisation in the various modules of the Reporting Framework. The Senior Leadership Statement serves as a general overview of the above-mentioned organisation's responsible investment approach. The Senior Leadership Statement does not constitute advice and should not be relied upon as such. Further, it is not a substitute for the skill, judgement and experience of any third parties, their management, employees, advisors and/or clients when making investment and other business decisions'.

○ B

Section 5. Additional Organisation Statements (Voluntary)

If you wish to do so, provide a document or link including information about any relevant legal or regulatory restrictions that apply to your responsible investment activities and how you comply with them.

<https://reporting.unpri.org/file/E5A956BB-EA42-4C0A-B374-880DD9647A5A/>

<https://montanaro.co.uk/wp-content/uploads/2025-Impact-Report-Montanaro-Better-Word-Fund.pdf>

OTHER RESPONSIBLE INVESTMENT REPORTING OBLIGATIONS (ORO)

OTHER RESPONSIBLE INVESTMENT REPORTING OBLIGATIONS

OTHER RESPONSIBLE INVESTMENT REPORTING OBLIGATIONS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
ORO 1	CORE	N/A	N/A	PUBLIC	Other Responsible Investment Reporting Obligations	6

During the reporting year, to which international or regional ESG-related legislation(s) and/or regulation(s) did your organisation report?

- (A) Corporate Sustainability Reporting Directive (CSRD) [European Union]
- (B) Directive on AIFM (2011/61/EU) [European Union]
- (C) **Enhancing climate-related disclosures by asset managers, life insurers and FCA-regulated pension providers (PS21/24) [United Kingdom]**
- (D) **EU Taxonomy Regulation [European Union]**
- (E) **Improving shareholder engagement and increasing transparency around stewardship (PS19/13) [United Kingdom]**
- (F) IORP II (Directive 2016/2341) [European Union]
- (G) Law on Energy and Climate (Article 29) [France]
- (H) **MiFID II (2017/565) [European Union]**
- (I) **Modern Slavery Act [United Kingdom]**
- (J) PEPP Regulation (2019/1238) [European Union]
- (K) **PRIIPS Regulation (2016/2340 and 2014/286) [European Union]**
- (L) Regulation on the Integration of Sustainability Risks in the Governance of Insurance and Reinsurance Undertakings (2021/1256) [European Union]
- (M) **SFDR Regulation (2019/2088) [European Union]**
- (N) SRD II (Directive 2017/828) [European Union]
- (O) The Occupational Pension Schemes Regulation on Climate Change Governance and Reporting [United Kingdom]
- (P) Climate Risk Management (Guideline B-15) [Canada]
- (Q) Continuous Disclosure Obligations (National Instrument 51-102) [Canada]
- (R) Disposiciones de Carácter General Aplicables a los Fondos de Inversión y a las Personas que les Prestan Servicios (SIEFORE) [Mexico]
- (S) Instrucciones para la Integración de Datores ASG en Los Mecanismos de Revelación de Información para FIC (External Circular 005, updated) [Colombia]
- (T) Provides for the creation, operation, and disclosure of information of investment funds, as well as the provision of services for the funds, and revokes the regulations that specifies (CVM Resolution No. 175) [Brazil]
- (U) SEC Expansion of the Names Rule [United States of America]
- (V) SEC Pay Ratio Disclosure Rule [United States of America]
- (W) ASIC RG65 Section 1013DA Disclosure Guidelines [Australia]
- (X) Circular to Licensed Corporations: Management and Disclosure of Climate-related Risks by Fund Managers [Hong Kong SAR]
- (Y) Financial Investment Services and Capital Markets Act (FSCMA) [Republic of Korea]
- (Z) Financial Instruments and Exchange Act (FIEA) [Japan]
- (AA) Financial Markets Conduct Act [New Zealand]
- (AB) Guiding Opinions on Regulating the Asset Management Business of Financial Institutions [China]
- (AC) Guidelines on Environmental Risk Management for Asset Managers [Singapore]
- (AD) Guidelines on Sustainable and Responsible Investment Funds [Malaysia]
- (AE) Modern Slavery Act (2018) [Australia]

- (AF) Stewardship Code for all Mutual Funds and All Categories of AIFs [India]
- (AG) ADGM Sustainable Finance Regulatory Framework [United Arab Emirates]
- (AH) JSE Limited Listings Requirements [South Africa]
- (AI) Other
- (AJ) Other
- (AK) Other
- (AL) Other
- (AM) Other
- (AN) Not applicable; our organisation did not report to any ESG-related legislation and/or regulation during the reporting year.

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
ORO 2	CORE	N/A	N/A	PUBLIC	Other Responsible Investment Reporting Obligations	6

During the reporting year, to which voluntary responsible investment/ESG frameworks did your organisation report?

- (A) Asset Owners Stewardship Code [Australia]
- (B) Código Brasileiro de Stewardship [Brazil]
- (C) New Zealand Stewardship Code
- (D) Principles for Responsible Institutional Investors (Stewardship Code) [Japan]
- (E) Stewardship Code [United Kingdom]**
- (F) Stewardship Framework for Institutional Investors [United States of America]
- (G) CFA Institute ESG Disclosure Standards for Investment Products [Global]
- (H) Guidelines on Funds' Names using ESG or Sustainability-related Terms [European Union]
- (I) Luxflag ESG Label [Luxembourg]
- (J) RIAA Responsible Investment Certification Program [Australia]
- (K) SRI Label [France]**
- (L) ANBIMA Code of Regulation and Best Practices of Investment Funds [Brazil]
- (M) Code for Institutional Investors 2022 [Malaysia]
- (N) Code for Responsible Investing in South Africa (CRISA 2) [South Africa]
- (O) Corporate Governance Guidelines [Canada]
- (P) Defined Contribution Code of Practice [United Kingdom]
- (Q) European Association for Investors in Non-Listed Real Estate Vehicles (INREV) Guidelines [Global]
- (R) Global ESG Benchmark for Real Assets (GRESB) [Global]
- (S) Global Impact Investing Network (GIIN) Impact Reporting and Investment Standards (IRIS+) [Global]**
- (T) OECD Guidelines for MNES - Responsible Business Conduct for Institutional Investors [Global]
- (U) UN Guiding Principles (UNGP) on Business and Human Rights [Global]
- (V) Net Zero Asset Managers (NZAM) Initiative [Global]**
- (W) Net-Zero Asset Owner Alliance (NZAOA) [Global]
- (X) Recommendations of the Taskforce for Climate-related Financial Disclosure (TCFD) [Global]
- (Y) The Net Zero Investment Framework (NZIF) 2.0 [Global]
- (Z) Recommendations of the Taskforce for Nature-related Financial Disclosure (TNFD) [Global]
- (AA) Global Reporting Initiative (GRI) Standards [Global]
- (AB) IFC Performance Standard [Global]
- (AC) International Sustainability Standards Board (ISSB) Standards [Global]
- (AD) Sustainability Accounting Standards Board (SASB) Standards [Global]
- (AE) Other
- (AF) Other
- (AG) Other
- (AH) Other
- (AI) Other
- (AJ) Not applicable; our organisation did not report to any voluntary responsible investment/ESG frameworks during the reporting year.

ORGANISATIONAL OVERVIEW (OO)

ORGANISATIONAL INFORMATION

REPORTING YEAR

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 1	CORE	N/A	N/A	PUBLIC	Reporting year	GENERAL

What is the year-end date of the 12-month period you have chosen to report for PRI reporting purposes?

	Date	Month	Year
Year-end date of the 12-month period for PRI reporting purposes:	30	06	2025

SUBSIDIARY INFORMATION

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 2	CORE	N/A	OO 2.1	PUBLIC	Subsidiary information	GENERAL

Does your organisation have subsidiaries?

- (A) Yes
- (B) No

ASSETS UNDER MANAGEMENT

ALL ASSET CLASSES

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 4	CORE	OO 3	N/A	PUBLIC	All asset classes	GENERAL

What are your total assets under management (AUM) at the end of the reporting year, as indicated in [OO 1]?

USD

(A) AUM of your organisation, including subsidiaries not part of row (B), and excluding the AUM subject to execution, advisory, custody, or research advisory only

US\$ 3,615,720,929.00

(B) AUM of subsidiaries that are PRI signatories in their own right and excluded from this submission, as indicated in [OO 2.2]

US\$ 0.00

(C) AUM subject to execution, advisory, custody, or research advisory only

US\$ 0.00

ASSET BREAKDOWN

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 5	CORE	OO 3	Multiple indicators	PUBLIC	Asset breakdown	GENERAL

Provide a percentage breakdown of your total AUM at the end of the reporting year as indicated in [OO 1].

	(1) Percentage of Internally managed AUM	(2) Percentage of Externally managed AUM
(A) Listed equity	>75%	0%
(B) Fixed income	0%	0%
(C) Private equity	0%	0%
(D) Real estate	0%	0%
(E) Infrastructure	0%	0%
(F) Hedge funds	0%	0%
(G) Forestry	0%	0%
(H) Farmland	0%	0%
(I) Other	0%	0%
(J) Off-balance sheet	0%	0%

ASSET BREAKDOWN: INTERNALLY MANAGED LISTED EQUITY

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 5.3 LE	CORE	OO 5	Multiple	PUBLIC	Asset breakdown: Internally managed listed equity	GENERAL

Provide a further breakdown of your internally managed listed equity AUM.

(A) Passive equity 0%

(B) Active – quantitative 0%

(C) Active – fundamental >75%

(D) Other strategies 0%

GEOGRAPHICAL BREAKDOWN

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 7	CORE	Multiple, see guidance	N/A	PUBLIC	Geographical breakdown	GENERAL

How much of your AUM in each asset class is invested in emerging markets and developing economies?

AUM in Emerging Markets and Developing Economies

(A) Listed equity (1) 0%

STEWARDSHIP

STEWARDSHIP

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 8	CORE	Multiple, see guidance	Multiple indicators	PUBLIC	Stewardship	GENERAL

Does your organisation conduct stewardship activities, excluding (proxy) voting, for any of your assets?

(1) Listed equity - active

- | | |
|------------------------------------|-------------------------------------|
| (A) Yes, through internal staff | <input checked="" type="checkbox"/> |
| (B) Yes, through service providers | <input checked="" type="checkbox"/> |
| (C) Yes, through external managers | <input type="checkbox"/> |
| (D) We do not conduct stewardship | <input type="radio"/> |

STEWARDSHIP: (PROXY) VOTING

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 9	CORE	Multiple, see guidance	Multiple indicators	PUBLIC	Stewardship: (Proxy) voting	GENERAL

Does your organisation conduct (proxy) voting activities for any of your listed equity holdings?

(1) Listed equity - active

- | | |
|--------------------------------------|-------------------------------------|
| (A) Yes, through internal staff | <input checked="" type="checkbox"/> |
| (B) Yes, through service providers | <input checked="" type="checkbox"/> |
| (C) Yes, through external managers | <input type="checkbox"/> |
| (D) We do not conduct (proxy) voting | <input type="radio"/> |

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 9.1	CORE	OO 9	PGS 10.1, PGS 31	PUBLIC	Stewardship: (Proxy) voting	GENERAL

For each asset class, on what percentage of your listed equity holdings do you have the discretion to vote?

Percentage of your listed equity holdings over which you have the discretion to vote

(A) Listed equity – active

(11) >90 to <100%

ESG INCORPORATION

INTERNALLY MANAGED ASSETS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 11	CORE	Multiple, see guidance	Multiple indicators	PUBLIC	Internally managed assets	1

For each internally managed asset class, does your organisation incorporate ESG factors, to some extent, into your investment decisions?

(1) Yes, we incorporate ESG factors into our investment decisions

(2) No, we do not incorporate ESG factors into our investment decisions

(C) Listed equity - active - fundamental

ESG STRATEGIES

LISTED EQUITY

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 17 LE	CORE	OO 11	OO 17.1 LE, LE 12	PUBLIC	Listed equity	1

Which ESG incorporation approach and/or combination of approaches does your organisation apply to your internally managed active listed equity?

Percentage out of total internally managed active listed equity

(A) Screening alone	0%
(B) Thematic alone	0%
(C) Integration alone	0%
(D) Screening and integration	>75%
(E) Thematic and integration	0%
(F) Screening and thematic	0%
(G) All three approaches combined	>0-10%
(H) None	0%

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 17.1 LE	CORE	OO 17 LE	LE 9	PUBLIC	Listed equity	1

What type of screening does your organisation use for your internally managed active listed equity assets where a screening approach is applied?

Percentage coverage out of your total listed equity assets where a screening approach is applied

(A) Positive/best-in-class screening only 0%

(B) Negative screening only 0%

(C) A combination of screening approaches >75%

ESG/SUSTAINABILITY FUNDS AND PRODUCTS

LABELLING AND MARKETING

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 18	CORE	OO 11–14	OO 18.1	PUBLIC	Labelling and marketing	1

Do you explicitly market any of your products and/or funds as ESG and/or sustainable?

(A) Yes, we market products and/or funds as ESG and/or sustainable

Provide the percentage of total AUM that your ESG and/or sustainability-marketed products or funds represent:

>75%

- (B) No, we do not offer products or funds explicitly marketed as ESG and/or sustainable
- (C) Not applicable; we do not offer products or funds

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 18.1	CORE	OO 18	OO 18.2	PUBLIC	Labelling and marketing	1

Do any of your ESG and/or sustainability-marketed products and/or funds hold formal ESG and/or RI certification(s) or label(s) awarded by a third party?

(A) Yes, our ESG and/or sustainability-marketed products and/or funds hold formal labels or certifications

Provide the percentage of total AUM that your labelled and/or certified products and/or funds represent:

>75%

- o (B) No, our ESG and/or sustainability-marketed products and/or funds do not hold formal labels or certifications

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 18.2	CORE	OO 18.1	N/A	PUBLIC	Labelling and marketing	1

Which ESG/RI certifications or labels do you hold?

- (A) Commodity type label (e.g. BCI)
- (B) GRESB
- (C) Austrian Ecolabel (UZ49)
- (D) B Corporation**
- (E) BREEAM
- (F) CBI Climate Bonds Standard
- (G) DDV-Nachhaltigkeitskodex-ESG-Strategie
- (H) DDV-Nachhaltigkeitskodex-ESG-Impact
- (I) EU Ecolabel
- (J) EU Green Bond Standard
- (K) Febelfin label (Belgium)
- (L) Finansol
- (M) FNG-Siegel Ecolabel (Germany, Austria and Switzerland)
- (N) Greenfin label (France)
- (O) Grüner Pfandbrief
- (P) ICMA Green Bond Principles
- (Q) ICMA Social Bonds Principles
- (R) ICMA Sustainability Bonds Principles
- (S) ICMA Sustainability-linked Bonds Principles
- (T) Kein Verstoß gegen Atomwaffensperrvertrag
- (U) Le label ISR (French government SRI label)
- (V) Luxflag Climate Finance
- (W) Luxflag Environment
- (X) Luxflag ESG
- (Y) Luxflag Green Bond
- (Z) Luxflag Microfinance
- (AA) Luxflag Sustainable Insurance Products
- (AB) National stewardship code**
Specify:
UK FRC Stewardship Code
- (AC) Nordic Swan Ecolabel
- (AD) Other SRI label based on EUROSIF SRI Transparency Code (e.g. Novethic)
- (AE) People's Bank of China green bond guidelines
- (AF) RIAA (Australia)
- (AG) Towards Sustainability label (Belgium)
- (AH) Other**
Specify:

CDP, LGPS Code of Transparency, Farm Animal Investment Risk and Return, Net Zero Asset Managers Initiative, Tobacco Free Portfolios Finance Pledge, Living Wage Accreditation, SDR Impact Label for our UK Domiciled Impact Fund.

SUMMARY OF REPORTING REQUIREMENTS

SUMMARY OF REPORTING REQUIREMENTS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 21	CORE	Multiple indicators	Multiple indicators	PUBLIC	Summary of reporting requirements	GENERAL

The following table shows which modules are mandatory or voluntary to report on in the separate PRI asset class modules. Where a module is voluntary, indicate if you wish to report on it.

Applicable modules	(1) Mandatory to report (pre-filled based on previous responses)	(2.1) Voluntary to report. Yes, I want to opt-in to reporting on the module	(2.2) Voluntary to report. No, I want to opt-out of reporting on the module
Policy, Governance and Strategy	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Confidence Building Measures	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
(C) Listed equity – active – fundamental	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

SUBMISSION INFORMATION

REPORT DISCLOSURE

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 32	CORE	OO 3, OO 31	N/A	PUBLIC	Report disclosure	GENERAL

How would you like to disclose the detailed percentage figures you reported throughout the Reporting Framework?

- (A) Publish as absolute numbers
- (B) Publish as ranges

POLICY, GOVERNANCE AND STRATEGY (PGS)

POLICY

RESPONSIBLE INVESTMENT POLICY ELEMENTS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 1	CORE	OO 8, OO 9	Multiple indicators	PUBLIC	Responsible investment policy elements	1, 2

Which elements are covered in your formal responsible investment policy(ies)?

- (A) Overall approach to responsible investment
- (B) Guidelines on environmental factors
- (C) Guidelines on social factors
- (D) Guidelines on governance factors
- (E) Guidelines on sustainability outcomes
- (F) Guidelines tailored to the specific asset class(es) we hold
- (G) Guidelines on exclusions
- (H) Guidelines on managing conflicts of interest related to responsible investment
- (I) Stewardship: Guidelines on engagement with investees
- (J) Stewardship: Guidelines on overall political engagement
- (K) Stewardship: Guidelines on engagement with other key stakeholders
- (L) Stewardship: Guidelines on (proxy) voting
- (M) Other responsible investment elements not listed here

Specify:

Guidelines on impact investing and our approach to the UN Sustainable Development Goals.

- (N) Our organisation does not have a formal responsible investment policy and/or our policy(ies) do not cover any responsible investment elements

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 2	CORE	PGS 1	Multiple, see guidance	PUBLIC	Responsible investment policy elements	1

Does your formal responsible investment policy(ies) include specific guidelines on systematic sustainability issues?

- (A) Specific guidelines on climate change (may be part of guidelines on environmental factors)
- (B) Specific guidelines on human rights (may be part of guidelines on social factors)
- (C) Specific guidelines on other systematic sustainability issues

Specify:

We consider the following additional points as part of our ESG analysis: Water Intensity; Waste Intensity; Employee Turnover; Gender diversity in the workforce; Gender diversity in management; Gender Pay Gap; Equal Opportunities; The Corporate Tax Gap; Remuneration of the Executive; Capital allocation record; Board independence and ESG culture of the Board.

- (D) Our formal responsible investment policy(ies) does not include guidelines on systematic sustainability issues

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 3	CORE	PGS 1, PGS 2	N/A	PUBLIC	Responsible investment policy elements	6

Which elements of your formal responsible investment policy(ies) are publicly available?

(A) Overall approach to responsible investment

Add link:

<https://montanaro.co.uk/wp-content/uploads/MONTANARO-ESG-HANDBOOK-2025.pdf>

(B) Guidelines on environmental factors

Add link:

<https://montanaro.co.uk/wp-content/uploads/MONTANARO-ESG-HANDBOOK-2025.pdf>

(C) Guidelines on social factors

Add link:

<https://montanaro.co.uk/wp-content/uploads/MONTANARO-ESG-HANDBOOK-2025.pdf>

(D) Guidelines on governance factors

Add link:

<https://montanaro.co.uk/wp-content/uploads/MONTANARO-ESG-HANDBOOK-2025.pdf>

(E) Guidelines on sustainability outcomes

Add link:

<https://montanaro.co.uk/wp-content/uploads/MONTANARO-ESG-HANDBOOK-2025.pdf>

(F) Specific guidelines on climate change (may be part of guidelines on environmental factors)

Add link:

<https://montanaro.co.uk/wp-content/uploads/MONTANARO-ESG-HANDBOOK-2025.pdf>

(G) Specific guidelines on human rights (may be part of guidelines on social factors)

Add link:

<https://montanaro.co.uk/wp-content/uploads/MONTANARO-ESG-HANDBOOK-2025.pdf>

(H) Specific guidelines on other systematic sustainability issues

Add link:

<https://montanaro.co.uk/wp-content/uploads/MONTANARO-ESG-HANDBOOK-2025.pdf>

(I) Guidelines tailored to the specific asset class(es) we hold

Add link:

<https://montanaro.co.uk/wp-content/uploads/MONTANARO-ESG-HANDBOOK-2025.pdf>

(J) Guidelines on exclusions

Add link:

<https://montanaro.co.uk/wp-content/uploads/MONTANARO-ESG-HANDBOOK-2025.pdf>

(K) Guidelines on managing conflicts of interest related to responsible investment

Add link:

<https://montanaro.co.uk/wp-content/uploads/Montanaro-Asset-Management-Stewardship-Code-2024-2.pdf>

(L) Stewardship: Guidelines on engagement with investees

Add link:

<https://montanaro.co.uk/wp-content/uploads/Montanaro-Asset-Management-Stewardship-Code-2024-2.pdf>

(M) Stewardship: Guidelines on overall political engagement

Add link:

<https://montanaro.co.uk/wp-content/uploads/Montanaro-Asset-Management-Stewardship-Code-2024-2.pdf>

(N) Stewardship: Guidelines on engagement with other key stakeholders

Add link:

<https://montanaro.co.uk/wp-content/uploads/Montanaro-Asset-Management-Stewardship-Code-2024-2.pdf>

(O) Stewardship: Guidelines on (proxy) voting

Add link:

<https://montanaro.co.uk/wp-content/uploads/Montanaro-Asset-Management-Stewardship-Code-2024-2.pdf>

(P) Other responsible investment aspects not listed here

Add link:

<https://montanaro.co.uk/wp-content/uploads/CFD-WS-Montanaro-Better-World-Fund.pdf>

- (Q) No elements of our formal responsible investment policy(ies) are publicly available

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 4	PLUS	PGS 1	N/A	PUBLIC	Responsible investment policy elements	1 – 6

Does your formal responsible investment policy(ies) identify a link between your responsible investment activities and your fiduciary duties or equivalent obligations?

(A) Yes

Elaborate:

A sustainable focus is central to how we invest. We believe that the best and most sustainable investment returns come from the highest quality businesses, run by the very best management teams. ESG forms part of our definition of a company's quality and as a consequence ESG is fully integrated into our investment process.

- (B) No

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 5	CORE	PGS 1	N/A	PUBLIC	Responsible investment policy elements	2

Which elements are covered in your organisation's policy(ies) or guidelines on stewardship?

- (A) Overall stewardship objectives**
- (B) Prioritisation of specific ESG factors to be advanced via stewardship activities**
- (C) Criteria used by our organisation to prioritise the investees, policy makers, key stakeholders, or other entities on which to focus our stewardship efforts**
- (D) How different stewardship tools and activities are used across the organisation**
- (E) Approach to escalation in stewardship**
- (F) Approach to collaboration in stewardship**

- (G) Conflicts of interest related to stewardship
- (H) How stewardship efforts and results are communicated across the organisation to feed into investment decision-making and vice versa
- (I) Other
- (J) None of the above elements is captured in our policy(ies) or guidelines on stewardship

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 6	CORE	PGS 1	N/A	PUBLIC	Responsible investment policy elements	2

Does your policy on (proxy) voting include voting principles and/or guidelines on specific ESG factors?

- (A) Yes, it includes voting principles and/or guidelines on specific environmental factors
- (B) Yes, it includes voting principles and/or guidelines on specific social factors
- (C) Yes, it includes voting principles and/or guidelines on specific governance factors
- (D) Our policy on (proxy) voting does not include voting principles or guidelines on specific ESG factors

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 7	CORE	OO 9	N/A	PUBLIC	Responsible investment policy elements	2

Does your organisation have a policy that states how (proxy) voting is addressed in your securities lending programme?

- (A) We have a publicly available policy to address (proxy) voting in our securities lending programme
Add link(s):
<https://montanaro.co.uk/wp-content/uploads/MONTANARO-VOTING-POLICY-GUIDELINES-AND-PROCESS-2024.pdf>
- (B) We have a policy to address (proxy) voting in our securities lending programme, but it is not publicly available
- (C) We rely on the policy of our external service provider(s)
- (D) We do not have a policy to address (proxy) voting in our securities lending programme
- (E) Not applicable; we do not have a securities lending programme

RESPONSIBLE INVESTMENT POLICY COVERAGE

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 8	CORE	PGS 1	N/A	PUBLIC	Responsible investment policy coverage	1

What percentage of your total AUM is covered by the below elements of your responsible investment policy(ies)?

Combined AUM coverage of all policy elements

(A) Overall approach to responsible investment						
(B) Guidelines on environmental factors					(7) 100%	
(C) Guidelines on social factors						
(D) Guidelines on governance factors						

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 9	CORE	PGS 2	N/A	PUBLIC	Responsible investment policy coverage	1

What proportion of your AUM is covered by your formal policies or guidelines on climate change, human rights, or other systematic sustainability issues?

AUM coverage

(A) Specific guidelines on climate change					(1) for all of our AUM	
(B) Specific guidelines on human rights					(1) for all of our AUM	
(C) Specific guidelines on other systematic sustainability issues					(1) for all of our AUM	

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 10	CORE	OO 8, OO 9, PGS 1	N/A	PUBLIC	Responsible investment policy coverage	2

Per asset class, what percentage of your AUM is covered by your policy(ies) or guidelines on stewardship with investees?

(A) Listed equity

(1) Percentage of AUM covered

- (1) >0% to 10%
- (2) >10% to 20%
- (3) >20% to 30%
- (4) >30% to 40%
- (5) >40% to 50%
- (6) >50% to 60%
- (7) >60% to 70%
- (8) >70% to 80%
- (9) >80% to 90%
- (10) >90% to <100%
- (11) 100%

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 10.1	CORE	OO 9.1, PGS 1	N/A	PUBLIC	Responsible investment policy coverage	2

What percentage of your listed equity holdings is covered by your guidelines on (proxy) voting?

(A) Actively managed listed equity

(1) Percentage of your listed equity holdings over which you have the discretion to vote

- (1) >0% to 10%
- (2) >10% to 20%
- (3) >20% to 30%
- (4) >30% to 40%
- (5) >40% to 50%
- (6) >50% to 60%
- (7) >60% to 70%
- (8) >70% to 80%
- (9) >80% to 90%
- (10) >90% to <100%
- (11) 100%

GOVERNANCE

ROLES AND RESPONSIBILITIES

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 11	CORE	N/A	Multiple indicators	PUBLIC	Roles and responsibilities	1

Which senior level body(ies) or role(s) in your organisation have formal oversight over and accountability for responsible investment?

(A) Board members, trustees, or equivalent

(B) Senior executive-level staff, or equivalent

Specify:

The Board of Directors has overall responsibility for assuring processes and policies and assessing the overall effectiveness of our activities relating to responsible investment. Responsible Investment and ESG are Board level items, discussed at regular meetings of the Board. Members of the Investment Team sit on Montanaro's Board: Charles Montanaro (Chairman), Cedric Durant des Aulnois (CEO), George Cooke (Head of Investments) and Ed Heaven (Chief of Staff/ Head of Sustainable Investments).

(C) Investment committee, or equivalent

Specify:

Oversight of Montanaro's Responsible Investment activities is provided by two Montanaro Committees: the Sustainability Committee and the Executive Committee.

(D) Head of department, or equivalent

Specify department:

The Head of Sustainable Investments leads MAM's sustainable investment responsibilities, encompassing stewardship, impact investing, engagement, voting and reporting to clients.

(E) None of the above bodies and roles have oversight over and accountability for responsible investment

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 11.1	CORE	PGS 1, PGS 2, PGS 11	N/A	PUBLIC	Roles and responsibilities	1, 2

Does your organisation's senior level body(ies) or role(s) have formal oversight over and accountability for the elements covered in your responsible investment policy(ies)?

(1) Board members, trustees, or equivalent

(2) Senior executive-level staff, investment committee, head of department, or equivalent

(A) Overall approach to responsible investment

(B) Guidelines on environmental, social and/or governance factors

(C) Guidelines on sustainability outcomes	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(D) Specific guidelines on climate change (may be part of guidelines on environmental factors)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(E) Specific guidelines on human rights (may be part of guidelines on social factors)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(F) Specific guidelines on other systematic sustainability issues	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(G) Guidelines tailored to the specific asset class(es) we hold	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(H) Guidelines on exclusions	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(I) Guidelines on managing conflicts of interest related to responsible investment	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(J) Stewardship: Guidelines on engagement with investees	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(K) Stewardship: Guidelines on overall political engagement	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(L) Stewardship: Guidelines on engagement with other key stakeholders	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(M) Stewardship: Guidelines on (proxy) voting	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(N) This role has no formal oversight over and accountability for any of the above elements covered in our responsible investment policy(ies)	<input type="radio"/>	<input type="radio"/>

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 11.2	CORE	N/A	N/A	PUBLIC	Roles and responsibilities	1 – 6

Does your organisation have governance processes or structures to ensure that your overall political engagement is aligned with your commitment to the principles of PRI, including any political engagement conducted by third parties on your behalf?

(A) Yes

Describe how you do this:

MAM's governance processes and structures ensures that any political engagement is aligned with our commitment to the principles of PRI. The monitoring and application of Montanaro's Responsible Investment responsibility begins with our Board, which is led by our Executive Chairman and Founder Charles Montanaro. As part of our B Corporation certification, the Board has a legal requirement – enshrined in Montanaro's Articles of Association – to consider the impact of our business on all stakeholders. The Board monitors Montanaro's approach to Responsible Investment, including company-level targets and responsibilities (e.g. ensuring we support the principles of the PRI; MAM's climate targets; other industry commitments) and those embedded within the services we provide to our clients (e.g. ESG and impact in the investment process).

The Board also sets targets for the company to achieve, such as the attainment of B Corporation certification; becoming a signatory to the UK Stewardship Code; or maintaining our status as a PRI signatory. The work involved in achieving and maintaining the responsibilities listed above fall on certain internal MAM Committees and teams, such as the Sustainability Committee and our ESG & Impact Analysts. The Sustainability Committee has three main functions:

1. Ensure that Montanaro's ESG and sustainable investment approach remains fully integrated into our investment process and continues to develop and improve;
- 2.

Review the ESG and impact analysis conducted by MAM's Investment Team, and review engagement and voting activity.

3. Oversee MAM's corporate stewardship responsibilities, such as our responsibilities as a B Corporation.

In conducting these functions, the Committee ensures that the political engagement conducted is aligned with the principles of the PRI and our own responsible investing and stewardship policies.

(B) No

(C) Not applicable, our organisation does not conduct any form of political engagement directly or through any third parties

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 12	CORE	N/A	N/A	PUBLIC	Roles and responsibilities	1

In your organisation, which internal or external roles are responsible for implementing your approach to responsible investment?

(A) Internal role(s)

Specify:

- Chief Executive Officer
- Head of Investments
- Chief of Staff/ Head of Sustainable Investments
- Chairman of the Sustainability Committee In addition, our investment team is trained and incentivised to deliver on our responsible investment policies. Within our investment team we have an ESG and Impact specialist.

(B) External investment managers, service providers, or other external partners or suppliers

Specify:

We make use of external service providers to aid our responsible investment research efforts. These include:

- MSCI
- Bloomberg
- ISS
- Impact Cubed

- (C) We do not have any internal or external roles with responsibility for implementing responsible investment

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 13	CORE	PGS 11	N/A	PUBLIC	Roles and responsibilities	1

Does your organisation use responsible investment KPIs to evaluate the performance of your board members, trustees, or equivalent?

(A) Yes, we use responsible investment KPIs to evaluate the performance of our board members, trustees, or equivalent

Describe: (Voluntary)

Our commitment to sustainable investing is embedded in our organisation, job descriptions and staff remuneration. Analysts are appraised on the quality of their research and stock recommendations. This includes the quality of their ESG analysis and contribution to MAM's engagement and voting efforts. There is a specific section dedicated to ESG in Analyst appraisals. Annual appraisals directly influence variable remuneration. In addition to our Analyst team, the Head of Sustainable Investments is appraised based on the quality of his leadership on ESG and sustainability matters. Our Impact & ESG Specialists have variable pay linked directly to work on ESG issues. MAM's CEO has announced that corporate sustainability targets will influence a portion of all employees' variable pay.

- (B) No, we do not use responsible investment KPIs to evaluate the performance of our board members, trustees, or equivalent

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 14	CORE	PGS 11	N/A	PUBLIC	Roles and responsibilities	1

Does your organisation use responsible investment KPIs to evaluate the performance of your senior executive-level staff (or equivalent), and are these KPIs linked to compensation?

(A) Yes, we use responsible investment KPIs to evaluate the performance of our senior executive-level staff (or equivalent)

Indicate whether these responsible investment KPIs are linked to compensation

(1) KPIs are linked to compensation

- (2) KPIs are not linked to compensation as these roles do not have variable compensation
- (3) KPIs are not linked to compensation even though these roles have variable compensation

Describe: (Voluntary)

Sustainability targets influence a portion of all employees' variable pay.

- (B) No, we do not use responsible investment KPIs to evaluate the performance of our senior executive-level staff (or equivalent)

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 15	PLUS	PGS 11	N/A	PUBLIC	Roles and responsibilities	1

What responsible investment competencies do you regularly include in the training of senior-level body(ies) or role(s) in your organisation?

	(1) Board members, trustees or equivalent	(2) Senior executive-level staff, investment committee, head of department or equivalent
(A) Specific competence in climate change mitigation and adaptation	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(B) Specific competence in investors' responsibility to respect human rights	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(C) Specific competence in other systematic sustainability issues	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(D) The regular training of this senior leadership role does not include any of the above responsible investment competencies	<input type="radio"/>	<input type="radio"/>

EXTERNAL REPORTING AND DISCLOSURES

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 16	CORE	N/A	N/A	PUBLIC	External reporting and disclosures	6

What elements are included in your regular reporting to clients and/or beneficiaries for the majority of your AUM?

- (A) Any changes in policies related to responsible investment
- (B) Any changes in governance or oversight related to responsible investment
- (C) Stewardship-related commitments
- (D) Progress towards stewardship-related commitments
- (E) Climate-related commitments
- (F) Progress towards climate-related commitments
- (G) Human rights-related commitments
- (H) Progress towards human rights-related commitments
- (I) Commitments to other systematic sustainability issues
- (J) Progress towards commitments on other systematic sustainability issues
- (K) We do not include any of these elements in our regular reporting to clients and/or beneficiaries for the majority of our AUM

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 17	CORE	N/A	N/A	PUBLIC	External reporting and disclosures	6

During the reporting year, did your organisation publicly disclose climate-related information in line with the Task Force on Climate-Related Financial Disclosures' (TCFD) recommendations?

- (A) Yes, including governance-related recommended disclosures
- (B) Yes, including strategy-related recommended disclosures
- (C) Yes, including risk management-related recommended disclosures
- (D) Yes, including applicable metrics and targets-related recommended disclosures
- (E) None of the above

Add link(s):

<https://montanaro.co.uk/wp-content/uploads/Project-Net-Zero-2024-Final.pdf>

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 18	PLUS	N/A	N/A	PUBLIC	External reporting and disclosures	6

During the reporting year, to which international responsible investment standards, frameworks, or regulations did your organisation report?

- (A) Disclosures against the European Union's Sustainable Finance Disclosure Regulation (SFDR)

Link to example of public disclosures

<https://montanaro.co.uk/wp-content/uploads/SFDR-Website-Disclosures-Article-9-Montanaro-Better-World-Fund.pdf>

- (B) Disclosures against the European Union's Taxonomy

Link to example of public disclosures

<https://montanaro.co.uk/wp-content/uploads/SFDR-Website-Disclosures-Article-9-Montanaro-Better-World-Fund.pdf>

- (C) Disclosures against the CFA's ESG Disclosures Standard
- (D) Disclosures against other international standards, frameworks or regulations

- (E) Disclosures against other international standards, frameworks or regulations

Specify:

Principle Adverse Impact Statement

Link to example of public disclosures

<https://montanaro.co.uk/wp-content/uploads/SFDR-Website-Disclosures-Article-9-Montanaro-Better-World-Fund.pdf>

- (F) Disclosures against other international standards, frameworks or regulations
- (G) Disclosures against other international standards, frameworks or regulations

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 19	CORE	N/A	N/A	PUBLIC	External reporting and disclosures	6

During the reporting year, did your organisation publicly disclose its membership in and support for trade associations, think tanks or similar bodies that conduct any form of political engagement?

(A) Yes, we publicly disclosed all of our membership in and support for trade associations, think tanks, or similar bodies that conduct any form of political engagement

Add link(s):

<https://montanaro.co.uk/wp-content/uploads/Montanaro-Asset-Management-Stewardship-Code-2024-2.pdf>

- (B) Yes, we publicly disclosed some of our membership in and support for trade associations, think tanks, or similar bodies that conduct any form of political engagement
- (C) No, we did not publicly disclose our membership in and support for trade associations, think tanks, or similar bodies that conduct any form of political engagement
- (D) Not applicable, we were not members in or supporters of any trade associations, think tanks, or similar bodies that conduct any form of political engagement during the reporting year

STRATEGY

CAPITAL ALLOCATION

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 20	CORE	N/A	N/A	PUBLIC	Capital allocation	1

Which elements do your organisation-level exclusions cover?

- (A) Exclusions based on our organisation's values or beliefs regarding particular sectors, products or services
- (B) Exclusions based on our organisation's values or beliefs regarding particular regions or countries
- (C) Exclusions based on minimum standards of business practice aligned with international norms such as the OECD Guidelines for Multinational Enterprises, the International Bill of Human Rights, UN Security Council sanctions or the UN Global Compact
- (D) Exclusions based on our organisation's climate change commitments
- (E) Other elements
- (F) Not applicable; our organisation does not have any organisation-level exclusions

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 21	CORE	N/A	N/A	PUBLIC	Capital allocation	1

How does your responsible investment approach influence your strategic asset allocation process?

- (A) We incorporate ESG factors into our assessment of expected asset class risks and returns
- Select from dropdown list:

- (1) for all of our AUM subject to strategic asset allocation
- (2) for a majority of our AUM subject to strategic asset allocation
- (3) for a minority of our AUM subject to strategic asset allocation

(B) We incorporate climate change–related risks and opportunities into our assessment of expected asset class risks and returns

Select from dropdown list:

- (1) for all of our AUM subject to strategic asset allocation
- (2) for a majority of our AUM subject to strategic asset allocation
- (3) for a minority of our AUM subject to strategic asset allocation

(C) We incorporate human rights–related risks and opportunities into our assessment of expected asset class risks and returns

Select from dropdown list:

- (1) for all of our AUM subject to strategic asset allocation
- (2) for a majority of our AUM subject to strategic asset allocation
- (3) for a minority of our AUM subject to strategic asset allocation

(D) We incorporate risks and opportunities related to other systematic sustainability issues into our assessment of expected asset class risks and returns

Select from dropdown list:

- (1) for all of our AUM subject to strategic asset allocation
- (2) for a majority of our AUM subject to strategic asset allocation
- (3) for a minority of our AUM subject to strategic asset allocation

Specify: (Voluntary)

We consider the following additional points as part of our ESG analysis: Water Intensity; Waste Intensity; Employee Turnover; Gender diversity in the workforce; Gender diversity in management; Gender Pay Gap; Equal Opportunities; The Corporate Tax Gap; Remuneration of the Executive; Capital allocation record; Board independence and ESG culture of the Board.

- (E) We do not incorporate ESG factors, climate change, human rights or other systematic sustainability issues into our assessment of expected asset class risks and returns
- (F) Not applicable; we do not have a strategic asset allocation process

STEWARDSHIP: OVERALL STEWARDSHIP STRATEGY

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 22	CORE	OO 8, OO 9	N/A	PUBLIC	Stewardship: Overall stewardship strategy	2

For the majority of AUM within each asset class, which of the following best describes your primary stewardship objective?

(1) Listed equity

(A) Maximise our portfolio-level risk-adjusted returns. In doing so, we seek to address any risks to overall portfolio performance caused by individual investees' contribution to systematic sustainability issues.



(B) Maximise our individual investments' risk-adjusted returns. In doing so, we do not seek to address any risks to overall portfolio performance caused by individual investees' contribution to systematic sustainability issues.



Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 23	PLUS	OO 5, OO 8, OO 9	N/A	PUBLIC	Stewardship: Overall stewardship strategy	2

How does your organisation, or the external service providers or external managers acting on your behalf, prioritise the investees or other entities on which to focus its stewardship efforts?

MAM prioritises the investee companies on which to focus our stewardship efforts in a number of ways. Stewardship opportunities are typically identified via our ESG analysis and are discussed by the Investment Team and Sustainability Committee to consider the order of priorities. For example, when supply chain management was identified as an area of common risk in 2018, the Sustainability Committee commissioned a Deep Dive engagement project, undertaken by our Investment Team, in order to better understand how our companies were managing supply chains. Similarly, the systemic risk of climate change has led to a desire to better understand the steps our companies are taking to support the transition to a low carbon economy. In 2020, we launched "Project: Net Zero Carbon", a long-term engagement project designed to encourage companies to set and meet Net Zero Carbon targets. We also attempt to prioritise ESG risks that companies may be facing that could be considered systemic.

Following a number of site visits in recent years to factories and other industrial facilities, we noticed that companies were exposed to the negative externalities generated by single-use plastic. This has led to engagements with businesses as we sought to understand how companies could reduce or limit their exposure to single-use plastic. In addition, using certain external frameworks helps us identify stewardship priorities. An example is the UN Sustainable Development Goals (UN SDGs). The UN SDGs have aided the identification of sustainability risks associated with the Montanaro Better World Fund. Priorities are also set together with our clients, for example a client may ask us to engage on a specific matter in relation to a single holding, or work with them on a broader issue such as that of climate change. Typically, we are well aligned to the priorities of our clients, but there may be difference at the application level. For example, clients may specify that climate change is a priority for them – as it is for us – but we may have to point out that we cannot participate in initiatives such as ClimateAction 100+ as such campaigns do not cover smaller companies. Our stewardship and engagement activity typically falls into one of the following categories: 1) Direct Company Engagements: a company-specific risk or issue has been identified on which we wish to engage. This may include an area of weakness identified in our ESG analysis or where we become aware of an incident or breach of our ESG policies or international norms (e.g. the UN Global Compact).

In the main, we consider this type of engagement to be “reactive” as we are responding to a particular event although we may also conduct fact finds on a company-specific basis. 2) Proxy Voting: voting is a vital part of our engagement with companies. This is why we attempt to vote at all Annual General Meetings for holdings within our Funds. We receive independent third-party corporate governance reports and voting recommendations from Institutional Investor Services (ISS) ahead of meetings, however, we use these for advice only; our analysts systematically review all resolutions ahead of shareholder meetings and we voice our concerns where required. We aim to discuss any issues with management prior to voting against or abstaining.

Our decisions are guided by our proprietary voting guidelines. 3) Deep Dive Research: we conduct thematic “Deep Dive” engagement projects on specific subjects to better understand how our companies are exposed to a particular issue or area of risk. We consider this type of engagement to be “proactive” as we are taking steps to understand more about a particular subject and the exposure of our investee companies to that risk before it can manifest. 4) Collaborative Engagements: we seek out collaborative engagement projects that offer a material benefit to the achievement of engagement aims. These projects can add additional support and aid in the promotion of sustainable investment practice.

5) Public Policy Advocacy: We are involved with groups that advocate for responsible stakeholder capitalism. These include the Glasgow Financial Alliance for Net Zero (GFANZ) and the B Corp Finance & Investment working group. These approaches have been chosen because they are efficient; amplify our voice; and ensure that we stay abreast of changing market conditions. By carefully targeting our engagement efforts we are able to effect change, despite the modest size of our organisation.

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 24	CORE	OO 8, OO 9	N/A	PUBLIC	Stewardship: Overall stewardship strategy	2

Which of the following best describes your organisation's default position, or the position of the external service providers or external managers acting on your behalf, concerning collaborative stewardship efforts?

- (A) We recognise the value of collective action, and as a result, we prioritise collaborative stewardship efforts wherever possible
- (B) We collaborate on a case-by-case basis
- (C) Other
- (D) We do not join collaborative stewardship efforts

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 24.1	PLUS	OO 8, OO 9	N/A	PUBLIC	Stewardship: Overall stewardship strategy	2

Elaborate on your organisation’s default position on collaborative stewardship, or the position of the external service providers or external investment managers acting on your behalf, including any other details on your overall approach to collaboration.

We seek out collaborative engagement projects that offer a material benefit to the achievement of engagement aims. These projects can add additional support and aid in the promotion of sustainable investment practice. The Sustainability Committee decides whether Montanaro will participate in a collaborative engagement. A member of the Committee, typically the Head of Sustainable Investments, will be responsible for liaising directly with the organisation leading the collaborative initiative. Analysts will be responsible for contacting the relevant companies that fall under their coverage, typically with the support of a member of the Sustainability Committee.

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 25	PLUS	OO 5, OO 8, OO 9	N/A	PUBLIC	Stewardship: Overall stewardship strategy	2

Rank the channels that are most important for your organisation in achieving its stewardship objectives.

- (A) Internal resources, e.g. stewardship team, investment team, ESG team, or staff**
Select from the list:
 1
- (B) External investment managers, third-party operators and/or external property managers, if applicable**
Select from the list:
 5
- (C) External paid specialist stewardship services (e.g. engagement overlay services or, in private markets, sustainability consultants) excluding investment managers, real assets third-party operators, or external property managers**
Select from the list:
 3
- (D) Informal or unstructured collaborations with investors or other entities**
Select from the list:
 4
- (E) Formal collaborative engagements, e.g. PRI-coordinated collaborative engagements, Climate Action 100+, or similar**
Select from the list:
 2
- (F) We do not use any of these channels

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 26	PLUS	OO 8, OO 9, PGS 1	N/A	PUBLIC	Stewardship: Overall stewardship strategy	2

How does your organisation ensure that its policy on stewardship is implemented by the external service providers to which you have delegated stewardship activities?

(A) Example(s) of measures taken when selecting external service providers:

We receive independent corporate governance reports and voting recommendations from Institutional Investor Services (ISS) ahead of votable meetings. We use these for advice only and meticulously review every ISS voting recommendation before we submit our vote. The annual review, led by the Sustainability Committee, involves a thorough examination of voting records to confirm adherence to our voting policies and preferences, especially in instances where we have voted contrary to ISS recommendations. Meetings with ISS are organised at least annually to evaluate their service offerings, ensuring they remain cost-effective and are fully utilised. We are pleased with the consistent quality of research notes and analytical tools provided by the ISS voting platform, which significantly aid in our decision-making process and subsequent review of voting patterns. We appreciate the depth of insight provided by ISS, which supports both our internal decision-making and our engagements with investee companies. Given the continued high quality and relevance of their service, we maintained our subscription with ISS for 2023 and into 2024, we will review the provision on an ongoing basis.

(B) Example(s) of measures taken when designing engagement mandates and/or consultancy agreements for external service providers:

(C) Example(s) of measures taken when monitoring the stewardship activities of external service providers:

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 27	PLUS	OO 8, OO 9	N/A	PUBLIC	Stewardship: Overall stewardship strategy	2

How are your organisation’s stewardship activities linked to your investment decision making, and vice versa?

The integration of stewardship and investment is consistently applied across all Montanaro portfolios. We use our bespoke ESG checklist to analyse the ESG credentials of all potential investments. In completing this checklist, analysts are able to identify any weaknesses in the way a company manages material ESG risks. Conclusions from our ESG analysis are presented to the Investment Committee who discuss any issues with the analyst. The Committee will decide to continue with, or discard, a new idea based on the analyst’s findings. Companies with a total ESG score of below 5 are flagged on the Checklist under “Investigate” meaning that engagement is required if we wish to invest in the company. Our clients typically have long-term investment horizons (five years plus) and our approach to ESG reflects this long-term commitment.

As a result, we are prepared to invest in a company with a weakness in its ESG profile so long as management express a willingness to engage with us and a desire to improve any areas of weakness. These checklists have led to engagements that have resulted in higher conviction in the investment case and also decisions to sell stocks, for example:

- Increased conviction: We added to our holding in a building materials manufacturer as we consider them to be ESG leaders. This influences our view on the quality of the business. The products help to improve the resiliency and sustainability of the urban environment and the company try to differentiate themselves from their competitors through the sustainability of their products.

In addition, we have spoken to the sustainability team on numerous occasions to determine the trajectory of their ambitious climate plans. This positive view of the ESG credentials of the business contributed to our decision to increase our position.

- Reduced conviction: We spoke to a company engaged in the development and manufacture of polymer product systems. MAM had several engagements with the company about its products, in particular focusing on the exposure to e-cigarette end markets. Although the business wasn’t technically in breach of our Tobacco ban (it is not a tobacco producer or distributor), our engagement – led by our Analyst and overseen by MAM’s Sustainability Committee – led us to conclude that the company should be sold from Portfolios as its product line is too closely linked to a sector of the economy that we do not wish to direct capital towards. The Sustainability Committee has the authority to determine such sales – and inform the Investment Team – of stocks that may have products/services that are too closely linked to the areas on MAM’s “Banned List”.

Analysts continue to update the ESG Checklists throughout the holding period as new information comes to light, for example after a set of results; the AGM; or an engagement.

The Sustainability Committee monitors the ESG scores of companies on our Approved List at quarterly meetings to understand how analysts are scoring companies. Our ESG Checklists also help us to set ESG priorities. In particular, they allow us to identify risks common to many of our companies. When we identify such risks, our Head of Investments and Head of Sustainable Investments work with the team to explore the issue in greater detail via an engagement “Deep Dive”. The purpose of these Deep Dives is to engage with companies from across our Approved List and improve our understanding of a particular risk and the quality of our analysis. Voting is another vital part of our how we exercise our stewardship responsibilities.

It is a key shareholder responsibility which is why we vote at all AGMs. We receive independent third-party corporate governance reports and voting recommendations from Institutional Investor Services (ISS) ahead of meetings. These are used for advice only. Our Analysts systematically review all resolutions ahead of shareholder meetings and we voice our concerns where required. We aim to discuss any issues with management prior to voting against or abstaining. As such, we consider ourselves as “active” shareholders rather than “activists”.

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 28	PLUS	OO 8, OO 9	N/A	PUBLIC	Stewardship: Overall stewardship strategy	2

If relevant, provide any further details on your organisation's overall stewardship strategy.

In 2024, we conducted a total of 75 company engagements covering a diverse range of issues. These engagements included collaborations and discussions with academics, charities and research organisations integral to our Deep Dive research project on the Built Environment. Governance issues were the focus of 24% of these engagements, the proportion of engagements addressing social issues was 15% and environmental issues, including those related to climate change, represented 28%. Engagements that covered a combination of issues accounted for 33%, indicating a holistic approach to addressing ESG factors.

In 2025, we will continue our commitment to net zero engagements and further our contribution to the development of the TNFD framework. We also plan to initiate additional Deep Dives (particularly on the topic of water) to continue enhancing our stewardship and impact in critical ESG areas.

STEWARDSHIP: (PROXY) VOTING

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 29	CORE	OO 9, PGS 1	N/A	PUBLIC	Stewardship: (Proxy) voting	2

When you use external service providers to give recommendations, how do you ensure those recommendations are consistent with your organisation's (proxy) voting policy?

(A) Before voting is executed, we review external service providers' voting recommendations for controversial and high-profile votes

Select from the below list:

- (1) in all cases
- (2) in a majority of cases
- (3) in a minority of cases

(B) Before voting is executed, we review external service providers' voting recommendations where the application of our voting policy is unclear

Select from the below list:

- (1) in all cases
- (2) in a majority of cases
- (3) in a minority of cases
- (D) We do not review external service providers' voting recommendations
- (E) Not applicable; we do not use external service providers to give voting recommendations

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 30	CORE	OO 9	N/A	PUBLIC	Stewardship: (Proxy) voting	2

How is voting addressed in your securities lending programme?

- (A) We recall all securities for voting on all ballot items
- (B) When a vote is deemed important according to pre-established criteria (e.g. high stake in the company), we recall all our securities for voting
- (C) Other
- (D) We do not recall our securities for voting purposes
- (E) Not applicable; we do not have a securities lending programme

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 31	CORE	OO 9.1	N/A	PUBLIC	Stewardship: (Proxy) voting	2

For the majority of votes cast over which you have discretion to vote, which of the following best describes your decision making approach regarding shareholder resolutions (or that of your external service provider(s) if decision making is delegated to them)?

- (A) We vote in favour of resolutions expected to advance progress on our stewardship priorities, including affirming a company's good practice or prior commitment
- (B) We vote in favour of resolutions expected to advance progress on our stewardship priorities, but only if the investee company has not already publicly committed to the action(s) requested in the proposal
- (C) We vote in favour of shareholder resolutions only as an escalation measure
- (D) We vote in favour of the investee company management's recommendations by default
- (E) Not applicable; we do not vote on shareholder resolutions

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 32	CORE	OO 9	N/A	PUBLIC	Stewardship: (Proxy) voting	2

During the reporting year, how did your organisation, or your external service provider(s), pre-declare voting intentions prior to voting in annual general meetings (AGMs) or extraordinary general meetings (EGMs)?

- (A) We pre-declared our voting intentions publicly through the PRI's vote declaration system on the Resolution Database
- (B) We pre-declared our voting intentions publicly by other means, e.g. through our website
- (C) We privately communicated our voting decision to investee companies prior to the AGM/EGM
- (D) We did not privately or publicly communicate our voting intentions prior to the AGM/EGM
- (E) Not applicable; we did not cast any (proxy) votes during the reporting year

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 33	CORE	OO 9	PGS 33.1	PUBLIC	Stewardship: (Proxy) voting	2

After voting has taken place, do you publicly disclose your (proxy) voting decisions or those made on your behalf by your external service provider(s), company by company and in a central source?

(A) Yes, for all (proxy) votes

Add link(s):

<https://montanaro.co.uk/wp-content/uploads/2025-Q1-Proxy-Voting-Summary.pdf>

- (B) Yes, for the majority of (proxy) votes
- (C) Yes, for a minority of (proxy) votes
- (D) No, we do not publicly report our (proxy) voting decisions company-by-company and in a central source

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 33.1	CORE	PGS 33	N/A	PUBLIC	Stewardship: (Proxy) voting	2

In the majority of cases, how soon after an investee's annual general meeting (AGM) or extraordinary general meeting (EGM) do you publish your voting decisions?

- (A) Within one month of the AGM/EGM
- (B) Within three months of the AGM/EGM
- (C) Within six months of the AGM/EGM
- (D) Within one year of the AGM/EGM
- (E) More than one year after the AGM/EGM

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 34	CORE	OO 9	N/A	PUBLIC	Stewardship: (Proxy) voting	2

After voting has taken place, did your organisation, and/or the external service provider(s) acting on your behalf, communicate the rationale for your voting decisions during the reporting year?

	(1) In cases where we abstained or voted against management recommendations	(2) In cases where we voted against an ESG-related shareholder resolution
(A) Yes, we publicly disclosed the rationale	(3) for a minority of votes	(3) for a minority of votes
(B) Yes, we privately communicated the rationale to the company	(1) for all votes	(1) for all votes

(C) We did not publicly or privately communicate the rationale, or we did not track this information

o

o

(D) Not applicable; we did not abstain or vote against management recommendations or ESG-related shareholder resolutions during the reporting year

o

o

(A) Yes, we publicly disclosed the rationale - Add link(s):

<https://montanaro.co.uk/wp-content/uploads/2025-Q1-BWF-Voting-Rationales.pdf>

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 35	PLUS	OO 9	N/A	PUBLIC	Stewardship: (Proxy) voting	2

How does your organisation ensure vote confirmation, i.e. that your votes have been cast and counted correctly?

We receive independent third party corporate governance reports and voting recommendations from Institutional Investor Services (ISS) ahead of meetings, however we use these for advice only; our analysts systematically review all resolutions ahead of shareholder meetings and we voice our concerns where required. We aim to discuss any issues with management prior to voting against or abstaining. We apply the same voting decisions across all portfolios, unless a segregated mandate client has specified that a particular voting policy be applied. We keep a record of our voting rationale. We publish Voting Activity Summary Reports on our website We use ISS to process our proxy voting. All voting activity is recorded in our Proxy Voting Log, and can also be reviewed on the ISS portal. The Sustainability Committee reviews voting activity for the quarter at each meeting, and we publish a summary of our voting statistics on our website. This includes the number of proposals where we voted either in favour, against or abstained on different subjects such as approving Remuneration policies, electing Directors, and approving capital increases. The first step in our voting process is that our Administration Team will be notified of a new ballot. The votable shares are then checked between our two systems (ISS and Charles River) to ensure that there is no discrepancy. The Team will also check whether there is any shareblocking in place for the company in question. The Administration Team will then circulate the ISS research note on the upcoming meeting to the Investment Team and, in some circumstances, members of the Compliance Team in line with our Conflicts of Interest Policy. The relevant analyst for that company will review the ISS recommendations. Then follows our discussion. This will take place between Analysts and the Sustainability Team and references:

- the ISS research;
- the MAM Voting Guidelines;
- any previous engagement with the company;
- the analyst's knowledge of the business.

If an analyst wishes to vote against management's recommendations, they will contact the company to discuss the matter and find out if there are any mitigating circumstances which explain the proposal of the resolution. When a decision has been reached, the Sustainability Team will send the final voting decision to the Administration Team for implementation. They will also provide a rationale for each item. Two logs are kept in conjunction with voting activity. One by the Administration Team to record that the steps have been undertaken correctly and one by the Sustainability Team to record voting rationale and engagement as a result of the decision-making process.

STEWARDSHIP: ESCALATION

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 36	CORE	OO 8, OO 9 HF, OO 9	N/A	PUBLIC	Stewardship: Escalation	2

For your listed equity holdings, what escalation measures did your organisation, or the external investment managers or service providers acting on your behalf, use in the past three years?

(1) Listed equity

(A) Joining or broadening an existing collaborative engagement or creating a new one



(B) Filing, co-filing, and/or submitting a shareholder resolution or proposal



(C) Publicly engaging the entity, e.g. signing an open letter



(D) Voting against the re-election of one or more board directors



(E) Voting against the chair of the board of directors, or equivalent, e.g. lead independent director



(F) Divesting



(G) Litigation



(H) Other



(I) In the past three years, we did not use any of the above escalation measures for our listed equity holdings



STEWARDSHIP: ENGAGEMENT WITH POLICY MAKERS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 39	CORE	OO 8, OO 9	PGS 39.1, PGS 39.2	PUBLIC	Stewardship: Engagement with policy makers	2

Did your organisation, or the external investment managers or service providers acting on your behalf, engage with policy makers as part of your responsible investment approach during the reporting year?

- (A) Yes, we engaged with policy makers directly
- (B) Yes, we engaged with policy makers through the leadership of or active participation in working groups or collaborative initiatives, including via the PRI
- (C) Yes, we were members of, supported, or were in another way affiliated with third party organisations, including trade associations and non-profit organisations, that engage with policy makers, excluding the PRI
 - (D) We did not engage with policy makers directly or indirectly during the reporting year beyond our membership in the PRI

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 39.1	CORE	PGS 39	N/A	PUBLIC	Stewardship: Engagement with policy makers	2

During the reporting year, what methods did you, or the external investment managers or service providers acting on your behalf, use to engage with policy makers as part of your responsible investment approach?

- (A) We participated in 'sign-on' letters
- (B) We responded to policy consultations
- (C) We provided technical input via government- or regulator-backed working groups

Describe:

Sign-on Letters: MAM joined the Business Coalition for a Global Plastics Treaty, convened by the Ellen MacArthur Foundation and WWF. This coalition aims to push for a legally binding UN treaty to reduce plastic pollution effectively. MAM co-signed a collective investor statement and engaged in discussions and webinars with stakeholders, including environmental NGOs and industry experts, to advocate for a comprehensive treaty that addresses urgent environmental issues like climate change, biodiversity loss and public health impacts.

Policy Consultations: We continued to provide input in policy consultations relevant to our sustainability goals. In 2024, this included contributions to the Investor Coalition on Food Policy.

Government or Regulator-backed Working Groups: MAM actively participated in working groups with the Glasgow Financial Alliance for Net Zero (GFANZ) and B Corp working groups. These groups focus on advocating responsible stakeholder capitalism and are pivotal in shaping policies that align with sustainable investment practices.

- (D) We engaged policy makers on our own initiative
- (E) Other methods

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 39.2	CORE	PGS 39	N/A	PUBLIC	Stewardship: Engagement with policy makers	2

During the reporting year, did your organisation publicly disclose details of your engagement with policy makers conducted as part of your responsible investment approach, including through external investment managers or service providers?

(A) We publicly disclosed all our policy positions

Add link(s):

<https://montanaro.co.uk/wp-content/uploads/Montanaro-Asset-Management-Stewardship-Code-2024-2.pdf>

(B) We publicly disclosed details of our engagements with policy makers

Add link(s):

<https://montanaro.co.uk/wp-content/uploads/Montanaro-Asset-Management-Stewardship-Code-2024-2.pdf>

(C) No, we did not publicly disclose details of our engagement with policy makers conducted as part of our responsible investment approach during the reporting year

STEWARDSHIP: EXAMPLES

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 40	PLUS	OO 8, OO 9	N/A	PUBLIC	Stewardship: Examples	2

Provide examples of stewardship activities that you conducted individually or collaboratively during the reporting year that contributed to desired changes in the investees, policy makers or other entities with which you interacted.

(A) Example 1:

Title of stewardship activity:

Engagement to discuss the company's approach to lowering emissions

(1) Led by

(1) Internally led

(2) External service provider led

(3) Led by an external investment manager, real assets third-party operator and/or external property manager

(2) Primary focus of stewardship activity

(1) Environmental factors

(2) Social factors

(3) Governance factors

(3) Asset class(es)

(1) Listed equity

(2) Fixed income

(3) Private equity

(4) Real estate

(5) Infrastructure

(6) Hedge funds

(7) Forestry

(8) Farmland

(9) Other

(4) Description of the activity and what was achieved. For collaborative activities, provide detail on your individual contribution.

We engaged with a European aerospace company to discuss its progress on climate-related disclosures and target setting. The company is preparing to report under the Corporate Sustainability Reporting Directive (CSRD) and expects to publish Scope 3 emissions data and a decarbonisation roadmap in 2025. It is also considering a formal commitment to the Science Based Targets initiative (SBTi).

The company outlined improvements in product efficiency, including an advanced narrowbody aircraft engine compatible with 100% sustainable aviation fuel (SAF), and future developments aimed at delivering further emissions reductions. Scope 3 emissions remain the most material component of its footprint, and the company acknowledged the challenges of managing impacts across the value chain. We welcomed the progress and will monitor delivery against the anticipated milestones.

(B) Example 2:

Title of stewardship activity:

Remuneration consultation

(1) Led by

- (1) Internally led
- (2) External service provider led
- (3) Led by an external investment manager, real assets third-party operator and/or external property manager

(2) Primary focus of stewardship activity

- (1) Environmental factors
- (2) Social factors
- (3) Governance factors

(3) Asset class(es)

- (1) Listed equity
- (2) Fixed income
- (3) Private equity
- (4) Real estate
- (5) Infrastructure
- (6) Hedge funds
- (7) Forestry
- (8) Farmland
- (9) Other

(4) Description of the activity and what was achieved. For collaborative activities, provide detail on your individual contribution.

We responded to a consultation on proposed changes to the company's remuneration policy, noting concerns over the frequency of revisions in recent years. While recognising strong business performance, we encouraged the inclusion of more stretching non-financial KPIs—such as climate targets aligned with the SBTi—in place of softer metrics like employee engagement. We also recommended a greater emphasis on free cash flow within the bonus structure to complement existing financial metrics. We voted on the policy at the AGM and will continue to monitor future developments.

(C) Example 3:

Title of stewardship activity:

Sharing our thoughts on positive impact

(1) Led by

- (1) Internally led
- (2) External service provider led
- (3) Led by an external investment manager, real assets third-party operator and/or external property manager

(2) Primary focus of stewardship activity

- (1) Environmental factors
- (2) Social factors
- (3) Governance factors

(3) Asset class(es)

- (1) Listed equity
- (2) Fixed income
- (3) Private equity
- (4) Real estate
- (5) Infrastructure
- (6) Hedge funds

- (7) Forestry
- (8) Farmland
- (9) Other

(4) Description of the activity and what was achieved. For collaborative activities, provide detail on your individual contribution.

We engaged to encourage improved disclosure of quantitative impact metrics, particularly using data from Environmental Product Declarations (EPDs). The company confirmed it is now using EPD data to report carbon intensity across more of its product range. For example, its concrete bricks are estimated to be around 40% less carbon intensive than traditional clay alternatives. It is also assessing the carbon benefits of a low-impact cement substitute. Further data and methodology are expected to support inclusion in our impact reporting.

(D) Example 4:

Title of stewardship activity:

Biodiversity

(1) Led by

- (1) Internally led
- (2) External service provider led
- (3) Led by an external investment manager, real assets third-party operator and/or external property manager

(2) Primary focus of stewardship activity

- (1) Environmental factors
- (2) Social factors
- (3) Governance factors

(3) Asset class(es)

- (1) Listed equity
- (2) Fixed income
- (3) Private equity
- (4) Real estate
- (5) Infrastructure
- (6) Hedge funds
- (7) Forestry
- (8) Farmland
- (9) Other

(4) Description of the activity and what was achieved. For collaborative activities, provide detail on your individual contribution.

We met with the company as part of our biodiversity-focused engagement programme, following MSCI data that flagged multiple operational sites in biodiversity-sensitive areas. The company questioned the accuracy of these flags, citing the industrial nature of most sites and minimal direct interaction with sensitive ecosystems.

While biodiversity has not historically been a material focus, the company has undertaken a location-based screening of c.255 sites using the WWF Biodiversity Risk Filter. Around 15 were flagged for potential risk, though most were storage or warehouse sites. Only two manufacturing sites were identified, in China and India, with local environmental concerns acknowledged.

The company is prioritising supply chain sustainability due to upcoming regulatory developments, particularly the EU Corporate Sustainability Due Diligence Directive. Scope 3 emissions, sustainable design, and packaging are focus areas. Although it does not currently intend to report to the TNFD, the company aligns its reporting with the ISSB framework.

We welcome the steps taken to understand and manage supply chain and location-based nature risks, and will continue to engage to encourage more systematic consideration of biodiversity alongside climate-related impacts.

(E) Example 5:

Title of stewardship activity:

Engagement to discuss standardised environmental reporting

(1) Led by

- (1) Internally led
- (2) External service provider led
- (3) Led by an external investment manager, real assets third-party operator and/or external property manager

(2) Primary focus of stewardship activity

- (1) Environmental factors
- (2) Social factors
- (3) Governance factors

(3) Asset class(es)

- (1) Listed equity
- (2) Fixed income
- (3) Private equity
- (4) Real estate
- (5) Infrastructure
- (6) Hedge funds
- (7) Forestry
- (8) Farmland
- (9) Other

(4) Description of the activity and what was achieved. For collaborative activities, provide detail on your individual contribution.

The engagement emphasised the critical importance of environmental disclosure as the global transition toward a net-zero economy accelerates, and various governments start implementing mandatory environmental disclosure regulations. The discussion highlighted the vital role companies play in mitigating carbon emissions and ensuring a sustainable future. With financial and capital markets increasingly interested in evaluating the risks and impacts associated with climate change on investments, proactive steps to address these issues rely on accurate and comprehensive data from companies. In response to our request, the company submitted both the climate questionnaire and the water security questionnaire to the CDP. This demonstrates their willingness to participate in standardised environmental reporting and highlights their commitment to transparency in addressing climate change and water security concerns. By participating, the company has contributed to comprehensive corporate environmental data that can be used for benchmarking, tracking progress, and aligning with global environmental disclosure standards, including those set by the TCFD.

CLIMATE CHANGE

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 41	CORE	N/A	PGS 41.1	PUBLIC	Climate change	General

Has your organisation identified climate-related risks and opportunities affecting your investments?

(A) Yes, within our standard planning horizon

Specify the risks and opportunities identified and your relevant standard planning horizon:

Our financed emissions are where we have the biggest impact. Our investment process manages environmental risks through the integration of climate data into our assessment of the quality of a business. We implement a specific climate related risk management process across all of our portfolios. This encompasses a qualitative and quantitative assessment that is applicable to assessing our portfolios' exposure to climate-related risks and opportunities across both short and long time horizons. We have reviewed the resilience of the organisation's strategy and have found that the dangers posed by unmitigated climate change will have a devastating impact on society at large, this includes the MAM business. We have sought to structure our portfolio to be well-positioned for a low carbon transition and align ourselves with a 1.5°C scenario. This has informed our target setting.

(B) Yes, beyond our standard planning horizon

(C) No, we have not identified climate-related risks and/or opportunities affecting our investments

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 41.1	CORE	PGS 41	N/A	PUBLIC	Climate change	General

Does your organisation integrate climate-related risks and opportunities affecting your investments in its overall investment strategy, financial planning and (if relevant) products?

(A) Yes, our overall investment strategy, financial planning and (if relevant) products integrate climate-related risks and opportunities

Describe how climate-related risks and opportunities have affected or are expected to affect your investment strategy, financial planning and (if relevant) products:

- Transition Plan The MAM strategy for transitioning to a low-carbon economy has involved the exclusion of fossil fuel companies. MAM does not invest directly in fossil fuel companies across any of its investment portfolios (100% of AUM). In addition to this exclusion on ethical grounds, we include climate and environmental metrics into our ESG checklist. This must be completed for every company eligible for investment and will influence our view on a company's quality. Our approach helps to drive more accurate risk analysis, helping us to invest in those businesses capable and willing to manage their environmental footprint in a changing world.
- Targets MAM has set net zero goals for our operations and investment portfolios. We aim to reduce our financed emissions by 7% year-on-year to achieve a 50% reduction in emissions by 2030 (from a 2019 baseline) and net zero by 2050.
- Actions We monitor the progress being made towards our targets by investee companies by updating our ESG checklists. This means that we can see if companies are reducing absolute emissions in line with the Paris Agreement. We also engage with our holdings to encourage appropriate climate action in line with the latest science. So far, we have met our annual financed emissions reduction goals. We publish our progress in an annual report entitled "Project: Net Zero".

○ (B) No, our organisation has not yet integrated climate-related risks and opportunities into its investment strategy, financial planning and (if relevant) products

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 42	PLUS	N/A	N/A	PUBLIC	Climate change	General

Which sectors are covered by your organisation's strategy addressing high-emitting sectors?

(A) Coal

Describe your strategy:

We exclude fossil fuel companies from all of our portfolios

(B) Gas

Describe your strategy:

We exclude fossil fuel companies from all of our portfolios

(C) Oil

Describe your strategy:

We exclude fossil fuel companies from all of our portfolios

(D) Utilities

Describe your strategy:

Our Environmental Policy helps us to assess which companies are managing their environmental footprints well and those with material environmental risks or weaknesses.

(E) Cement

Describe your strategy:

Our Environmental Policy helps us to assess which companies are managing their environmental footprints well and those with material environmental risks or weaknesses.

(F) Steel

Describe your strategy:

Our Environmental Policy helps us to assess which companies are managing their environmental footprints well and those with material environmental risks or weaknesses.

(G) Aviation

Describe your strategy:

Our Environmental Policy helps us to assess which companies are managing their environmental footprints well and those with material environmental risks or weaknesses.

(H) Heavy duty road

Describe your strategy:

Our Environmental Policy helps us to assess which companies are managing their environmental footprints well and those with material environmental risks or weaknesses.

(I) Light duty road

Describe your strategy:

Our Environmental Policy helps us to assess which companies are managing their environmental footprints well and those with material environmental risks or weaknesses.

(J) Shipping

Describe your strategy:

Our Environmental Policy helps us to assess which companies are managing their environmental footprints well and those with material environmental risks or weaknesses.

(K) Aluminium

Describe your strategy:

Our Environmental Policy helps us to assess which companies are managing their environmental footprints well and those with material environmental risks or weaknesses.

(L) Agriculture, forestry, fishery

Describe your strategy:

Our Environmental Policy helps us to assess which companies are managing their environmental footprints well and those with material environmental risks or weaknesses.

(M) Chemicals

Describe your strategy:

Our Environmental Policy helps us to assess which companies are managing their environmental footprints well and those with material environmental risks or weaknesses.

(N) Construction and buildings

Describe your strategy:

Our Environmental Policy helps us to assess which companies are managing their environmental footprints well and those with material environmental risks or weaknesses.

(O) Textile and leather

Describe your strategy:

Our Environmental Policy helps us to assess which companies are managing their environmental footprints well and those with material environmental risks or weaknesses.

(P) Water

Describe your strategy:

Our Environmental Policy helps us to assess which companies are managing their environmental footprints well and those with material environmental risks or weaknesses.

(Q) Other

- (R) We do not have a strategy addressing high-emitting sectors

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
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PGS 43	CORE	N/A	N/A	PUBLIC	Climate change	General
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Has your organisation assessed the resilience of its investment strategy in different climate scenarios, including one in which the average temperature rise is held to below 2 degrees Celsius (preferably to 1.5 degrees Celsius) above pre-industrial levels?

- (A) Yes, using the Inevitable Policy Response Forecast Policy Scenario (FPS) or Required Policy Scenario (RPS)
- (B) Yes, using the One Earth Climate Model scenario
- (C) Yes, using the International Energy Agency (IEA) Net Zero scenario

(D) Yes, using other scenarios

Specify:

The PAII Net Zero Investment Framework (NZIF) was used to set an annual 7% emissions reduction target across our portfolios. The 7% annual reduction target will apply across each of our in-scope portfolios. The 7% emission reduction year-on-year target is derived from the P2 model in the IPCC special report on global warming and aligned to a 1.5°C scenario (and a 50% reduction in emissions by 2030).

- (E) No, we have not assessed the resilience of our investment strategy in different climate scenarios, including one that holds temperature rise to below 2 degrees

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
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PGS 44	CORE	N/A	N/A	PUBLIC	Climate change	General
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Does your organisation have a process to identify, assess, and manage the climate-related risks (potentially) affecting your investments?

(A) Yes, we have a process to identify and assess climate-related risks

(1) Describe your process

To identify and assess climate risks, we utilise our Environmental Policy. The application of this policy to all current and potential holdings helps us to evaluate which companies are managing their environmental footprints well and those with material environmental risks or weaknesses.

We record the carbon intensity of companies across Scopes 1, 2 and 3 based on tonnes of carbon used per million US Dollars of sales generated. This allows us to compare the carbon intensity of companies across our Approved List as well as within a given sector or Portfolio. In addition to the above, we also record the absolute carbon emissions associated with each company across all three scopes.

(2) Describe how this process is integrated into your overall risk management

The Policy referenced above is integrated into the MAM ESG Checklist, we use this methodology to score companies out of 10. We integrate our ESG scores into our view of a company's quality. Our approach helps to drive more accurate risk analysis, helping us to invest in those businesses capable and willing to manage their environmental footprint in a changing world.

(B) Yes, we have a process to manage climate-related risks

(1) Describe your process

Where we identify weaknesses in a company's approach to managing climate-related risks, we engage with companies to better understand their approach to environmental issues; improve areas of weakness; and encourage improved levels of data disclosure and reporting.

The Sustainability Committee monitors the ESG scores of companies on our Approved List at quarterly meetings to understand how Analysts are scoring companies. The Sustainability committee will also review the engagement log to see how well companies are responding to our requests for improvement.

Where companies fail to make the requisite improvements to their approach, we will consider divesting from the company due to a heightened exposure to climate-related risk without an appropriate strategy in place to manage said risks.

(2) Describe how this process is integrated into your overall risk management

Overall, our strategy combines:

- the identification of environmental risk using our ESG checklists prior to investment
- ongoing monitoring of environmental performance using company reporting and third party ESG data
- engagement to advocate for climate action.

- (C) No, we do not have any processes to identify, assess, or manage the climate-related risks affecting our investments

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 45	CORE	N/A	N/A	PUBLIC	Climate change	General

During the reporting year, which of the following climate risk metrics or variables affecting your investments did your organisation use and publicly disclose?

- (A) Exposure to physical risk
- (B) Exposure to transition risk
- (C) Internal carbon price
- (D) Total carbon emissions**
 - (1) Indicate whether this metric or variable was used and disclosed, including the methodology
 - (1) Metric or variable used
 - (2) Metric or variable used and disclosed
 - **(3) Metric or variable used and disclosed, including methodology**
 - (2) Provide link to the disclosed metric or variable, including the methodology followed, as applicable
 - <https://montanaro.co.uk/wp-content/uploads/Project-Net-Zero-2024-Final.pdf>
- (E) Weighted average carbon intensity**
 - (1) Indicate whether this metric or variable was used and disclosed, including the methodology
 - (1) Metric or variable used
 - (2) Metric or variable used and disclosed
 - **(3) Metric or variable used and disclosed, including methodology**
 - (2) Provide link to the disclosed metric or variable, including the methodology followed, as applicable
 - <https://montanaro.co.uk/wp-content/uploads/Project-Net-Zero-2024-Final.pdf>
- (F) Avoided emissions
- (G) Implied Temperature Rise (ITR)
- (H) Non-ITR measure of portfolio alignment with UNFCCC Paris Agreement goals
- (I) Proportion of assets or other business activities aligned with climate-related opportunities**
 - (1) Indicate whether this metric or variable was used and disclosed, including the methodology
 - (1) Metric or variable used
 - (2) Metric or variable used and disclosed
 - **(3) Metric or variable used and disclosed, including methodology**
 - (2) Provide link to the disclosed metric or variable, including the methodology followed, as applicable
 - <https://montanaro.co.uk/wp-content/uploads/Project-Net-Zero-2024-Final.pdf>
- (J) Other metrics or variables
 - (K) Our organisation did not use or publicly disclose any climate risk metrics or variables affecting our investments during the reporting year

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 46	CORE	N/A	N/A	PUBLIC	Climate change	General

During the reporting year, did your organisation publicly disclose its Scope 1, Scope 2, and/or Scope 3 greenhouse gas emissions?

- (A) Scope 1 emissions**
 - (1) Indicate whether this metric was disclosed, including the methodology
 - (1) Metric disclosed
 - (2) Metric and methodology disclosed**
 - (2) Provide links to the disclosed metric and methodology, as applicable
 - <https://montanaro.co.uk/wp-content/uploads/Project-Net-Zero-2024-Final.pdf>
- (B) Scope 2 emissions**
 - (1) Indicate whether this metric was disclosed, including the methodology
 - (1) Metric disclosed
 - (2) Metric and methodology disclosed**
 - (2) Provide links to the disclosed metric and methodology, as applicable
 - <https://montanaro.co.uk/wp-content/uploads/Project-Net-Zero-2024-Final.pdf>
- (C) Scope 3 emissions (including financed emissions)**
 - (1) Indicate whether this metric was disclosed, including the methodology
 - (1) Metric disclosed
 - (2) Metric and methodology disclosed**
 - (2) Provide links to the disclosed metric and methodology, as applicable
 - <https://montanaro.co.uk/wp-content/uploads/Project-Net-Zero-2024-Final.pdf>
- (D) Our organisation did not publicly disclose its Scope 1, Scope 2, or Scope 3 greenhouse gas emissions during the reporting year

SUSTAINABILITY OUTCOMES

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 47	CORE	N/A	Multiple indicators	PUBLIC	Sustainability outcomes	1, 2

Has your organisation identified the intended and unintended sustainability outcomes connected to its investment activities?

- (A) Yes, we have identified one or more specific sustainability outcomes connected to our investment activities**
- (B) No, we have not yet identified the sustainability outcomes connected to any of our investment activities

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 47.1	CORE	PGS 47	N/A	PUBLIC	Sustainability outcomes	1, 2

Which widely recognised frameworks has your organisation used to identify the intended and unintended sustainability outcomes connected to its investment activities?

- (A) The UN Sustainable Development Goals (SDGs) and targets
- (B) The UNFCCC Paris Agreement
- (C) The UN Guiding Principles on Business and Human Rights (UNGPs)
- (D) OECD frameworks: OECD Guidelines for Multinational Enterprises and Guidance on Responsible Business Conduct for Institutional Investors
- (E) The EU Taxonomy
- (F) Other relevant taxonomies
- (G) The International Bill of Human Rights
- (H) The International Labour Organization's Declaration on Fundamental Principles and Rights at Work and the eight core conventions
- (I) The Convention on Biological Diversity
- (J) Other international framework(s)
- (K) Other regional framework(s)
- (L) Other sectoral/issue-specific framework(s)
- (M) Our organisation did not use any widely recognised frameworks to identify the intended and unintended sustainability outcomes connected to its investment activities

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 47.2	CORE	PGS 47	PGS 48	PUBLIC	Sustainability outcomes	1, 2

What are the primary methods that your organisation has used to determine the most important intended and unintended sustainability outcomes connected to its investment activities?

- (A) Identify sustainability outcomes that are closely linked to our core investment activities
- (B) Consult with key clients and/or beneficiaries to align with their priorities
- (C) Assess which actual or potential negative outcomes for people are most severe based on their scale, scope, and irremediable character
- (D) Identify sustainability outcomes that are closely linked to systematic sustainability issues
- (E) Analyse the input from different stakeholders (e.g. affected communities, civil society, trade unions or similar)
- (F) Understand the geographical relevance of specific sustainability outcome objectives
- (G) Other method
- (H) We have not yet determined the most important sustainability outcomes connected to our investment activities

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 48	CORE	PGS 47.2	PGS 48.1, SO 1	PUBLIC	Sustainability outcomes	1, 2

Has your organisation taken action on any specific sustainability outcomes connected to its investment activities, including to prevent and mitigate actual and potential negative outcomes?

- (A) Yes, we have taken action on some of the specific sustainability outcomes connected to our investment activities

- (B) No, we have not yet taken action on any specific sustainability outcomes connected to our investment activities

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 48.1	PLUS	PGS 48	N/A	PUBLIC	Sustainability outcomes	1, 2

Why has your organisation taken action on specific sustainability outcomes connected to its investment activities?

- (A) We believe that taking action on sustainability outcomes is relevant to our financial risks and returns over both short- and long-term horizons
- (B) We believe that taking action on sustainability outcomes, although not yet relevant to our financial risks and returns, will become so over a long-time horizon
- (C) We have been requested to do so by our clients and/or beneficiaries
- (D) We want to prepare for and respond to legal and regulatory developments that are increasingly addressing sustainability outcomes
- (E) We want to protect our reputation, particularly in the event of negative sustainability outcomes connected to investments
- (F) We want to enhance our social licence-to-operate (i.e. the trust of beneficiaries, clients, and other stakeholders)
- (G) We believe that taking action on sustainability outcomes in parallel to financial return goals has merit in its own right
- (H) Other

HUMAN RIGHTS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 49	PLUS	PGS 47	PGS 49.1	PUBLIC	Human rights	1, 2

During the reporting year, what steps did your organisation take to identify and take action on the actual and potential negative outcomes for people connected to your investment activities?

- (A) We assessed the country level context of our potential and/or existing investments to understand how this could connect our organisation to negative human rights outcomes

Explain how these activities were conducted:

We record and score companies on their human rights policies and practices. Our approach is included in our Social Policy which is integrated into our ESG checklist and is undertaken for every company prior to investment. This allows us to analyse the potential exposure of a business to human rights risks, leading to more accurate risk analysis of investment opportunities. The areas that we focus on are influenced by and support the UN Global Compact. We use MSCI, Bloomberg and company sourced data to measure and record how investee companies manage human rights risks. Where we identify weaknesses in a company's approach we will engage with companies– by doing so, we believe that we can help to encourage management teams to put appropriate systems in place. If we become aware of a serious human rights failure at a company, we will consider divestment.

- (B) We assessed the sector context of our potential and/or existing investments to understand how this could connect our organisation to negative human rights outcomes
- (C) We assessed the human rights performance of our potential and/or existing investments to understand how this could connect our organisation to negative human rights outcomes
- (D) We monitored severe and emerging human rights controversies to understand how this could connect our organisation to negative human rights outcomes
- (E) We took other steps to assess and manage the actual and potentially negative outcomes for people connected to our investment activities

- (F) We did not identify and take action on the actual and potentially negative outcomes for people connected to any of our investment activities during the reporting year

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 49.1	PLUS	PGS 49	N/A	PUBLIC	Human rights	1, 2

During the reporting year, which stakeholder groups did your organisation include when identifying and taking action on the actual and potential negative outcomes for people connected to your investment activities?

(A) Workers

Sector(s) for which each stakeholder group was included

- (1) Energy
- (2) Materials
- (3) Industrials
- (4) Consumer discretionary
- (5) Consumer staples
- (6) Healthcare
- (7) Finance
- (8) Information technology
- (9) Communication services
- (10) Utilities
- (11) Real estate

(B) Communities

Sector(s) for which each stakeholder group was included

- (1) Energy
- (2) Materials
- (3) Industrials
- (4) Consumer discretionary
- (5) Consumer staples
- (6) Healthcare
- (7) Finance
- (8) Information technology
- (9) Communication services
- (10) Utilities
- (11) Real estate

(C) Customers and end-users

Sector(s) for which each stakeholder group was included

- (1) Energy
- (2) Materials
- (3) Industrials
- (4) Consumer discretionary
- (5) Consumer staples
- (6) Healthcare
- (7) Finance
- (8) Information technology
- (9) Communication services
- (10) Utilities
- (11) Real estate

(D) Other stakeholder groups

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 49.2	PLUS	PGS 47	N/A	PUBLIC	Human rights	1, 2

During the reporting year, what information sources did your organisation use to identify the actual and potential negative outcomes for people connected to its investment activities?

(A) Corporate disclosures

Provide further detail on how your organisation used these information sources:

We use company sourced data to measure and record how investee companies manage human rights risks.

(B) Media reports

Provide further detail on how your organisation used these information sources:

We use media reports to monitor how investee companies manage human rights risks.

(C) Reports and other information from NGOs and human rights institutions

Provide further detail on how your organisation used these information sources:

We use reports from organisations such as Amnesty International and Freedom House to monitor how investee companies manage human rights risks.

(D) Country reports, for example, by multilateral institutions, e.g. OECD, World Bank

(E) Data provider scores or benchmarks

Provide further detail on how your organisation used these information sources:

We use MSCI, Bloomberg and ISS to measure and record how investee companies manage human rights risks.

(F) Human rights violation alerts

(G) Sell-side research

(H) Investor networks or other investors

(I) Information provided directly by affected stakeholders or their representatives

(J) Social media analysis

(K) Other

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 50	PLUS	PGS 47	N/A	PUBLIC	Human rights	1, 2

During the reporting year, did your organisation, directly or through influence over investees, enable access to remedy for people affected by negative human rights outcomes connected to your investment activities?

(A) Yes, we enabled access to remedy directly for people affected by negative human rights outcomes we caused or contributed to through our investment activities

(B) Yes, we used our influence to ensure that our investees provided access to remedies for people affected by negative human rights outcomes we were linked to through our investment activities

(C) No, we did not enable access to remedy directly, or through the use of influence over investees, for people affected by negative human rights outcomes connected to our investment activities during the reporting year

Explain why:

This was not an issue we encountered for any of our investee companies over the course of the reporting year and as a consequence this did not feature as a topic of our engagement.

LISTED EQUITY (LE)

OVERALL APPROACH

MATERIALITY ANALYSIS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
LE 1	CORE	OO 21	N/A	PUBLIC	Materiality analysis	1

Does your organisation have a formal investment process to identify and incorporate material ESG factors across your listed equity strategies?

(3) Active - fundamental

(A) Yes, our investment process incorporates material governance factors

(1) for all of our AUM

(B) Yes, our investment process incorporates material environmental and social factors

(1) for all of our AUM

(C) Yes, our investment process incorporates material ESG factors beyond our organisation's average investment holding period

(1) for all of our AUM

(D) No, we do not have a formal process. Our investment professionals identify material ESG factors at their discretion

o

(E) No, we do not have a formal or informal process to identify and incorporate material ESG factors

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MONITORING ESG TRENDS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
LE 2	CORE	OO 21	N/A	PUBLIC	Monitoring ESG trends	1

Does your organisation have a formal process for monitoring and reviewing the implications of changing ESG trends across your listed equity strategies?

(3) Active - fundamental

(A) Yes, we have a formal process that includes scenario analyses

(1) for all of our AUM

(B) Yes, we have a formal process, but it does not include scenario analyses

(C) We do not have a formal process for our listed equity strategies; our investment professionals monitor how ESG trends vary over time at their discretion

o

(D) We do not monitor and review the implications of changing ESG trends on our listed equity strategies

o

(A) Yes, we have a formal process that includes scenario analysis - Specify: (Voluntary)

Our proprietary ESG checklists are kept up to date throughout to holding period of the company. Here is where we record the changing circumstances of the business and how well investee companies are managing ESG risks and opportunities. As trends evolve we review the implications this may have on the business and our investment case.

PRE-INVESTMENT

ESG INCORPORATION IN RESEARCH

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
LE 3	CORE	OO 21	N/A	PUBLIC	ESG incorporation in research	1

How does your financial analysis and equity valuation or security rating process incorporate material ESG risks?

(2) Active - fundamental

(A) We incorporate material governance-related risks into our financial analysis and equity valuation or security rating process

(1) in all cases

(B) We incorporate material environmental and social risks into our financial analysis and equity valuation or security rating process

(1) in all cases

(C) We incorporate material environmental and social risks related to companies' supply chains into our financial analysis and equity valuation or security rating process

(1) in all cases

(D) We do not incorporate material ESG risks into our financial analysis, equity valuation or security rating processes

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Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
LE 4	CORE	OO 21	N/A	PUBLIC	ESG incorporation in research	1

What information do you incorporate when you assess the ESG performance of companies in your financial analysis, benchmark selection and/or portfolio construction process?

(3) Active - fundamental

(A) We incorporate qualitative and/or quantitative information on current performance across a range of material ESG factors	(1) in all cases
(B) We incorporate qualitative and/or quantitative information on historical performance across a range of material ESG factors	(1) in all cases
(C) We incorporate qualitative and/or quantitative information on material ESG factors that may impact or influence future corporate revenues and/or profitability	(1) in all cases
(D) We incorporate qualitative and/or quantitative information enabling current, historical and/or future performance comparison within a selected peer group across a range of material ESG factors	(1) in all cases
(E) We do not incorporate qualitative or quantitative information on material ESG factors when assessing the ESG performance of companies in our financial analysis, equity investment or portfolio construction process	o

ESG INCORPORATION IN PORTFOLIO CONSTRUCTION

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
LE 5	PLUS	OO 21	N/A	PUBLIC	ESG incorporation in portfolio construction	1

Provide an example of how you incorporated ESG factors into your equity selection and research process during the reporting year.

Our ESG checklist is designed to help us identify high-quality companies by integrating sustainability risks and opportunities into our research process. ESG factors are assessed alongside financial and strategic considerations and are used to inform our overall view of a company's quality. Only companies that have passed our ESG and ethical analysis are included on the Approved List and are deemed eligible for investment. Therefore, only companies meeting our ESG criteria are featured within our portfolios.

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
LE 6	CORE	OO 21	N/A	PUBLIC	ESG incorporation in portfolio construction	1

How do material ESG factors contribute to your stock selection, portfolio construction and/or benchmark selection process?

(3) Active - fundamental

(A) Material ESG factors contribute to the selection of individual assets and/or sector weightings within our portfolio construction and/or benchmark selection process

(1) for all of our AUM

(B) Material ESG factors contribute to the portfolio weighting of individual assets within our portfolio construction and/or benchmark selection process

(1) for all of our AUM

(C) Material ESG factors contribute to the country or region weighting of assets within our portfolio construction and/or benchmark selection process

(1) for all of our AUM

(D) Other ways material ESG factors contribute to your portfolio construction and/or benchmark selection process

(E) Our stock selection, portfolio construction or benchmark selection process does not include the incorporation of material ESG factors

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POST-INVESTMENT

ESG RISK MANAGEMENT

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
LE 9	CORE	OO 17.1 LE, OO 21	N/A	PUBLIC	ESG risk management	1

What compliance processes do you have in place to ensure that your listed equity assets subject to negative exclusionary screens meet the screening criteria?

- (A) We have internal compliance procedures that ensure all funds or portfolios that are subject to negative exclusionary screening have pre-trade checks
- (B) We have an external committee that oversees the screening implementation process for all funds or portfolios that are subject to negative exclusionary screening
- (C) We have an independent internal committee that oversees the screening implementation process for all funds or portfolios that are subject to negative exclusionary screening
- (D) We do not have compliance processes in place to ensure that we meet our stated negative exclusionary screens

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
LE 10	CORE	OO 21	N/A	PUBLIC	ESG risk management	1

For the majority of your listed equity assets, do you have a formal process to identify and incorporate material ESG risks and ESG incidents into your risk management process?

(2) Active - fundamental

(A) Yes, our formal process includes reviews of quantitative and/or qualitative information on material ESG risks and ESG incidents and their implications for individual listed equity holdings

(B) Yes, our formal process includes reviews of quantitative and/or qualitative information on material ESG risks and ESG incidents and their implications for other listed equity holdings exposed to similar risks and/or incidents

(C) Yes, our formal process includes reviews of quantitative and/or qualitative information on material ESG risks and ESG incidents and their implications for our stewardship activities

(D) Yes, our formal process includes ad hoc reviews of quantitative and/or qualitative information on severe ESG incidents

(E) We do not have a formal process to identify and incorporate material ESG risks and ESG incidents into our risk management process; our investment professionals identify and incorporate material ESG risks and ESG incidents at their discretion

(F) We do not have a formal process to identify and incorporate material ESG risks and ESG incidents into our risk management process

o

PERFORMANCE MONITORING

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
LE 11	PLUS	OO 21	N/A	PUBLIC	Performance monitoring	1

Provide an example of how the incorporation of ESG factors in your listed equity valuation or portfolio construction affected the realised returns of those assets.

In our opinion, the two biggest drivers to the valuation of a stock are growth and quality. ESG is part of our definition of a company's quality and our analysis of ESG therefore directly influences the price we are prepared to pay for a company's shares.

- ESG influences our view on the quality of a business.

We evaluate the ESG profile of every potential holding using our proprietary ESG Checklist, which forms a core part of the investment due diligence process. This tool covers a range of material topics across four pillars: Ethics, Environment, Social, and Governance. Each area is scored individually and then weighted to produce a final score out of 10.

Governance is weighted most heavily, reflecting our belief that strong governance is essential for delivering broader ESG objectives. ESG scores inform analyst ratings, which in turn influence the quality rating of a company and the Investment Committee's decision on whether the company should be added to our Approved List. Companies with a score below 5 are flagged for further investigation and would typically trigger engagement if deemed investable.

- Example A relevant example during the reporting year was our investment in a UK-based manufacturer of ventilation systems, which received a score of 7.6 on our ESG Checklist. The company demonstrates strong ESG risk management and transparency, including through the use of Environmental Product Declarations (EPDs) to monitor the environmental footprint of selected product lines.

At the same time, it benefits from alignment with environmental and social sustainability outcomes. Efficient ventilation supports energy efficiency objectives within the built environment and contributes to improved indoor air quality. This has positive implications for public health, particularly through the prevention of respiratory illnesses associated with poor air quality. We believe this is an example of a company that is not only managing its own ESG risks effectively but is also well positioned to benefit from the transition to a more sustainable, health-conscious society. The company's quality, underpinned by strong ESG performance, has supported its investment case and long-term value creation.

DISCLOSURE OF ESG SCREENS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
LE 12	CORE	OO 17 LE, OO 21	N/A	PUBLIC	Disclosure of ESG screens	6

For all your listed equity assets subject to ESG screens, how do you ensure that clients understand ESG screens and their implications?

- (A) We share a list of ESG screens
- (B) We share any changes in ESG screens
- (C) We explain any implications of ESG screens, such as their deviation from a benchmark or impact on sector weightings
- (D) We do not share the above information for all our listed equity assets subject to ESG screens

SUSTAINABILITY OUTCOMES (SO)

SETTING TARGETS AND TRACKING PROGRESS

SETTING TARGETS ON SUSTAINABILITY OUTCOMES

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SO 1	PLUS	PGS 48	SO 2, SO 2.1, SO 3	PUBLIC	Setting targets on sustainability outcomes	1, 2

What specific sustainability outcomes connected to its investment activities has your organisation taken action on?

(A) Sustainability outcome #1

(1) Widely recognised frameworks used to guide action on this sustainability outcome

(1) The UN Sustainable Development Goals (SDGs) and targets

(2) The UNFCCC Paris Agreement

(3) The UN Guiding Principles on Business and Human Rights (UNGPs)

(4) OECD frameworks: OECD Guidelines for Multinational Enterprises and Guidance on Responsible Business Conduct for Institutional Investors

(5) The EU Taxonomy

(6) Other relevant taxonomies

(7) The International Bill of Human Rights

(8) The International Labour Organization's Declaration on Fundamental Principles and Rights at Work and the eight core conventions

(9) The Convention on Biological Diversity

(10) Other international, regional, sector-based or issue-specific framework(s)

(2) Classification of sustainability outcome

(1) Environmental

(2) Social

(3) Governance-related

(4) Other

(3) Sustainability outcome name

We have set net zero goals for our portfolios. We want to achieve net zero financed emissions by 2050 and have all investee companies committed to the SBTi by 2040. In addition, by 2030, Montanaro Asset Management will be carbon negative and will have removed from the environment all the carbon it has emitted since its founding in 1991. We believe we are the first UK Asset Manager to commit to these ambitious targets.

(4) Number of targets set for this outcome

(1) No target

(2) One target

(3) Two or more targets

(B) Sustainability outcome #2

(1) Widely recognised frameworks used to guide action on this sustainability outcome

(1) The UN Sustainable Development Goals (SDGs) and targets

(2) The UNFCCC Paris Agreement

(3) The UN Guiding Principles on Business and Human Rights (UNGPs)

(4) OECD frameworks: OECD Guidelines for Multinational Enterprises and Guidance on Responsible Business Conduct for Institutional Investors

(5) The EU Taxonomy

(6) Other relevant taxonomies

(7) The International Bill of Human Rights

(8) The International Labour Organization's Declaration on Fundamental Principles and Rights at Work and the eight core conventions

- (9) The Convention on Biological Diversity
- (10) Other international, regional, sector-based or issue-specific framework(s)
- (2) Classification of sustainability outcome
 - (1) Environmental
 - (2) **Social**
 - (3) Governance-related
 - (4) Other
- (3) Sustainability outcome name

Living wage provision
- (4) Number of targets set for this outcome
 - (1) **No target**
 - (2) One target
 - (3) Two or more targets
- (C) **Sustainability outcome #3**
 - (1) Widely recognised frameworks used to guide action on this sustainability outcome
 - (1) **The UN Sustainable Development Goals (SDGs) and targets**
 - (2) The UNFCCC Paris Agreement
 - (3) The UN Guiding Principles on Business and Human Rights (UNGPs)
 - (4) OECD frameworks: OECD Guidelines for Multinational Enterprises and Guidance on Responsible Business Conduct for Institutional Investors
 - (5) The EU Taxonomy
 - (6) Other relevant taxonomies
 - (7) The International Bill of Human Rights
 - (8) The International Labour Organization's Declaration on Fundamental Principles and Rights at Work and the eight core conventions
 - (9) The Convention on Biological Diversity
 - (10) Other international, regional, sector-based or issue-specific framework(s)
 - (2) Classification of sustainability outcome
 - (1) **Environmental**
 - (2) **Social**
 - (3) **Governance-related**
 - (4) **Other**
 - (3) Sustainability outcome name

We use investment themes mapped to the UN SDGs as part of the impact investment process. This influences our Better World Fund portfolio and other impact strategies.
 - (4) Number of targets set for this outcome
 - (1) No target
 - (2) One target
 - (3) **Two or more targets**
- (D) **Sustainability outcome #4**
 - (1) Widely recognised frameworks used to guide action on this sustainability outcome
 - (1) The UN Sustainable Development Goals (SDGs) and targets
 - (2) The UNFCCC Paris Agreement
 - (3) The UN Guiding Principles on Business and Human Rights (UNGPs)
 - (4) OECD frameworks: OECD Guidelines for Multinational Enterprises and Guidance on Responsible Business Conduct for Institutional Investors
 - (5) **The EU Taxonomy**
 - (6) Other relevant taxonomies
 - (7) The International Bill of Human Rights
 - (8) The International Labour Organization's Declaration on Fundamental Principles and Rights at Work and the eight core conventions
 - (9) The Convention on Biological Diversity
 - (10) Other international, regional, sector-based or issue-specific framework(s)
 - (2) Classification of sustainability outcome
 - (1) **Environmental**
 - (2) Social
 - (3) Governance-related
 - (4) Other

(3) Sustainability outcome name

Our Article 9 fund contributes to environmental objectives under the EU taxonomy regulation.

(4) Number of targets set for this outcome

- (1) No target
- (2) One target
- (3) Two or more targets
- (E) Sustainability outcome #5
- (F) Sustainability outcome #6
- (G) Sustainability outcome #7
- (H) Sustainability outcome #8
- (I) Sustainability outcome #9
- (J) Sustainability outcome #10

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SO 2	PLUS	SO 1	SO 2.1, SO 4, SO 5	PUBLIC	Setting targets on sustainability outcomes	1

For each sustainability outcome, provide details of up to two of your nearest-term targets.

(A1) Sustainability Outcome #1: Target details

(A1) Sustainability Outcome #1:	We have set net zero goals for our portfolios. We want to achieve net zero financed emissions by 2050 and have all investee companies committed to the SBTi by 2040. In addition, by 2030, Montanaro Asset Management will be carbon negative and will have removed from the environment all the carbon it has emitted since its founding in 1991. We believe we are the first UK Asset Manager to commit to these ambitious targets.
(1) Target name	Net Zero Emissions
(2) Baseline year	2019
(3) Target to be met by	2050
(4) Methodology	<p>PAII NZIF has been used to set an annual 7% emissions reduction target across our portfolios. The 7% annual reduction target will apply across each of our in-scope portfolios. The 7% emission reduction year-on-year target is derived from the P2 model in the IPCC special report on global warming and aligned to a 1.5°C scenario (and a 50% reduction in emissions by 2030).</p> <p>We will also aim for 50% of the designated AUM will have implemented a SBT by 2030 and 100% of AUM will be covered by 2040. Montanaro's operational emissions can be broken down into our Scope 1 emissions (direct emissions, such as the running of our office on Threadneedle Street, London), our Scope 2 emissions (electricity bought to heat and cool the office) and our upstream Scope 3 emissions (including business travel, hotel stays and IT suppliers).</p>

We have partnered with Klimate (the Danish Carbon Removal Platform), to provide access to high-quality, innovative, and verifiable carbon removal solutions, aligned with science. In this way, we will adopt a “portfolio-type” approach, where we will select a number of carbon removal projects and technologies. We are looking for exposure to innovative projects such as direct air capture; deep storage bio-oil; ocean kelp; and restorative tree-planting.

All will be independently verified to ensure their integrity. The net sum of this project is that we have 1,381 tonnes of historical emissions to take into consideration; we seek to remove these emissions from the atmosphere while taking into account future emissions in our path to become carbon negative by 2030.

(5) Metric used (if relevant)	Metric tonnes of CO2e.
(6) Absolute or intensity-based (if relevant)	(1) Absolute
(7) Baseline level or amount (if relevant):	47,583 tCO2e of financed emissions (in 2019) and 1,381 tonnes of historical operational emissions.
(8) Target level or amount (if relevant)	0
(9) Percentage of total AUM covered in your baseline year for target setting	70%
(10) Do you also have a longer-term target for this?	(2) No

(A2) Sustainability Outcome #1: Target details

(A2) Sustainability Outcome #1:	We have set net zero goals for our portfolios. We want to achieve net zero financed emissions by 2050 and have all investee companies committed to the SBTi by 2040. In addition, by 2030, Montanaro Asset Management will be carbon negative and will have removed from the environment all the carbon it has emitted since its founding in 1991. We believe we are the first UK Asset Manager to commit to these ambitious targets.
(1) Target name	
(2) Baseline year	
(3) Target to be met by	
(4) Methodology	
(5) Metric used (if relevant)	
(6) Absolute or intensity-based (if relevant)	

(7) Baseline level or amount (if relevant):

(8) Target level or amount (if relevant)

(9) Percentage of total AUM covered in your baseline year for target setting

(10) Do you also have a longer-term target for this?

(C1) Sustainability Outcome #3: Target details

(C1) Sustainability Outcome #3: We use investment themes mapped to the UN SDGs as part of the impact investment process. This influences our Better World Fund portfolio and other impact strategies.

(1) Target name UN SDG alignment

(2) Baseline year 2018

(3) Target to be met by 2030

(4) Methodology

In order to be eligible for investment in our impact strategies, companies must pass our impact analysis. This considers the environmental and social problems the products and services of the company are helping to solve. The company must also have at least 50% revenue alignment with one of our six Better World Themes. These have been mapped against the UN SDGs.

Only companies that we believe are contributing to the achievement of the UN SDGs and the 2030 Agenda can be included in our impact portfolios.

We also apply negative screens via our Ethics Checklist that prohibit investment in: exploration & production fossil fuel companies; tobacco producers & distributors; alcohol producers & distributors; weapons manufacturers; gambling companies; adult entertainment; high interest rate lending companies; and animal testing (unless required by law for healthcare related companies). We exclude from investment any company with 10% or more revenue exposure to these restricted business areas. A company will either “pass” or “fail” the Ethics Checklist.

(5) Metric used (if relevant) N/A

(6) Absolute or intensity-based (if relevant)

(7) Baseline level or amount (if relevant): N/A

(8) Target level or amount (if relevant) 100% of AUM managed under our impact strategies.

(9) Percentage of total AUM covered in your baseline year for target setting 20%

(10) Do you also have a longer-term target for this? (2) No

(C2) Sustainability Outcome #3: Target details

(C2) Sustainability Outcome #3: We use investment themes mapped to the UN SDGs as part of the impact investment process. This influences our Better World Fund portfolio and other impact strategies.

(1) Target name

(2) Baseline year

(3) Target to be met by

(4) Methodology

(5) Metric used (if relevant)

(6) Absolute or intensity-based (if relevant)

(7) Baseline level or amount (if relevant):

(8) Target level or amount (if relevant)

(9) Percentage of total AUM covered in your baseline year for target setting

(10) Do you also have a longer-term target for this?

FOCUS: SETTING NET-ZERO TARGETS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SO 3	PLUS	SO 1	Multiple, see guidance	PUBLIC	Focus: Setting net-zero targets	General

If relevant to your organisation, you can opt-in to provide further details on your net-zero targets.

- (A) Yes, we would like to provide further details on our organisation's asset class-specific net-zero targets
- (B) Yes, we would like to provide further details on our organisation's net-zero targets for high-emitting sectors
- (C) Yes, we would like to provide further details on our organisation's mandate or fund-specific net-zero targets
- (D) No, we would not like to provide further details on our organisation's asset class, high-emitting sectors or mandate or fund-specific net-zero targets
- (E) No, our organisation does not have any asset class, high-emitting sectors or mandate or fund-specific net-zero targets

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
NZAM 1	PLUS	NZAM, SO 3	SO 3.1, SO 3.2	PUBLIC	Focus: Setting net-zero targets	General

Select the relevant asset class breakdown for your organisation to report on your net-zero targets.

- (A) PRI's standard asset class breakdown
- (B) Asset class breakdown as per the NZAOA's Target Setting Protocol

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SO 3.1	PLUS	SO 3	N/A	PUBLIC	Focus: Setting net-zero targets	General

Provide details of your nearest-term net zero targets per asset class.

- (A) PRI asset class breakdown
 - Listed equity

Target details

(A) PRI asset class breakdown: Listed equity

(1) Baseline year 2019

(2) Target to be met by 2050

(3) Emissions included in target

(1) Scope 1
(2) Scope 2

(4) Methodology

PAII NZIF has been used to set an annual 7% emissions reduction target across our portfolios. The 7% annual reduction target will apply across each of our in-scope portfolios. The 7% emission reduction year-on-year target is derived from the P2 model in the IPCC special report on global warming and aligned to a 1.5°C scenario (and a 50% reduction in emissions by 2030). We will also aim for 50% of the designated AUM will have implemented a SBT by 2030 and 100% of AUM will be covered by 2040.

(5) Metric used

(2) Absolute: MtCO₂e

(6) Baseline amount

47,583 tCO₂e

(7) Current amount (if different from baseline amount)

14,611 tCO₂e

(8) Targeted reduction with respect to baseline

100%

(9) Percentage of total AUM covered in your baseline year for target setting

70%

(10) If coverage is below 100% for this asset class, explain why

Our trusts and segregated mandates are not covered by the target but all of our open ended funds are in scope.

- Fixed income
- Private equity
- Real estate
- Infrastructure
- Hedge funds
- Forestry
- Farmland
- Other

TRACKING PROGRESS AGAINST TARGETS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SO 4	PLUS	SO 2	SO 4.1	PUBLIC	Tracking progress against targets	1

Does your organisation track progress against your nearest-term sustainability outcomes targets?

(A1) Sustainability outcome #1:

(A1) Sustainability outcome #1:

We have set net zero goals for our portfolios. We want to achieve net zero financed emissions by 2050 and have all investee companies committed to the SBTi by 2040. In addition, by 2030, Montanaro Asset Management will be carbon negative and will have removed from the environment all the carbon it has emitted since its founding in 1991. We believe we are the first UK Asset Manager to commit to these ambitious targets.

Target name:

Net Zero Emissions

Does your organisation track progress against your nearest-term sustainability outcome targets?

(1) Yes

(C1) Sustainability outcome #3:

(C1) Sustainability outcome #3:

We use investment themes mapped to the UN SDGs as part of the impact investment process. This influences our Better World Fund portfolio and other impact strategies.

Target name:

UN SDG alignment

Does your organisation track progress against your nearest-term sustainability outcome targets?

(1) Yes

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SO 4.1	PLUS	SO 4	N/A	PUBLIC	Tracking progress against targets	1

During the reporting year, what qualitative or quantitative progress did your organisation achieve against your nearest-term sustainability outcome targets?

(A1) Sustainability Outcome #1: Target details

(A1) Sustainability Outcome #1:	We have set net zero goals for our portfolios. We want to achieve net zero financed emissions by 2050 and have all investee companies committed to the SBTi by 2040. In addition, by 2030, Montanaro Asset Management will be carbon negative and will have removed from the environment all the carbon it has emitted since its founding in 1991. We believe we are the first UK Asset Manager to commit to these ambitious targets.
(1) Target name	Net Zero Emissions
(2) Target to be met by	2050
(3) Metric used (if relevant)	Metric tonnes of CO2e.
(4) Current level or amount (if relevant)	14,611 tCO2e
(5) Other qualitative or quantitative progress	As of December 2024, 77 companies on our Approved List had made SBTi commitments and set targets, representing 41% of AUM.
(6) Methodology for tracking progress	We record our absolute financed emissions and the number of companies that have committed to SBTi on a quarterly basis to monitor progress.

(C1) Sustainability Outcome #3: Target details

(C1) Sustainability Outcome #3:	We use investment themes mapped to the UN SDGs as part of the impact investment process. This influences our Better World Fund portfolio and other impact strategies.
(1) Target name	UN SDG alignment
(2) Target to be met by	2030
(3) Metric used (if relevant)	N/A

(4) Current level or amount (if relevant) 100% of our Impact AUM is aligned with the achievement of the UN SDGs.

(5) Other qualitative or quantitative progress N/A

(6) Methodology for tracking progress In order to be eligible for investment in our impact strategies, companies must pass our impact analysis. This considers the environmental and social problems the products and services of the company are helping to solve. The company must also have at least 50% revenue alignment with one of our six Better World Themes. These have been mapped against the UN SDGs. The impact checklists that are filled in to assess the contribution of a company to sustainable development are maintained throughout the holding period to ensure that the impact case remains aligned to the UN SDGs.

INDIVIDUAL AND COLLABORATIVE INVESTOR ACTION ON OUTCOMES

LEVERS USED TO TAKE ACTION ON SUSTAINABILITY OUTCOMES

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SO 5	PLUS	SO 2	Multiple	PUBLIC	Levers used to take action on sustainability outcomes	1, 2, 5

During the reporting year, which of the following levers did your organisation use to take action on sustainability outcomes, including to prevent and mitigate actual and potential negative outcomes?

- (A) Stewardship with investees, including engagement, (proxy) voting, and direct influence with privately held assets
 - Select from drop down list:
 - (1) Individually
 - (2) With other investors or stakeholders
- (B) Stewardship: engagement with external investment managers
- (C) Stewardship: engagement with policy makers
 - Select from drop down list:
 - (1) Individually
 - (2) With other investors or stakeholders
- (D) Stewardship: engagement with other key stakeholders
- (E) Capital allocation
- (F) Our organisation did not use any of the above levers to take action on sustainability outcomes during the reporting year

STEWARDSHIP WITH INVESTEES

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SO 8	PLUS	SO 5	N/A	PUBLIC	Stewardship with investees	2

During the reporting year, how did your organisation use stewardship with investees to take action on sustainability outcomes, including preventing and mitigating actual and potential negative outcomes?

(A) Across all sustainability outcomes

(1) Describe your approach

One of the key strategies we employ to drive progress towards our sustainability outcomes is through the active use of stewardship with our investees.

• Why Stewardship Matters:

Engagement forms a key part of our long-term approach, allowing us to identify and manage risks within our portfolios, fulfil our stewardship responsibilities and consider other stakeholders (a duty of all B Corps). Engagement is used as a tool to better understand a company's impact, leading to better investment decisions.

• How We Use Stewardship to Drive Progress on Sustainability Outcomes:

1. Engagement and Advocacy: We engage directly with our investees to encourage them to adopt ambitious sustainability goals, including net zero emissions targets in line with the latest climate science.

Through dialogues, we advocate for the integration of sustainability practices into their business strategies.

2. Voting and Proxy Actions: We exercise our voting rights and proxy actions to influence investees' decisions on sustainability matters. This can include voting for board members who prioritise sustainability or supporting shareholder resolutions that call for greater transparency.

3. Collaboration and Partnerships: We actively seek opportunities for collaboration and partnerships with our investees and other stakeholders.

This can involve joint initiatives to reduce carbon emissions, invest in renewable energy, or support projects aligned with the UN SDGs.

4. Reporting and Transparency: We emphasize the importance of transparent reporting on sustainability metrics. We encourage investees to disclose their progress towards sustainability goals and to adopt industry best practices in reporting, which enhances accountability and transparency.

5. Public Policy Advocacy: We are involved with groups that advocate for responsible stakeholder capitalism.

These include the Glasgow Financial Alliance for Net Zero (GFANZ) and the B Corp Finance & Investment working group.

Expected Outcomes:

Our stewardship activities are expected to result in tangible progress on sustainability outcomes, including:

1. Net Zero Ambitions: By engaging with investees to set ambitious net zero emissions targets, we anticipate reduced carbon footprints across our investment portfolios. This contributes to the global effort to mitigate climate change.

2. UN SDGs Support: Through collaboration and partnerships, we aim to direct investee resources and efforts towards projects that align with the UN SDGs.

This includes investments in renewable energy, sustainable housing, and clean water access, among others.

3. Risk Reduction: Our proactive approach to addressing sustainability risks helps prevent and mitigate potential negative outcomes. This, in turn, enhances the resilience of our investment portfolio and safeguards our clients' assets. In summary, our MAM uses stewardship and engagement as a proactive and strategic approach to drive progress on sustainability outcomes.

(2) Stewardship tools or activities used

(1) Engagement
(2) (Proxy) voting at shareholder meetings

(3) Example

In 2024, Montanaro Asset Management conducted 75 company engagements addressing a variety of issues. This marked an increase in overall engagement activities compared to 2023. Examples include:

1. Climate engagement We engaged with a European aerospace company to discuss progress on climate disclosures. The firm is preparing for CSRD reporting, plans to disclose Scope 3 emissions, and is considering SBTi commitment. A decarbonisation roadmap is expected in 2025.

2. Remuneration consultation We responded to a consultation on remuneration policy, flagging concerns over frequent revisions. We encouraged the use of more stretching non-financial KPIs (e.g. SBTi-aligned climate goals) and greater emphasis on free cash flow. We voted at the AGM and will monitor developments.

3. Impact disclosure We encouraged better disclosure of product impact metrics using Environmental Product Declarations. The company now reports lower carbon intensity for concrete bricks (c.40% less than clay) and is exploring low-carbon cement alternatives for inclusion in our impact reporting.

4. Biodiversity risk flags We engaged a company flagged by MSCI for operations in biodiversity-sensitive areas. The company challenged the accuracy of these flags, citing low ecological interaction at its industrial sites.

5. Standardised reporting We engaged on the need for robust environmental disclosure ahead of upcoming regulation. We stressed the importance of consistent, decision-useful data as net zero transitions accelerate and governments introduce mandatory reporting requirements.

(B) Sustainability Outcome #1:

(B) Sustainability Outcome #1:

We have set net zero goals for our portfolios. We want to achieve net zero financed emissions by 2050 and have all investee companies committed to the SBTi by 2040. In addition, by 2030, Montanaro Asset Management will be carbon negative and will have removed from the environment all the carbon it has emitted since its founding in 1991. We believe we are the first UK Asset Manager to commit to these ambitious targets.

(1) Describe your approach

(2) Stewardship tools or activities used

(3) Example

(C) Sustainability Outcome #2:

(C) Sustainability Outcome #2: Living wage provision

(1) Describe your approach

(2) Stewardship tools or activities used

(3) Example

(D) Sustainability Outcome #3:

(D) Sustainability Outcome #3: We use investment themes mapped to the UN SDGs as part of the impact investment process. This influences our Better World Fund portfolio and other impact strategies.

(1) Describe your approach

(2) Stewardship tools or activities used

(3) Example

(E) Sustainability Outcome #4:

(E) Sustainability Outcome #4: Our Article 9 fund contributes to environmental objectives under the EU taxonomy regulation.

(1) Describe your approach

(2) Stewardship tools or activities used

(3) Example

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SO 9	PLUS	SO 5	N/A	PUBLIC	Stewardship with investees	2

How does your organisation prioritise the investees you conduct stewardship with to take action on sustainability outcomes, including preventing and mitigating actual and potential negative outcomes?

- (A) We prioritise the most strategically important companies in our portfolio.
- (B) We prioritise the companies in our portfolio most significantly connected to sustainability outcomes.**

Describe how you do this:

Over the reporting period we set our engagement priorities by performing comparison exercises using MSCI data. For example, when deciding which companies to engage with on climate related issues, we recorded the carbon intensity of portfolio holdings using Scope 1 and 2 emissions (tonnes of CO2e) per million sales in USD. This meant that we were able to normalise the carbon emissions from each company so the comparison could be performed regardless of sectors, geographies and size of the businesses. We then selected our engagement targets by choosing the most carbon intense companies across a number of portfolios, according to the MSCI database.

Select from the list:

- 1**
 - 2
 - 3
 - 4
- (C) We prioritise the companies in our portfolio to ensure that we cover a certain proportion of the sustainability outcomes we are taking action on.
 - (D) Other

STEWARDSHIP: ENGAGEMENT WITH POLICY MAKERS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SO 11	PLUS	SO 5	N/A	PUBLIC	Stewardship: Engagement with policy makers	2

During the reporting year, how did your organisation use engagement with policy makers to take action on sustainability outcomes, including preventing and mitigating actual and potential negative outcomes?

(A) Across all sustainability outcomes

(1) Describe your approach	We are involved with groups that advocate for responsible stakeholder capitalism. These include the GFANZ and the B Corp Finance & Investment working group.
(2) Engagement tools or activities used	<ul style="list-style-type: none"> (1) We participated in 'sign-on' letters (2) We responded to policy consultations (3) We provided technical input via government- or regulator-backed working groups
(3) Example(s) of policies engaged on	<p>GFANZ comprises a series of workstreams, each with a specific remit designed to improve the pace of the transition to a net zero economy. These workstreams are made up of financial firms and asset owners from across the globe who come together roughly once a month to discuss their specific agendas and goals. Each workstream has a Lead, often from a very large financial firm.</p> <p>Together, the Leads form the Principles Group. The Principles Group report into the Co-Chairs, Mark Carney and Michael Bloomberg. Through the chairs, GFANZ reports periodically to the G20's Financial Stability Board. This connects us to the very top of net zero policy making globally.</p> <p>We joined GFANZ in 2021 and we were invited onto one of the workstreams, the "Real Economy Transition Workstream", which aims to set the standards expected by the financial markets for how corporates report on their net zero transition plans. We have since been asked to become a member of two other workstreams: 1) Nature in Net Zero Transition Planning 2) The Public Policy Workstream Our presence helps to ensure that we:</p> <ul style="list-style-type: none"> - have a good understanding of how the sustainability / net zero market is developing - understand the challenges involved in transition planning: data issues; diverging frameworks; regulatory changes - interact with some of our asset owner clients - have access to policy makers and governments Our role in this group is to contribute ideas and add to the debate. Our work has been included in a couple of GFANZ reports.

(B) Sustainability Outcome #1:

(B) Sustainability Outcome #1:

We have set net zero goals for our portfolios. We want to achieve net zero financed emissions by 2050 and have all investee companies committed to the SBTi by 2040. In addition, by 2030, Montanaro Asset Management will be carbon negative and will have removed from the environment all the carbon it has emitted since its founding in 1991. We believe we are the first UK Asset Manager to commit to these ambitious targets.

(1) Describe your approach

(2) Engagement tools or activities used

(3) Example(s) of policies engaged on

(C) Sustainability Outcome #2:

(C) Sustainability Outcome #2:

Living wage provision

(1) Describe your approach

(2) Engagement tools or activities used

(3) Example(s) of policies engaged on

(D) Sustainability Outcome #3:

(D) Sustainability Outcome #3:

We use investment themes mapped to the UN SDGs as part of the impact investment process. This influences our Better World Fund portfolio and other impact strategies.

(1) Describe your approach

(2) Engagement tools or activities used

(3) Example(s) of policies engaged on

(E) Sustainability Outcome #4:

(E) Sustainability Outcome #4: Our Article 9 fund contributes to environmental objectives under the EU taxonomy regulation.

(1) Describe your approach

(2) Engagement tools or activities used

(3) Example(s) of policies engaged on

STEWARDSHIP: COLLABORATION

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SO 13	PLUS	SO 5	N/A	PUBLIC	Stewardship: Collaboration	2

During the reporting year, to which collaborative initiatives did your organisation contribute to take action on sustainability outcomes, including preventing and mitigating actual and potential negative outcomes?

(A) Initiative #1

(1) Name of the initiative CDP Non-Disclosure Campaign

(2) Indicate how your organisation contributed to this collaborative initiative (B) We acted as a collaborating investor in one or more focus entities (e.g. investee companies)

(3) Provide further detail on your participation in this collaborative initiative We participate in the CDP's Non-Disclosure Campaign to engage with companies to disclose environmental data. In 2022, we joined 260 financial institutions representing nearly US\$30 trillion in assets to request that companies continue to submit corporate environmental data.

(B) Initiative #2

(1) Name of the initiative Farm Animal Investment Risk and Return (FAIRR)

(2) Indicate how your organisation contributed to this collaborative initiative (B) We acted as a collaborating investor in one or more focus entities (e.g. investee companies)

(3) Provide further detail on your participation in this collaborative initiative

We are signatories to two of their collaborative engagement initiatives that concern our investee companies. The first concerns the environmental risks associated with aquaculture and the second involves labour risks in the meat production sector. We have been involved with both of these campaigns for a number of years.

(C) Initiative #3

(1) Name of the initiative

Long-term Investors in People's Health

(2) Indicate how your organisation contributed to this collaborative initiative

(B) We acted as a collaborating investor in one or more focus entities (e.g. investee companies)

(3) Provide further detail on your participation in this collaborative initiative

We have joined the working group and participate in collective engagements as well as sharing our experience of direct engagements with our investee companies to provide helpful case studies for other signatories. This builds on the work of the Healthy Markets Initiative, that we have been involved with for a number of years, to expand the scope of the collaboration and cover more health related engagement topics.

(D) Initiative #4

(1) Name of the initiative

NZAM

(2) Indicate how your organisation contributed to this collaborative initiative

(I) Other

(3) Provide further detail on your participation in this collaborative initiative

The NZAM is an international group of asset managers committed to supporting the goal of net zero greenhouse gas emissions by 2050 or sooner, in line with global efforts to limit warming to 1.5°C. We have published our emissions reduction targets for our portfolios and used this to encourage investee companies to set ambitious and credible reduction goals that are aligned with the Paris Agreement. We publish our progress on an annual basis and in our net zero engagement project report.

CONFIDENCE-BUILDING MEASURES (CBM)

CONFIDENCE-BUILDING MEASURES

APPROACH TO CONFIDENCE-BUILDING MEASURES

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
CBM 1	CORE	N/A	Multiple indicators	PUBLIC	Approach to confidence-building measures	6

How did your organisation verify the information submitted in your PRI report this reporting year?

- (A) We conducted independent third-party assurance of selected processes and/or data related to the responsible investment processes reported in our PRI report, which resulted in a formal assurance conclusion
- (B) We conducted a third-party readiness review and are making changes to our internal controls or governance processes to be able to conduct independent third-party assurance next year
- (C) We conducted an internal audit of selected processes and/or data related to the responsible investment processes reported in our PRI report
- (D) Our board, trustees (or equivalent), senior executive-level staff (or equivalent), and/or investment committee (or equivalent) signed off on our PRI report
- (E) Our responses in selected sections and/or the entirety of our PRI report were internally reviewed before submission to the PRI
- (F) We did not verify the information submitted in our PRI report this reporting year

INTERNAL AUDIT

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
CBM 4	CORE	OO 21, CBM 1	N/A	PUBLIC	Internal audit	6

What responsible investment processes and/or data were audited through your internal audit function?

- (A) Policy, governance and strategy
 - Select from dropdown list:
 - (1) Data internally audited
 - (2) Processes internally audited
 - (3) Processes and data internally audited
- (C) Listed equity
 - Select from dropdown list:
 - (1) Data internally audited
 - (2) Processes internally audited
 - (3) Processes and data internally audited

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
CBM 5	PLUS	CBM 1	N/A	PUBLIC	Internal audit	6

Provide details of the internal audit process regarding the information submitted in your PRI report.

To ensure the credibility of our submissions to PRI Reporting Framework, all responses have been subject to internal review. This included a review of our disclosed Responsible Investment processes and data. The review process has been overseen by senior executive-level staff including the CEO and Head of Sustainable Investments at MAM.

INTERNAL REVIEW

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
CBM 6	CORE	CBM 1	N/A	PUBLIC	Internal review	6

Who in your organisation reviewed the responses submitted in your PRI report this year?

- (A) Board, trustees, or equivalent
- (B) Senior executive-level staff, investment committee, head of department, or equivalent**
 - Sections of PRI report reviewed
 - (1) the entire report**
 - (2) selected sections of the report
 - (C) None of the above internal roles reviewed selected sections or the entirety of the responses submitted in our PRI report this year