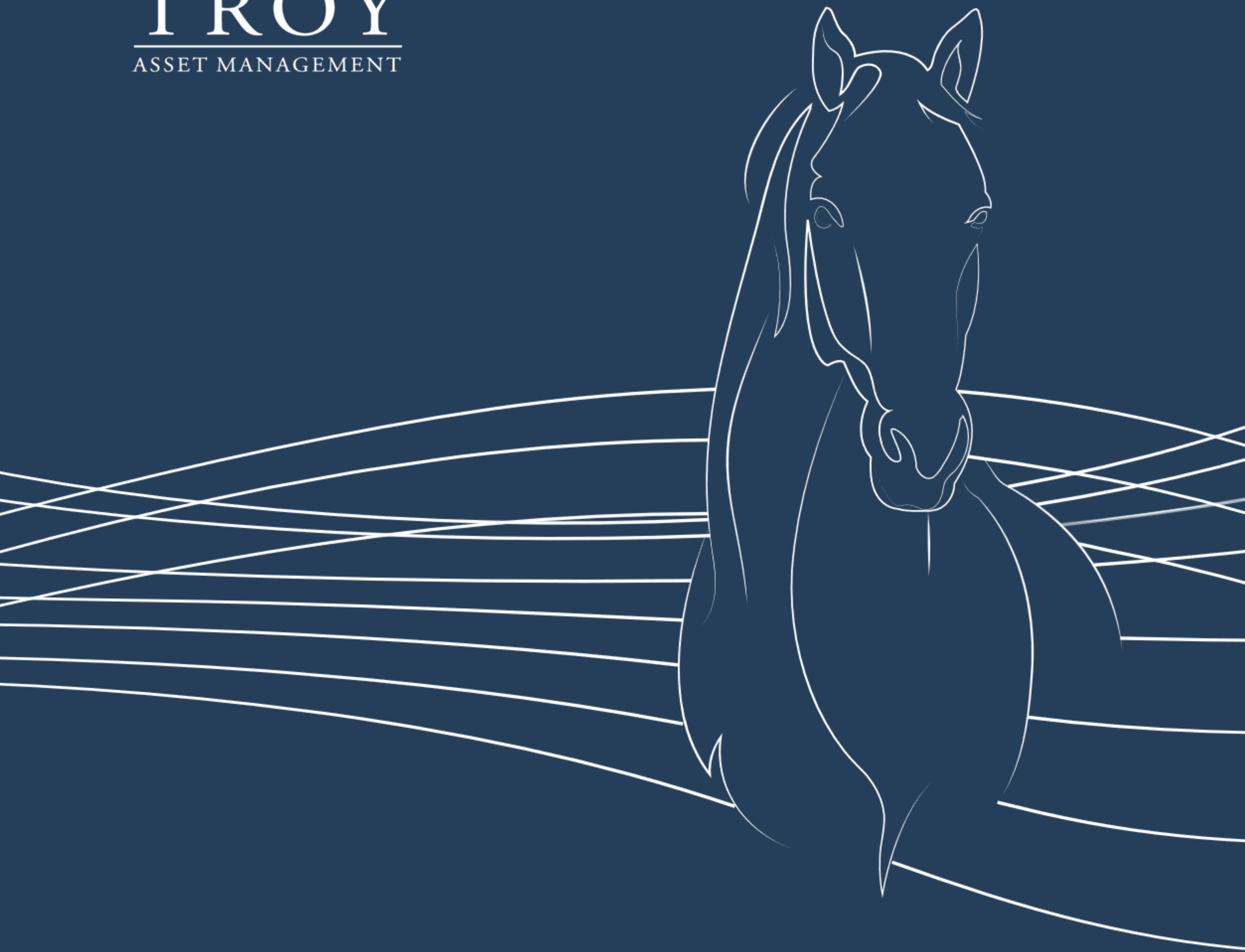
TROY
ASSET MANAGEMENT



# Troy Asset Management Limited

## Responsible Investment – Climate Change Mitigation Policy

Date: December 2024

# Climate Change Mitigation Policy

## 1. Introduction

Troy Asset Management ("Troy") considers climate change to be one of the most significant and complex systemic risks facing the world today. As a result, Troy believes it is important to assess the greenhouse gas ("GHG") emissions and climate transition strategies of the companies in which it invests. Delaying climate mitigation efforts and investment in adaptation will heighten the impact of climate-related disruption and increase costs at a later date.

Troy actively engages with investee companies to promote the goals of the Paris Agreement. To this end, Troy became a signatory to the Net Zero Asset Managers initiative ("NZAM") in July 2021. As a signatory, Troy commits to supporting the transition towards net zero GHG emissions by 2050, in line with international efforts to limit global warming to 1.5°C above pre-industrial levels ('net zero emissions by 2050 or sooner').

## 2. Scope

This policy is binding on the following funds which seek to promote climate change mitigation:

Trojan Investment Funds – Trojan Fund, Trojan Income Fund, Trojan Global Income Fund, Trojan Ethical Global Income Fund, Trojan Ethical Fund, Trojan Ethical Income Fund and Crystal Fund.

Trojan Funds (Ireland) plc – Trojan Fund (Ireland), Trojan Income Fund (Ireland), Trojan Ethical Fund (Ireland), Trojan Global Income Fund (Ireland) and Trojan Global Equity Fund (Ireland).

The asset classes within scope of this policy are equities (including real estate investment trusts) and corporate debt securities. For the avoidance of doubt, this policy does not cover investments in: collective investments, index futures/options, government debt securities, exchange traded commodities, physical commodities or currency derivatives[1].

As the funds follow different strategies, investors and potential investors should compare the scope of this policy with the investment objective, policy and strategy sections set out in the prospectus of the relevant fund, to ascertain the extent of the impact of this policy on that particular fund.

## 3. Assessment methodology and categorisation of investments

Troy believes that climate change mitigation can be effectively promoted by:

- Investing in companies that have, or have a commitment to, Paris-aligned/net-zero goals

[1] The methodologies, industry practice, frameworks, and measurement tools of climate change mitigation are less developed for certain asset classes and as a result it has been deemed appropriate to exclude such asset classes from the scope of this policy.

- Pursuing an active ownership strategy that targets alignment with the Paris Agreement/net zero goals

Troy assesses a company's alignment to, or commitment to align to, net zero greenhouse gas emissions by 2050 by reference to the Paris Aligned Investor Initiative's Net Zero Investment Framework (NZIF) outlined below (Troy's "Net Zero Criteria"):

| Alignment Categories | Description | Criteria |
|---|---|---|
| **Not Aligning** | Any company that has not set a long term 2050 goal consistent with achieving global net zero. | |
| **Committed to Aligning** | A company that has complied with criterion 1 by setting a clear goal to achieve net zero emissions by 2050. | **Criterion 1** - Ambition: A long term 2050 goal consistent with achieving global net zero. |
| **Aligning towards a net zero pathway** | Companies that:<br>• Have set a short or medium-term target (criterion 2);<br>• Disclose scope 1, 2 and material scope 3 emissions data (criterion 4); and<br>• Have a plan relating to how the company will achieve these targets (partial criterion 5) but has yet to show sustained performance against those targets. | **Criterion 2** - Targets: Short- and medium-term emissions reduction target (scope 1, 2 and material scope 3).<br>**Criterion 4** - Disclosure: Disclosure of scope 1, 2 and material scope 3 emissions.<br>**Criterion 5** - Decarbonisation Strategy: A quantified plan setting out the measures that will be deployed to deliver GHG targets, proportions of revenues that are green and where relevant increases in green revenues. |
| **Aligned to a net zero pathway** | Companies that:<br>• Meet criteria 1-6 for high impact companies or criteria 2, 3 or 4 for lower impact companies; and<br>• Have adequate performance over time in relation to criterion 3, in line with targets set. | **Criterion 3** - Emissions Performance: Current emissions intensity performance (scope 1, 2 and material scope 3) relative to targets.<br>For High Impact Sectors[2] Only:<br>**Criterion 6** - Capital Allocation Alignment: A clear demonstration that the capital expenditures of the company are consistent with achieving net zero emissions by 2050. |
| **Achieving net zero** | Companies that have current emissions intensity performance at, or close to, net zero emissions with an investment plan or business model expected to continue to achieve that goal over time. | |

All holdings are formally reviewed, using the above framework, prior to each investment, and in respect of continued holdings, at least on an annual basis.

[2] 'High impact sectors' has the meaning set out in in Appendix B in the Institutional Investors Group on Climate Change's ("IIGCC") Net Zero Investment Framework Implementation Guide available here.

In carrying out its analysis, Troy reviews company disclosures, as well as data and/or information from specialist research providers.

## 4. Engagement

Troy engages[3] with all investee companies identified as "not aligning"[4] with a net zero GHG emissions pathway. The objective of these engagements is to encourage each company to set a target consistent with the goals of the Paris Agreement and a transition towards net zero by 2050.

The first step in our engagement process is to contact the investee company setting out Troy's approach to assessing climate change and formally requesting to engage with the company in relation to its climate strategy. Troy prioritises engagements based on a range of considerations, including the:

- Company's contribution to the relevant portfolio's GHG emissions
- Perceived shortfall in the company's existing climate strategy
- Severity of the failure to implement any published net zero/climate mitigation strategy
- Availability of collaborative engagement opportunities
- Aggregate ownership of the company (across all portfolios)
- Size of investment in the company as a proportion of the overall size of the portfolio

Where formally engaging with a company in this context, the engagement must be raised with the company at least annually to update on progress. Following an update, the assessment set out in section 3 should be reviewed, and, where relevant, refreshed.

Troy may also engage with companies that are aligning towards or have committed to aligning to a net zero GHG emissions pathway where Troy identifies areas for further improvement.

Troy maintains a log of all engagements with investee companies, which includes: the subject of the engagement, medium of communication, current status and outcome. The engagement log is provided to, and reviewed by, Troy's Responsible Investment & Climate Committee.

## 5. Escalation

All investee companies which are "not currently aligning" to a net zero GHG emissions pathway are reported to the Responsible Investment & Climate Committee on a quarterly basis, along with the engagement activity undertaken in relation to such companies. If the Responsible Investment & Climate Committee concludes that the relevant company is not taking sufficient action to reduce its GHG emissions, or where the engagement process has been ongoing for two years without progress, the engagement activity will be escalated.

Escalation of engagement activities may include:

[3] For more detail on engagement, see Troy's Responsible Investment & Stewardship Policy.
[4] A company is considered to be "not aligning" if it has not set a long term 2050 goal consistent with achieving global net zero.

- Engaging with the Board
- Collaborative engagement via collective engagement forums such as the Carbon Disclosure Project[5] and Climate Action 100+[6]
- Using voting rights on behalf of Troy's clients (where Troy has authority to do so) in an attempt to drive change
- Filing or co-filing shareholder resolutions, where Troy has authority to do so
- The partial or complete sale of a holding

Information on voting carried out by Troy is reported on Troy's website.

## 6. Divestment

As described above, divestment may be pursued if other forms of escalation fail. However, given the current bias within Troy's portfolios to less carbon-intensive sectors and companies with relatively low transition risk, we expect engagement to be the predominant driver of change.

## 7. Investor Reporting

Troy will report on the climate mitigation progress of each fund at least annually.

## 8. Internal Oversight

Adherence to the processes set out in this policy are monitored on a periodic basis by Troy's Compliance Team. The Responsible Investment & Climate Committee is responsible for oversight of this policy and the processes set out herein.

## 9. Review

This policy will be reviewed on an annual basis.

[5] Further details of the Carbon Disclosure Project can be found here: https://www.cdp.net/en
[6] Further details of Climate Action 100+ can be found here: https://www.climateaction100.org/