

EDEKT Asset Management S.A. ESG Policy

EDEKT Asset Management S.A. is a leading fiduciary investment manager in Greece providing public pension funds a wide range of services. Our objective is to assist our pension fund clients in achieving their long term goals within a defined risk management framework by providing the following:

- Advice on long-term strategic asset allocation policy
- Advisory services on portfolio structuring
- Management of tactical asset allocation and risk management
- Performance measurement and attribution
- Manager Selection and Assessment
- Customized and Consolidated Reporting

The Company was established on the basis of Greek Law 2768/1999 and is supervised by the Hellenic Capital Market Commission, while it is governed by MiFID II (incorporated in Greece by Law 4515/2018) as an Investment Firm. The investment philosophy followed by EDEKT S.A. is based on defining an optimal long-term investment policy framework, and implementing such through the selection of the most suitable portfolio structure that will maximize investment objectives, while minimizing costs at the same time.

Introduction

As a fiduciary manager, EDEKT's primary objective is to assist pension funds in defining their long-term investment policy, designing the optimal portfolio structure and implementing their strategy. Within this scope, it is our responsibility to adhere to the evolving legal framework for providing investment services and to take into account the long-term prospects of capital markets.

We believe that Environmental, Social and Governance (ESG) factors play an important role in assessing the long-term sustainability of investments, whereas the integration of ESG factors into our investment process will lead to increased value and lower risk.

EDEKT S.A., recognizing the importance of responsible investment decisions based on ESG criteria, joined the United Nations Principles for Responsible Investment (PRI) initiative as "Investment Manager Signatory". We believe that adhering to the United Nations backed PRI Principles may better align investors with the broader objectives of society, given the increasing relevance of environmental, social and corporate governance issues to investment practices.

The present ESG Policy therefore constitutes an inseparable part of the Company's broader investment policy. It has been prepared by the Investment Committee and approved by the Board of Directors on 26.9.2023. As the integration of sustainability factors is an evolving process, the ESG Policy will be reviewed at least on an annual basis, whereas the Investment Committee is responsible for ensuring that the Company's Investment Policy incorporates the principles set by the ESG Policy.

1. Definition of Responsible Investments

This Policy is based on the following definition of responsible investments by Mercers *“By responsible investment we mean the integration of environmental, social and corporate governance (ESG) considerations into investment management processes and ownership practices in the belief that these factors can have an impact on financial performance”*.

Moreover, as signatories of the United Nations PRI, and where consistent with our fiduciary responsibilities, we commit to the following principles:

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

The above principles supplement the Company’s focus on the core principles of portfolio diversification as an effective way to maximize long-term risk returns within a well-defined risk management framework, through investment advisory services that avoid conflict of interests and through ensuring that underlying investments follow good corporate governance and management of material risks.

2. Responsible Investments Guidelines/Procedures

The Company’s objective in the long run is the full integration of ESG criteria in its investment processes. As the Company primary activity concerns the provision of fiduciary management services to Social Security Institutions and Occupational Pension Schemes in Greece, the integration and monitoring of sustainability factors in the Investment Process mainly concerns the assessment of such factors in the long-term investment policy, and in the provision of investment advisory services, as well as the implementation of proper due diligence when selecting external managers, either through segregated accounts or through Collective Investments, and ensuring compliance of such with sustainability rules.

At the same time, the Company intends to evaluate the incorporation of financial products that promote environmental or social characteristics (according to the definition of article 8 of Regulation 2019/2088), as well as products that have sustainable investment as their objective (according to the definition of article 9 of Regulation 2019/2088), in research and investment advice on long-term investment policy (strategic asset allocation) that it prepares on behalf of clients.

The integration of ESG factors in our investment processes therefore will be implemented gradually through the following procedures:

- Integration of ESG factors in strategic asset allocation research studies and reviews, definition of appropriate allocation to such factors, as well as the different approaches to such integration.
- Set-up of middle-office structure in which ESG factors are measured and monitored on a regular basis, in conjunction with the internal risk management function. Inclusion of dedicated ‘ESG Scoring’ section in monthly investment reports.

- ESG integration concepts will be adjusted to each asset class type and investment strategy and for this purpose regular research will be performed on different types of ESG integration investment concepts. The Investment Committee therefore aspires to integrate ESG factors into investment processes, where relevant, for all asset classes.
- As part of our due diligence process, all external fund management services will be assessed through dedicated ESG questionnaires in order to ensure that such managers and/or products are in line with our responsible investment beliefs and in order to evaluate the level to which they integrate ESG factors into their investment process.

As regards to active ownership procedures, for assets that are externally managed, we will implement proper due diligence processes to ensure that such external managers demonstrate responsible ownership policies. For assets that may be internally managed, and which refer to passive Greek equity and fixed income portfolios, active ownership approaches will be applied taking into account the evolution of sustainability factors in the Greek market, and with the support of third-party advisors when deemed necessary.

3. Oversight

EDEKT's Investment Committee (IC) is responsible for implementing the Company's responsible investment policy. At the same time, the IC is responsible for following the progress of the financial industry's standard practices and regulatory objectives in relation to ESG factors, and to proposing to the Board of Directors reviews of the present ESG policy on an annual basis.

An Annual ESG Report will be prepared during each year, including an analysis of the progress towards ESG integration.

Monthly investment reports analyzed by the Investment Committee, and presented to the Board of Directors, will include a dedicated ESG Scoring section. As the integration of ESG factors progresses, the IC will gradually develop this section to include key performance indicators when deemed necessary.

**Latest Version of the Policy: Approved by the Board of Directors 14-7-2022*

**1nd Version of the Policy: Approved by the Board of Directors 6-7-2021*