Guinness Global Quality Mid Cap

Exclusion Policy



About the Fund

The Guinness Global Quality Mid Cap Fund is managed for capital growth and holds a concentrated portfolio of quality growth businesses, biased towards mid-cap companies, in any industry and in any developed region.

Firm-Wide Exclusions

Weapons

We exclude companies that have been identified by credible third parties as being directly involved in the design, manufacture or sale of cluster munitions, landmines, and biological and chemical weapons.

Thermal Coal

We exclude companies that generate more than 30% of revenues via thermal coal extraction or thermal coal power generation.

Fund-Specific Exclusions

Our Fund exclusion policy focuses on the product and practice:

Practice:

(i) MSCI ESG Laggards

We exclude companies rated as laggards (B or CCC rating) by MSCI. Such businesses tend to display inadequate or worsening management of ESG issues and are vulnerable to ESG-related disruptions and controversies.

Product:

This is complemented by an internally generated exclusion list of companies which derive more than 10% of revenue from:

- (ii) Adult entertainment companies that produce adult entertainment or own an adult entertainment company.
- (iii) Alcohol companies involved in the production and sale of alcoholic products.
- (iv) Fossil Fuels companies involved in the extraction, refinement and production of oil, gas, or coal (in addition to our firm-wide exclusions).
- (v) Gambling companies that own or operate gambling facilities.
- (vi) Nuclear Energy companies involved in the production of nuclear energy.
- (vii) Palm Oil companies involved in the production and distribution of palm oil products.
- (viii) Tobacco companies involved in the production and sales of tobacco products.
- (ix) Weapons companies involved in the production or sale of all weapons (in addition to our firm-wide exclusions)

Additional:

(x) Norges Bank Exclusion List

The Fund also adheres to the exclusion list of companies prepared by Norges Bank, which is guided by internationally recognized principles, including the UN Global Compact. The Norges Bank Exclusion list is based on recommendations from the Norwegian Council on Ethics (appointed by the Norwegian Ministry of Finance). Companies might be placed on the list as a result of serious violations of norms including serious or systematic human rights violations, such as murder, torture, deprivation of liberty, forced labour and the worst forms of child labour, severe environmental damage, gross corruption, or other particularly serious violations of fundamental ethical norms.

Policy implementation

To implement this policy, we use exclusion lists of companies based on information provided by independent third-party sources. We update the exclusion lists annually on a best-efforts basis. The exclusion lists are distributed periodically across the firm.

We will not knowingly invest in any company that breaches this policy. In the event that we identify a company in our portfolios that does not comply with these policy requirements, we will contact the company directly for confirmation of their involvement in an excluded activity. Following confirmation of their involvement in this activity, we will divest any such holdings within 90 business days.

We monitor compliance in respect of this policy. However, due to the complexity of the issue and the evolution of company business models, there may be occasions when relevant securities appear in portfolios in error. Should this occur, we will seek to divest from any such holdings within 90 business days.

Important Information

This document is provided for information only. All the information contained in it is believed to be reliable but may be inaccurate or incomplete; it should not be relied upon. It is not an invitation to make an investment, nor does it constitute an offer for sale.

The documentation needed to make an investment, including the Prospectus, the Key Information Document (KID), the Key Investor Information Document (KIID) and the Application Form, is available from our website www.guinnessgi.com

The Fund invests mainly in shares, and the value of these may fall or rise due to a number of factors, including the performance of the company and general stock market and exchange rate fluctuations. The value of your investment may rise or fall, and you could get back less than you invest. Past performance is not a guide to future performance. Further information about risks can be found in the Prospectus.

The Investment Manager, Guinness Asset Management Ltd, is domiciled in the United Kingdom and is authorised and regulated by the Financial Conduct Authority.

Guinness Asset Management Funds plc, the umbrella fund with the Guinness sub-funds, is domiciled in Ireland and is authorised and supervised by the Central Bank of Ireland as a UCITS fund. It is also recognised by the Financial Conduct Authority for distribution in the United Kingdom. The sub-funds may also be distributed in various other countries – please contact us for details.