

Fund Description

The Guinness Sustainable Energy Fund ("The Fund") invests in equity securities of globally based companies involved in sustainable energy or energy technology sectors. Sustainable energy includes but is not limited to energy derived from such sources as solar or wind power, hydroelectricity, tidal flow, wave movements, geothermal heat, biomass, or biofuels. Energy technology includes technologies that enable these sources to be trapped and also various manners of storage and transportation of energy, including hydrogen and other types of fuel cells, batteries, and flywheels, as well as technologies that conserve or enable more efficient use of energy.

Firm-Wide Exclusions

(i) Controversial weapons

There are two major international conventions that specifically address cluster munitions and landmines:

- **The Convention on Cluster Munitions (2008):** This Convention restricts the manufacture, use, and stockpiling of cluster munitions and the components of these weapons.
- **The Convention on the Prohibition of the Use, Stockpiling, Production and Transfer of Anti-Personnel Mines and on Their Destruction (1997):** This Convention aims to eliminate anti-personnel landmines around the world.

Consistent with the aims of these two Conventions, The Fund excludes active investments in companies that have been identified, by credible third parties, as being directly involved in the design, manufacture, or sale of such weapons.

(ii) 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 also focuses on:

(i) Extraction of fossil fuels

The Fund excludes companies engaged in the extraction of oil, natural gas, and coal.

(ii) Other

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 our Exclusion Policy, we use exclusion lists of companies based on information provided by independent third-party sources. We update the exclusion lists on an annual basis. The exclusion lists are distributed periodically across the firm.

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 related securities appear in portfolios in error. If and when such instances are identified, we will seek to divest 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.

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