

Summit Asset Managers Ltd

Principal Adverse Impact policy disclosure

The EU Sustainable Finance Disclosure Regulation (“SFDR”) requires Summit Asset Managers Ltd to make a “comply or explain” disclosure as to whether or not the principal adverse impacts of investment decisions on sustainability factors are considered in investment decision making. Summit Asset Managers Ltd does not currently consider adverse impacts of its investment decisions on sustainability factors at an entity level. It is noted that the legislation relating to disclosure standards continues to evolve. Summit Asset Managers Ltd and its investment managers, Keyridge Asset Management Ltd (“Keyridge”) and Northleaf Capital Partners (Canada) Ltd. (“Northleaf”), are therefore taking a principles based approach to compliance with the SFDR standards.

Keyridge considers principal adverse impacts of its investment decisions on sustainability factors and publishes an annual statement on principal adverse impacts on sustainability factors of Keyridge at entity level. The following specific PAI indicators are currently prioritised across Keyridge’s investment portfolio:

- Greenhouse Gas (“GHG”) emissions (PAI 1-6)
- Violations of UN Global Compact principles and Organisation for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises (PAI 10)
- Board gender diversity (PAI 13)
- Exposure to controversial weapons (anti-personnel mines, cluster munitions, chemical weapons and biological weapons) (PAI 14)

Northleaf does not consider adverse impacts of investment decisions on sustainability factors as specifically contemplated by the SFDR. Northleaf considers its existing ESG policies and procedures to be appropriate, proportional and tailored to its investment strategies. Northleaf continue to keep this position under review.