SUSTAINABILITY POLICY

&

EXCLUSION POLICY



RAM Active Investments

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1. INTRODUCTION

RAM Active Investments SA (hereinafter "RAM") is committed to responsible investment.

As a legal entity within the Mediobanca Group, RAM's commitment to sustainability aligns with the Group's overarching strategy, which integrates ethics and profit, aiming for long-term economic growth alongside social and environmental progress.

The Group Sustainability Policy and the Group ESG Policy, applicable to the entire Mediobanca Group, define general principles and guidelines for identifying, assessing, preventing, and reducing direct and indirect impacts, particularly those arising from investment activities. These foundational policies are based on internationally recognized frameworks, including the Ten Principles of the UN Global Compact, the UN Guiding Principles on Business and Human Rights, the Corporate Sustainability Reporting Directive (CSRD) emphasizing double materiality, and the European Taxonomies for sustainable investments.

RAM also adheres to the Group's priority areas in sustainability, which include measures to tackle bribery and corruption, human rights protection, financial health and inclusion, diversity and inclusion, and addressing climate change and environmental issues

2. OBJECTIVES

The Sustainability Policy ("the Policy") has three **objectives**:

i) to define a sustainable due diligence process for potential investments of the UCITS under management (hereinafter the "Funds") and

ii) to improve RAM's knowledge regarding the identification and measurement of adverse impacts on the environment and the society caused by investments. The ultimate objective is to avoid or reduce such adverse impacts through different actions which may be defined out of the scope of this Policy. Preventing and mitigating adverse impacts may in turn also help RAM to maximise positive contributions to the environment and society while improving stakeholder relationships and protecting reputation.

iii) to provide more transparency about the processes undertaken.

Based on RAM's size, business model and range of Funds, RAM may apply the proportionality principle without damaging the key objectives of this Policy.

Adherence to international standards and meaningful engagement with relevant stakeholders are also important elements to address potential adverse impacts on sustainability factors. Although RAM has a standalone *Voting and Engagement policy* accessible on www.ram-ai.com, please refer to the section "Active Ownership" where the interaction with sustainability factors[1] is explained.

3. ORGANISATION

The **Responsible Investment Committee** ("RI Committee" or "RIC") meets at least quarterly to cover all environmental, social and governance ("**ESG**") aspects from a compliance, commercial and operational standpoint. Experts from different teams integrate the RI Committee to deal with the evolving ESG challenges. Key ESG decisions are reviewed and validated by the RI Committee before approval of the Board

[1] '*Sustainability factors' mean environmental, social and employee matters, respect for human rights, anti-corruption and anti-bribery matters.*

of Directors. To ensure consistency across decisions, members from other committees (such as the Product Committee, Risk Committee or Compliance Committee) are part of the RI Committee. The RI Committee's main functions are detailed below:

- It defines RAM's approach towards sustainability and the best ways for implementation (for example, it monitors/excludes all relevant stocks and defines engagement targets)
- It defines screening criteria for companies: screening criteria are applied through a systematic monitoring of companies to identify holdings for further assessment, engagement, and/or exclusion. Conjunctly, a discretionary approach can also be applied to exclude certain issuers which are associated to publicly available negative information.
- It assists to exercise active shareholder stewardship.

Each SICAV's Board of Directors grants the following powers to the IR Committee (and/or individually to its members):

- to represent the SICAV in ESG marketing activities;
- to look into specific questions connected to ESG issues on behalf of the SICAV;
- to report to the stakeholders on ESG matters and management of investments on behalf of the SICAV.
- to provide clarifications on investments and strategies.

This Committee's scope is without limit with respect to the securities covered or the topics examined and discussed. Nonetheless, the SICAV's Board of Directors will ask it to focus on sustainable issues related to the Funds' portfolio, investment strategies, or companies' marketing activities.

The Committee is chaired by the Risk function, with representatives from the Compliance, HR and IT participating. The Compliance and Risk departments monitor and control that all sustainability requirements are met over time.

4. SUSTAINABILITY PROFILES

RAM recognises both the escalating environmental issues and the unique investment opportunities that sustainable factors create over the longer-term.

The evolving regulations on sustainable finance are also closely monitored to ensure compliance with the legal framework.

RAM's research has proved that the integration of sustainability factors brings a sustainable angle into the investment process making it more responsible and assisting to reduce long-term investment risk and to enhance returns in the strategy.

The integration of specific sustainability indicators into the investment process has a measurable positive impact on the sustainability factors included in the portfolios.

Systematic Funds: leveraging off RAM's *Deep Learning* platform, and by marrying structured and unstructured data, the strategy aims to identify the sustainable alpha opportunities in the Funds' dynamic universe of all-cap stocks.

Non-systematic Funds: depending on the type of investments performed by each article 8 Fund, the approach may be different. Funds use extensive ESG data in order to assess the eligibility of investments from a sustainable angle. ESG data integration into the investment process comes

after the filtering of companies passing RAM's responsible investment policy which applies exclusion based on value- and norm-based approaches.

According to the Sustainable Finance Disclosure Regulation 2019/2088 ("SFDR"), RAM Funds are classified either as article **6, 8** or **9**. The categorisation of Funds is validated by different experts including RAM's ESG-Advisory committee, the RI Committee and the Board of Directors at RAM.

- at RAM, there are 3 types of article **8** Funds promoting environmental or social characteristics.

SFDR	Environmentally sustainable investments	Social sustainable investments	Taxonomy aligned investments
8	Yes	No	Yes
	Yes	No	No
	No	No	No

- Article **9** Funds have a sustainable investment objective. The Investment Manager seeks the optimal combination of ESG-related data and fundamental data to achieve its objective.

SFDR	Environmentally sustainable investments	Social sustainable investments	Taxonomy aligned investments
9	Yes	No	Yes

- For Funds classified as article **6** of the SFDR, RAM deemed also necessary to apply a minimum set of ESG exclusion to the whole investment universe. There is no active sustainable integration into the investment process leading to a promotion of the sustainability factors. In this regard, RAM article 6 Funds neither consider the sustainability risks nor the principal adverse impacts of investments on sustainability factors.

The sustainable due diligence process may vary depending on the type of Fund and adapt to the different types of assets. Please refer to the section 4 below for further information.

5. ESG DUE DILIGENCE

The following section refers exclusively to article 8 and article 9 Funds.

5.1 EXCLUSIONS

RAM excludes a company when there is an important risk that it contributes to or is responsible for key ESG issues that RAM has identified as harmful or potentially harmful, in contradiction to RAM's fundamental values or against international laws, norms and conventions. RAM only excludes listed equities on the long side of the book and may short these names within the alternative strategies. However, coal and thermal coal are excluded from both long and short books.

The exclusion list is based both on data from external data providers and on RAM's own in-house analysis of companies. Companies can be excluded based on one or several criteria and issues identified. The decision to exclude a company is taken after an assessment of the issue by the RAM RI Committee.

Please refer to the **Exclusion Policy** integrated in **ANNEX 1** which applies to all Funds to the share of corporate asset classes (listed equity and corporate bonds).

RAM broadly applies exclusions on business conduct and activities:

- Controversial business conduct which is against international norms or RAM AI's values
- Revenue generated from business activities that are harmful to society or the environment. Three categories are considered:
    - Weapons
    - Consumer Products & Services
    - Energy and Fossil Fuels

5.2 GOOD GOVERNANCE ASSESSMENT

SFDR specifies that the assessment of good governance practices forms an integral part of those financial funds that promote environmental or social characteristics, or that have sustainable investment as their objective.

RAM applies a multi-step governance process applying seven binary metrics reflecting the SFDR requirements and covering i) employee relations, ii) sound management structures, iii) tax compliance and iv) remuneration of staff.



A company that fails the good governance test is automatically excluded from the investable universe.

In case there is not sufficient information provided by companies to perform the above-mentioned assessment, remediation efforts may apply (global governance score, assessment of potential additional data sources, contact with data vendors etc.)

Supranationals are excluded from the good governance tests as those instruments are not related to a company.

5.3 PRINCIPAL ADVERSE IMPACT ("PAI") CONSIDERATION

a. Uses of principal adverse impacts

There are 3 different use cases of principal adverse impacts at product level.

1. To fulfil the *do not significantly harm* ("DNSH") of SFDR. The use of PAI indicators to demonstrate that an investment qualifies as a sustainable investment. For this purpose the DNSH is based on 14 mandatory PAIs and 2 optional chosen by the Fund. The method to assess each PAI relies on one of the below approaches.

Value definition approach	**Total exclusions**	**Exclusion of laggards**
The DNSH test is performed against a given value for each principal adverse impact	No tolerance to the principal adverse impact	Companies creating the most intensive principal adverse impacts are excluded.

Investments in equities: PAIs are integrated when building the investable universe, and the process is applied in a systematic manner. Several processes have been deployed to identify PAIs as explained above.

RAM has developed a quantitative model of the PAIs. Each indicator must meet a constraint approved by the Responsible Investment Committee and reviewed periodically. For each company in the investable universe, a violation of the constraint results in the identification and subsequent exclusion of the company.

Investments in Funds: the Fund relies on the information provided by the underlying Fund.

2. To meet disclosure requirements as set out in Article 7 SFDR.
   Should a Fund decide to consider PAI, mandatory disclosure requirements apply.

SFDR	**Consideration of PAI**
FMP[2]	**Yes**
9	**Yes**
8	**Yes**
8	No

3. To measure the attainment of environmental or social characteristics ("sustainability indicators").

   The achievement of the Fund's sustainable objective or the promotion of environmental / social characteristics can be measured through different sustainability indicators. Please refer to the section 4.5 for further details.

[2] Financial Market Participant

b. Prioritization of PAI

Although RAM recognises that all PAI are harmful for the environment and the society, there is a general prioritization of environmental aspects specially linked to climate. Some examples are linked to carbon emissions, carbon footprint, carbon intensity and fossil fuel. However, please note that each Fund can prioritize different PAIs and accordingly it is advisable to refer to the Prospectus for further details.

The prioritization of PAI is mainly performed through the application of specific sustainability indicators and the DNSH. In addition, other metrics employed the Investment Managers in the active selection of investments may contribute to the prioritization of PAI.

c. Governance

RAM regularly assesses the nature of the specific adverse impact and the context of the investments harming the relevant sustainability factor. The assessment is performed by a multi-disciplinary team and submitted to the RI Committee. RAM is closely monitoring PAI and aims to reduce them over time.

The RI Committee shall review the reports and is empowered to request further information or suggest specific actions. The RI Committee shall keep RAM's board of directors informed. RAM's board of directors is the ultimate responsible body to ensure that appropriate monitoring and actions are taken to deal with relevant PAI on sustainable factors.

d. Mitigation measures

For that purpose, a combination of mitigation measures is applied to reduce the probability of occurrence and/or the severity of the impact. The mitigation measures mainly relate to engagement, voting and exclusions but also to the careful active sustainable selection of investments and measurable indicators.

In order to mitigate adverse impacts via:

- exclusions, RAM believes that excluding companies from the investable universe is an important step to avoid promotion of harming or potentially harmful entities. The exclusion list is dynamic and reflects sustainability values. The decision to exclude a company is taken after an assessment of the issue by the RAM RI Committee.
  The exclusion policy covers: i) controversial business conducts such as a breach of UN Guiding Principles or OECD Guidelines for Multinational Enterprises ii) revenues from business involvement with a high occurrence of adverse impact such as controversial weapons iii) negative screening or the avoidance of the lowest-scoring part of a metric related to a principal adverse impact indicator.

- engagement, RAM mainly applies collective engagements via CDP which has proved the most effective manner to enter into dialogue with companies given RAM's size. Individual engagement also contributes to the make companies accountable of potential actions and reinforces the due diligence process on companies.

- voting, it is RAM's policy to primarily vote on shareholder proposals following guidance from the proxy voting provider As You Saw,. The guidance captures a sustainable dimension aligned with RAM values. For more granular information, please refer to section below "Active Ownership" and to the "Engagement and Voting Policy" on the website.

- active selection of investments, after a careful due diligence process integrating good governance measures and sustainable criteria such as the use of measurable indicators conditioning the investment and the do not significantly harm test.

The mitigation measures shall be reviewed at least once a year to assess their efficiency and to adapt to potential changes.

e. Data sources

RAM has adopted a multi-provider approach to data sourcing which reduces the margin of error when assessing PAI.

PAIs calculation is currently based on MSCI ESG Research, CDP, S&P Global, World Bank and companies' non-financial reports.

Data sources shall be regularly reassessed to ensure that data needs are appropriately covered not putting at risk any process. Finally, more information regarding data management processes and quality control can be found in the section of this policy related to ESG data sources and processing.

Methodologies and actions foreseen may evolve to adapt to the evolving risks, regulations and ESG data landscape. As a result, the process to identify PAIs is ongoing, responsive, and changing. RAM aims to progressively improve its systems and processes to reduce ESG risks and better tackle the principal adverse impacts of the investments.

5.4 SUSTAINABILITY RISK CONSIDERATION

Under SFDR, "sustainability risk" means an environmental, social or governance event or condition that, if it occurs, could cause an actual or a potential material negative impact on the value of an investment.

Sustainability risk management is performed on two levels. Firstly, for article 8 and 9 Funds, it is integrated in the investment process and secondly, for all funds, the independent risk management function reviews and rejects or validates the execution according to the rules defined in the prospectus, the exclusion list and the respective risk profile of the Fund.

Please refer to the Sustainability Risk policy available on the website of the Management Company of the Funds

5.5 SUSTAINABILITY INDICATORS

Most Funds promote similar sustainability factors and are specially oriented to environmental matters. The measurement of the sustainability characteristics promoted or the achievement of the sustainable objective is done through a common set of indicators mainly represented by:

- Carbon Emissions, Intensity and Footprint (Scope 1, 2, 3)
- Fossil Fuel exposure,
- Exposure to activities with a significant impact on global warming such as coal, oil sands, shale gas and very deep water drilling.
- % of portfolio in violation of the UN Global Compact or the Universal Declaration of Human Rights.

- No exposure to controversial weapons

** Scope 1 GHG emissions: direct emissions from sources owned/controlled by the company*

*** Scope 2 GHG emissions: indirect emissions resulting from energy purchased by a company, but whose source belongs to other entities*

**** Scope 3 GHG emissions: indirect emissions (not included in scope 2) that the company cannot control (often a large part of a company's carbon footprint*

Additional indicators are applicable for article 9 Funds.

Other Funds, not fitting the above-mentioned description, are more oriented to the promotion of social factors and the indicators mainly refer to corruption, controversies, governance aspects, political stability and absence of terrorism.

In addition, the active selection of investments may involve other metrics such as ESG scores & ratings, sentiment and trends.

Please refer to the latest prospectus (including SFDR annexes) for further details.

5.6 ACTIVE OWNERSHIP

ENGAGEMENT POLICY

RAM believes that the proper attention to corporate governance, environmental and social matters is key to a long-term value creation, in line with our fundamental approach to investing. As an institutional investor, RAM's fiduciary role is always to act in the best interest of investors and beneficiaries and to help clients harness the potential of markets to reach their respective goals.

RAM's engagement focuses on companies that severely and structurally breach principles of the United Nations Global Compact or of other international convention in the areas of human rights, labour, environment and anti-corruption.

RAM believes that a constructive dialogue with the companies in which the Funds invest is more effective than excluding companies from our investment universe. RAM maintains an internal log of engagements for submission to the RI Committee.

DIFFERENT FORMS OF ENGAGEMENT

Recognizing the value of different forms of engagement, RAM independently carries out collaborative engagements with other investors or institutions.

Given the size and nature of RAM, the most effective manner to promote improved market practices is through active membership in collaborative platforms such as The Institutional Investors Group on Climate Change (IIGCC), United Nations Principles for Responsible Investment (UN PRI), and Carbon Disclosure Project (CDP), Access to Medicine Foundation, Climate Action 100+. For each of these platforms, RAM identifies and prioritizes its collaborative engagement activities within these memberships. Whilst RAM might use such platforms for collaborative engagement, RAM will not outsource its engagement responsibilities to third parties.

In addition, RAM performs punctual individual engagements when severe controversies are detected in companies. If the engagement does not lead to the desired change, the RI Committee can decide to exclude a company from the investment universe.

VOTING

The voting scope is made up of companies for which aggregated positions meet one of the four following conditions: i) is a holding of the Article 9 SFDR fund(s) (systematic) or selected Article 8 SFDR fund(s) (case-by-case decision of voting); ii) qualitative evaluation on the relative importance of vote, iii) ad hoc demand or iv) local market regulation requirements.

These factors ensure that RAM concentrates its efforts on positions held in a wide proportion in our assets under management and participate efficiently and effectively at shareholders' meetings of companies in which RAM's collective investment schemes hold a significant proportion of the capital.

It is RAM's policy to primarily vote on shareholder proposals following guidance from *As You Saw*, the proxy voting advisor. The decision by RAM to retain the services of the proxy voting advisor is based principally on the view that the services provided, subject to oversight by RAM, generally will result in proxy voting decisions which serve the best sustainable economic interests of the holding and consequently the CIS and its investors.

Please refer to the *Voting Rights and Engagement Policy* and the latest *engagement and voting reports* published on the website for more information

6. ESG DATA SOURCES AND PROCESSING

RAM's ESG specialists follow an advanced research process to avoid unwanted biases and apply a multi-data provider approach to identify reliable sources of information and mitigate methodological biases. With time, a custom ESG database has been built, comprising historical data and live feed for an all cap, global universe (10K+ companies). It covers both Structured (numerical) and Unstructured Data (text).

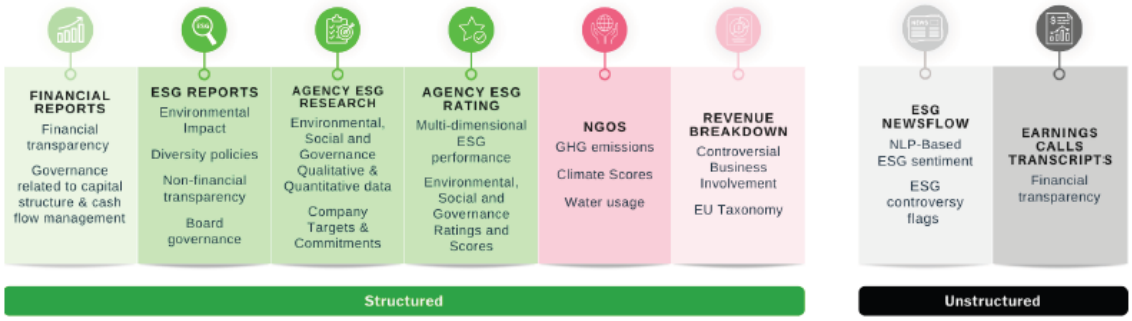
RAM is leveraging on its data expertise to identify, test and integrate multiple ESG datasets from various data sources, including third party analysts (MSCI ESG Research, S&P Global Trucost), NGOs (CDP), ESG NewsFlow (StreetAccount), governmental data (Worldbank) as well as company financial and non-financial reports.

***For equities and corporate issuers**:*

The growing number of ESG data sources are leveraged to create investment inputs that:

- measure clear ESG characteristics
- carry value-added information from traditional sources
- improve the Fund's return and volatility predictions.

Please refer to the diagrams below for further information.



RAM has robust data management processes to automate data feed and quality control. RAM maps each vendor's data to a common identifier to create consistent views that allow teams across the firm to access and use the data. Importantly, quantitative analysis is performed over time to detect outliers or other potential errors in incoming data sets. When such event happens, an engagement process with the relevant data vendor is initiated, resulting in potential adjustments.

Although RAM performs its best efforts to obtain reliable data, it is possible that some sources are not accurate, available or complete. RAM believes that data providers are currently developing more advanced tools to increase data availability and reliability to face a growing demand of data.

7. LABELS, CODES, INTERNATIONAL STANDARDS AND TRANSPARENCY INFORMATION

RAM's responsible investment guidelines are framed within the UN-backed Principles for Responsible Investment, which RAM signed in 2015. The six Principles for Responsible Investment offer a menu of possible actions for incorporating ESG issues into investment practice.

RAM is also a member of Swiss Sustainable Finance (SSF) that aims to strengthen the position of Switzerland in the global marketplace for sustainable finance by informing, educating and catalyzing growth. Furthermore, it is also a CDP investor member.

In 2021, RAM joined the Net-Zero Asset Manager's initiative and committed to meeting Net-Zero emissions by 2050. Staying on track requires setting and meeting interim targets — and we're pleased to confirm that we have already reached our 2025 goal of a 33% reduction in carbon emission intensity (scope 1 + scope 2), based on our 2019 baseline. Our next objective is a 50% reduction by 2030.

This reduction target covers our Systematic Fund range and the RAM Strata Credit Fund, which together represent over 80% of our current AUM. To meet these targets, we apply three approaches: allocation, engagement and divestment.

Knowledge Transfer

RAM aims to contribute to the global effort for transitioning toward a more sustainable financial industry. As quantitative researchers/investors, we believe that the most impactful approach is to share internal ESG research and collaborates, from time to time, with non-for-profit organisation through:

- Publications
- Conferences/panels
- Joint research with universities
- Hackathons

8. APPROVAL AND EFFECTIVE DATE

The latest version of this Policy was approved on 27.07.2025 and it is immediately effective.

For issues related to sustainability regulation, not expressly addressed within this document, please refer to the following Group policies:

- REGOLAMENTO DI GRUPPO DEL DIRIGENTE PREPOSTO ALLA REDAZIONE DEI DOCUMENTI CONTABILI SOCIETARI AI SENSI DELL'ART. 154 BIS DEL TUF

- Codice Etico del Gruppo Mediobanca (Dec 2022)

- Politica di Gruppo sulla sostenibilità (Feb 2024);

- Codice di Condotta.

- Politica di Gruppo ESG;

- Direttiva di Gruppo ESG;

- Politica di gestione delle risorse umane;

- Politica di remunerazione e incentivazione del personale;

- Codice Diversità e inclusione del Gruppo Mediobanca;

- Politica di Gruppo in materia di informativa finanziaria

- Manuale sulla doppia materialità

- Manuale di Gruppo sul Greenwashing;

- Politica di Gruppo in materia di informativa finanziaria e di sostenibilità

This policy is written in accordance with group guidelines.

RAM Active Investments



ESG EXCLUSION POLICY

Introduction

Exclusions are an important step in our comprehensive sustainable investment process, safeguarding our investment portfolios from business activities that are deemed unethical, irresponsible or unsustainable. Exclusions not only provide investors with a safety net against reputational risks but also provides them with the means to align investments with their values. At RAM, we respect widely accepted norms on good business conduct and monitor companies against poor business practices. We also place restrictions on revenues generated by companies from controversial business activities.

We exclude a company when there is an important risk that it contributes to or is responsible for key ESG issues that RAM has identified as harmful or potentially harmful, in contradiction to RAM AI's fundamental values or against international laws, norms and conventions. RAM only excludes listed equities on the long side of the book and could short these names within the alternative strategies.

This policy applies to all funds managed by Mediobanca Management Company with RAM Active Investments SA as delegated investment manager (the "RAM AI Fund Range") to the share of corporate asset classes (listed equity and corporate bonds)

We broadly apply exclusions on business conduct and activities:

1. Controversial business conduct which is against international norms or RAM AI's values
2. Revenue generated from business activities that are harmful to society or the environment

1. Exclusions

Exclusions based on Controversial Business Conduct

Controversial business conduct that causes severe environmental and social damage, such as (but not limited to) oil spills, deforestation, and unacceptable greenhouse gas emissions, are excluded from RAM AI's investible universe. Given the high environmental cost of unsustainable Palm oil and recreational cannabis, these are excluded as well. Companies that are engaged in serious ethical violations or controversies over Animal Testing are also excluded. Furthermore, we also exclude companies that are suspected of accounting fraud, corruption, and lack of minority shareholder protection.

Lastly, companies engaging in controversial behaviour or serious breaches of the UN Global Compact, International Labor Organization (ILO), and other multi-national standards are excluded from the investment universe across the RAM AI fund range:

- The OECD Guidelines for Multinational Enterprises (OECD MNE Guidelines)[3]
- UN Global Compact[4] - This UN initiative aims to encourage businesses worldwide to align their operations and strategies with ten universally accepted principles in the areas of human rights, labour, environment and anti-corruption.
- ILO Conventions[5] - The eight fundamental conventions cover the topics of freedom of association and the effective recognition of the right to collective bargaining; the elimination

[3] https://www.oecd.org/corporate/mne/ncps.htm
[4] UNGC's Ten principles - https://www.unglobalcompact.org/what-is-gc/mission/principles
[5] ILO Conventions - https://www.ilo.org/global/standards/introduction-to-international-labour-standards/conventions-and-recommendations/lang--en/index.htm

of all forms of forced or compulsory labour; the effective abolition of child labour; and the elimination of discrimination in respect of employment and occupation.

Breaches and controversies are identified by in-house analysis of the companies in the investible universe. Moreover, our proprietary controversy detection infrastructure, which employs a natural language processing methodology, is also used to detect controversies. Companies can be excluded based on one or several criteria described in this Exclusion Policy and/or by specific issues identified. The decision to exclude a company is taken after an assessment of the issue by the RAM AI Responsible Investment (RI) Committee. Ad-hoc criteria can be considered in certain cases. The company is then placed on the exclusion list.

We reassess these companies periodically. If the excluded companies demonstrate improvements in their policies and business operations, they may be reinstated in the RAM AI's investable universe.

Exclusions based on Revenues

RAM AI conducts revenue-based exclusions in line with our fundamental beliefs and values. The threshold level refers to the proportion of revenue a company generates from a controversial activity. We have general exclusion thresholds applicable to the RAM AI Fund Range. To our long-only systematic equity funds, due to their enhanced sustainable characteristics, stricter limits apply. The thresholds are approved by RAM RI Committee.

We use data provided by third parties and complement it with our in-house research. This data is dynamic as it is updated regularly based on reports from companies and data provided by third parties. Due to this dependency, there could be a lag between the data reported and the exclusions applied.

The table below provides an overview of the revenue-based thresholds. In the subsequent section, more details on the activities are provided.

Weapons Activity-based Exclusions

Category	Long-Only Systematic Equity Funds	All Other Funds
Controversial Weapons		
Incendiary Weapons	0%	0%
Depleted Uranium	0%	0%
Blinding Laser Weapons and Undetectable Fragments	0%	0%
Prohibited Weapons[6]		
Anti-Personnel Mines	0%	0%
Cluster Munitions	0%	0%
Biological and Chemical Weapons	0%	0%
Nuclear Weapons		
Manufacturing	0%	0%
*Related Product and Services	5%	5%
Conventional Weapons	50%	50%

*Please see the specification on nuclear weapons involvement in the following section.

Consumer Products & Services Activity-based Exclusions

Category	Long-Only Systematic Equity Funds	All Other Funds
Adult Entertainment		
Production	0%	5%
Related Products and Services, Retail and Distribution	5%	No Restriction
Gambling	5%	50%
Tobacco	5%	10%

[6] Pursuant to Commission Delegated Regulation (EU) 2025/1775, amending Commission Delegated Regulation (EU) 2020/1818 as regards the definition of prohibited weapons

Energy and Fossil Fuels Activity-based Exclusions

Category	Long-Only Systematic Equity Funds	All Other Funds
Arctic Drilling	5%	20%
Ultra Deep-Sea Drilling	5%	20%
Shale Oil and Gas	5%	20%
Oil sands	5%	20%
Coal Mining	5%	10%
Coal Power Generation	10%	20%

Weapon Activity-based Exclusions

Prohibited and Controversial Weapons

At RAM, we believe that prohibited and controversial weapons, due to their indiscriminate use against military personnel and civilians, cause excessive human suffering and damage to the environment. We respect the following conventions on prohibited and controversial weapons:

- Convention on the Prohibition of Biological Weapons (1972)
- Convention on the Prohibition of Chemical Weapons (1993)
- Convention on the Prohibition of Anti-Personnel Mines (Ottawa Treaty) (1997)
- Convention on Cluster Munitions (2008)
- Convention on Prohibitions or Restrictions on the Use of Certain Conventional Weapons Which May be Deemed to be Excessively Injurious or to Have Indiscriminate Effects (CCW) (1980) together with its protocols regulating specific weapon types (including blinding laser weapons, incendiary weapons, and non-detectable fragments)

the use, possession, development, transfer, manufacture, and stockpiling

Companies that are engaged in the development, manufacturing of components that are intended solely for use in the production and are essential for the functioning of prohibited and controversial weapons are entirely excluded. We also exclude companies that provide related services such as the possession, stockpiling or transferring controversial weapons.

Nuclear Weapons

Nuclear weapons are capable of mass destruction and excessively harmful due to radioactive fallout that has a severe, long-lasting impact on the population.

a) We have a 0% tolerance for manufacturers of nuclear warheads and/or whole nuclear missiles. It includes assembly and integration of warhead and missile body, and

operational/management contracts of government-owned facilities on a nuclear warhead and missile manufacturing.

b) Similarly, a 0% tolerance for manufacturers of components that were developed and/or significantly modified for exclusive use in nuclear weapons. Includes operational/management contracts of government-owned facilities on nuclear warhead and missile manufacturing.
c) Provided that the two previous criteria on nuclear weapons are met with a 0% tolerance, a maximum of 5% revenue from related products and services is permissible.

Defence & Weapons

We exclude companies that generate revenues of more than 50% from weapon and non-weapon-related products and/or services tailor-made for military applications.

Consumer Products & Services Activity-based Exclusions

At RAM, certain consumer products do not align with our values. Adult entertainment, Gambling, and Tobacco are subject to restrictions.

Adult Entertainment

a. Production of Adult Entertainment
   We place a threshold of 5% (0% for Long-only systematic equity funds) on companies involved in adult entertainment production.
b. Related Products, Services, and distribution for Adult Entertainment
   We apply a limit of 5% for our Long-only systematic equity funds and no limit to the remaining funds.

Gambling

Given the addictive nature of gambling activities that can have a long-term negative impact on an individual's mental health, finances, relationships and the wider society, we have applied a threshold of 50% to this category. For our Long-only systematic equity, a stricter limit of 5% applies.

Tobacco

Due to the negative impact of tobacco on human health, we only invest in companies that generate revenues equal to or less than 10% from tobacco production, retail, and distribution. A stricter limit of 5% applies to our Long-only Systematic Equity funds.

Energy and Fossil Fuels Activity-based Exclusions

We have restricted controversial fuels such as shale oil and gas, and controversial drilling processes such as Artic and Ultra deep-sea and coal.

Arctic Drilling and Ultra Deep-Sea Drilling

Arctic and ultra-deep-sea drilling have long-lasting negative impacts on the environment and biodiversity. Therefore, we restrict companies that generate revenues of more than 20% (5% for long-only funds) from the extraction and/or production of fossil fuels via the method of artic drilling or ultra deep-sea drilling.

Shale Oil and Gas and Oil sands

We place a revenue threshold of 20% on companies that generate revenues from the extraction and/or production of shale oil and gas and oil sands.

Coal Mining

We place a revenue threshold of 10% on companies that generate revenues from thermal and metallurgical coal mining and manufacturing of coal products.

Thermal Coal Power Generation

We exclude companies involved in electricity generation using coal power plants through the company's operations or those of its subsidiaries. We also restrict the companies that are engaged in providing essential products and/or services for coal power generation and distribution. Furthermore, companies that transmit and/or distribute power that is generated by coal power plants also face similar restrictions. We place a limitation of 20% for the RAM AI Fund Range and a narrower limit of 10% for Long-only systematic equities funds.

Exclusion criteria for Green Bonds

Green Bonds issued by companies that follow ICMA or EU Green Bond framework are exempted from the requirement for coal mining and thermal coal power generation based exclusions.

2. Pre-trade implementation

After approval from the RI Committee, all exclusions are incorporated in the form of a SQL table, and used by both investment and risk managers.

First level: exclusion as part of the investment process:

The portfolio manager has developed automated tools to retrieve information from the SQL table, allowing them to dynamically exclude relevant instruments from their investable universe.

Second level: exclusion verification managed by the risk team:

The pre-trade risk module identifies any trades whose names are on the exclusion list and alerts the relevant teams for further investigation.

3. Oversight

Under the oversight of RAM's Board of Directors, the task of reviewing, implementing and monitoring all aspects of the exclusion policy is mandated to RAM's Responsible Investment Committee. Moreover, RAM's Risk Management team is responsible for compliance with the policy.

For issues related to sustainability regulation, not expressly addressed within this document, please refer to the following Group policies:

- REGOLAMENTO DI GRUPPO DEL DIRIGENTE PREPOSTO ALLA REDAZIONE DEI DOCUMENTI CONTABILI SOCIETARI AI SENSI DELL'ART. 154 BIS DEL TUF

- Codice Etico del Gruppo Mediobanca (Dec 2022)

- Politica di Gruppo sulla sostenibilità (Feb 2024);

- Codice di Condotta.

- Politica di Gruppo ESG;

- Direttiva di Gruppo ESG;

- Politica di gestione delle risorse umane;

- Politica di remunerazione e incentivazione del personale;

- Codice Diversità e inclusione del Gruppo Mediobanca;

- Politica di Gruppo in materia di informativa finanziaria

- Manuale sulla doppia materialità

- Manuale di Gruppo sul Greenwashing;

- Politica di Gruppo in materia di informativa finanziaria e di sostenibilità

This policy is written in accordance with group guidelines.

IMPORTANT INFORMATION

This Procedure does not represent neither an offer nor an invitation to buy or sell any RAM Funds and may not be interpreted as an investment advisory service. Publication is done for regulatory[7] and transparency purposes.

Opinions included in this material constitute the judgement of RAM Active Investments (SA) at the approval date of this Policy and may be subject to change without immediate publication on the website. In case of questions, investors are invited to contact RAM Active Investments via email or phone.

We understand that this material is solely for the attention of professional investors

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The prospectus, constitutive documents and financial reports are available in English and French while IIDs are available in the relevant local languages. These documents can be obtained, free of charge, from the SICAVs' and Management Company's head office and www.ram-ai.com, its representative and distributor in Switzerland, RAM Active Investments S.A. and the relevant local representatives in the distribution countries.