Premier Investment Holdings Limited Environmental Governance and Social Policy

Document Review and Approval

Version Control

Version	Reviewed by	Endorsed by	Approved by	Implemented on
1.0	Compliance Officer	Senior Executive Officer	Board of Directors	10/09/2025

Premier Invest

Unlocking the Power of Capital

1. Purpose and Commitment

Premier Investment Holdings Limited ("PIHL" or "the Firm") is committed to integrating Environmental, Social and Governance (ESG) considerations into its investment advisory, fund management, and credit arranging activities.

This policy sets out the principles, governance, and practices that guide our approach to responsible business conduct and sustainable investment. It reflects our commitment to:

Supporting the UAE's and ADGM's initiatives for sustainable finance.

Aligning with global frameworks such as the UN Principles for Responsible Investment (PRI), UN Sustainable Development Goals (SDGs), Organisation for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises and the Task Force on Climate-related Financial Disclosures (TCFD).

PIHL is dedicated to protecting the long-term interests of our stakeholders, clients, and the wider community.

2. Scope

This ESG Policy applies to:

- All business lines licensed by ADGM FSRA, including Advising on Investments or Credit, Arranging Credit, Arranging Deals in Investments, and Managing Collective Investment Funds.
- All employees, directors, and contractors of PIHL.
- All investment activities, client advisory processes, credit arrangements, and fund management strategies undertaken by PIHL.

3. Governance Framework

Governance: having appropriate governance structures in place, according to the company's stage (e.g. board structure, share structure); writing out a code of conduct (committing the company to high ethical standards); adopting a whistle-blower policy.

Board Oversight

- The Board of Directors retains ultimate responsibility for ESG strategy, risk management, and oversight.
- The Board will review ESG performance annually and ensure alignment with regulatory expectations and stakeholder interests.
- The Board will monitor ESG integration across investment and advisory activities, reviewing ESG risks and opportunities, and recommending policy updates.

Management Responsibilities

- The Head of Compliance ensures adherence to ADGM requirements and coordinates ESG reporting.
- Portfolio managers and advisors are responsible for embedding ESG factors into due diligence, portfolio construction, and client recommendations.
- The Head of Compliance ensures that PIHL is on top of and aligned to the latest laws, regulations and compliance standards (e.g. GDPR (and equivalent), UN Guiding Principles of Business and Human Rights, the eight core ILO conventions); the oversight of these issues should be ensured by the Management team and Board of Directors.

4. ESG Principles

Environmental

Assess climate-related and environmental risks in investment due diligence.

Avoid or mitigate exposure to sectors with material adverse environmental impacts (e.g., coal mining, deforestation).

Promote investments aligned with renewable energy, clean technology, sustainable infrastructure, and resource efficiency.

Social

Consider labour standards, health & safety, human rights, and diversity in investee companies and business partners.
Avoid financing or investing in companies engaged in child labour, forced labour, or systemic human rights abuse.
Encourage investee companies to foster inclusive workplaces and positive community impact.

Governance

Ensure robust governance structures in investee companies, including effective boards, transparent reporting, and accountability.
Monitor risks relating to corruption, bribery, tax evasion, and conflicts of interest.
Encourage alignment of executive compensation with long-term performance and sustainability goals.

5. Integration into Licensed Activities

1. Advising on Investments or Credit: Integrate ESG factors into client suitability and recommendation processes; consider sector exposures, climate and transition risks, human capital practices, and governance quality in all advice provided.

2. Arranging Deals in Investments: Embed ESG due diligence in counterparty assessments and transaction structuring; identify material ESG risks, apply exclusion criteria, and document mitigations and post-deal monitoring obligations.

3. Arranging Credit: Incorporate ESG analysis into borrower and facility assessments, including use-of-proceeds, sector and jurisdictional risks, environmental and social impact, and governance controls. Where appropriate, promote sustainability-linked features (e.g., KPIs, covenants, margin ratchets) and require minimum ESG disclosures and remediation plans for identified risks.

4. Managing a Collective Investment Fund: Apply ESG screening and scoring to portfolio construction and ongoing monitoring; disclose material ESG risks/opportunities in offering documents and periodic reports; engage with portfolio entities to improve ESG performance and escalate where remediation is insufficient.

6. Exclusion Policy

PIHL will not knowingly advise on, arrange, or invest in companies involved in:
Illegal or controversial weapons (e.g., cluster munitions, landmines).
Activities in breach of international sanctions.
Severe environmental damage without remediation plans.
Systemic human rights abuses.

7. ESG Risk Management

ESG risks are assessed alongside financial, operational, and regulatory risks.
Tools include negative screening, ESG scoring, and qualitative risk assessments.
Material ESG risks are escalated to the ESG & Risk Committee and incorporated into the firm’s risk register.

8. Reporting & Transparency
PIHL will provide annual ESG disclosures to clients and stakeholders, covering policy implementation, ESG risks, and material outcomes. ESG reporting will align, where possible, with TCFD's recommendations and ADGM sustainability guidelines.

9. Training & Awareness
All employees will receive mandatory ESG training as part of their compliance induction and annual refresher programmes. The firm will build internal capacity to evaluate ESG issues and engage with stakeholders on sustainability matters.

10. Continuous Improvement
This policy will be reviewed annually by the ESG & Risk Committee.
Feedback from clients, regulators, and stakeholders will inform policy updates.
PIHL will aim to align with evolving ADGM requirements, UAE national strategies (including the UAE Net Zero 2050 initiative), and international ESG standards.

11. Approval
This ESG Policy has been reviewed and approved by the Board of Directors of Premier Investment Holdings Limited on [Date].

Signed:

Head of Compliance
Premier Investment Holdings Limited

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