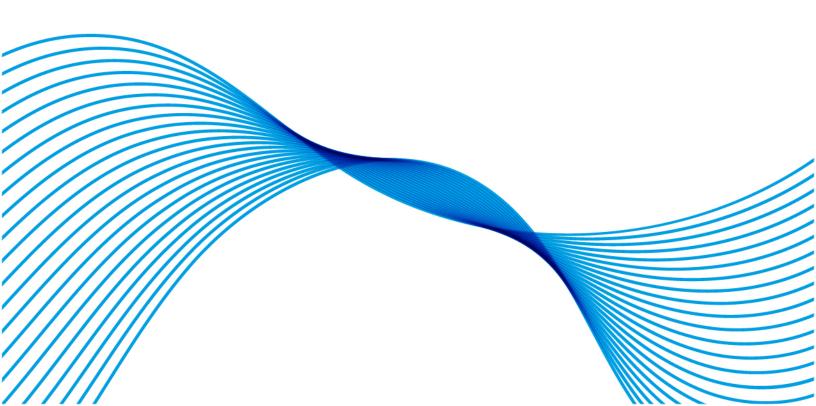
## **PRI** Principles for Responsible Investment

## PUBLIC TRANSPARENCY REPORT

2024

## **Loftus Peak Pty Limited**

Generated 25-11-2024



# About this report

PRI reporting is the largest global reporting project on responsible investment. It was developed with investors, for investors.

PRI signatories are required to report publicly on their responsible investment activities each year. In turn, they receive a number of outputs, including a public and private Transparency Report.

The public Transparency Reports, which are produced using signatories' reported information, provide accountability and support signatories to have internal discussions about their practices and to discuss these with their clients, beneficiaries, and other stakeholders.

This public Transparency Report is an export of the signatory's responses to the PRI Reporting Framework during the 2024 reporting period. It includes the signatory's responses to core indicators, as well as responses to plus indicators that the signatory has agreed to make public.

In response to signatory feedback, the PRI has not summarised signatories' responses – the information in this document is presented exactly as it was reported.

For each of the indicators in this document, all options selected by the signatory are presented, including links and qualitative responses. In some indicators, all applicable options are included for additional context.

# Disclaimers

## Legal Context

PRI recognises that the laws and regulations to which signatories are subject differ by jurisdiction. We do not seek or require any signatory to take an action that is not in compliance with applicable laws. All signatory responses should therefore be understood to be subject to and informed by the legal and regulatory context in which the signatory operates.

## **Responsible investment definitions**

Within the PRI Reporting Framework Glossary, we provide definitions for key terms to guide reporting on responsible investment practices in the Reporting Framework. These definitions may differ from those used or proposed by other authorities and regulatory bodies due to evolving industry perspectives and changing legislative landscapes. Users of this report should be aware of these variations, as they may impact interpretations of the information provided.

## Data accuracy

This document presents information reported directly by signatories in the 2024 reporting cycle. This information has not been audited by the PRI or any other party acting on its behalf. While this information is believed to be reliable, no representations or warranties are made as to the accuracy of the information presented. The PRI has taken reasonable action to ensure that data submitted by signatories in the reporting tool is reflected in their official PRI reports accurately. However, it is possible e that small data inaccuracies and/or gaps remain, and the PRI shall not be responsible or liable for such inaccuracies and gaps.

# **Table of Contents**

Module	Page
SENIOR LEADERSHIP STATEMENT (SLS)	4
ORGANISATIONAL OVERVIEW (OO)	6
POLICY, GOVERNANCE AND STRATEGY (PGS)	15
LISTED EQUITY (LE)	44
SUSTAINABILITY OUTCOMES (SO)	52
CONFIDENCE-BUILDING MEASURES (CBM)	55



# **SENIOR LEADERSHIP STATEMENT (SLS)**

## SENIOR LEADERSHIP STATEMENT

## SENIOR LEADERSHIP STATEMENT

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SLS 1	CORE	N/A	N/A	PUBLIC	Senior Leadership Statement	GENERAL

#### Section 1. Our commitment

Why does your organisation engage in responsible investment?

• What is your organisation's overall approach to responsible investment, and what major responsible investment commitment(s) have you made?

We believe that the incorporation of ESG into Loftus Peak's investment and business processes delivers stronger ESG outcomes and is in the best interests of Loftus Peak's stakeholders. It is important to consider and integrate ESG factors into the investment approach as they have the potential to impact the long-term sustainability of companies in the Loftus Peak investment universe.

The Loftus Peak investment process incorporates qualitative and quantitative ESG considerations into stock selection and portfolio construction. Negative screens are applied to a range of industry sectors, incorporate ESG risk as an input to stock valuation and seek alignments between Loftus Peak's investment thematics and the Sustainable Development Goals ("SDGs"). Once invested, these considerations continue to be monitored as well as engaging in stewardship activities such as voting on shareholder resolutions and active direct engagement with companies in relation to ESG issues or disclosures. Loftus Peak collaborate on ESG matters with other investors and market participants, including through membership of the Responsible Investment Association Australasia (RIAA).

#### Section 2. Annual overview

Discuss your organisation's progress during the reporting year on the responsible investment issue you consider most relevant or material to your organisation or its assets.

Reflect on your performance with respect to your organisation's responsible investment objectives and targets during the reporting year. Details might include, for example, outlining your single most important achievement or describing your general progress on topics such as the following (where applicable):

- refinement of ESG analysis and incorporation
- stewardship activities with investees and/or with policymakers
- collaborative engagements
- · attainment of responsible investment certifications and/or awards

During the financial year to June 2024, Loftus Peak released its first annual stewardship report and sustainability report (for the year to June 2023) as required for RIAA certification. Loftus Peak increased its level of company engagement, engaging with 6 companies in the year ending June 2024 compared with 2 in the year ending June 30 2023.

As of the year ending June 2024, Loftus Peak is RIAA certified and rated 4 Globes and low carbon by Morningstar. Loftus Peak is rated Three Leaf Ethical Fund Rating issued by Australia's Ethical Advisers Co-operative , pending a review.

#### Section 3. Next steps

What specific steps has your organisation outlined to advance your commitment to responsible investment in the next two years?



Going forward, Loftus Peak seeks to maintain or improve its current ratings, improve its communication of ESG issues, practice and solutions and adapt to the changing standards of ESG.

Loftus Peak seeks to retain its responsible manager certification from the Responsible Investment Association Australasia (RIAA). A review of Loftus Peak's Ethical Fund Rating issued by Australia's Ethical Advisers Co-operative is pending.

In keeping with RIAA certification, Loftus Peak will publish an annual Stewardship and sustainability report for the year to June 30 2024. Loftus Peak is also aiming to improve the transparency of our engagements with companies.

#### Section 4. Endorsement

'The Senior Leadership Statement has been prepared and/or reviewed by the undersigned and reflects our organisation-wide commitment and approach to responsible investment'.

Name

**Richard Ellis Steele** 

Position

CEO

Organisation's Name

Loftus Peak Pty Limited

#### A

'This endorsement applies only to the Senior Leadership Statement and should not be considered an endorsement of the information reported by the above-mentioned organisation in the various modules of the Reporting Framework. The Senior Leadership Statement serves as a general overview of the above-mentioned organisation's responsible investment approach. The Senior Leadership Statement does not constitute advice and should not be relied upon as such. Further, it is not a substitute for the skill, judgement and experience of any third parties, their management, employees, advisors and/or clients when making investment and other business decisions'.

• B



# **ORGANISATIONAL OVERVIEW (OO)**

## **ORGANISATIONAL INFORMATION**

## **REPORTING YEAR**

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
001	CORE	N/A	N/A	PUBLIC	Reporting year	GENERAL
What is the year-end date of the 12-month period you have chosen to report for PRI reporting purposes?						
		Date		Month		Year
	ate of the 12-month RI reporting purposes:	30		06	:	2024

## SUBSIDIARY INFORMATION

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
00 2	CORE	N/A	00 2.1	PUBLIC	Subsidiary information	GENERAL

#### Does your organisation have subsidiaries?

○ (A) Yes● (B) No



## **ASSETS UNDER MANAGEMENT**

## **ALL ASSET CLASSES**

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
00 4	CORE	OO 3	N/A	PUBLIC	All asset classes	GENERAL
What are your to	tal assets under man	agement (AUM) at	the end of the r	eporting year, a	as indicated in [OO 1	]?
		USD				
(A) AUM of you including subside excluding the A execution, advise research advise	diaries, and NM subject to sory, custody, or	US\$ 641,629,827.	00			
PRI signatories and excluded fi	osidiaries that are in their own right rom this indicated in [OO	own right US\$ 0.00				
(C) AUM subjer advisory, custor advisory only		US\$ 0.00				

Additional information on the exchange rate used: (Voluntary)

Assuming a USDAUD exchange rate of 0.66785



## **ASSET BREAKDOWN**

Indicator	Type of i	indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
00 5	CORE		OO 3	Multiple indicators	PUBLIC	Asset breakdown	GENERAL
Provide a perc	entage break	down of y	our total AUM at t	he end of the repor	ting year as inc	licated in [OO 1].	
		(1) Percei	ntage of Internally	managed AUM	(2) Percentag	e of Externally ma	naged AUM
(A) Listed eq	uity	100%			0%		
(B) Fixed inc	ome	0%			0%		
(C) Private e	quity	0%			0%		
(D) Real esta	ate	0%			0%		
(E) Infrastruc	ture	0%			0%		
(F) Hedge fu	nds	0%			0%		
(G) Forestry		0%			0%		
(H) Farmland	t	0%			0%		
(I) Other		0%			0%		
(J) Off-balan	ce sheet	0%			0%		



## ASSET BREAKDOWN: INTERNALLY MANAGED LISTED EQUITY

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 5.3 LE	CORE	OO 5	Multiple	PUBLIC	Asset breakdown: Internally managed listed equity	GENERAL
Provide a furthe	er breakdown of you	internally manage	ed listed equity	AUM.		
(A) Passive e	quity 0%					
(B) Active – q	uantitative 0%					
(C) Active – fu	indamental 100	9%				
(D) Other stra	tegies 0%					

### **GEOGRAPHICAL BREAKDOWN**

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
00 7	CORE	Multiple, see guidance	N/A	PUBLIC	Geographical breakdown	GENERAL

How much of your AUM in each asset class is invested in emerging markets and developing economies?

#### AUM in Emerging Markets and Developing Economies

(A) Listed equity

(2) >0 to 10%



## STEWARDSHIP

### **STEWARDSHIP**

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle		
OO 8	CORE	Multiple, see guidance	Multiple indicators	PUBLIC	Stewardship	GENERAL		
Does your organ	Does your organisation conduct stewardship activities, excluding (proxy) voting, for any of your assets?							

	(1) Listed equity - active
(A) Yes, through internal staff	
(B) Yes, through service providers	
(C) Yes, through external managers	
(D) We do not conduct stewardship	0

## STEWARDSHIP: (PROXY) VOTING

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 9	CORE	Multiple, see guidance	Multiple indicators	PUBLIC	Stewardship: (Proxy) voting	GENERAL

Does your organisation conduct (proxy) voting activities for any of your listed equity holdings?

	(1) Listed equity - active
(A) Yes, through internal staff	
(B) Yes, through service providers	
(C) Yes, through external managers	
(D) We do not conduct (proxy) voting	0



Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 9.1	CORE	00 9	PGS 10.1, PGS 31	PUBLIC	Stewardship: (Proxy) voting	GENERAL

For each asset class, on what percentage of your listed equity holdings do you have the discretion to vote?

	Percentage of your listed equity holdings over which you have the discretion to vote
(A) Listed equity – active	(9) >70 to 80%

## **ESG INCORPORATION**

### INTERNALLY MANAGED ASSETS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
00 11	CORE	Multiple, see guidance	Multiple indicators	PUBLIC	Internally managed assets	1
For each inter investment de	nally managed asset cl ecisions?	ass, does your org	anisation incorpo	orate ESG facto	ors, to some extent,	into your
		(1) Yes, we incorporate ESG factors into our investment decisions			No, we do not incorr rs into our investme	
(C) Listed e	quity - active -				0	

fundamental

۲

0



## **ESG STRATEGIES**

## LISTED EQUITY

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
00 17 LE	CORE	00 11	00 17.1 LE, LE 12	PUBLIC	Listed equity	1

Which ESG incorporation approach and/or combination of approaches does your organisation apply to your internally managed active listed equity?

(A) Screening alone	0%
(B) Thematic alone	0%
(C) Integration alone	0%
(D) Screening and integration	100%
(E) Thematic and integration	0%
(F) Screening and thematic	0%
(G) All three approaches combined	0%
(H) None	0%

#### Percentage out of total internally managed active listed equity



Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
00 17.1 LE	CORE	00 17 LE	LE 9	PUBLIC	Listed equity	1

What type of screening does your organisation use for your internally managed active listed equity assets where a screening approach is applied?

	Percentage coverage out of your total listed equity assets where a screening approach is applied
(A) Positive/best-in-class screening only	0%
(B) Negative screening only	100%
(C) A combination of screening approaches	0%

## **ESG/SUSTAINABILITY FUNDS AND PRODUCTS**

## LABELLING AND MARKETING

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 18	CORE	00 11–14	OO 18.1	PUBLIC	Labelling and marketing	1

Do you explicitly market any of your products and/or funds as ESG and/or sustainable?

 $\circ~$  (A) Yes, we market products and/or funds as ESG and/or sustainable

(B) No, we do not offer products or funds explicitly marketed as ESG and/or sustainable

 $\circ~$  (C) Not applicable; we do not offer products or funds



## SUMMARY OF REPORTING REQUIREMENTS

## SUMMARY OF REPORTING REQUIREMENTS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
00 21	CORE	Multiple indicators	Multiple indicators	PUBLIC	Summary of reporting requirements	GENERAL

The following table shows which modules are mandatory or voluntary to report on in the separate PRI asset class modules. Where a module is voluntary, indicate if you wish to report on it.

Applicable modules	(1) Mandatory to report (pre-filled based on previous responses)	(2.1) Voluntary to report. Yes, I want to opt-in to reporting on the module	(2.2) Voluntary to report. No, I want to opt-out of reporting on the module	
Policy, Governance and Strategy	۲	0	0	
Confidence Building Measures	۲	0	0	
(C) Listed equity – active – fundamental	۲	0	0	

## **SUBMISSION INFORMATION**

### **REPORT DISCLOSURE**

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 32	CORE	OO 3, OO 31	N/A	PUBLIC	Report disclosure	GENERAL

How would you like to disclose the detailed percentage figures you reported throughout the Reporting Framework?

• (A) Publish as absolute numbers

• (B) Publish as ranges



# POLICY, GOVERNANCE AND STRATEGY (PGS)

## POLICY

## **RESPONSIBLE INVESTMENT POLICY ELEMENTS**

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 1	CORE	OO 8, OO 9	Multiple indicators	PUBLIC	Responsible investment policy elements	1, 2

Which elements are covered in your formal responsible investment policy(ies)?

(A) Overall approach to responsible investment

(B) Guidelines on environmental factors

☑ (C) Guidelines on social factors

☑ (D) Guidelines on governance factors

**(E)** Guidelines on sustainability outcomes

 $\Box$  (F) Guidelines tailored to the specific asset class(es) we hold

☑ (G) Guidelines on exclusions

 $\Box$  (H) Guidelines on managing conflicts of interest related to responsible investment

☑ (I) Stewardship: Guidelines on engagement with investees

 $\hfill\square$  (J) Stewardship: Guidelines on overall political engagement

 $\hfill\square$  (K) Stewardship: Guidelines on engagement with other key stakeholders

☑ (L) Stewardship: Guidelines on (proxy) voting

 $\Box$  (M) Other responsible investment elements not listed here

• (N) Our organisation does not have a formal responsible investment policy and/or our policy(ies) do not cover any responsible investment elements

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 2	CORE	PGS 1	Multiple, see guidance	PUBLIC	Responsible investment policy elements	1

#### Does your formal responsible investment policy(ies) include specific guidelines on systematic sustainability issues?

☑ (A) Specific guidelines on climate change (may be part of guidelines on environmental factors)

(B) Specific guidelines on human rights (may be part of guidelines on social factors)

□ (C) Specific guidelines on other systematic sustainability issues

• (D) Our formal responsible investment policy(ies) does not include guidelines on systematic sustainability issues



Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 3	CORE	PGS 1, PGS 2	N/A	PUBLIC	Responsible investment policy elements	6

#### Which elements of your formal responsible investment policy(ies) are publicly available?

(A) Overall approach to responsible investment

Add link:

https://www.loftuspeak.com.au/wp-content/uploads/2024/06/230519-Loftus-Peak-Responsible-Investment-Policy.pdf

#### (B) Guidelines on environmental factors

Add link:

https://www.loftuspeak.com.au/wp-content/uploads/2024/06/230519-Loftus-Peak-Responsible-Investment-Policy.pdf

#### ☑ (C) Guidelines on social factors

Add link:

https://www.loftuspeak.com.au/wp-content/uploads/2024/06/230519-Loftus-Peak-Responsible-Investment-Policy.pdf

#### (D) Guidelines on governance factors Add link:

https://www.loftuspeak.com.au/wp-content/uploads/2024/06/230519-Loftus-Peak-Responsible-Investment-Policy.pdf

#### (E) Guidelines on sustainability outcomes Add link:

https://www.loftuspeak.com.au/wp-content/uploads/2024/06/230519-Loftus-Peak-Responsible-Investment-Policy.pdf

#### ☑ (F) Specific guidelines on climate change (may be part of guidelines on environmental factors) Add link:

https://www.loftuspeak.com.au/wp-content/uploads/2024/06/230519-Loftus-Peak-Responsible-Investment-Policy.pdf

#### ☑ (G) Specific guidelines on human rights (may be part of guidelines on social factors) Add link:

https://www.loftuspeak.com.au/wp-content/uploads/2024/06/230519-Loftus-Peak-Responsible-Investment-Policy.pdf

#### ☑ (J) Guidelines on exclusions

Add link:

https://www.loftuspeak.com.au/wp-content/uploads/2024/06/230519-Loftus-Peak-Responsible-Investment-Policy.pdf

#### ☑ (L) Stewardship: Guidelines on engagement with investees Add link:

https://www.loftuspeak.com.au/wp-content/uploads/2024/06/230519-Loftus-Peak-Responsible-Investment-Policy.pdf

#### ☑ (O) Stewardship: Guidelines on (proxy) voting Add link:

https://www.loftuspeak.com.au/wp-content/uploads/2024/06/120.4-Loftus-Peak-Proxy-Voting-Policy.pdf

• (Q) No elements of our formal responsible investment policy(ies) are publicly available



Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 4	PLUS	PGS 1	N/A	PUBLIC	Responsible investment policy elements	1-6

## Does your formal responsible investment policy(ies) identify a link between your responsible investment activities and your fiduciary duties or equivalent obligations?

#### (A) Yes

Elaborate:

Loftus Peak is a fund manager that invests client monies in disruptive companies expected to outperform global equity markets over the medium- to long-term. The allocation of capital is a powerful force for change; Loftus Peak understands that investment decisions, when taken together with others, can drive positive ESG outcomes. It is important to consider and integrate ESG factors into the investment approach as they have the potential to impact the long-term sustainability of companies in the Loftus Peak investment universe.

Loftus Peak believes companies with strong ESG credentials and opportunity often carry a disruptive edge and can even be classified as disruptive by riding on ESG thematics. This disruption makes them more attractive as investments. Loftus Peak looks to where the world is heading and positions its clients to benefit from that change, selecting investments based on a disciplined valuation process. There are two distinct questions facing responsible investors looking for suitable companies to invest in; what type of business a company is involved in and how a company operates its business.

#### • (B) No

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 5	CORE	PGS 1	N/A	PUBLIC	Responsible investment policy elements	2

#### Which elements are covered in your organisation's policy(ies) or guidelines on stewardship?

- ☑ (A) Overall stewardship objectives
- (B) Prioritisation of specific ESG factors to be advanced via stewardship activities

☑ (C) Criteria used by our organisation to prioritise the investees, policy makers, key stakeholders, or other entities on which to focus our stewardship efforts

- ☑ (D) How different stewardship tools and activities are used across the organisation
- (E) Approach to escalation in stewardship
- ☑ (F) Approach to collaboration in stewardship
- $\Box$  (G) Conflicts of interest related to stewardship

(H) How stewardship efforts and results are communicated across the organisation to feed into investment decisionmaking and vice versa

#### □ (I) Other

• (J) None of the above elements is captured in our policy(ies) or guidelines on stewardship



Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 6	CORE	PGS 1	N/A	PUBLIC	Responsible investment policy elements	2

#### Does your policy on (proxy) voting include voting principles and/or guidelines on specific ESG factors?

- (A) Yes, it includes voting principles and/or guidelines on specific environmental factors
- (B) Yes, it includes voting principles and/or guidelines on specific social factors
- (C) Yes, it includes voting principles and/or guidelines on specific governance factors
- (D) Our policy on (proxy) voting does not include voting principles or guidelines on specific ESG factors

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 7	CORE	OO 9	N/A	PUBLIC	Responsible investment policy elements	2

#### Does your organisation have a policy that states how (proxy) voting is addressed in your securities lending programme?

- (A) We have a publicly available policy to address (proxy) voting in our securities lending programme
- (B) We have a policy to address (proxy) voting in our securities lending programme, but it is not publicly available
- (C) We rely on the policy of our external service provider(s)
- $\circ$  (D) We do not have a policy to address (proxy) voting in our securities lending programme
- (E) Not applicable; we do not have a securities lending programme



## **RESPONSIBLE INVESTMENT POLICY COVERAGE**

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 8	CORE	PGS 1	N/A	PUBLIC	Responsible investment policy coverage	1
What percenta	age of your total AUM is	covered by the b	elow elements	of your respon	sible investment policy	y(ies)?
			Combined AU	M coverage of	all policy elements	
factors (C) Guideline				(7) 100%		
Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
					Responsible	
PGS 9	CORE	PGS 2	N/A	PUBLIC	investment policy coverage	1
	CORE on of your AUM is cove stainability issues?				investment policy coverage	
What proportio	on of your AUM is cove				investment policy coverage nate change, human ri	
What proportions systematic sub	on of your AUM is cove		I policies or gu	idelines on cli	investment policy coverage mate change, human ri ge	



Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 10	CORE	OO 8, OO 9, PGS 1	N/A	PUBLIC	Responsible investment policy coverage	2

Per asset class, what percentage of your AUM is covered by your policy(ies) or guidelines on stewardship with investees?

#### (A) Listed equity

(1) Percentage of AUM covered

- (1) >0% to 10%
- (2) >10% to 20%
- (3) >20% to 30%
- (4) >30% to 40%
- (5) >40% to 50%
- (6) >50% to 60%
- (7) >60% to 70%
- (8) >70% to 80%
- (9) >80% to 90%
- (10) >90% to <100%
- **(11) 100%**

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 10.1	CORE	OO 9.1, PGS 1	N/A	PUBLIC	Responsible investment policy coverage	2

#### What percentage of your listed equity holdings is covered by your guidelines on (proxy) voting?

#### ☑ (A) Actively managed listed equity

(1) Percentage of your listed equity holdings over which you have the discretion to vote

- (1) >0% to 10%
- (2) >10% to 20%
- (3) >20% to 30%
- (4) >30% to 40%
- (5) >40% to 50%
- (6) >50% to 60%
- (7) >60% to 70%
- (1) correction to 20%
  (8) >70% to 80%
- (0) > 10% to 00%
   (0) > 00% to 00%
- (9) >80% to 90%
- (10) >90% to <100%
- (11) 100%

(2) If your AUM coverage is below 100%, explain why: (Voluntary)

The Loftus Peak Global Change Portfolio (LPGCP), is managed by Mason Stevens and operated by Loftus Peak as the investment adviser. Each investor holds LGPCP as a managed discretionary account (MDA) meaning shares are directly held by clients. As LPGCP accounts for <10% of total AUM, >90% to <100% of AUM is covered by guidelines on voting. However, because the holdings of LPGCP track that of the Loftus Peak Global Disruption Fund (LPGD) this means it follows the all aspects of LPGD's ESG policy apart from proxy voting, including other elements of stewardship such as engagement.



## GOVERNANCE

### **ROLES AND RESPONSIBILITIES**

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 11	CORE	N/A	Multiple indicators	PUBLIC	Roles and responsibilities	1

Which senior level body(ies) or role(s) in your organisation have formal oversight over and accountability for responsible investment?

 $\Box$  (A) Board members, trustees, or equivalent

 $\hfill\square$  (B) Senior executive-level staff, or equivalent

☑ (C) Investment committee, or equivalent

Specify:

Investment Risk Committee, a sub-committee of the Board

 $\Box$  (D) Head of department, or equivalent

• (E) None of the above bodies and roles have oversight over and accountability for responsible investment

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 11.1	CORE	PGS 1, PGS 2, PGS 11	N/A	PUBLIC	Roles and responsibilities	1, 2

Does your organisation's senior level body(ies) or role(s) have formal oversight over and accountability for the elements covered in your responsible investment policy(ies)?

(2) Senior executive-level staff, investment committee, head of department, or
equivalent

- 1



(H) Guidelines on exclusions	
(J) Stewardship: Guidelines on engagement with investees	
(M) Stewardship: Guidelines on (proxy) voting	
(N) This role has no formal oversight over and accountability for any of the above elements covered in our responsible investment policy(ies)	0

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 11.2	CORE	N/A	N/A	PUBLIC	Roles and responsibilities	1-6

Does your organisation have governance processes or structures to ensure that your overall political engagement is aligned with your commitment to the principles of PRI, including any political engagement conducted by third parties on your behalf?

- (A) Yes
- (B) No

• (C) Not applicable, our organisation does not conduct any form of political engagement directly or through any third parties

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 12	CORE	N/A	N/A	PUBLIC	Roles and responsibilities	1

In your organisation, which internal or external roles are responsible for implementing your approach to responsible investment?

#### ☑ (A) Internal role(s)

Specify:

ESG Expert and Investment team for implementation.

 $\Box$  (B) External investment managers, service providers, or other external partners or suppliers

• (C) We do not have any internal or external roles with responsibility for implementing responsible investment



Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 15	PLUS	PGS 11	N/A	PUBLIC	Roles and responsibilities	1

## What responsible investment competencies do you regularly include in the training of senior-level body(ies) or role(s) in your organisation?

## (2) Senior executive-level staff, investment committee, head of department or equivalent

(A) Specific competence in climate change mitigation and adaptation	
(B) Specific competence in investors' responsibility to respect human rights	
(C) Specific competence in other systematic sustainability issues	
(D) The regular training of this senior leadership role does not include any of the above responsible investment competencies	۲

### EXTERNAL REPORTING AND DISCLOSURES

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 16	CORE	N/A	N/A	PUBLIC	External reporting and disclosures	6

What elements are included in your regular reporting to clients and/or beneficiaries for the majority of your AUM?

(A) Any changes in policies related to responsible investment

 $\Box$  (B) Any changes in governance or oversight related to responsible investment

☑ (C) Stewardship-related commitments

☑ (D) Progress towards stewardship-related commitments

☑ (E) Climate–related commitments

☑ (F) Progress towards climate-related commitments

 $\Box$  (G) Human rights–related commitments

□ (H) Progress towards human rights–related commitments

 $\hfill\square$  (I) Commitments to other systematic sustainability issues

 $\Box$  (J) Progress towards commitments on other systematic sustainability issues

• (K) We do not include any of these elements in our regular reporting to clients and/or beneficiaries for the majority of our AUM



Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 17	CORE	N/A	N/A	PUBLIC	External reporting and disclosures	6

## During the reporting year, did your organisation publicly disclose climate-related information in line with the Task Force on Climate-Related Financial Disclosures' (TCFD) recommendations?

□ (A) Yes, including all governance-related recommended disclosures

 $\Box$  (B) Yes, including all strategy-related recommended disclosures

□ (C) Yes, including all risk management–related recommended disclosures

(D) Yes, including all applicable metrics and targets-related recommended disclosures

• (E) None of the above

Add link(s):

https://www.loftuspeak.com.au/wp-content/uploads/2024/07/Loftus-Peak-Global-Disruption-Fund-June-2024-Update.pdf

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 19	CORE	N/A	N/A	PUBLIC	External reporting and disclosures	6

During the reporting year, did your organisation publicly disclose its membership in and support for trade associations, think tanks or similar bodies that conduct any form of political engagement?

• (A) Yes, we publicly disclosed our membership in and support for trade associations, think tanks, or similar bodies that conduct any form of political engagement

• (B) No, we did not publicly disclose our membership in and support for trade associations, think tanks, or similar bodies that conduct any form of political engagement

• (C) Not applicable, we were not members in or supporters of any trade associations, think tanks, or similar bodies that conduct any form of political engagement during the reporting year

## STRATEGY

### **CAPITAL ALLOCATION**

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 20	CORE	N/A	N/A	PUBLIC	Capital allocation	1

#### Which elements do your organisation-level exclusions cover?

(A) Exclusions based on our organisation's values or beliefs regarding particular sectors, products or services

□ (B) Exclusions based on our organisation's values or beliefs regarding particular regions or countries

□ (C) Exclusions based on minimum standards of business practice aligned with international norms such as the OECD Guidelines for Multinational Enterprises, the International Bill of Human Rights, UN Security Council sanctions or the UN Global Compact



#### $\Box$ (D) Exclusions based on our organisation's climate change commitments

#### ☑ (E) Other elements

Specify:

For the funds managed by Loftus Peak, exclusions are applied at the company level based on what businesses they operate in. A maximum revenue threshold of 5% is applied to:

- Adult Entertainment
- Alcohol manufacture, supply and retail sales
- Animal cruelty fur and specialty leather, non-pharmaceutical animal testing
- Fossil fuels oil, gas and thermal coal extraction and generation
- Gambling equipment manufacture, supply, services and outlets
- Logging old growth forest
- Nuclear power
- Predatory lending
- Tobacco and nicotine alternatives supply and retail sales
- Weapons manufacture and supply
- A maximum revenue threshold of 0% is applied to:
- Tobacco and nicotine alternatives production
- Controversial weapon production
- Nuclear weapon production

• (F) Not applicable; our organisation does not have any organisation-level exclusions

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 21	CORE	N/A	N/A	PUBLIC	Capital allocation	1

#### How does your responsible investment approach influence your strategic asset allocation process?

(A) We incorporate ESG factors into our assessment of expected asset class risks and returns

Select from dropdown list:

(1) for all of our AUM subject to strategic asset allocation

- $\circ~$  (2) for a majority of our AUM subject to strategic asset allocation
- $\circ$  (3) for a minority of our AUM subject to strategic asset allocation

(B) We incorporate climate change-related risks and opportunities into our assessment of expected asset class risks and returns

Select from dropdown list:

- (1) for all of our AUM subject to strategic asset allocation
- (2) for a majority of our AUM subject to strategic asset allocation
- $\circ$  (3) for a minority of our AUM subject to strategic asset allocation



## ☑ (C) We incorporate human rights-related risks and opportunities into our assessment of expected asset class risks and returns

Select from dropdown list:

(1) for all of our AUM subject to strategic asset allocation

 $\circ$  (2) for a majority of our AUM subject to strategic asset allocation

 $\circ$  (3) for a minority of our AUM subject to strategic asset allocation

(D) We incorporate risks and opportunities related to other systematic sustainability issues into our assessment of expected asset class risks and returns

Select from dropdown list:

(1) for all of our AUM subject to strategic asset allocation

 $\circ~$  (2) for a majority of our AUM subject to strategic asset allocation

 $\circ~$  (3) for a minority of our AUM subject to strategic asset allocation

Specify: (Voluntary)

Material ESG risks are used to determine the ESG risk of an investment. The ESG risk of an investment impacts its risk rating in Loftus Peak's valuation model, meaning the ESG risk impacts Loftus Peak's fair value for a company. Loftus Peak considers material ESG risks in line with Sustainalytics reporting. These risks can be subdivided into environmental (which includes climate change), social (which includes human rights) and governance.

• (E) We do not incorporate ESG factors, climate change, human rights or other systematic sustainability issues into our assessment of expected asset class risks and returns

 $\circ$  (F) Not applicable; we do not have a strategic asset allocation process



### STEWARDSHIP: OVERALL STEWARDSHIP STRATEGY

ndicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 22	CORE	OO 8, OO 9	N/A	PUBLIC	Stewardship: Overall stewardship strategy	2
For the major objective?	ity of AUM within each a	asset class, which	of the followin	g best describ	es your primary stewar	dship
				(1) Listed equ	uity	
risk-adjuste we seek to a overall portf caused by in	e our portfolio-level d returns. In doing so, address any risks to folio performance ndividual investees' to systematic y issues.			۲		
investments In doing so, address any portfolio per individual in	e our individual ' risk-adjusted returns. we do not seek to y risks to overall formance caused by vestees' contribution to sustainability issues.			O		
ndicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle

PGS 23 PLUS	OO 5, OO 8, N/A OO 9 N/A	PUBLIC Stewardship: Overall 2 stewardship strategy	
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## How does your organisation, or the external service providers or external managers acting on your behalf, prioritise the investees or other entities on which to focus its stewardship efforts?

Loftus Peak votes according to its Proxy Voting Policy which acts solely in accordance with its fiduciary responsibility to consider the collective interests of members as a whole. The policy details the voting methodology that Lotus Peak believes best manages the investments held on behalf of investors. In accordance with Loftus Peak's belief that strong ESG credentials can help a company financially, voting in favour of ESG concerns is reflected in of the proxy voting approach.

Loftus peak's main priority in proxy voting is to obtain a full set of ESG information on which to assign ESG risk. We penalise companies that lack disclosure.



Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 24	CORE	OO 8, OO 9	N/A	PUBLIC	Stewardship: Overall stewardship strategy	2

Which of the following best describes your organisation's default position, or the position of the external service providers or external managers acting on your behalf, concerning collaborative stewardship efforts?

• (A) We recognise the value of collective action, and as a result, we prioritise collaborative stewardship efforts

wherever possible(B) We collaborate on a case-by-case basis

(C) Other

• (D) We do not join collaborative stewardship efforts

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 24.1	PLUS	OO 8, OO 9	N/A	PUBLIC	Stewardship: Overall stewardship strategy	2

Elaborate on your organisation's default position on collaborative stewardship, or the position of the external service providers or external investment managers acting on your behalf, including any other details on your overall approach to collaboration.

Loftus Peak collaborates on ESG matters with other investors and market participants, including through membership of the Responsible Investment Association Australasia (RIAA).

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 25	PLUS	OO 5, OO 8, OO 9	N/A	PUBLIC	Stewardship: Overall stewardship strategy	2

Rank the channels that are most important for your organisation in achieving its stewardship objectives.

☑ (A) Internal resources, e.g. stewardship team, investment team, ESG team, or staff Select from the list:

**0**1

Image: B) External investment managers, third-party operators and/or external property managers, if applicable Select from the list:

• 5

☑ (C) External paid specialist stewardship services (e.g. engagement overlay services or, in private markets, sustainability consultants) excluding investment managers, real assets third-party operators, or external property managers

Select from the list:

**0**2

☑ (D) Informal or unstructured collaborations with investors or other entities

Select from the list:

#### ●4

☑ (E) Formal collaborative engagements, e.g. PRI-coordinated collaborative engagements, Climate Action 100+, or similar

Select from the list:



#### ۵ (

 $\circ~$  (F) We do not use any of these channels

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 26	PLUS	OO 8, OO 9, PGS 1	N/A	PUBLIC	Stewardship: Overall stewardship strategy	2

## How does your organisation ensure that its policy on stewardship is implemented by the external service providers to which you have delegated stewardship activities?

 $\Box$  (A) Example(s) of measures taken when selecting external service providers:

(B) Example(s) of measures taken when designing engagement mandates and/or consultancy agreements for external service providers:

Loftus Peak uses ISS to identify the types of ballots raised at shareholder meetings, how the service provider approached researching these ballots and how they constructed a recommendation. Loftus Peak's Proxy Voting policy takes into account the research and recommendations available through ISS, other available research.

□ (C) Example(s) of measures taken when monitoring the stewardship activities of external service providers:

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 27	PLUS	OO 8, OO 9	N/A	PUBLIC	Stewardship: Overall stewardship strategy	2

#### How are your organisation's stewardship activities linked to your investment decision making, and vice versa?

The ESG characteristics of portfolio companies and prospective investments are reflected in Loftus Peak's investment process by way of the impact of ESG risk on the discount rates applied to companies in the valuation process.

Stewardship activities, both voting and direct engagement, when taken together with the efforts of other investors, can drive improvements in ESG risk and make companies more investable.

Stewardship in the form of direct engagement also provides Loftus Peak with a better understanding of portfolio investments, particularly when engaging with companies which lack published research on ESG issues. This is more common among smaller companies where ESG disclosures are limited relative to larger companies. Smaller companies are often rated as carrying a higher ESG risk by the firm's primary ESG data provider Sustainalytics, and in such cases may prompt direct engagement to improve ESG information. In these cases, responses from the engagement can then help develop a better idea of the ESG risk involved which in turn will impact discount rates applied in the investment process.

Disruption exists across industries and is dynamic. The approach to stewardship reflects this. New material ESG risks can arise in portfolio companies when they change their business model or enter new industries. The number of companies which lack published research on material ESG risks will also change.

Over the past twelve months Loftus Peak has increased the weight to companies with relatively smaller market capitalisation, increasing the importance of direct engagement.



## **STEWARDSHIP: (PROXY) VOTING**

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 29	CORE	OO 9, PGS 1	N/A	PUBLIC	Stewardship: (Proxy) voting	2

When you use external service providers to give recommendations, how do you ensure those recommendations are consistent with your organisation's (proxy) voting policy?

☑ (A) Before voting is executed, we review external service providers' voting recommendations for controversial and high-profile votes

Select from the below list:

- (1) in all cases
- (2) in a majority of cases
- (3) in a minority of cases

(B) Before voting is executed, we review external service providers' voting recommendations where the application of our voting policy is unclear

Select from the below list:

#### (1) in all cases

- (2) in a majority of cases
- (3) in a minority of cases
- $\circ$  (D) We do not review external service providers' voting recommendations

• (E) Not applicable; we do not use external service providers to give voting recommendations

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 30	CORE	00 9	N/A	PUBLIC	Stewardship: (Proxy) voting	2

#### How is voting addressed in your securities lending programme?

 $\circ$  (A) We recall all securities for voting on all ballot items

• (B) When a vote is deemed important according to pre-established criteria (e.g. high stake in the company), we recall all our

- securities for voting
- o (C) Other
- (D) We do not recall our securities for voting purposes

(E) Not applicable; we do not have a securities lending programme

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 31	CORE	00 9.1	N/A	PUBLIC	Stewardship: (Proxy) voting	2

For the majority of votes cast over which you have discretion to vote, which of the following best describes your decision making approach regarding shareholder resolutions (or that of your external service provider(s) if decision making is delegated to them)?

(A) We vote in favour of resolutions expected to advance progress on our stewardship priorities, including affirming a company's good practice or prior commitment

 $\circ$  (B) We vote in favour of resolutions expected to advance progress on our stewardship priorities, but only if the investee company has not already publicly committed to the action(s) requested in the proposal

 $\circ~$  (C) We vote in favour of shareholder resolutions only as an escalation measure



- (D) We vote in favour of the investee company management's recommendations by default
- $\circ~$  (E) Not applicable; we do not vote on shareholder resolutions

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 32	CORE	00 9	N/A	PUBLIC	Stewardship: (Proxy) voting	2

## During the reporting year, how did your organisation, or your external service provider(s), pre-declare voting intentions prior to voting in annual general meetings (AGMs) or extraordinary general meetings (EGMs)?

□ (A) We pre-declared our voting intentions publicly through the PRI's vote declaration system on the Resolution Database

□ (B) We pre-declared our voting intentions publicly by other means, e.g. through our website

□ (C) We privately communicated our voting decision to investee companies prior to the AGM/EGM

(D) We did not privately or publicly communicate our voting intentions prior to the AGM/EGM

• (E) Not applicable; we did not cast any (proxy) votes during the reporting year

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 33	CORE	00 9	PGS 33.1	PUBLIC	Stewardship: (Proxy) voting	2

After voting has taken place, do you publicly disclose your (proxy) voting decisions or those made on your behalf by your external service provider(s), company by company and in a central source?

#### • (A) Yes, for all (proxy) votes

Add link(s):

https://www.loftuspeak.com.au/wp-content/uploads/2024/06/Loftus-Peak-Proxy-Voting-Summary-Q1-2024.pdf

• (B) Yes, for the majority of (proxy) votes

• (C) Yes, for a minority of (proxy) votes

• (D) No, we do not publicly report our (proxy) voting decisions company-by-company and in a central source

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 33.1	CORE	PGS 33	N/A	PUBLIC	Stewardship: (Proxy) voting	2

In the majority of cases, how soon after an investee's annual general meeting (AGM) or extraordinary general meeting (EGM) do you publish your voting decisions?

 $\circ~$  (A) Within one month of the AGM/EGM

(B) Within three months of the AGM/EGM

• (C) Within six months of the AGM/EGM

• (D) Within one year of the AGM/EGM

• (E) More than one year after the AGM/EGM



Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 34	CORE	00 9	N/A	PUBLIC	Stewardship: (Proxy) voting	2

After voting has taken place, did your organisation, and/or the external service provider(s) acting on your behalf, communicate the rationale for your voting decisions during the reporting year?

	(1) In cases where we abstained or voted against management recommendations	(2) In cases where we voted against an ESG-related shareholder resolution		
(A) Yes, we publicly disclosed the rationale	(1) for all votes	(3) for a minority of votes		
(B) Yes, we privately communicated the rationale to the company				
(C) We did not publicly or privately communicate the rationale, or we did not track this information	Ο	ο		
(D) Not applicable; we did not abstain or vote against management recommendations or ESG-related shareholder resolutions during the reporting year	0	ο		

#### (A) Yes, we publicly disclosed the rationale - Add link(s):

#### https://www.loftuspeak.com.au/wp-content/uploads/2023/10/Loftus-Peak-Stewardship-Report-2023.pdf

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 35	PLUS	OO 9	N/A	PUBLIC	Stewardship: (Proxy) voting	2

#### How does your organisation ensure vote confirmation, i.e. that your votes have been cast and counted correctly?

Compared votes are checked before their cut off date against ISS recommendations and Management preferences to ensure that votes are being cast correctly.

Portfolio holdings are reconciled against the number of votes cast.



## **STEWARDSHIP: ESCALATION**

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 36	CORE	OO 8, OO 9 HF, OO 9	N/A	PUBLIC	Stewardship: Escalation	2
	equity holdings, what ers acting on your beha			nisation, or the	e external investm	ent managers or
			(1	L) Listed equity	/	
	r broadening an borative engagement new one					
	-filing, and/or shareholder resolution					
	engaging the entity, an open letter					
	gainst the re-election re board directors					
board of dire	gainst the chair of the ctors, or equivalent, ependent director					
(F) Divesting						
(G) Litigation	I					
(H) Other						
not use any o	easures for our listed			o		

### (H) Other - (1) Listed equity - Specify:

Direct engagement



### STEWARDSHIP: ENGAGEMENT WITH POLICY MAKERS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 39	CORE	OO 8, OO 9	PGS 39.1, PGS 39.2	PUBLIC	Stewardship: Engagement with policy makers	2

## Did your organisation, or the external investment managers or service providers acting on your behalf, engage with policy makers as part of your responsible investment approach during the reporting year?

 $\Box$  (A) Yes, we engaged with policy makers directly

 $\Box$  (B) Yes, we engaged with policy makers through the leadership of or active participation in working groups or collaborative initiatives, including via the PRI

 $\Box$  (C) Yes, we were members of, supported, or were in another way affiliated with third party organisations, including trade associations and non-profit organisations, that engage with policy makers, excluding the PRI

• (D) We did not engage with policy makers directly or indirectly during the reporting year beyond our membership in the PRI

Explain why: (Voluntary)

### **STEWARDSHIP: EXAMPLES**

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 40	PLUS	OO 8, OO 9	N/A	PUBLIC	Stewardship: Examples	2

Provide examples of stewardship activities that you conducted individually or collaboratively during the reporting year that contributed to desired changes in the investees, policy makers or other entities with which you interacted.

(A) Example 1:

Title of stewardship activity:

Direct engagement with Crowdstrike

(1) Led by

- (1) Internally led
- (2) External service provider led
- (3) Led by an external investment manager, real assets third-party operator and/or external property manager
- (2) Primary focus of stewardship activity
  - $\Box$  (1) Environmental factors
  - (2) Social factors
  - $\Box$  (3) Governance factors
- (3) Asset class(es)
  - ☑ (1) Listed equity
  - $\Box$  (2) Fixed income
  - $\Box$  (3) Private equity
  - $\Box$  (4) Real estate
  - □ (5) Infrastructure
  - $\Box$  (6) Hedge funds
  - □ (7) Forestry
  - $\Box$  (8) Farmland
  - $\Box$  (9) Other



(4) Description of the activity and what was achieved. For collaborative activities, provide detail on your individual contribution.

Loftus Peak engaged with Crowdstrike following a marked change in their ESG risk rating between October and November -2023 moving from a low risk to medium risk (according to Sustainalytics). The driving material factor cited by Sustainalytics was Human Capital. In particular, the risk of the cybersecurity sub industry's dependance on the small pool of software developers capable of operating these companies.

Crowdstrike responded to Loftus Peak's engagement letter. The company articulated its approach to Human Capital risk through managing existing employees as well as developing new talent. Of specific note were the hybrid working arrangements with 70% of the company operating remotely before COVID-19.

The company also offers scholarship programs, including our NextGen Scholarship Program, the Thurgood Marshall College Fund, and the Arkwright Engineering Scholarships program. The company reported that their scholarship program expanded by +33% across FY23.

These insights gave Loftus Peak confidence in the company's ability to handle this risk going forward enabled retaining the same ESG risk penalty in Loftus Peak's valuation process

(B) Example 2:

Title of stewardship activity:

Direct engagement with Trimble

(1) Led by

#### (1) Internally led

- $\circ~$  (2) External service provider led
- (3) Led by an external investment manager, real assets third-party operator and/or external property manager
- (2) Primary focus of stewardship activity
  - $\Box$  (1) Environmental factors
  - $\Box$  (2) Social factors

☑ (3) Governance factors

- (3) Asset class(es)
  - ☑ (1) Listed equity
  - $\Box$  (2) Fixed income
  - □ (3) Private equity
  - $\Box$  (4) Real estate
  - □ (5) Infrastructure
  - $\Box$  (6) Hedge funds
  - $\Box$  (7) Forestry
  - □ (8) Farmland
  - (9) Other

(4) Description of the activity and what was achieved. For collaborative activities, provide detail on your individual contribution.

Loftus Peak engaged with Trimble following its auditor, raising concerns regarding the design and execution of certain information technology and other controls for revenue-related systems and processes as of Dec. 29, 2023.

We engaged concerning both the status of the company's controls as well as why this oversight had not been brought up in the Q4 earnings immediately after the concern was identified.

Given our lack of certainty over Trimble's accounting, we exited the stock following the initial news. The company's response to our engagement restored some of our confidence in their accounting. As of our May 31 2024 portfolio disclosure, we do not hold Trimble. However we may consider re-entering the stock given the company's explanation of how this event unfolded and given further problems are not identified upon further investigation.

(C) Example 3:

Title of stewardship activity:

(1) Led by

o (1) Internally led



- (2) External service provider led
- (3) Led by an external investment manager, real assets third-party operator and/or external property manager
- (2) Primary focus of stewardship activity
  - $\Box$  (1) Environmental factors
  - $\Box$  (2) Social factors
  - $\Box$  (3) Governance factors
- (3) Asset class(es)
  - $\Box$  (1) Listed equity
  - $\Box$  (2) Fixed income
  - $\Box$  (3) Private equity
  - $\Box$  (4) Real estate
  - $\Box$  (5) Infrastructure
  - $\Box$  (6) Hedge funds
  - □ (7) Forestry
  - $\Box$  (8) Farmland
  - $\Box$  (9) Other
- (4) Description of the activity and what was achieved. For collaborative activities, provide detail on your individual contribution. (D) Example 4:
- Title of stewardship activity:

(1) Led by

- (1) Internally led
- (2) External service provider led
- (3) Led by an external investment manager, real assets third-party operator and/or external property manager
- (2) Primary focus of stewardship activity
  - □ (1) Environmental factors
  - $\Box$  (2) Social factors
  - □ (3) Governance factors
- (3) Asset class(es)
  - $\Box$  (1) Listed equity
  - $\Box$  (2) Fixed income
  - $\Box$  (3) Private equity
  - $\Box$  (4) Real estate
  - □ (5) Infrastructure
  - □ (6) Hedge funds
  - $\Box$  (7) Forestry
  - $\Box$  (8) Farmland
  - (9) Other
- (4) Description of the activity and what was achieved. For collaborative activities, provide detail on your individual contribution.
- (E) Example 5:
- Title of stewardship activity:
- (1) Led by
  - (1) Internally led
  - $\circ~$  (2) External service provider led
  - (3) Led by an external investment manager, real assets third-party operator and/or external property manager
- (2) Primary focus of stewardship activity
  - □ (1) Environmental factors
  - □ (2) Social factors
  - $\Box$  (3) Governance factors
- (3) Asset class(es)
  - □ (1) Listed equity
  - $\Box$  (2) Fixed income
  - $\Box$  (3) Private equity
  - $\Box$  (4) Real estate
  - □ (5) Infrastructure
  - $\Box$  (6) Hedge funds
  - □ (7) Forestry
  - □ (8) Farmland
  - (9) Other



(4) Description of the activity and what was achieved. For collaborative activities, provide detail on your individual contribution.

### **CLIMATE CHANGE**

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 41	CORE	N/A	PGS 41.1	PUBLIC	Climate change	General

#### Has your organisation identified climate-related risks and opportunities affecting your investments?

#### ☑ (A) Yes, within our standard planning horizon

Specify the risks and opportunities identified and your relevant standard planning horizon:

The risk posed by climate-induced damage to the assets of holdings is considerable. Irrespective of where Loftus Peak's holdings are domiciled, they depend on and feed into global supply chains. So Loftus Peak supports the carbon emission action proposed in the 2015 Paris Agreement and the urgency required to meet the targets as quickly as possible to minimise the impacts of climate change.

□ (B) Yes, beyond our standard planning horizon

• (C) No, we have not identified climate-related risks and/or opportunities affecting our investments

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 41.1	CORE	PGS 41	N/A	PUBLIC	Climate change	General

## Does your organisation integrate climate-related risks and opportunities affecting your investments in its overall investment strategy, financial planning and (if relevant) products?

• (A) Yes, our overall investment strategy, financial planning and (if relevant) products integrate climate-related risks and opportunities

Describe how climate-related risks and opportunities have affected or are expected to affect your investment strategy, financial planning and (if relevant) products:

We identify companies which have business models that are carbon intensive as increasing this risk. Conversely, companies that provide solutions to climate-related risks are identified as having business models that can benefit from a growing need for their products or services. As a result, we penalise the former and reward the latter when accounting for the risk in an investment. This directly impacts which investments we will make.

• (B) No, our organisation has not yet integrated climate-related risks and opportunities into its investment strategy, financial planning and (if relevant) products

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 42	PLUS	N/A	N/A	PUBLIC	Climate change	General

Which sectors are covered by your organisation's strategy addressing high-emitting sectors?

### ☑ (A) Coal

Describe your strategy:



Negative screening for thermal coal extraction and generation at a maximum revenue threshold of 5% per company.

#### 🗹 (B) Gas

Describe your strategy:

Negative screening for gas extraction and generation at a maximum revenue threshold of 5% per company.

#### ☑ (C) Oil

Describe your strategy:

Negative screening for oil extraction and generation at a maximum revenue threshold of 5% per company.

- (D) Utilities
  (E) Cement
  (F) Steel
  (G) Aviation
  (H) Heavy duty road
  (I) Light duty road
  (J) Shipping
  (K) Aluminium
  (L) Agriculture, forestry, fishery
  (M) Chemicals
  (N) Construction and buildings
- $\Box$  (N) Construction and buildings
- $\Box$  (O) Textile and leather
- □ (P) Water
- ☑ (Q) Other

Specify:

Old growth forest logging

Describe your strategy:

Negative screening for old growth forest logging at a maximum revenue threshold of 5% per company.

• (R) We do not have a strategy addressing high-emitting sectors

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 43	CORE	N/A	N/A	PUBLIC	Climate change	General

Has your organisation assessed the resilience of its investment strategy in different climate scenarios, including one in which the average temperature rise is held to below 2 degrees Celsius (preferably to 1.5 degrees Celsius) above preindustrial levels?

□ (A) Yes, using the Inevitable Policy Response Forecast Policy Scenario (FPS) or Required Policy Scenario (RPS)

 $\Box$  (B) Yes, using the One Earth Climate Model scenario

 $\Box$  (C) Yes, using the International Energy Agency (IEA) Net Zero scenario

 $\Box$  (D) Yes, using other scenarios

• (E) No, we have not assessed the resilience of our investment strategy in different climate scenarios, including one that holds temperature rise to below 2 degrees



Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 44	CORE	N/A	N/A	PUBLIC	Climate change	General

Does your organisation have a process to identify, assess, and manage the climate-related risks (potentially) affecting your investments?

 $\Box$  (A) Yes, we have a process to identify and assess climate-related risks

 $\Box$  (B) Yes, we have a process to manage climate-related risks

(C) No, we do not have any processes to identify, assess, or manage the climate-related risks affecting our

#### investments

Explain why: (Voluntary)

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 45	CORE	N/A	N/A	PUBLIC	Climate change	General

## During the reporting year, which of the following climate risk metrics or variables affecting your investments did your organisation use and publicly disclose?

 $\Box$  (A) Exposure to physical risk

- $\Box$  (B) Exposure to transition risk
- $\Box$  (C) Internal carbon price
- $\Box$  (D) Total carbon emissions
- (E) Weighted average carbon intensity
  - (1) Indicate whether this metric or variable was used and disclosed, including the methodology
    - (1) Metric or variable used
    - $\circ~$  (2) Metric or variable used and disclosed
    - (3) Metric or variable used and disclosed, including methodology
  - (2) Provide link to the disclosed metric or variable, including the methodology followed, as applicable

https://www.loftuspeak.com.au/wp-content/uploads/2024/07/Loftus-Peak-Global-Disruption-Fund-June-2024-Update.pdf

 $\Box$  (F) Avoided emissions

- □ (G) Implied Temperature Rise (ITR)
- □ (H) Non-ITR measure of portfolio alignment with UNFCCC Paris Agreement goals
- $\Box$  (I) Proportion of assets or other business activities aligned with climate-related opportunities
- $\Box$  (J) Other metrics or variables

• (K) Our organisation did not use or publicly disclose any climate risk metrics or variables affecting our investments during the reporting year

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 46	CORE	N/A	N/A	PUBLIC	Climate change	General

## During the reporting year, did your organisation publicly disclose its Scope 1, Scope 2, and/or Scope 3 greenhouse gas emissions?

□ (A) Scope 1 emissions

□ (B) Scope 2 emissions

□ (C) Scope 3 emissions (including financed emissions)



• (D) Our organisation did not publicly disclose its Scope 1, Scope 2, or Scope 3 greenhouse gas emissions during the reporting year

### SUSTAINABILITY OUTCOMES

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 47	CORE	N/A	Multiple indicators	PUBLIC	Sustainability outcomes	1, 2

Has your organisation identified the intended and unintended sustainability outcomes connected to its investment activities?

(A) Yes, we have identified one or more specific sustainability outcomes connected to our investment activities

• (B) No, we have not yet identified the sustainability outcomes connected to any of our investment activities

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 47.1	CORE	PGS 47	N/A	PUBLIC	Sustainability outcomes	1, 2

Which widely recognised frameworks has your organisation used to identify the intended and unintended sustainability outcomes connected to its investment activities?

#### ☑ (A) The UN Sustainable Development Goals (SDGs) and targets

□ (B) The UNFCCC Paris Agreement

□ (C) The UN Guiding Principles on Business and Human Rights (UNGPs)

 $\Box$  (D) OECD frameworks: OECD Guidelines for Multinational Enterprises and Guidance on Responsible Business Conduct for Institutional Investors

 $\Box$  (E) The EU Taxonomy

 $\Box$  (F) Other relevant taxonomies

 $\Box$  (G) The International Bill of Human Rights

 $\Box$  (H) The International Labour Organization's Declaration on Fundamental Principles and Rights at Work and the eight core conventions

 $\Box$  (I) The Convention on Biological Diversity

 $\Box$  (J) Other international framework(s)

 $\Box$  (K) Other regional framework(s)

 $\Box$  (L) Other sectoral/issue-specific framework(s)

• (M) Our organisation did not use any widely recognised frameworks to identify the intended and unintended sustainability

outcomes connected to its investment activities

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 47.2	CORE	PGS 47	PGS 48	PUBLIC	Sustainability outcomes	1, 2

## What are the primary methods that your organisation has used to determine the most important intended and unintended sustainability outcomes connected to its investment activities?

☑ (A) Identify sustainability outcomes that are closely linked to our core investment activities

 $\Box$  (B) Consult with key clients and/or beneficiaries to align with their priorities

☑ (C) Assess which actual or potential negative outcomes for people are most severe based on their scale, scope, and irremediable character

(D) Identify sustainability outcomes that are closely linked to systematic sustainability issues



(E) Analyse the input from different stakeholders (e.g. affected communities, civil society, trade unions or similar)

 $\Box$  (F) Understand the geographical relevance of specific sustainability outcome objectives

 $\Box$  (G) Other method

• (H) We have not yet determined the most important sustainability outcomes connected to our investment activities

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 48	CORE	PGS 47.2	PGS 48.1, SO 1	PUBLIC	Sustainability outcomes	1, 2

Has your organisation taken action on any specific sustainability outcomes connected to its investment activities, including to prevent and mitigate actual and potential negative outcomes?

(A) Yes, we have taken action on some of the specific sustainability outcomes connected to our investment activities

• (B) No, we have not yet taken action on any specific sustainability outcomes connected to our investment activities

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 48.1	PLUS	PGS 48	N/A	PUBLIC	Sustainability outcomes	1, 2

Why has your organisation taken action on specific sustainability outcomes connected to its investment activities?

(A) We believe that taking action on sustainability outcomes is relevant to our financial risks and returns over both short- and long-term horizons

□ (B) We believe that taking action on sustainability outcomes, although not yet relevant to our financial risks and returns, will become so over a long-time horizon

 $\Box$  (C) We have been requested to do so by our clients and/or beneficiaries

 $\Box$  (D) We want to prepare for and respond to legal and regulatory developments that are increasingly addressing sustainability outcomes

 $\Box$  (E) We want to protect our reputation, particularly in the event of negative sustainability outcomes connected to investments

 $\Box$  (F) We want to enhance our social licence-to-operate (i.e. the trust of beneficiaries, clients, and other stakeholders)

☑ (G) We believe that taking action on sustainability outcomes in parallel to financial return goals has merit in its own right

□ (H) Other

### HUMAN RIGHTS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 49	PLUS	PGS 47	PGS 49.1	PUBLIC	Human rights	1, 2

## During the reporting year, what steps did your organisation take to identify and take action on the actual and potentially negative outcomes for people connected to your investment activities?

 $\Box$  (A) We assessed the human rights context of our potential and/or existing investments and projected how this could connect our organisation to negative human rights outcomes

 $\Box$  (B) We assessed whether individuals at risk or already affected might be at heightened risk of harm



 $\Box$  (C) We consulted with individuals and groups who were at risk or already affected, their representatives and/or other relevant stakeholders such as human rights experts

☑ (D) We took other steps to assess and manage the actual and potentially negative outcomes for people connected to our investment activities

Specify:

We asses and apply risk to companies with high ESG risk. This encapsulates the social risk posed by an investment towards people: both to its employees and the broader public.

Explain how these activities were conducted:

Loftus Peak monitors its investments for social ESG risk and so may be able to identify potentially negative outcomes for people connected to Loftus Peak's investment activities. Crowdstrike is an example of this. The company was flagged as having an increasing exposure to ESG risk - specifically a personnel risk caused by the restricted hiring pool of workers capable of working in cybersecurity.

Loftus Peak took action on this identified risk and engaged with the company to assess what policies they had in place to mitigate this risk.

• (E) We did not identify and take action on the actual and potentially negative outcomes for people connected to any of our investment activities during the reporting year

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 49.1	PLUS	PGS 49	N/A	PUBLIC	Human rights	1, 2

## During the reporting year, which stakeholder groups did your organisation include when identifying and taking action on the actual and potentially negative outcomes for people connected to your investment activities?

#### (A) Workers

Sector(s) for which each stakeholder group was included

- 🗆 (1) Energy
- $\Box$  (2) Materials
- $\Box$  (3) Industrials
- $\Box$  (4) Consumer discretionary
- $\Box$  (5) Consumer staples
- □ (6) Healthcare
- $\Box$  (7) Finance
- ☑ (8) Information technology
- $\Box$  (9) Communication services
- $\Box$  (10) Utilities
- $\Box$  (11) Real estate
- □ (B) Communities
- $\Box$  (C) Customers and end-users
- $\Box$  (D) Other stakeholder groups

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 49.2	PLUS	PGS 47	N/A	PUBLIC	Human rights	1, 2

## During the reporting year, what information sources did your organisation use to identify the actual and potentially negative outcomes for people connected to its investment activities?

#### ☑ (A) Corporate disclosures

Provide further detail on how your organisation used these information sources:



Loftus Peak reviews corporate disclosures as they are released across the year - including ESG reports where applicable

- □ (B) Media reports
- $\Box$  (C) Reports and other information from NGOs and human rights institutions
- □ (D) Country reports, for example, by multilateral institutions, e.g. OECD, World Bank

#### (E) Data provider scores or benchmarks

Provide further detail on how your organisation used these information sources:

Loftus Peak subscribes to Sustainalytics' ESG risk ratings to understand and (if necessary) further direct research into the potential and actual negative outcomes of companies.

#### ☑ (F) Human rights violation alerts

Provide further detail on how your organisation used these information sources:

Sustainalytics also provides alerts for new ESG risks - including human rights violations and potential human rights violations.

#### G (G) Sell-side research

Provide further detail on how your organisation used these information sources:

Loftus Peak regularly reviews broker research for information about current and potential holdings including where that research relates to ESG.

- $\Box$  (H) Investor networks or other investors
- $\Box$  (I) Information provided directly by affected stakeholders or their representatives
- $\Box$  (J) Social media analysis
- □ (K) Other

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 50	PLUS	PGS 47	N/A	PUBLIC	Human rights	1, 2

## During the reporting year, did your organisation, directly or through influence over investees, enable access to remedy for people affected by negative human rights outcomes connected to your investment activities?

 $\Box$  (A) Yes, we enabled access to remedy directly for people affected by negative human rights outcomes we caused or contributed to through our investment activities

 $\Box$  (B) Yes, we used our influence to ensure that our investees provided access to remedies for people affected by negative human rights outcomes we were linked to through our investment activities

(C) No, we did not enable access to remedy directly, or through the use of influence over investees, for people
 affected by negative human rights outcomes connected to our investment activities during the reporting year
 Explain why:



# LISTED EQUITY (LE)

## **OVERALL APPROACH**

## **MATERIALITY ANALYSIS**

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
LE 1	CORE	00 21	N/A	PUBLIC	Materiality analysis	1
Does your orga listed equity st	anisation have a forma trategies?	l investment proce	ess to identify a	nd incorporate	e material ESG factors	across your
			(3)	Active - funda	mental	
	investment process material governance		(	1) for all of our	AUM	
incorporates	investment process material al and social factors		(	1) for all of our	AUM	
incorporates beyond our c	investment process material ESG factors organisation's average olding period		(	1) for all of our	AUM	
process. Our	s identify material ESG			0		
informal proc	o not have a formal or cess to identify and naterial ESG factors			o		



### **MONITORING ESG TRENDS**

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
LE 2	CORE	00 21	N/A	PUBLIC	Monitoring ESG trends	1
	anisation have a forma ted equity strategies?	l process for mon	itoring and revi	iewing the imp	lications of changing E	SG trends
			(3)	) Active - funda	amental	
• •	nave a formal process scenario analyses					
• •	nave a formal process, ot include scenario			(1) for all of our	AUM	
process for o strategies; ou professionals	ot have a formal ur listed equity ur investment s monitor how ESG ver time at their			0		
	ot monitor and review ons of changing ESG r listed equity			0		

### (B) Yes, we have a formal process but it does not include scenario analysis - Specify: (Voluntary)

Sustainalytics ESG risk rating scores are recorded monthly and their month-to-month changes are monitored. These changes are reviewed every quarter at the investment risk committee.



## **PRE-INVESTMENT**

## **ESG INCORPORATION IN RESEARCH**

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
LE 3	CORE	00 21	N/A	PUBLIC	ESG incorporation in research	1
How does you	r financial analysis and	equity valuation	or security rati	ng process inc	orporate material ESG	risks?
			(2)	Active - funda	mental	
governance- financial ana	porate material related risks into our lysis and equity security rating process			(1) in all cas	es	
environment our financial	porate material al and social risks into analysis and equity security rating process	(1) in all cases				
environmenta related to con chains into o	porate material al and social risks mpanies' supply ur financial analysis aluation or security ss			(1) in all cas	es	
ESG risks int	ot incorporate material to our financial uity valuation or g processes			0		



Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
LE 4	CORE	00 21	N/A	PUBLIC	ESG incorporation in research	1

What information do you incorporate when you assess the ESG performance of companies in your financial analysis, benchmark selection and/or portfolio construction process?

	(3) Active - fundamental
(A) We incorporate qualitative and/or quantitative information on current performance across a range of material ESG factors	(1) in all cases
(B) We incorporate qualitative and/or quantitative information on historical performance across a range of material ESG factors	(1) in all cases
(C) We incorporate qualitative and/or quantitative information on material ESG factors that may impact or influence future corporate revenues and/or profitability	(1) in all cases
(D) We incorporate qualitative and/or quantitative information enabling current, historical and/or future performance comparison within a selected peer group across a range of material ESG factors	(3) in a minority of cases
(E) We do not incorporate qualitative or quantitative information on material ESG factors when assessing the ESG performance of companies in our financial analysis, equity investment or portfolio construction process	o



### ESG INCORPORATION IN PORTFOLIO CONSTRUCTION

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
LE 5	PLUS	00 21	N/A	PUBLIC	ESG incorporation in portfolio construction	1

## Provide an example of how you incorporated ESG factors into your equity selection and research process during the reporting year.

Loftus Peak identified cybersecurity as disruptive trend which Loftus Peak identifies as coinciding with SDG 16. Peace, Justice and Strong Institutions. Loftus Peak invested in companies exposed to this trend, including Palo Alto and Crowdstrike. These names were contributors for the year ending June 20 2024.

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
LE 6	CORE	00 21	N/A	PUBLIC	ESG incorporation in portfolio construction	1

How do material ESG factors contribute to your stock selection, portfolio construction and/or benchmark selection process?

	(3) Active - fundamental
(A) Material ESG factors contribute to the selection of individual assets and/or sector weightings within our portfolio construction and/or benchmark selection process	(1) for all of our AUM
(B) Material ESG factors contribute to the portfolio weighting of individual assets within our portfolio construction and/or benchmark selection process	(1) for all of our AUM
(C) Material ESG factors contribute to the country or region weighting of assets within our portfolio construction and/or benchmark selection process	(3) for a minority of our AUM
(D) Other ways material ESG factors contribute to your portfolio construction and/or benchmark selection process	(1) for all of our AUM



## (D) Other ways material ESG factors contribute to your portfolio construction and/or benchmark selection process - Specify:

Material ESG factors feed into Loftus Peak's valuation methodology. ESG risk is an input for determining the appropriate discount rate to apply in Loftus Peak's valuation process, which then determines the fair value ascribed to each company. This means material ESG factors contribute to the fair values Loftus Peak see for companies.

## **POST-INVESTMENT**

### ESG RISK MANAGEMENT

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
LE 9	CORE	OO 17.1 LE, OO 21	N/A	PUBLIC	ESG risk management	1

What compliance processes do you have in place to ensure that your listed equity assets subject to negative exclusionary screens meet the screening criteria?

## ☑ (A) We have internal compliance procedures that ensure all funds or portfolios that are subject to negative exclusionary screening have pre-trade checks

 $\Box$  (B) We have an external committee that oversees the screening implementation process for all funds or portfolios that are subject to negative exclusionary screening

 $\Box$  (C) We have an independent internal committee that oversees the screening implementation process for all funds or portfolios that are subject to negative exclusionary screening

• (D) We do not have compliance processes in place to ensure that we meet our stated negative exclusionary screens



Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
LE 10	CORE	00 21	N/A	PUBLIC	ESG risk management	1

# For the majority of your listed equity assets, do you have a formal process to identify and incorporate material ESG risks and ESG incidents into your risk management process?

	(2) Active - fundamental
(A) Yes, our formal process includes reviews of quantitative and/or qualitative information on material ESG risks and ESG incidents and their implications for individual listed equity holdings	
(B) Yes, our formal process includes reviews of quantitative and/or qualitative information on material ESG risks and ESG incidents and their implications for other listed equity holdings exposed to similar risks and/or incidents	
(C) Yes, our formal process includes reviews of quantitative and/or qualitative information on material ESG risks and ESG incidents and their implications for our stewardship activities	
(D) Yes, our formal process includes ad hoc reviews of quantitative and/or qualitative information on severe ESG incidents	
(E) We do not have a formal process to identify and incorporate material ESG risks and ESG incidents into our risk management process; our investment professionals identify and incorporate material ESG risks and ESG incidents at their discretion	O



### **PERFORMANCE MONITORING**

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
LE 11	PLUS	00 21	N/A	PUBLIC	Performance monitoring	1

0

## Provide an example of how the incorporation of ESG factors in your listed equity valuation or portfolio construction affected the realised returns of those assets.

Loftus Peak identified cybersecurity as disruptive trend which Loftus Peak identifies as coinciding with SDG 16. Peace, Justice and Strong Institutions. Loftus Peak invested in companies exposed to this trend, including Palo Alto and Crowdstrike. These names were contributors for the year ending June 20 2024.

### DISCLOSURE OF ESG SCREENS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
LE 12	CORE	OO 17 LE, OO 21	N/A	PUBLIC	Disclosure of ESG screens	6

For all your listed equity assets subject to ESG screens, how do you ensure that clients understand ESG screens and their implications?

☑ (A) We share a list of ESG screens

(B) We share any changes in ESG screens

□ (C) We explain any implications of ESG screens, such as their deviation from a benchmark or impact on sector weightings

• (D) We do not share the above information for all our listed equity assets subject to ESG screens



# SUSTAINABILITY OUTCOMES (SO)

## SETTING TARGETS AND TRACKING PROGRESS

## SETTING TARGETS ON SUSTAINABILITY OUTCOMES

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SO 1	PLUS	PGS 48	SO 2, SO 2.1, SO 3	PUBLIC	Setting targets on sustainability outcomes	1, 2

#### What specific sustainability outcomes connected to its investment activities has your organisation taken action on?

### ☑ (A) Sustainability outcome #1

(1) Widely recognised frameworks used to guide action on this sustainability outcome

- ☑ (1) The UN Sustainable Development Goals (SDGs) and targets
- $\Box$  (2) The UNFCCC Paris Agreement
- $\Box$  (3) The UN Guiding Principles on Business and Human Rights (UNGPs)
- □ (4) OECD frameworks: OECD Guidelines for Multinational Enterprises and Guidance on Responsible Business Conduct for Institutional Investors
- □ (5) The EU Taxonomy
- $\Box$  (6) Other relevant taxonomies
- $\Box$  (7) The International Bill of Human Rights
- $\Box$  (8) The International Labour Organization's Declaration on Fundamental Principles and Rights at Work and the eight core conventions
- $\Box$  (9) The Convention on Biological Diversity
- $\Box$  (10) Other international, regional, sector-based or issue-specific framework(s)
- (2) Classification of sustainability outcome
  - $\Box$  (1) Environmental
  - ☑ (2) Social
  - $\Box$  (3) Governance-related
  - (4) Other
- (3) Sustainability outcome name

2) Zero Hunger

- (4) Number of targets set for this outcome
  - (1) No target
  - (2) One target
  - (3) Two or more targets
- (B) Sustainability outcome #2
  - (1) Widely recognised frameworks used to guide action on this sustainability outcome
    - ☑ (1) The UN Sustainable Development Goals (SDGs) and targets
    - $\Box$  (2) The UNFCCC Paris Agreement
    - $\Box$  (3) The UN Guiding Principles on Business and Human Rights (UNGPs)
    - □ (4) OECD frameworks: OECD Guidelines for Multinational Enterprises and Guidance on Responsible Business Conduct for Institutional Investors
    - $\Box$  (5) The EU Taxonomy
    - $\Box$  (6) Other relevant taxonomies
    - $\Box$  (7) The International Bill of Human Rights
    - $\Box$  (8) The International Labour Organization's Declaration on Fundamental Principles and Rights at Work and the eight core conventions
    - $\Box$  (9) The Convention on Biological Diversity
    - $\Box$  (10) Other international, regional, sector-based or issue-specific framework(s)



- (2) Classification of sustainability outcome
  - □ (1) Environmental
    - (2) Social
    - $\Box$  (3) Governance-related
    - $\Box$  (4) Other
- (3) Sustainability outcome name
  - 3) Good Health and Well-Being
- (4) Number of targets set for this outcome
  - (1) No target
  - (2) One target
  - $\circ$  (3) Two or more targets
- (C) Sustainability outcome #3

#### (1) Widely recognised frameworks used to guide action on this sustainability outcome

- ☑ (1) The UN Sustainable Development Goals (SDGs) and targets
  - $\hfill\square$  (2) The UNFCCC Paris Agreement
  - $\Box$  (3) The UN Guiding Principles on Business and Human Rights (UNGPs)
- (4) OECD frameworks: OECD Guidelines for Multinational Enterprises and Guidance on Responsible Business Conduct
- for Institutional Investors
- $\Box$  (5) The EU Taxonomy
- $\Box$  (6) Other relevant taxonomies
- $\Box$  (7) The International Bill of Human Rights
- $\Box$  (8) The International Labour Organization's Declaration on Fundamental Principles and Rights at Work and the eight core conventions
- $\Box$  (9) The Convention on Biological Diversity
- □ (10) Other international, regional, sector-based or issue-specific framework(s)
- (2) Classification of sustainability outcome

#### 🗹 (1) Environmental

- □ (2) Social
- $\Box$  (3) Governance-related
- (4) Other
- (3) Sustainability outcome name

7) Affordable and Clean Energy

- (4) Number of targets set for this outcome
  - (1) No target
  - (2) One target
  - $\circ$  (3) Two or more targets
- (D) Sustainability outcome #4

(1) Widely recognised frameworks used to guide action on this sustainability outcome

- ☑ (1) The UN Sustainable Development Goals (SDGs) and targets
- □ (2) The UNFCCC Paris Agreement
- $\Box$  (3) The UN Guiding Principles on Business and Human Rights (UNGPs)
- (4) OECD frameworks: OECD Guidelines for Multinational Enterprises and Guidance on Responsible Business Conduct
- for Institutional Investors
- $\Box$  (5) The EU Taxonomy
- $\Box$  (6) Other relevant taxonomies
- $\Box$  (7) The International Bill of Human Rights
- $\Box$  (8) The International Labour Organization's Declaration on Fundamental Principles and Rights at Work and the eight core conventions
- $\Box$  (9) The Convention on Biological Diversity
- $\Box$  (10) Other international, regional, sector-based or issue-specific framework(s)
- (2) Classification of sustainability outcome

### ☑ (1) Environmental

- $\Box$  (2) Social
- $\Box$  (3) Governance-related
- (4) Other
- (3) Sustainability outcome name



9) Industry, Innovation and Infrastructure

(4) Number of targets set for this outcome

- (1) No target
- (2) One target

 $\circ$  (3) Two or more targets

(E) Sustainability outcome #5

(1) Widely recognised frameworks used to guide action on this sustainability outcome

☑ (1) The UN Sustainable Development Goals (SDGs) and targets

- $\Box$  (2) The UNFCCC Paris Agreement
- □ (3) The UN Guiding Principles on Business and Human Rights (UNGPs)
- (4) OECD frameworks: OECD Guidelines for Multinational Enterprises and Guidance on Responsible Business Conduct
- for Institutional Investors
- $\Box$  (5) The EU Taxonomy
- $\Box$  (6) Other relevant taxonomies
- $\Box$  (7) The International Bill of Human Rights

 $\Box$  (8) The International Labour Organization's Declaration on Fundamental Principles and Rights at Work and the eight core conventions

- $\Box$  (9) The Convention on Biological Diversity
- $\Box$  (10) Other international, regional, sector-based or issue-specific framework(s)
- (2) Classification of sustainability outcome
  - □ (1) Environmental
  - ✓ (2) Social
  - ☑ (3) Governance-related
  - (4) Other
- (3) Sustainability outcome name

16) Peace, Justice and Strong Institutions

- (4) Number of targets set for this outcome
  - (1) No target
  - (2) One target
- $\circ$  (3) Two or more targets
- $\Box$  (F) Sustainability outcome #6
- $\Box$  (G) Sustainability outcome #7
- $\Box$  (H) Sustainability outcome #8
- $\Box$  (I) Sustainability outcome #9
- $\Box$  (J) Sustainability outcome #10



# **CONFIDENCE-BUILDING MEASURES (CBM)**

## **CONFIDENCE-BUILDING MEASURES**

### APPROACH TO CONFIDENCE-BUILDING MEASURES

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
CBM 1	CORE	N/A	Multiple indicators	PUBLIC	Approach to confidence-building measures	6

#### How did your organisation verify the information submitted in your PRI report this reporting year?

□ (A) We conducted independent third-party assurance of selected processes and/or data related to the responsible investment processes reported in our PRI report, which resulted in a formal assurance conclusion

 $\Box$  (B) We conducted a third-party readiness review and are making changes to our internal controls or governance processes to be able to conduct independent third-party assurance next year

□ (C) We conducted an internal audit of selected processes and/or data related to the responsible investment processes reported in our PRI report

## ☑ (D) Our board, trustees (or equivalent), senior executive-level staff (or equivalent), and/or investment committee (or equivalent) signed off on our PRI report

 $\Box$  (E) We conducted an external ESG audit of our holdings to verify that our funds comply with our responsible investment policy  $\Box$  (F) We conducted an external ESG audit of our holdings as part of risk management, engagement identification or investment decision-making

G) Our responses in selected sections and/or the entirety of our PRI report were internally reviewed before submission to the PRI

 $\circ$  (H) We did not verify the information submitted in our PRI report this reporting year

### **INTERNAL REVIEW**

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
CBM 6	CORE	CBM 1	N/A	PUBLIC	Internal review	6

#### Who in your organisation reviewed the responses submitted in your PRI report this year?

 $\Box$  (A) Board, trustees, or equivalent

(B) Senior executive-level staff, investment committee, head of department, or equivalent

Sections of PRI report reviewed

#### • (1) the entire report

• (2) selected sections of the report

• (C) None of the above internal roles reviewed selected sections or the entirety of the responses submitted in our PRI report this year

