



EXCLUSIONS

We take a selective approach to exclusionary screening criteria as, in general, we believe most clients wish to retain broad market exposure. The only blanket exclusion we seek to employ for all investments relates to cluster bombs and anti-personnel land mines, as these are subject to international conventions and law. Where we invest directly, we do not knowingly invest in securities (equity or debt) of listed companies involved in the manufacture, development or trade of anti-personnel mines or cluster munitions. We also undertake regular checks to monitor any exposure through third party funds to controversial weapons.

Ethical and values-oriented investment based on client requirements is incorporated on an individual client basis, informed by their specific ethical preferences and values within Quilter Cheviot's discretionary portfolio service. These will vary from client to client and will focus on sectors, industries or individual companies. Beyond this, more specific negative screens may also be applied for funds that have clear ESG objectives, for example the Quilter Investors Ethical Equity Fund and the Quilter Cheviot Climate Assets Fund. Typically, these could relate to activities that we feel are unsustainable, such as tobacco production, and which may either be excluded completely or subject to tolerance bands, such as revenue contribution, depending on the strategy. We also monitor all our strategies for exposure to controversial activities including, but not limited to: thermal coal; oil sands; military contracting and armaments; gambling; palm oil production and tobacco production.

