OVERVIEW

Abbilon's Mission is to help everyone achieve Permanent Financial Success. We take pride in doing our best to do so while investing responsibly.

Because environmental, social and governance ("ESG") issues that are the focus of socially responsible investing ("SRI") can directly impact investment performance, Abbilon's regularly assesses such factors as part of its investment process. The purpose of this policy is to outline how Abbilon incorporates ESG issues into the investment process.

GENERAL GUIDELEINES

ESG issues present regulatory, market, reputational and operational risks and opportunities that should be considered when analyzing the prospective returns of an investment. We believe that long-term value will be enhanced if we account for relevant ESG risks in our investment decisions.

This Policy is informed by the principles set forth in the United Nations Sustainable Development Goals. (the "UN PRI"). Our goal is to apply the fundamental principles of the UN PRI in the context of Abbilon's investment strategies.

Abbilon uses its best efforts to find great investment opportunities in companies that act in a socially responsible manner. In evaluating an existing or prospective investment, Abbilon's investment professionals generally seek to (a) identify ESG issues that may affect the investment, (b) analyze the relative importance of, and risk posed by, any identified ESG issue, (c) and consider the costs and benefits of potential remedial measures undertaken by the issuer.

Because Abbilon may invest clients' assets in companies which are based on, or operate in, different countries or regions of the world, our ability to assess ESG issues in practice will vary significantly from one investment to another.

Companies that provide access to full and accurate disclosures regarding ESG issues allow us to better evaluate such issues. Some companies, however, provide limited ESG related information – this may be due to legal requirements to do so or because management simply chooses not to inform stakeholders about the true impact of those issues. When such information is lacking, Abbilon may not be able to properly assess their impact.

Abbilon will do its best to avoid investing in companies having a negative social impact. However, because Abbilon's primary investment focus is the generation of superior risk-adjusted returns, we may make or maintain investments even in the face of ESG issues if we deem it appropriate (i.e., the company is addressing the issues or the selling at the present price would be inconsistent with our fiduciary duties to our clients).

SPECIFIC GUIDELINES

In considering a potential investment, the responsible investment professionals should conduct a high-level assessment of the investment's ESG profile. A high-level assessment of a potential investment's ESG profile is not expected to involve a formal process or documentation, but rather a general review of factors that may be relevant to ESG risk.

Investment professionals should use their best judgment in identifying issues and should feel free to consult with their colleagues and Abbilon's management if they have questions or concerns. The following sets out a non-exclusive list of relevant considerations:

- **Environmental Issues**. These issues include a company's profile with respect to CO2 emission and climate change, waste generation and mitigation practices, utilization of renewable fuels, commitment to resource conservation, energy efficiency and chemical safety.
- **Social Issues**. These issues include a company's profile with respect to bribery, improper political contributions, money laundering, equal employment and labor laws (including child labor), fair compensation, worker health and safety, human rights abuses and combat weapons.
- **Governance Issues**. These issues include a company's profile with respect to transparency, internal controls, risk management, executive compensation, shareholder rights, accounting techniques, independent oversight, conflicts of interest and legal and regulatory compliance.

Additional ESG due diligence on a potential investment may be warranted based on an investment professional's high-level assessment of the investment's ESG profile and the nature of the investment.

The level of ESG risk should guide the amount of ESG due diligence to be undertaken with respect to a proposed investment.

Low risk investments should not require much, if any, ESG due diligence. ESG due diligence for medium risk and high-risk investments should be tailored to the level of perceived risk and should also reflect the nature of the proposed investment. For example, if the company is listed on a U.S. securities exchange, it will likely be enough to review the relevant disclosures in the company's public filings. If the company is listed in a foreign country, more extensive ESG diligence may be warranted.

The scope of our inquiry should be guided by the circumstances of the proposed investment.

Since our primary responsibility is to seek to maximize investment returns of our clients, our ESG due diligence should always be tailored with this goal in mind. Some examples of the types of due diligence Abbilon may conduct are included below:

a. *Environmental Issues*. Appropriate due diligence under the circumstances may include conducting environmental site assessments on potential real estate holdings or engaging consultants to review environmental issues, such as manufacturing operations or emissions taxes.
b. *Social Issues*. Appropriate due diligence under the circumstances may involve identifying where the company's operations and customers are located. Certain jurisdictions may be at greater risk for bribery, money laundering or child labor, or may be subject to U.S. sanctions that would prohibit or restrict us from doing business in that jurisdiction to achieve U.S. foreign policy or national security goals.
c. *Governance Issues*. Appropriate due diligence under the circumstances may involve engaging legal counsel to review organizational documents and accounting firms to review financial information.

Investment professionals should factor the results of their ESG due diligence into their investment decisions.

There may be situations where the results of our ESG due diligence will lead to a decision to forgo the potential investment because identified ESG risks materially impact the investment's anticipated returns. For example, an identified environmental liability or pending investigation may present an unacceptable risk of loss. In addition, ESG due diligence may reveal unacceptable legal or reputational risk, such as unacceptable employment practices or relationships with governments subject to OFAC sanctions or participation in commerce that is known to finance terrorist organizations.

Assuming there is no material ESG-related reason not to make an investment, the responsible investment professional should nevertheless seek to address any identified ESG issues to the extent practical.

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For questions or comments please contact us at admin@abbilon.com.