

STONEHAGE FLEMING INVESTMENT MANAGEMENT LIMITED

Entity Level Disclosure



NOW AND FOR FUTURE GENERATIONS

The below firm level disclosures are required under the European Union Sustainable Finance Disclosure Regulation (SFDR).

SUSTAINABILITY RISK STATEMENT (ARTICLE 3)

At Stonehage Fleming Investment Management Limited (SFIM) we believe that businesses that have a focus on sustainability have superior prospects and are better positioned to weather adverse conditions than those with poor sustainable profiles. We believe that consideration of the sustainable profile of companies alongside other fundamental investment factors is likely to improve investment outcomes. We have included the explicit consideration of Environmental, Social and Governance (ESG) sustainability factors into the processes of our global equity investment strategies. We have established a Global Sustainable Investment Portfolio strategy that has a core objective of making a net positive impact on social equality and the planet. We are currently reviewing the incorporation of sustainability factors across our other strategies.

PRINCIPLE ADVERSE IMPACTS STATEMENT (ARTICLE 4)

Presently, the Firm does not consider the adverse impacts of investment decisions on sustainability factors at the firm level. We are not required to produce this information under the SFDR.

The Firm has established a Shareholder Engagement Policy, which you can access here: <https://cdn.io.stonehagefleming.com/craft-cms/legal/Shareholders-Rights-II-SRD-II.pdf>

This Policy describes how we integrate shareholder engagement in our investment strategy for funds that invest in the shares of companies traded on a regulated market. We are revising this policy to reflect our approach for the following funds we took over managing from Cavendish Asset Management in June 2020 (TM Stonehage Fleming International Fund, TM Stonehage Fleming Opportunities Fund, and TM Stonehage Fleming AIM Fund). A printed copy of the Shareholder Engagement Policy is available on request:

- In writing: 6 St James's Square, London, SW1Y 4JU
- Telephone: 020 7087 0000
- Email: enquiries@stonehagefleming.com

REMUNERATION POLICIES (ARTICLE 5)

Currently, the firm's Remuneration Policy does not integrate sustainability risks.

ADHERENCE TO INTERNATIONAL STANDARDS (ARTICLE 4)

SFIM supports the objectives in the UK Stewardship Code 2020. We are working towards aligning existing and implementing new processes that will achieve these objectives across investment strategies and anticipate completing this work by the end of 2023. You can access our Disclosure Statement on the Stewardship Code here: <https://cdn.io.stonehagefleming.com/craft-cms/legal/SFIM STATEMENT ON THE UK STEWARDSHIP CODE - NOVEMBER 2015.pdf>

A printed copy is available on request.

SFIM is not a member of UN Principles for Responsible Investment (UNPRI) or any other relevant organisation, but we are evaluating the requirements and the timescale required to meet them.



