



Value Squared: Guidelines for Managing Conflicts of Interest in Responsible Investments

Introduction

Value Squared is committed to responsible investment practices that prioritize both financial returns and positive environmental, social, and governance (ESG) impacts. To uphold this commitment and maintain the trust of our clients, we have established these Guidelines for Managing Conflicts of Interest related to Responsible Investments. These guidelines define potential conflict scenarios and outline procedures to mitigate them, ensuring our investment decisions are made solely in the best interests of our clients and responsible investment objectives.

Identifying Conflicts of Interest

Conflicts of interest may arise when our professional judgment regarding investments could be unduly influenced by other considerations. Here are some potential areas of conflict specific to responsible investments:

- **Personal Investments:** Employees' personal investments could create a conflict if they influence investment decisions for client portfolios.

Mitigating Conflicts of Interest

Value Squared takes a proactive approach to mitigating these potential conflicts. Here are the key elements of our strategy:

- **Disclosure and Transparency:**
 - We maintain a comprehensive conflicts of interest register that identifies potential conflicts and the steps taken to mitigate them.
 - We disclose all relevant information about our ESG investment processes and methodologies to clients.
 - We avoid selective disclosure of information that could benefit specific investments or relationships.
- **Information Barriers:**
 - We establish information barriers between portfolio managers, analysts, and sales or marketing teams to prevent personal financial interests from influencing investment decisions.

- Employees with potential conflicts are restricted from accessing or sharing sensitive information related to specific investments.
- **Independent Research and Due Diligence:**
 - We rely on independent research and analysis conducted by dedicated ESG specialists for all our investment decisions.
 - External ESG ratings and data providers are used alongside internal research to ensure objectivity.
- **Internal Governance:**
 - Investment decisions are reviewed by a committee structure to ensure objectivity and adherence to ESG criteria.
- **Employee Code of Conduct:**
 - Our code of conduct outlines employee responsibilities regarding conflicts of interest, including restrictions on personal investments and gifts from issuers.
 - Employees are required to disclose any potential conflicts of interest to their supervisors.

Monitoring and Enforcement

These guidelines are subject to ongoing review and improvement. We will monitor the effectiveness of our conflict management strategies and make necessary adjustments as needed. Any violation of these guidelines will be taken seriously and may result in disciplinary action.

Conclusion

By implementing these guidelines, Value Squared is committed to upholding the highest ethical standards in responsible investing. We believe that transparent and objective decision-making is essential to achieving our clients' financial goals while promoting positive environmental and social impact.

Additional Considerations

- These guidelines are a starting point and can be further customized to address specific needs and areas of focus within Value Squared's responsible investment strategy.
- Consider including specific examples of potential conflicts and how they would be mitigated to further illustrate the application of these guidelines.

We are confident that these Guidelines will enable Value Squared to continue its leadership in responsible investments, fostering trust and delivering sustainable value for our clients.