



CARMIGNAC'S EXCLUSION POLICY **APRIL 2025**

Carmignac is fully committed to actively managing investments on behalf of investors. We stand out due to our thorough proprietary analysis and company engagements. It is part of Carmignac's fiduciary duty to assess environmental, social and governance factors in the investment process and offer suitable investment solutions. With this in mind, we believe our investments should be made in companies with sustainable business models. As such, we have compiled an exclusion list with companies that do not meet Carmignac's investment standards due to their business activities or breaches of international norms.

SCOPE – The “Business norms” and “Business activity” exclusions with the “firm-wide exclusion” mention below apply to all funds that are open-ended funds where Carmignac acts as investment manager. For fund specific exclusions please refer to the [“Funds specific in scope per exclusion category”](#) section at the end of this document.

We will not knowingly hold any securities that we identify to be in violation of the above guidelines. We do not exclude companies whose products or business activities' main purpose is not stated in the above guidelines.

Our Socially Responsible Investment Funds have broadened their commitments through additional negative screening and exclusions, detailed in the following sections, in the Transparency Code and fund documentation published on our website.

1. BUSINESS NORMS EXCLUSIONS

Carmignac adheres to the principles of the United Nations Global Compact (UNGC), the United Nations Guiding Principles on Business and Human Rights (UNGP), the International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work, and the Organisation for Economic Co-operation and Development (OECD) guidelines for multinational enterprises. These frameworks help us evaluate companies' adherence to various norms, such as human rights, labor laws, and climate practices. To assist us in monitoring and identifying controversies, we rely on an external data provider, Institutional Shareholder Services (ISS). ISS categorizes controversies as red, amber, or green based on their severity. Our sustainable investment team carefully analyses these controversies, paying particular attention to the red ones. Through our proprietary analysis, we determine whether the controversy should be lifted or if it warrants the exclusion of the issuer. Controversies may be lifted after internal analysis in the following cases:

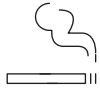
- The controversy takes a side in a geopolitical conflict.
- The issuer is involved in a controversy but has limited operational control over resolving the issue.
- The issuer has already taken credible and measurable steps to address a legacy controversy and we are expecting this to be reflected in the severity rating of the controversy.

For companies that severely breach these principles and guidelines, but are invested in following the internal review, we may implement an enhanced engagement process. If this process, which can take up to three years, fails to bring about the desired change, we will exclude the company from our investment universe.

2. BUSINESS ACTIVITY EXCLUSIONS

TOBACCO

Firm wide Exclusion



Carmignac considers investment in tobacco companies to be unsustainable, given that it is an unhealthy and polluting product with no safe level of consumption. Tobacco kills more than 8 million people worldwide each year¹, including an estimated 1.3 million non-smokers who are exposed to second-hand smoke¹. In addition to the detrimental impact of tobacco on health, the total economic cost of smoking (from health expenditures and productivity losses combined) is estimated to be around US\$ 1.4 trillion per year². The acetate cellulose present in cigarette filters takes up to 14 years to decompose in the nature and can pollute up to 500L of water³. In addition, the nicotine present in tobacco products is highly addictive, making it difficult for users to stop smoking despite knowing the harmful effects of the habit on their health.

We exclude companies that are involved in the production of tobacco including alternative tobacco smoking products such as e-cigarettes. We also exclude those which have significant ownership⁴ in such companies, as well as those which are involved in the wholesale distribution of tobacco or in the supply of cigarette components, such as filters (≥5% of firm revenue).

THERMAL COAL



Carmignac acknowledges that reducing thermal coal emissions, as recommended by scientists⁵, is one of the most effective ways of transitioning to a cleaner energy system and being consistent with the Paris Agreement⁶. In 2022, emissions related to the burning of thermal coal accounts for around 10% of global emissions⁷ through highly potent methane emissions. These emissions have a global warming potential around 30 times higher than regular carbon dioxide over 100 years⁸. Furthermore, Carmignac pledges that, should there be any future coal-related investments permitted within the confines of Carmignac's Exclusion

¹ World Health Organization: <https://www.who.int/news-room/fact-sheets/detail/tobacco>

² World Health Organization: https://www.who.int/health-topics/tobacco#tab=tab_1

³ Kwit: <https://kwit.app/en/blog/posts/cigarette-butts-the-main-source-of-sea-and-ocean-pollution>

⁴ Carmignac defines significant ownership as having a majority of the voting rights and the ability to exercise significant influence or control over the relevant company.

⁵ Intergovernmental Panel on Climate Change (IPCC) report on Global warming of 1.5 degrees, https://report.ipcc.ch/sr15/pdf/sr15_spm_final.pdf

⁶ Paris Agreement, <https://unfccc.int/process-and-meetings/the-paris-agreement/the-paris-agreement>

*The exclusion list built for label compliance are constructed using more restrictive criteria (ie companies with any ties to the activities mentioned above). Some issuers can be reintegrated to the investable universe using the below criteria for each exclusion category after an ad hoc analysis conducted by the Sustainable Investment team.

⁷ UNEP: Emissions Gap report 2024: <https://www.unep.org/resources/emissions-gap-report-2024>

⁸ UNECE: <https://unece.org/challenge#:~:text=Methane%20is%20a%20powerful%20greenhouse,are%20due%20to%20human%20activities>.

Policy, a total exit from coal-related investee companies will be implemented by 2030 for OECD countries and 2040 for non-OECD countries. We deem that thermal coal faces an increasing investment risk for the future, as companies are moving away from thermal coal as a fuel source

Firm wide exclusion

To avoid the risk of owning stranded thermal coal mines through our investments, we have developed a framework to exclude any company which derives more than 10% of their revenue from thermal coal mining or produces >20 million tons of thermal coal per year. **Carmignac will not knowingly directly finance new coal mining projects.** Should an investee company through acquisition be involved in new coal projects, Carmignac will seek to disinvest within a defined / precise timeframe.

Extended Thermal Coal - Fund specific exclusion

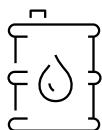
In addition to our firm wide exclusion, some of our funds have a stricter exclusion criteria on thermal coal. Companies which derive any revenue from activities in exploration, mining, extraction, transportation, distribution or refining of thermal coal or providing dedicated equipment or services for such companies are excluded from the investment universe.

The company must not be involved in the exploitation or development of new coal mines.

In addition, a company involved in the aforementioned activities could be reintegrated to the investment universe if it meets the following criteria:

- Have an annual thermal coal production less than 10Mt and derive less than 5% of its revenues from activities described above.

OIL AND GAS



The oil and gas sector remains a foundationally important area of the economy as it delivers energy security and helps maintain modern living standards in developed markets and improves living conditions in emerging markets, as we necessarily transition to a cleaner energy system. Indeed, the International Energy Agency (IEA) predicts demand for oil will peak before 2030⁹ after which it is expected to plateau for some time before declining. Due to the relatively early stage of the energy transition we are in, Carmignac does not believe that the sector should face a blanket exclusion from our investment universe at firm level until the new clean energy system is more widely implemented. Instead, we utilise a

⁹ International Energy Agency: <https://www.iea.org/reports/oil-2024#overview>

range of approaches including portfolio net zero targets, a case by case approach to assessing the ESG risks and transition plan based on individual companies performance, with stewardship consequences if required and clear reporting.

Carmignac however does have a fund range with higher ESG outcome standards for which oil and gas companies are excluded according to the criteria described below.

Oil and Gas Extraction – Fund specific exclusion

For some of our funds, companies that derive more than 5% of their revenues from the exploration and extraction of O&G are excluded from the fund's investment universe.

Conventional and Unconventional Oil And Gas – Fund specific Exclusion

Some of our funds have stricter oil and gas exclusions than the one described above. The company shall currently **not be involved in exploration**, and not be involved in exploitation or **development of new oil or gas fields**.

In addition companies which derive **any revenue** from activities in exploration, extraction, refining, and transportation of conventional and unconventional O&G (defined as tar/oil sands, shale oil, shale gas and Arctic drilling) or providing dedicated equipment or services for such companies are excluded from the investment universe.

On an exceptional basis, a company with any involvement in the aforementioned activities can be deemed investable if it meets at least one of the following criteria following a dedicated analysis from the Sustainable Investment team:

- Less than 5% revenues from O&G activities as described above
- Have more than 15% CAPEX dedicated to contributing activities, such as EU Taxonomy aligned activities not including natural gas or nuclear power or SDG aligned activities¹⁰ (if a company is involved in unconventional O&G the CAPEX requirement increases to 50%).
- Companies deriving less than 25% of its revenues from bespoke products, equipment or services dedicated to enabling the execution of activities described above

POWER GENERATIONS



Power generators play a crucial role in the global energy transition. Emissions related to the power generation industry contribute to 26% of global emissions¹¹,

¹⁰ https://www.carmignac.fr/en_GB/sustainable-investment/approach

¹¹ UNEP: Emissions Gap report 2024: <https://www.unep.org/resources/emissions-gap-report-2024>

contributing largely to global warming and requiring a framework to ensure our investments do not contribute further to these. Even though thermal coal may have a short-term role in the economic development and growth of emerging countries, in a context of falling renewable energy prices, coal-powered plants will not be viable over the long-term.

A dual criteria looking at the mix of high polluting power assets such as coal and natural gas as well as the power generation carbon intensity using gCo2/kWh allows for a credible approach to high polluting power generators.

Firm wide Exclusion

Knowing that a typical coal power plant will generate electricity at an intensity of 800 to 1200 gCo2/kWh and a natural gas power plant will generate an intensity of 400 to 600 gCo2/kWh, Carmignac has committed to exclude companies generating electricity above the below thresholds informed by the International Energy Agency (IEA) to keep global temperature rise below 2 degrees, as set out by the Paris Agreement.

| | 2023 | 2024 | 2025 | 2026 | 2027 | 2028 |
|----------------------|------|------|------------|------|------|------|
| Max. gCO2/kWh | 366 | 326 | 291 | 260 | 232 | 207 |

In addition, power generation companies with more than 10% of their generation mix in thermal coal are excluded.

Carmignac recognizes the importance of encouraging companies to reduce their dependence on coal power generation in order to align their activities with the Paris Agreement. Hence, Carmignac will consider making exceptions to its exclusion rules for the power generators making credible commitments (ie SBTi approved targets or well defined transition strategies with clear coal exit policies) to reduce and exit their thermal coal-based power generation.

Extended Power Generation - Funds exclusion

Carmignac has a fund range with higher ESG outcome standards which have stricter exclusions on power generators than the one described above. Companies shall currently not be involved in building new coal-fired power stations and its absolute production of or capacity for coal-based power shall not be structurally increasing and be less than 5 GW. In addition, companies with activities in the generation of power/heat from non-renewable energy sources or providing dedicated equipment or services for such companies are excluded from the investment universe.

On an exceptional basis, a company with any involvement in the aforementioned activities can be deemed investable if it meets at least one of the following criteria following a dedicated analysis from the Sustainable Investment team:

- Have a carbon intensity lower than 291 gCO₂/kWh
- Have a SBTi target set at well-below 2°C or 1.5°C, or have a SBTi 'Business Ambition for 1.5°C' commitment
- Derive less than 5% of its revenues from activities described above
- Derive more than 50% of its revenues from contributing activities such as EU Taxonomy aligned activities not including natural gas or nuclear power or SDG aligned activities¹²
- Have more than 50% of capital expenditure dedicated to contributing activities such as EU Taxonomy aligned activities not including natural gas or nuclear power or SDG aligned activities¹⁴

Nuclear energy production - Fund Specific Exclusion

Some of our funds have stricter criteria nuclear exclusions reflecting the uncertainty and risks around long-term storage of high-level nuclear waste. Companies that derive more than 5% of revenues from production of nuclear energy are excluded from the investment universe.

ADULT ENTERTAINMENT AND PORNOGRAPHY

Firm Wide exclusion



The adult entertainment and pornography industry has high risks associated with human trafficking as well as the exploitation of underaged women. Additionally, the industry has a negative impact on society by promoting and normalizing the improper objectification and violence towards women.¹³

We exclude companies who receive >2% of their revenues from the production or distribution of Adult Entertainment and Pornography, or those which have a significant ownership¹⁴ in such companies.

WEAPONS



Controversial weapons are excluded at firm level because they cause indiscriminate harm and long lasting damages to civilians and the environment

¹² https://www.carmignac.fr/en_GB/sustainable-investment/approach

¹³ (Archives of Sexual Behavior, A Descriptive Analysis of the Types, Targets, and Relative Frequency of Aggression in Mainstream Pornography July 13, 2020) <https://pubmed.ncbi.nlm.nih.gov/32661813/>

¹⁴ Carmignac defines significant ownership as having a majority of the voting rights and the ability to exercise significant influence or control over the relevant company.

and are widely considered unethical and inhumane. In contrast, conventional weapons, provided they are used in accordance with international law, are a fundamental component of international defence and an indispensable tool for maintaining national security and stability which is why they are only excluded in our fund range with higher ESG standards.

Controversial Weapons - Firm Wide Exclusion

Carmignac deems anti-personnel mines, nuclear weapons, cluster munitions, biological and chemical weapons, depleted uranium, white phosphorus munitions, blinding lasers, white phosphorous and non-detectable fragments to be controversial weapons. We exclude companies which manufacture products that do not comply with the following treaties or legal bans on controversial weapons:

1. The Ottawa Treaty (1997), which prohibits the use, stockpiling, production and transfer of anti-personnel mines.
2. The Convention on Cluster Munitions (2008), which prohibits the use, stockpiling, production and transfer of cluster munitions.
3. The Chemical Weapons Convention (1997), which prohibits the use, stockpiling, production and transfer of chemical weapons.
4. The Biological Weapons Convention (1975), which prohibits the use, stockpiling, production and transfer of biological weapons.
5. The Treaty on the Non-Proliferation of Nuclear Weapons (1968), which limits the spread of nuclear weapons to the group of so-called nuclear weapons states (USA, Russia, UK, France and China).
6. The Belgian Loi Mahoux, which bans uranium weapon investments.
7. The 1980 Convention on certain conventional weapons concerning non detectable fragments, mines incendiary weapons, blinding laser weapons.

Conventional Weapons Producers - Fund Specific Exclusion

For some of our funds, companies that derive more than 10% of revenues from the manufacture of conventional weapons including firearms and components.

Conventional Weapons - Fund Specific Exclusion

Some of our funds have even stricter exclusion criteria on conventional weapons. Companies that derive more than 5% of revenues from the manufacture and sale of conventional weapons including firearms and support services and equipment are excluded from the investment universe.

ALCOHOL

Fund Specific Exclusion



Alcohol consumption is linked to a range of health issues, including addiction, liver disease, cardiovascular problems, and mental health disorders. The negative health impacts can place a significant burden on healthcare systems and society. In addition to its health impact, alcohol abuse can also lead to various social problems, such as domestic violence, crime, accidents, and reduced productivity. These issues can have far-reaching effects on communities and economies.

This is why Carmignac has a fund range with higher ESG outcome standards for which companies that derive more than 10% of revenues from the production of alcohol are excluded from the investment universe (our Carmignac Emerging Markets Equities range uses a 5% revenues threshold).

GAMBLING

Fund Specific Exclusion



Gambling is considered to be highly addictive and causes severe social, financial and psychological harm. Estimates suggest that 1.2% of the world's adult population is suffering from a gambling addiction¹⁵. This is why Carmignac has a fund range with higher ESG outcome standards for which companies that derive more than 2% of revenues from gambling-related business activities are excluded from the investment universe.

ANIMAL WELFARE

Fund Specific Exclusion



Agriculture contributes to 11% of global emissions primarily due to emissions from livestock¹⁶. In addition, commercial animal husbandry and animal testing has strong ties to animal cruelty.

This is why Carmignac has a fund range with higher ESG standards for which companies that are involved in commercial animal husbandry for the purpose of food production, including breeding, raising, and slaughtering pork, veal, poultry, and beef, as well as dairy and egg farm operators are excluded from the investment universe. This category does not include restaurants or other food establishments where meat products are sold. Companies that are on the

¹⁵World health organization: [https://www.who.int/news-room/fact-sheets/detail/gambling#:~:text=Standardized%20global%20estimation%20of%20gambling,billion%20by%202028%20\(1\).](https://www.who.int/news-room/fact-sheets/detail/gambling#:~:text=Standardized%20global%20estimation%20of%20gambling,billion%20by%202028%20(1).)

¹⁶ UNEP: Emissions Gap report 2024: <https://www.unep.org/resources/emissions-gap-report-2024>

People for the Ethical Treatment of Animals (PETA) list of facilities that manufacture animal-tested products, as well as brands that are owned by companies that have not yet adopted a permanent "no animal testing" policy are also excluded from the investment universe.

PALM OIL



Fund Specific Exclusion

Production of palm oil is a leading cause of deforestation, particularly in tropical regions like Indonesia and Malaysia. This deforestation leads to the destruction of habitats for endangered species contributing to biodiversity loss. In addition to the disastrous impact of palm oil on biodiversity, there are numerous reports of human rights abuses in the palm oil industry, including poor working conditions, child labor, and exploitation of workers. Indigenous communities are often displaced from their land to make way for palm oil plantations, leading to social conflicts and loss of livelihoods. This is why Carmignac has a fund range with higher ESG outcome standards for which companies that are involved in the palm oil industry, including producer, distributor, and owners are excluded from the fund's investment universe.

AIRLINES



Fund Specific Exclusion

The airline industry is a significant contributor to global carbon emissions (2 to 3% of global emissions) due to the burning of fossil fuels. Some arguments exist for the substitution of short regional flights with less polluting alternative transports. This is why Carmignac has a fund range with higher ESG standards for which airlines are excluded from the investment universe.

SOVEREIGN EXPOSURE POLICY- Fund Specific Exclusion–

States that issue sovereign instruments are classified based on the income level of their economy, based on the classifications of the World Bank: low-income, lower middle-income, upper middle-income and high-income economies.

All our sovereign instruments in Belgian label portfolios comply with the 6 Worldwide Governance Indicators (WGI), established by the World Bank:

1. Voice and Accountability
2. Political Stability and Absence of Violence/Terrorism

3. Government Effectiveness
4. Regulatory Quality
5. Rule of Law
6. Control of Corruption

A State is eligible if both of the following conditions are met; it is otherwise excluded

- The average of its scores on all 6 WGIs is at least -0.59
- It does not score less than -1.00 on a single WGI

Additional criteria for high-income economies:

In addition to the base criteria stated above, high-income economy States must also meet the following requirements:

The State has ratified or has implemented in equivalent national legislation:

- the eight fundamental conventions identified in the International Labour Organisation's declaration on Fundamental Rights and Principles at Work
- at least half of the 18 core International Human Rights Treaties. The State is party to:
 - the Paris Agreement
 - the UN Convention on Biological Diversity
 - the Nuclear Non-Proliferation Treaty
 - The State does not have a particularly high military budgets (>4% GDP)
 - The State is not considered a 'jurisdiction with strategic AML/CFT deficiencies' by the FATF
 - The State scores at least 40/100 on the Transparency International Corruption Perception Index
 - The State is not qualified as 'Not free' by the Freedom House 'Freedom in the World'-survey
 - The State does not have the death penalty legal and in use

All States not meeting the criteria above will be excluded; unless exception described below:

Exceptions:

Portfolios can invest for reasons of diversification or (currency risk) hedging, in public debt instruments issued by core reserve (non-EURO) currency issuers that do not comply with the above requirements, to a maximum of 30% (in total) of the portfolio. This threshold may temporarily be exceeded in the event of extraordinary market circumstances to protect investors' financial interests. Use-of-proceeds instruments issued by non-compliant States can still be eligible.

- Use-of-proceeds Instruments

Use-of-proceeds instruments issued by sovereigns that fail the aforementioned criteria can be eligible if it meets the following criteria:

- Use-of-proceeds instruments comply with an appropriate framework (e.g., ICMA/CBI/EU GBS/LMA) and be subject to independent external review. For some specific issuers, supranational institutions and agencies, this might not be possible. In that case, elaborate on equivalence (see c.).
- Issuers and beneficiaries of use-of-proceeds instruments are subject to the ESG due diligence process of the manager. The environmental, social and governance aspects of the financed programs/projects shall be taken into account when investing in use-of-proceeds instruments.
- The evaluation of use-of-proceeds instruments issued by financial institutions, sovereigns and supra-nationals is left to the discretion of the manager.

UNDERLYING PORTFOLIO – FUND SPECIFIC EXCLUSION

For some of our funds with higher ESG constraints, at least 90% of underlying portfolios (measured by AUM) are:

- a) Underlying portfolios that have the Towards Sustainability label.
- b) Underlying index-based portfolios evaluated on QS compliance using a look-through approach, if based on a solid regular monitoring and audit system. The look-through approach shall ensure that the composition of the indices is compliant with the exclusionary requirements of the QS.
- c) To a maximum of 30% of underlying portfolios, (unlabelled) sovereign bonds portfolios that only invest in sovereign-issued instruments issued by States compliant with the criteria for high-income economies.

The remainder (max. 10% measured by AUM) of underlying portfolios are portfolios that promote ESG characteristics, comply with the Belgian label criteria on sustainable investments and consider principal adverse impacts on sustainability factors.

Underlying money market funds are considered cash-equivalent and are not evaluated if their only purpose is technical or for the hedging of risks.

3. IMPLEMENTATION

A. GUIDELINES

1. For company exclusions, all listed company-related investment instruments (e.g. equity, single issuer name derivatives and corporate bonds) are in scope.
2. Carmignac's in-house ESG team, supported by external data, tools and research providers, undertakes a series of ESG-themed assessments which identify companies within our investment universe that could qualify for potential exclusion.
3. Any new firm-wide sector exclusion is discussed within the Investment team, which is then submitted to Carmignac's Sustainable Investment Governance group for approval.
4. Cases of companies with controversial behaviour are discussed firstly within the Investment and Sustainable Investment team. The decision must be backed up with specific arguments and is concluded on by the SI team.
5. For discretionary mandates and client-specific investments solutions, Carmignac will initially suggest clients apply the current Carmignac exclusion framework; but Carmignac may finally apply further / different restrictions if requested by client.
6. If company A is partially owned by company B and company B is involved in controversial behaviour, controversial weapons, thermal coal mining or tobacco, Carmignac will not exclude company A.
7. The list of excluded companies does not apply to index derivatives, whose administrators are external parties.
8. Excluded companies will be reviewed on a quarterly basis, using Carmignac's proprietary assessment framework, to check if relevant changes have been made to the company's activities or behaviour. A review of such changes may lead to the exclusion being lifted.
9. Once an invested company is placed on Carmignac's exclusion list, we will divest any holdings from our Funds within a defined and precise timeframe. Carmignac's Compliance team monitors adherence. Any identified breach to the defined timeframe would be dully escalated to the ESG Governance Group.

B. GOVERNANCE AND MONITORING OF THE POLICY

Carmignac's Strategic Product Committee, composed of Carmignac Senior Managers, oversees the adequate implementation and update of the exclusion policy at the firm level. Acting as an escalation body, this governance group decides on the additions and/or deletions and to approve exceptions of the exclusion list should that be necessary.

An operational framework is also in place to manage our exclusion list. Exclusions are monitored by the Investment Management and the Sustainable Investment team as a first level of control through the portfolio management trading system where hard exclusions of sectors and processes mentioned in this exclusion policy are registered and cannot be traded. The Compliance team acts as a second level of control and ensures that the applied exclusion strategy complies with the various constraints (regulatory, statutory and internal), using the software Bloomberg Compliance Manager tool (CMGR).

APPENDIX

4. UN GLOBAL COMPACT PRINCIPLES

- **Human Rights:** Businesses should

Principle 1: support and respect the protection of internationally proclaimed human rights; and

Principle 2: make sure that they are not complicit in human rights abuses.

- **Labour Standards:** Businesses should

Principle 3: uphold the freedom of association and the effective recognition of the right to collective bargaining;

Principle 4: the elimination of all forms of forced and compulsory labour;

Principle 5: the effective abolition of child labour; and

Principle 6: the elimination of discrimination in respect of employment and occupation.

- **Environment:** Businesses should

Principle 7: support a precautionary approach to environmental challenges;

Principle 8: undertake initiatives to promote greater environmental responsibility; and

Principle 9: encourage the development and diffusion of environmentally friendly technologies

- **Anti-Corruption:** Businesses should

Principle 10: work against all forms of corruption, including extortion and bribery.

Source: www.unglobalcompact.org.uk/the-ten-principles/

5. OECD GUIDELINES FOR MULTINATIONAL ENTERPRISES

Enterprises should take fully into account established policies in the countries in which they operate and consider the views of other stakeholders. In this regard, enterprises should:

1. Contribute to economic, environmental and social progress with a view to achieving sustainable development.
2. Respect the internationally recognised human rights of those affected by their activities.
3. Encourage local capacity building through close co-operation with the local community, including business interests, as well as developing the enterprise's activities in domestic and foreign markets, consistent with the need for sound commercial practice.
4. Encourage human capital formation, in particular by creating employment opportunities and facilitating training opportunities for employees.
5. Refrain from seeking or accepting exemptions not contemplated in the statutory or regulatory framework related to human rights, environmental, health, safety, labour, taxation, financial incentives, or other issues.

6. Support and uphold good corporate governance principles and develop and apply good corporate governance practices, including throughout enterprise groups.
7. Develop and apply effective self-regulatory practices and management systems that foster a relationship of confidence and mutual trust between enterprises and the societies in which they operate.
8. Promote awareness of and compliance by workers employed by multinational enterprises with respect to company policies through appropriate dissemination of these policies, including through training programmes.
9. Refrain from discriminatory or disciplinary action against workers who make bona fide reports to management or, as appropriate, to the competent public authorities, on practices that contravene the law, the Guidelines or the enterprise's policies.
10. Carry out risk-based due diligence, for example by incorporating it into their enterprise risk management systems, to identify, prevent and mitigate actual and potential adverse impacts as described in paragraphs 11 and 12, and account for how these impacts are addressed. The nature and extent of due diligence depend on the circumstances of a particular situation.
11. Avoid causing or contributing to adverse impacts on matters covered by the Guidelines, through their own activities, and address such impacts when they occur.
12. Seek to prevent or mitigate an adverse impact where they have not contributed to that impact, when the impact is nevertheless directly linked to their operations, products or services by a business relationship. This is not intended to shift responsibility from the entity causing an adverse impact to the enterprise with which it has a business relationship.
13. In addition to addressing adverse impacts in relation to matters covered by the Guidelines, encourage, where practicable, business partners, including suppliers and sub-contractors, to apply principles of responsible business conduct compatible with the Guidelines.
14. Engage with relevant stakeholders in order to provide meaningful opportunities for their views to be taken into account in relation to planning and decision making for projects or other activities that may significantly impact local communities.
15. Abstain from any improper involvement in local political activities

Source: <http://mneguidelines.oecd.org/>

6. ILO DECLARATION ON FUNDAMENTAL PRINCIPLES AND RIGHTS AT WORK

Adopted in 1998, the Declaration commits Member States to respect and promote principles and rights in four categories, whether or not they have ratified the relevant Conventions.

These categories are: freedom of association and the effective recognition of the right to collective bargaining, the elimination of forced or compulsory labour, the abolition of child labour and the elimination of discrimination in respect of employment and occupation.

7. FUNDS SPECIFIC IN SCOPE PER EXCLUSION CATEGORY

The Tobacco, Adult Entertainment, Thermal Coal mining, Power generators and Controversial Weapons exclusion categories are firm wide exclusion, they apply to all of our funds and are therefore not present in the table below.

| Exclusion Category | Funds in scope | |
|--|---|---|
| Extended Thermal Coal | Carmignac Emergents Carmignac Portfolio Emergents Carmignac Portfolio Grandchildren Carmignac Portfolio Emerging Patrimoine | Carmignac Portfolio Human Xperience Carmignac Portfolio Grande Europe Carmignac Portfolio Patrimoine Europe |
| Oil and Gas Extraction | Carmignac Portfolio Absolute Return Europe Carmignac Absolute Return Europe Carmignac Portfolio Long-Short European Equities | Carmignac China New Economy Carmignac Portfolio China New Economy |
| Conventional and Unconventional Oil and Gas | Carmignac Emergents Carmignac Portfolio Emergents Carmignac Portfolio Grandchildren Carmignac Portfolio Human Xperience Carmignac Portfolio Grande Europe | Carmignac Portfolio Patrimoine Europe Carmignac Portfolio Emerging Patrimoine FP Carmignac Emerging Markets FP Carmignac Global Equity Compounders FP Carmignac European Leaders |
| Extended Power generation | Carmignac Emergents Carmignac Portfolio Emergents Carmignac Portfolio Grandchildren Carmignac Portfolio Human Xperience Carmignac Portfolio Grande Europe | Carmignac Portfolio Patrimoine Europe Carmignac Portfolio Emerging Patrimoine FP Carmignac Emerging Markets FP Carmignac Global Equity Compounders FP Carmignac European Leaders |
| Nuclear Power Production | Carmignac Emergents Carmignac Portfolio Emergents | FP Carmignac Emerging Markets |
| Conventional Weapon Producers | Carmignac Portfolio Absolute Return Europe | Carmignac Absolute Return Europe |
| Conventional Weapons and Support Services | Carmignac Emergents Carmignac Portfolio Emergents Carmignac Portfolio Grandchildren Carmignac Portfolio Human Xperience Carmignac Portfolio Grande Europe Carmignac Portfolio Long-Short European Equities | Carmignac Portfolio Patrimoine Europe Carmignac Portfolio Emerging Patrimoine FP Carmignac Emerging Markets FP Carmignac Global Equity Compounders FP Carmignac European Leaders Carmignac China New Economy Carmignac Portfolio China New Economy |
| Alcohol (10% revenues threshold) | Carmignac Portfolio Grandchildren Carmignac Portfolio Grande Europe Carmignac Portfolio Patrimoine Europe | Carmignac Portfolio Emerging Patrimoine FP Carmignac Global Equity Compounders FP Carmignac European Leaders |
| Alcohol (5% revenues threshold) | Carmignac Emergents Carmignac Portfolio Emergents | FP Carmignac Emerging Markets |
| Gambling | Carmignac Emergents Carmignac Portfolio Emergents Carmignac Portfolio Absolute Return Europe Carmignac Absolute Return Europe Carmignac China New Economy Carmignac Portfolio China New Economy Carmignac Portfolio Grandchildren | Carmignac Portfolio Long-Short European Equities Carmignac Portfolio Grande Europe Carmignac Portfolio Patrimoine Europe Carmignac Portfolio Emerging Patrimoine FP Carmignac Emerging Markets FP Carmignac Global Equity Compounders FP Carmignac European Leaders |
| Animal Welfare | Carmignac Emergents Carmignac Portfolio Emergents | Carmignac Portfolio Emerging Patrimoine FP Carmignac Emerging Markets |
| Palm Oil | Carmignac Emergents Carmignac Portfolio Emergents | Carmignac Portfolio Emerging Patrimoine FP Carmignac Emerging Markets |
| Airlines | Carmignac Emergents Carmignac Portfolio Emergents | FP Carmignac Emerging Markets |

8. DISCLAIMER

This document may not be reproduced, in whole or in part, without prior authorisation from the management company. This document does not constitute a subscription offer, nor does it constitute investment advice. Access to the Fund may be subject to restrictions with regard to certain persons or countries. The Fund is not registered in North America, in South America, in Asia nor is it registered in Japan. The Funds are registered in Singapore as restricted foreign scheme (for professional clients only). The Fund has not been registered under the US Securities Act of 1933. The Fund may not be offered or sold, directly or indirectly, for the benefit or on behalf of a "U.S. person", according to the definition of the US Regulation S and/or FATCA. The Fund presents a risk of loss of capital. The risks and fees are described in the KID (Key Information Document). The Fund's prospectus, KIDs and annual reports are available at www.carmignac.com, or upon request to the Management Company. The KID must be made available to the subscriber prior to subscription. The Management Company can cease promotion in your country anytime. Investors have access to a summary of their rights in English on the following link at section 6: https://www.carmignac.com/en_US/article-page/regulatory-information-1788

- **In Switzerland**, the Fund's respective prospectuses, KIDs and annual reports are available at www.carmignac.ch, or through our representative in Switzerland, CACEIS (Switzerland) S.A., Route de Signy 35, CH-1260 Nyon. The paying agent is CACEIS Bank, Montrouge, Nyon Branch / Switzerland, Route de Signy 35, 1260 Nyon.
- **In the United Kingdom**, the Funds' respective prospectuses, KIDs and annual reports are available at www.carmignac.co.uk, or upon request to the Management Company, or for the French Funds, at the offices of the Facilities Agent at BNP PARIBAS SECURITIES SERVICES, operating through its branch in London: 55 Moorgate, London EC2R. This material was prepared by Carmignac Gestion, Carmignac Gestion Luxembourg or Carmignac UK Ltd and is being distributed in the UK by Carmignac Gestion Luxembourg.

CARMIGNAC GESTION 24, place Vendôme - F-75001 Paris - Tél : (+33) 01 42 86 53 35. Investment management company approved by the AMF Public limited company with share capital of € 13,500,000 - RCS Paris B 349 501 676. **CARMIGNAC GESTION Luxembourg** - City Link - 7, rue de la Chapelle - L-1325 Luxembourg - Tel : (+352) 46 70 60 1 Subsidiary of Carmignac Gestion - Investment fund management company approved by the CSSF Public limited company with share capital of € 23,000,000 - RCS Luxembourg B 67 549