

MARCH A.M.



General Policy ESG

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Introduction

As part of the non-delegable power legally vested in the Board of Directors of March AM to establish, maintain and supervise internal control policies and propose the values that will support the company's vision, and assuming that the Company has the capacity to comply with ESG (Environmental, Social, Governance) criteria, it has created this General ESG Policy ("the Policy"). This Policy is tied to the United Nations Principles for Responsible Investment (UNPRI) and the primary objectives for March AM as a fund manager.

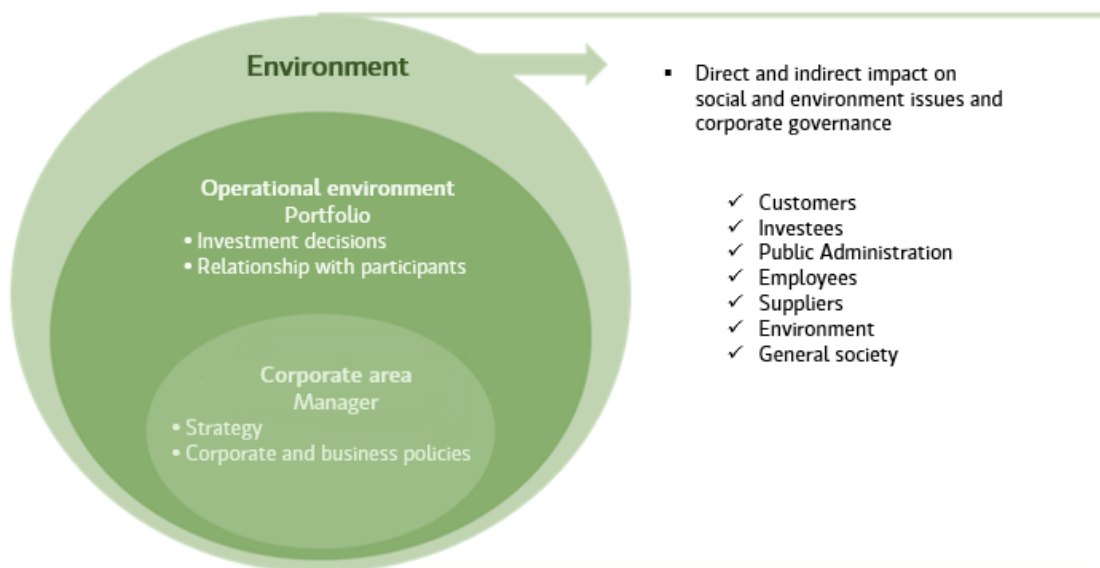
This Policy is based on commitments to sustainable business management and strategic commitments to achieving the company's strategic goals, the latter being developed further in the Investment Policy that complements this Policy.

Purpose and scope of the Policy

The purpose of this Policy is two-fold:

1. First, to establish a general framework so that March AM can tailor its corporate activities to applicable regulations, its strategy and its sustainability principles and values.
2. Second, build a theoretical framework for the company's specific corporate policies. These will help to mitigate the risks inherent in its business activity, and also convey these principles and commitments to its investees, broadening their impact.

This Policy complements the company's Investment Policy: the principles and commitments established in this ESG Policy are core to the dealings between March AM and its stakeholders (customers, employees, investees, etc.), which is also true for the Investment Policy insofar as it guides the fund manager's main business activities; and the Investment Policy will reduce risk exposure for March AM, by integrating non-financial factors in the analysis and conveying those principles and commitments to its investees. There are a number of synergies between these complementary policies:



This Policy is built around the most important issues for the company, as identified in its materiality analysis, with two aims: identifying internal issues relevant to the management of March AM and prioritising the potential external impacts of its investments through its portfolio.

This Policy applies to all of the fund manager's activities and will co-exist alongside related and applicable regulations that March AM establishes.

General principles of conduct

March AM is firmly committed to progressing towards a sustainable economy that combines long-term profitability, with an appropriate risk level, with environmental protection, social justice and influence on the best decision-making in the companies in which March AM products invest. To achieve this, it draws on widely recognised and accepted sustainability frameworks, specifically the United Nations Principles for Responsible Investment applicable to financial sector players. March AM has interpreted and tailored the above, resulting in the following principles of conduct:

- **Include ESG criteria in investment analysis and decision-making:**
ESG criteria will be addressed in the corporate investment policy, and tools and skills will be developed internally as part of this adaptation process, and externally through data providers
- **Take active ownership of and incorporate ESG criteria into the company's own practices and policies:**
Voting rights and relational skills will be exercised according to the commitments assumed under this policy and the complementary investment policy

- **Play an active role in conveying ESG criteria to investees:**
Sustainability reports will be presented to investees and shareholder initiatives that encourage the dissemination of these criteria will be backed
- **Assume an active role in the sector, backing external initiatives:**
Engaging through forums and initiatives to raise awareness of and promote these criteria in the sector, and convey them to suppliers and other participants
- **Present annual transparency reports:**
Compliance with these commitments will be monitored through a periodic ESG corporate report

ESG commitments

This Policy and its general principles will be exercised in the form of specific commitments based on international and sector-specific sustainability frameworks, to which the company will adapt its activities and which will be overseen by the following governing bodies responsible for compliance:

- **Due diligence:**
March AM will promote due diligence to ensure compliance with this Policy for the company's day-to-day business activities
- **Relationship with stakeholders:**
This Policy will ensure proper management of stakeholder relationships and expectations, and establishes transparency, cooperation, legitimacy and common interest as the core values underpinning the relationship with those stakeholders, namely customers, investees, public administration (legislators and supervisors), employees, suppliers, environmental and general society
- **Risk management:**
March AM will apply the principles of this Policy to its risk management system, with a two-fold approach: minimising risk exposure from the assets in its portfolio, and promoting opportunities arising from the adaptation to climate change
- **Alignment with the corporate investment policy:**
This Policy will be aligned with and complement the March AM investment policy, specifically where this identifies ESG KPIs and defines the exclusion of assets or investees that do not comply with the Policy from its portfolio
- **Transparency:**
As part of this Policy, March AM will be committed to transparency about its progress, a requirement that its investees must also meet
- **Continuity and development:**

March AM will review and expand the scope and commitments of this Policy, and design new specific ones, along the path towards fully integrating ESG criteria into its business activities

- **Processing and use of integrated ESG data:**

As set out in the Investment Policy, March AM will incorporate new data sources into its day-to-day asset management activities, and will include this type of extended information in its relationship with investees, encouraging transparency in this regard

Governance

The following governing bodies are responsible for approving, implementing and monitoring this Policy:

- **Board of Directors:**
 - Responsible for approving and supervising compliance with this Policy, and the regulations developed hereunder
 - Responsible for allocating the necessary resources to apply this Policy
- **Head of SRI:**
 - Coordinates top-level corporate and operational policies in direct liaison with the Board of Directors
 - Ensures that all areas of the company are informed about and know the policies that fall under his/her responsibility, at both a corporate and a business level
 - Proposes any necessary updates to the Policy and its regulations, if applicable, to the Board of Directors
 - Represents the principles and commitments established in this Policy on the various March AM committees as a channel to integrate them in the business processes
- **Sustainability committee:**
 - Routinely monitors fulfilment of the main content of this Policy, and proposes any necessary updates to the Policy and its regulations
 - Assesses the resources required for compliance with this Policy and any other needs, proposing them to the Board for approval
 - Proposes reviews, updates and additions to this Policy so that March AM can quickly and efficiently respond to its obligations and any new trends that affect it
 - Establishes the corporate and business systems required to apply the principles and commitments of this Policy across all areas of the company

An approval process for new ESG regulations, policies or procedures arising from this Policy will be established, to allow March AM to respond to the needs and trends that affect it. The Sustainability Committee will hold meetings with representatives from across the whole company to assess the areas where specific regulatory measures are necessary, and will establish the guidelines to design them.

The Policy was approved on 1 March 2021 by the Board of Directors.



Juan Manuel Soto Palacios

Chairman of the Board of Directors

March AM