

TYNDARIS

Responsible Investing Policy

Tyndaris (the “Firm”) has sought to develop a responsible investment policy that is in alignment with the United Nations Principles for Responsible Investment (“PRI”) requirements (the “Principles”).

As employees, partners and consultants of the Firm, we are expected to be mindful of and act within the scope of the Principles as follows:

1. Conduct ourselves in accordance with the highest legal, ethical and professional standards in our business.
2. Strive to achieve best practices appropriate to our industry and investment strategies.
3. Recognise the importance of environmental, social and governance (“ESG”) issues applicable to our investment strategies.
4. Consider relevant ESG issues on a strategy-by-strategy basis and review to determine their potential impact on investment performance.
5. Act as a responsible steward of investors’ capital paying due regard to the information needs of investors in the fund, and communicating adequate information to investors, including on ESG risks, in a way which is clear, fair and not misleading.
6. Implement appropriate risk limits on our trading strategies and monitor levels of counterparty trading and exposure.
7. Maintain restricted lists for each strategy containing entity and jurisdiction-specific details and notify relevant personnel of any changes.
8. Develop and implement policies (including employee training) to prevent insider trading, market abuse, bribery and corruption, and limit any exposure to the same.

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