

ESG and Sustainability Policy

Introduction and purpose

This document sets out how IDAD intends to implement Environmental, Social and Governance ("ESG") initiatives within the firm's operating model. This policy also enables the Board an effective review framework in which to assess when and where efforts prove insufficient or lacking.

IDAD must implement appropriate policies and procedures to integrate ESG considerations into its investment decision-making or advisory processes in order to make investments more sustainable.

ESG frameworks seek to ensure a harmonised transparency regime to provide investors with a uniform standard to compare financial products for their ESG risks and sustainable investment objectives. The integration of ESG considerations into investment management processes and ownership practices are done so in the belief that these factors can have an impact on financial performance.

ESG processes and procedures focus on non-financial performance indicators that address a company's approach towards responsible investment, sustainability, its impact on society and the environment, as well as other ethical and corporate governance considerations.

Definition

ESG or sustainable investments mean any of the following or a combination of any of the following: (i) Environmental (E) investments in an economic activity that contributes to an environmental objective that relate to the quality and functioning of the natural environment and natural systems; (ii) Social (S) investment in an economic activity that contributes to a social objective, and that relate to the rights, well-being and interests of people and communities; and (iii) Governance (G) issues relate to investments in companies following good governance practices and in particular companies with sound management structures, employee relations, remuneration of relevant staff and tax compliance.

Sustainability risk is an ESG event or condition that, if it occurs, could cause an actual or a potential material negative impact on the value of the investment. Principal adverse impacts are impacts of investment decisions and advice that result in negative effects on ESG factors.

Applicability

This policy applies to IDAD when providing investment management or advisory services to its clients.

Policy

IDAD will adopt the following overarching policies relating to business conducted and ensure it is published on the firm's website.

Corporate Governance

The governing body of IDAD takes ultimate responsibility under its terms of reference for ensuring sustainability risks are embedded within organisational procedures, systems, and controls to ensure that they are properly taken into account in the investment and risk management processes. The governing body will be responsible for ensuring that adequate resource and expertise is allocated within the firm for the integration of ESG risks.

The governing body will be responsible for the identification, recording, management and where necessary disclosure of conflicts of interest relating to the integration of ESG risks and factors in accordance with IDAD's Conflicts of Interest Policy.

A Senior Manager(s) will be allocated responsibility with their individual Statement of Responsibilities for the integration of ESG risks throughout the business model.

Risk Management

IDAD's risk management function will ensure that risk management systems include ESG risks when establishing, implementing and maintaining an adequate and documented Risk Management Policy. Risks in this regard will be defined as the risk of fluctuation in the value of positions in relevant portfolios due to ESG factors.

Product Governance

IDAD will, where relevant, ensure ESG factors are taken into account when identifying the target market and within the product review process.

Investment and Due Diligence

IDAD shall factor in ESG risks when selecting and monitoring investments, designing written policies and procedures on due diligence, and implementing effective arrangements. ESG risks will always be taken into consideration when making0 investment decisions or providing investment advice. Where applicable, IDAD shall develop engagement strategies, including for the exercise of voting rights, where available, with a view to reducing the principal adverse impact of investee companies on sustainability factors.



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Disclosure
IDAD will disclose how ESG risks are integrated in the investment decision- making and advisory process on its website. It will disclose the integration of sustainability risks to potential investors in its pre contractual information and will provide periodic reports to investors on the contribution of investment decisions to the sustainable investment objectives and on how the investment strategy is aligned with the sustainable investment objectives.

Annual Assessment and Review
The firm shall ensure that any information published as per above is kept up to date. Any amendments made shall require a clear explanation of this on the website.

Procedure

IDAD implement the following systems and controls relating to sustainable investments and sustainability risks.
How IDAD incorporates sustainability risk into investment management or advisory process.

IDAD's approach to integrating sustainability risks is as follows:

- IDAD assesses ESG criteria on all new product launches as well as monitoring ongoing products as part of the life cycle management.
- ESG criteria will be favoured where it is in the best interest of the investors.

IDAD's ESG and Sustainability commitments include:

Environmental: the impact of a company on the environment.	Social: the company's relationships with its employees, suppliers, and customers.	Governance: the company's leadership, executive pay, audits, and internal controls.
Support employees undertaking charity work and challenges to support sustainability projects	Support of the local community through the sponsorship of local sports teams	An open minded and non-biased approach to recruitment through employee gender and diversity
Actively manage waste recycling	Organising Earth day activities	Implementation of policies that demonstrate the wider responsibilities of the company
	We have made a commitment to the health and wellbeing of our people through initiatives that support their physical and mental health (for example, weekly personal training sessions)	
	IDAD provide a weekly fruit drop for staff to encourage healthy eating	

We aim to deliver this by integrating sustainability into our business; through our business model, our procedures, how we deliver our projects and infusing it across the IDAD culture.

IDAD does consider ESG factors as part of its remuneration policy.

How IDAD's target of sustainable investments is ensured
IDAD's approach to meeting its target for sustainable investment is:

- To help target the above commitments IDAD will appoint an employee as an ESG and sustainability Champion to encourage a better approach. They will conduct ongoing:
- Reviews of Corporate gifts to make them more environmentally friendly.
- Review office waste practices.
- Arrange training and activities to encourage awareness throughout IDAD's employees.
- Stay aware of new trends, practices, guides, and laws.
- Update material for the website helping our consumer to better understand our ESG specific products (including the methodology and calculation we use when selecting to create specific investments) and our continued sustainability commitments.

Periodic Reporting
IDAD will describe in its periodic reports to investors the sustainability-related impact of investments by means of relevant indicators.