

A) Summary of the entity's general approach to taking into account environmental, social and quality of governance criteria, and in particular in the investment policy and strategy

Polar Capital aims to provide a range of fundamentally driven investment products that deliver differentiated, long-term returns to our investors and promote long-term value for shareholders and other stakeholders, acting as responsible stewards of our clients' capital. One of our founding principles is the autonomy of the investment teams and this same principle is applied to investment related ESG practices. We believe incorporating ESG and stewardship approaches into the investment process is something that should be driven by the investment teams, ensuring ESG analysis, engagement and voting decisions are closely linked with the investment decision-making process, while being supported by robust central resources.

Our Japan Value Team, registered under Polar Capital Europe, benefits from a devolved structure, where they have autonomy over their investment strategy. As such analysis and interpretation of environmental, social and governance (ESG) is specific to the team.

Governance

The Polar Capital Holdings Board is responsible for the overall stewardship of the business, approving its strategy and holding the Executive Committee to account for the running of the business. ESG concerns are prominent in the Board's discussions and strategy development. The governance structure allows the Board, senior management and management committees to integrate ESG concerns and risks into strategy.

The primary committee focused on ESG issues is the Sustainability Committee, which reports directly to the Group Risk Committee, a sub-committee of the Polar Capital Executive Committee. The Sustainability Committee is comprised of members of staff from across the business including the CEO, CIO, CRO and Head of Sustainability. The Committee was established with the objective of co-ordinating the company's sustainability initiatives at a corporate level, including implementation of key regulatory and industry advances. The Committee also promotes the sharing of best practice for ESG integration and knowledge insight across the business. The Committee plays an instrumental role as Polar Capital continues to strengthen its ESG position from both an investment and corporate standpoint.

Polar Capital established a Responsible Investment Working Group which provides a forum across our 13 investment teams to share approaches and best practice enabling collaboration on shareholder engagement, voting, and developing our climate change strategy.

ESG Implementation and Oversight

Each investment team at Polar Capital has autonomy in the way it evaluates ESG issues. As such, they use the information and data sources available to them to assist with their assessment including, but not limited to a company's financial reports, a company's ESG and other non-financial reports and third-party data. This level of investment autonomy is central to Polar Capital's approach.

Nevertheless, portfolio characteristics are observed and monitored centrally by Polar Capital's CIO and risk and sustainability teams. ESG monitoring is an integral part of their oversight process.

Each investment strategy is reviewed in detail every four months in a meeting with the lead portfolio manager, CIO, CRO and the Head of Sustainability. The sustainability team monitors changes in the aggregated ESG scores of the strategy and any material changes in company ratings. The portfolio is screened from a norms and controversies perspective to highlight any lagging company practices with regards to the UN Global Compact principles, global norms, human or labour rights. The report highlights any companies with material business involvement activities of particular interest to the strategy. Finally, company-specific carbon performance data and aggregated portfolio-level carbon metrics are included for review.

Voting

Polar Capital uses Institutional Shareholder Services (ISS) to assist with proxy voting. This highlights all situations where the proxy adviser recommends voting against management, identifies contentious issues and produces research as part of recommendations. Where ISS recommends voting against management, these issues are reviewed by the investment teams and the portfolio managers then decide how they wish to vote.

Further information on Polar Capital's approach to voting can be found in our voting policy, and shareholder engagement can be found in our SRD II Shareholder Engagement Policy.

Japan Value has autonomy in the way it evaluates ESG issues. As such, they use the information and data sources available to them to assist with their assessment including, but not limited to, a company's financial reports, a company's ESG and other nonfinancial reports, third-party ratings and data providers. Portfolio characteristics (performance, style, macro factor sensitivity, decision-making patterns and liquidity) are observed and monitored centrally by Polar Capital's CIO and risk team.

Over the review period the Polar Capital China Mercury Fund limited was liquidated. This fund employed ESG screening through fundamental research and analysis which was applied primarily to the long book of the long short equity strategy. The team takes the view that companies with strong ESG credentials will be long-term outperformers. As a result, companies where there were ESG concerns may have been considered in the fund's short book.

B) Content, frequency and means used by the entity to inform subscribers, affiliates, contributors, beneficiaries, or customers of the criteria relating to the environmental, social and quality of governance objectives taken into account in the investment policy and strategy

We interact with our clients through our Client Service and Distribution team as well as the investment teams. They maintain contact through virtual and in person meetings (including interviews with appropriate media outlets and direct meetings with shareholders) and presentations.

Alongside regular reporting through fact sheet commentaries, dedicated sustainability-related disclosures, annual report updates and various regulatory documents e.g. prospectus, we produce a number of investment insights – through a combination of written articles, video, radio appearances, webcasts and podcasts – that were sent to clients and published on our website. The topics covered ranged from market and thematic updates, the investment analysis of key events, up-to-date news comments and ESG-related insights from our specialist fund managers.

In addition, we communicate directly with clients during their due diligence on our funds and, increasingly, ESG and stewardship practices are a core element of this.

C) List of financial products mentioned under Articles 8 and 9 of Regulation (EU) 2019/2088 of the European Parliament and of the Council of 27 November 2019, and the overall share, in percentage, of assets under management taking into account the criteria environmental, social and quality of governance in the total amount of outstandings managed by the entity, if applicable;

Not Applicable – Japan Value, registered under Polar Capital Europe is article 6. China Mercury was liquidated before financial YE 31/03/2023.

D) Consideration of environmental, social and quality of governance criteria in the decision-making process for the allocation of new management mandates by reinsurers and professional pension funds, where applicable;

Not Applicable.

E) Adherence of the entity, or of certain financial products, to a charter, code, initiative or obtaining a label on the consideration of environmental, social and governance quality criteria, as well as a description summary of these.

The Polar Capital Group which includes Polar Capital Europe are signatories of the UK Stewardship Code and the UN Principles for Responsible Investment (UN PRI).

The UK Stewardship Code sets high stewardship standards for those investing money on behalf of UK savers and pensioners, and those that support them. Stewardship is the responsible allocation, management and oversight of capital to create long-term value for clients and beneficiaries leading to sustainable benefits for the economy, the environment and society.

Signing the internationally-recognised Principles for Responsible Investment allows your organisation to publicly demonstrate its commitment to investing responsibly

