

GAM EXCLUSION POLICY

GAM Exclusion Policy
March 2024



1. Introduction

This Policy sets out how we apply restrictions regarding exposure to controversial weapons and is designed to reflect applicable laws and regulations. We consider controversial weapons to be those that have been subject to widespread ban or restriction by key international treaties or conventions such as the Convention on Cluster Munitions and Anti-Personnel Mines, Biological and Chemical Weapons, which prohibit the use, production, stockpiling and transfer of these weapons.

The Policy applies to all regulated subsidiaries within GAM Holding AG that manage portfolios and/or funds (together 'GAM', 'GAM Investments' or 'we').

2. Key Principle

GAM Investments does not intend to directly hold any security that is involved in the manufacturing of anti-personnel mines, cluster munitions, biological and chemical weapons, incendiary (white phosphorous), laser-blinding and non-detectable fragments. This definition includes securities assessed as involved in directly manufacturing weapons, producing customs parts, dual use of components and smart weapons outlined in this Policy.

On this basis, the following securities are assessed as involved in controversial weapons and excluded:

List as at 27th March 2024

Excluded Issuers	Involvement
Anhui Great Wall Military Industry Co Ltd.	Cluster Munitions
Aryt Industries Ltd.	Cluster Munitions
Avibras Industria Aeroespacial S/A.	Cluster Munitions
Bharat Dynamics Ltd.	Cluster Munitions
China Aerospace Science and Technology Corporation	Cluster Munitions
China North Industries Group Corporation Ltd.	Cluster Munitions
Lig Nex1 Co. Ltd.	Cluster Munitions
Poongsan Corporation	Cluster Munitions
Roketsan Roket Sanayi Ve Ticaret Anonim Sirketi	Cluster Munitions
Solar Industries India Limited	Cluster Munitions
Hanwha Corp	Anti-personnel Landmines
National Presto Industries, Inc.	Anti-personnel Landmines

3. Scope of the Policy

We apply these exclusions to all actively managed GAM branded investment products and mandates, whether managed internally or by third-party managers. These exclusions are applied to single-security holdings (including derivatives), not to broad index holdings.

We also apply these exclusions to actively managed funds within our Fund Management Services (FMS) for which GAM acts as Management Company. In cases where a FMS client requests the application of their own exclusion list for controversial weapons, we will apply such list providing it is publicly available or made available to us by the client and regularly updated.

4. Governance and Implementation

The list of companies/ excluded issuers is compiled using independent third-party research and reviewed quarterly. We have one main research provider and where there is conflicting research between our main and alternative research providers or between a research provider and the company, then we will use our own analysis, including on the timeliness of assessments, to determine involvement. This list is constructed and implemented on a best-efforts basis. Where any new issuers are added to our exclusion list, we will seek to divest any holdings within 90 business days. Exceptions to this will be treated on a case-by-case basis with relevant escalation and approvals sought.

The Exclusion Policy will be reviewed at least annually.

5. Transparency

The Exclusion Policy and latest available list of excluded companies are available on GAM's website. Please email GRI@gam.com for any further information.

6. Appendix

Controversial Weapons, Treaties and Conventions

Weapon Category	Convention / Treaty
Chemical Weapons	Chemical Weapons Convention
Biological Weapons	Biological Weapons Convention
Cluster Munitions	Cluster Munitions Convention
Anti-personnel mines	Mine Ban Treaty
Weapons Utilizing Non-Detectable Fragments	Convention on Certain Conventional Weapons, Protocol I
White Phosphorous	Convention on Certain Conventional Weapons, Protocol III
Blinding Laser Weapons	Convention on Certain Conventional Weapons, Protocol IV

Types of Involvement

Types of involvement	Definitions
Manufacturer	Companies that manufacture restricted weapons including whole weapons systems and components. Delivery platforms are not included within this definition.
Dual Use Components	Companies that manufacture components that were not developed or are not significantly modified for exclusive use in anti-personnel landmines and cluster munitions.
Intended Use Components	Companies that manufacture components that were developed or are significantly modified for exclusive use in anti-personnel landmines and cluster munitions.
Smart Weapon	Companies that exclusively manufacture anti-personnel landmines and cluster munitions determined to be smart weapons. Also identifies companies that manufacture components or delivery platforms exclusively for "smart" weapons.
Company ownership	Where a company owns 50 percent or more of an involved subsidiary, that company is given a direct involvement tie.
Whole Weapons Systems Manufacturers	Companies that manufacture anti-personnel mines, landmines, cluster munitions, biological and chemical weapons, Incendiary (white phosphorous), Laser-Blinding and Non-detectable fragments.

Important information

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